

## DIVERSITYINTEGRATION.COM | PRIVACY POLICY

By accessing or using any of the Lila Kelly Associates, LLC (hereinafter “LKA”) Internet properties including, without limitation, [www.lilakelly.com](http://www.lilakelly.com), [www.diversityintegration.com](http://www.diversityintegration.com), related mobile websites, microsites, mobile applications, LKA profiles on social media sites and any other digital services or properties operated or used by LKA (collectively referred to as the “Sites”), you agree to comply with and be bound by these Terms of Use (“Terms of Use”). Please read these Terms of Use carefully as well as this Privacy Policy. If you do not agree to both the Terms of Use and the Privacy Policy, you must immediately terminate your use of the Sites.

**1. LKA Privacy Policy Overview.** This Privacy Policy explains how LKA may collect, use, share, and safeguard information on the Sites from time to time. This Privacy Policy is meant to provide guidance to our customers in an easy to understand format. If you have questions or concerns, please contact LKA at:

<http://lilakelly.com/contact/>

**2. Changes to the Privacy Policy.** LKA reserves the right to amend this Privacy Policy at any time, for any reason.

### **3. Information LKA May Collect**

a. **Personally Identifiable Information:** We may collect information that identifies you (“Personally Identifiable Information”) when you contact us, or otherwise interact with LKA, including, but not limited to, applying for any membership or enrollment, registering for a LKA event or program, or purchasing LKA products or services on the Sites. Types of Personally Identifiable Information collected may include your name, address, phone number, birth date, billing and delivery information, email address, credit card, or other financial account information.

b. **Non-Personal Information:** As you interact with our Sites, we may collect information about your browsing history or certain other information that is not Personally Identifiable Information through your use of and visits to the Sites and our use of a variety of technologies, including, but not limited to, cookies, tags, beacons, Internet Protocol (IP) address, and other tools. The types of non-personal data collected on our Sites, and other tools as LKA may add from time to time, include, but are not limited to: the search terms you used, new or returning user, browser information, computer type, operating system, internet service providers, website usage, referring/exit pages, platform type, date/time stamp, number of clicks, ads viewed, etc. Additionally, cookies, tags and other tools placed by third parties may collect other information about you and your visits to Sites and elsewhere on the Internet (collectively, all of the foregoing data is referred to as the "Non-Personal Data").

### **4. Personally Identifiable Information: Our Use**

a. Once collected, we may use your Personally Identifiable Information in a variety of ways including, but not limited to:

- (i) Provide service communications such as bill reminders, order confirmations, program registrations, and customer service messages
- (ii) Respond to your emails or online requests for products, services, or information
- (iii) Deliver or process surveys
- (iv) Personalize and improve the usability of the Sites
- (v) Fulfill or deliver LKA products and services
- (vi) Tailor content on the Sites, advertising and marketing
- (vii) Share with third parties as required by law
- (viii) Share your email address as permitted under LKA Email Policy as described below

b. Sharing Your Personally Identifiable Information to Perform Business Functions. When fulfilling service requests initiated by you, we may share your Personally Identifiable Information with certain third parties to fulfill the requests or share such information with service providers that perform business functions for us. LKA may occasionally hire other companies to provide limited services on our behalf including, but not limited to, packaging, mailing and delivering promotional offers, answering customer questions about products or services, sending postal mail and processing registrations. In such cases, LKA may share your Personally Identifiable Information to the extent permitted by applicable law.

c. Sharing Your Personally Identifiable Information When Legally Necessary or to Protect LKA's Interests. LKA may disclose your Personally Identifiable Information if required to do so by law or in the good-faith belief that such action is necessary to: (i) conform to legal requirements or comply with legal process served on LKA; (ii) protect and defend the rights or property of LKA; or (iii) protect the personal safety of LKA personnel or members of the public in appropriate circumstances. In addition, if LKA and/or its assets (or a portion of its assets) are sold, assigned, transferred, or merged, or if LKA undergoes some other change including a change to its corporate form as part of a bankruptcy proceeding or otherwise, information may be transferred as part of that transaction or change.

d. Sharing Your Email Address. Your email address will only be used by LKA and its entities and will not be sold to anyone outside LKA. As such, LKA will refrain from sharing email addresses to unrelated third parties. LKA may share your email address with third parties: (i) to enable LKA to take security measures to help protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of data, and (ii) to perform certain services on our behalf, such as packaging, mailing and delivering products and processing event registrations and to respond to your service requests.

e. You can manage your profile and email preferences, including opting out of email either online or by contacting us.

## **5. Non-Personal Data: Our Use**

a. We may collect Non-Personal Data to improve the usability of our Sites/Services and for other business purposes. We may share the Non-Personal Data we collect with third parties or permit third parties to place tools like cookies, tags and web beacons, to collect additional Non-Personal Data when you browse our Sites. LKA or other third party companies may then use the Non-

Personal Data to provide advertisements and targeted advertisements to you (ads based on the Non-Personal Data). However, we will refrain from sharing any Personally Identifiable Information with third parties with whom we share your Non-Personal Data.

b. **How You Can Manage Collection of Non-Personal Data.** Third party advertising companies may collect data about your visit to our Sites and others; this is referred to as Online Behavioral Advertising. You opt out from this collection and use of data by companies participating in the Digital Advertising Alliance (“DAA”) on the “Opt Out from Online Behavioral Advertising” website.

c. **Third Party Requests, Use or Analysis of Data.** (i) We may disclose your information upon Government demand in the form of a court order or subpoena, when otherwise required by law, to enforce the policies herein, or to protect LKA property or safety. (ii) We may share your information to prevent illegal use of our products or to defend LKA against any third party claims. (iii) Your information may be transferred to a third party in whole or in part as part of a merger, acquisition, or similar transfer or assignment of assets. (iv) We may transfer your information to third party service providers to conduct or improve LKA business or Sites, or for any business purpose, including, but not limited to credit card processing, shipping, data management, email distribution, marketing research, information analysis and promotions management.

**6. Minors.** The LKA Sites are intended for adult customer use only. LKA does not knowingly collect personal data online from or market online to children under the age of 18.

## **7. Information Security**

a. LKA implements security measures as commercially reasonable to help protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of data, and restricts access to personal information to certain companies who may need to know that information in order to operate, develop, or improve services. All LKA partner organizations are bound by confidentiality obligations and may be subject to termination if they fail to meet these obligations.

b. Although LKA uses commercially reasonable security measures as detailed above, data transmission over the Internet can never be guaranteed to be absolutely secure. LKA cannot guarantee or warrant the security of any information transmitted by you, or to or from our online products or services.

**8. Linking to Other Internet Sites.** Other Internet sites that are linked from the Sites or from an LKA email message may contain privacy provisions that differ from the provisions of this Privacy Policy. To ensure your privacy is protected, we recommend that you review the privacy statements of these other linked sites.

*Last updated January 1, 2017*