

Creators Writing Room Privacy Policy

Last Updated: March 25, 2021

Welcome to Creators Writing Room LLC (“Creators Writing Room”, “CWR”, “us”, “our” or “we”). We provide on-line and in-person classes, coaching, offerings or other activities conducted, provided and/or undertaken by Creators Writing Room, its principals, members, employees, representatives, or agents (collectively, “Classes”).

To do that, we need information about you. Protecting your privacy is really important to us. We only use your information where we have a legal basis to do so. This Privacy Policy will help you understand what information we collect, how we use it and what choices you have with any websites we own or operate including www.thecwroom.com/ (“Sites”), purchase any of our subscriptions or additional offerings, participate in our events or promotions, and more generally use any of our other products or services (collectively with the Classes, the “Services”).

By using our Services, you are accepting the practices described in our Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Services. We reserve the right to modify or amend the terms of our Privacy Policy from time to time. Your continued use of our Services following the posting of changes to the Privacy Policy will mean you accept those changes. If we intend to apply the modifications or amendments to this Privacy Policy retroactively or to personal information already in our possession, we will provide you with notice of the modifications or amendments.

Please be advised that the practices described in this Privacy Policy apply only to information gathered by us through our Services. It does not apply to any information you provide to third-party platforms (such as Zoom, YouTube, Vimeo, etc.) used to access the Services, pay for the services, or otherwise. Please review their privacy policies carefully to understand what information they may collect, process, and use from you.

You should also read our Terms which set out the contract between you and Creators Writing Room.

1. The information we collect about you

This Privacy Policy covers our use of any information that can or could be used to identify you (“Personal Data”).

We may collect and use the following Personal Data to provide the Services to you and fulfil the Terms:

- When you sign up for our Services you give us Personal Data voluntarily by providing it to us, for example when you sign up for an account. We collect and use that information in order to authenticate you when you register an account and use the Services, to make

sure you are eligible and able to receive the Services, and so that you receive the correct version of the Services. Depending on which of the Services you use, that may include your name, mailing address, phone number, residency, gender, date of birth (as needed to verify eligibility), and email address. We may collect this information through various forms and in various places on the Service, including at registration, Class sign-up forms, “contact us” forms, or when you otherwise interact with the Service. We use that information to fulfil those Services to you and to provide related customer support to you.

- We may automatically and passively collect and use certain information from your device whenever you visit, use, or interact with our Service, including: the Internet Protocol address (IP address) of the machine which accessed the Services, general location information, the date and time of your visit, the path taken through the Services, content preferences, the browser and operating system being used, a list of files downloaded or viewed, the amount of time spent accessing files, any errors encountered, crash reports which may be automatically generated when or if our Services crash and includes information about the system and the crash, and other similar data.
- You also give us Personal Data when you make a purchase through us, register for our Classes or Services, or communicate with us. Providing this information is completely voluntary on your part; however, it may be required to use or access some of our Services and Classes. For example, if you choose to contact us via email, we may retain your email and email address along with any other associated information. Doing so is completely voluntary on your part, and you have the choice about whether and what information to disclose via your email.
- We may use third-party vendors to process online payments and provide platforms for us to receive questions and comments through the Services. If we utilize such vendors, the third-party payment vendor will collect payment and other personal information (such as your payment card information, email address, mobile phone number, billing and shipping address) to complete your purchases, but only with your permission. The vendor may also use cookies to track your activity and for other purposes. The third-party vendor that provides the platform for messages and comments may collect, use, disclose, store, process, and transfer personally-identifiable information when you interact with its services through the Services. This vendor may also use cookies to track your activity and other purposes. Creators Writing Room is not responsible for, and assumes no liability for, the privacy and information collection and use practices of these or any other third-party vendors. Please review the third-parties privacy and other applicable policies carefully. If you do not agree to the collection and use of this information by our third-party vendors, please do not use the online payment, message or comment features.
- We may receive information about you from your friends and others that use the Service, such as when they submit content to us or post on the Service. Additionally, we may, from time to time, supplement the information we collect directly from you on our Service with outside records from third parties for various purposes, including to enhance our ability to serve you, to tailor our content to you and to offer you opportunities that may be of interest to you.

- In addition, please note, our Services and Classes may use third-party platforms to access the Services and Classes, such as and without limitation Zoom Video, YouTube, Vimeo, or other platforms. Or, we may provide third party interfaces or links on the Service to facilitate your accessing the Classes and Services. When you use these third-party platforms, the third-party platforms may or may not provide us with information about you. We are not responsible for the terms, policies, disclosures or actions of any third-party platforms.
- Additionally, any communications made using or during the Services and Classes should not be considered private. You acknowledge and agree that you have no expectation of privacy concerning the transmission of any user generated content or communications, including without limitation e-mail, chat, text, video or voice communications. Because voice, video, chat, text, and other communications and user generated content may be viewed and/or heard by other users, users should avoid revealing any personally identifiable information in those communications.
- We may collect certain personal information from you during the course of our normal business operations if you do business with us and/or are employed by us. For example, we may collect certain personal information about you (such as, without limitation, name, email address, date of birth, address, and phone number) either directly from you or from your representative, or from third parties authorized by you.

2. How we use the information we collect about you

We have and rely on a legitimate interest in using your Personal Data as follows:

Use of Information by Us. We may use your information:

- to provide you with our Services;
- to improve our Services and to customize your experience with the Services;
- to maintain your account;
- for internal business purposes;
- for any purposes disclosed at the time you provide your information;
- any purposes provided for in our Terms;
- to provide technical and customer support to you;
- to offer new or additional features for our Services;
- to enforce our Terms;
- to send you materials by email or via notifications, or other communications;
- to carry out anti-fraud or other measures prohibited under our Terms;
- and as otherwise set forth in this Privacy Policy.

Third Parties. We may engage vendors, agents, service providers, and affiliated entities to provide services to us. In providing their services, they may access, receive, maintain or otherwise process data on our behalf. Our contracts with these service providers do not permit use of your data for their own marketing and other purposes.

Legal Matters; Safety. We may, without your consent, access and disclose your information, any communications sent or received by you, and any other information that we may have about you as may be permitted or required by law or to prevent or investigate suspected fraud or activity that appears to us to be illegal or may expose us to legal liability. Additionally, we may disclose your information and/or communications in situations that we believe to be: (i) emergencies involving potential threats to the physical safety of any person or property if we believe that your information in any way relates to that threat; or (ii) your conduct that we believe is inappropriate and inconsistent with generally accepted norms of behavior.

3. Who we share information with

We will not share any Personal Data that we have collected from or regarding you except as described below:

Information Shared with Our Service Providers. We engage external service providers to work with us to administer and provide the Services. As part of that they may process your Personal Data on our behalf. These external service providers have access to your Personal Data only for the purpose of performing services on our behalf, in compliance with this Privacy Policy, and we make sure each one is contractually obliged not to disclose or use your Personal Data for any other purpose. The service providers we use may help us to:

- run, operate and maintain our Services through third party platform and software tools;
- perform content moderation and crash analytics;
- run email and mobile messaging campaigns;
- perform Service and marketing analytics;
- provide payment attribution and process payments for purchases; and
- provide technical and customer support.

Some external service providers may also collect information directly from you (for example, a payment processor may request your billing and financial information) as a third party service in accordance with their own privacy policy. Such external service provider does not share your financial information, like credit card number, with us, but it may share limited information with us related to your purchase, like your zip or postal code.

Information Shared with Other Users. When you use the Services or Classes, information about you may be shared or visible to other users and therefore become publicly available, including without limitation: your name, submitted content and questions, basic location, and public messages.

Information Disclosed for Our Protection and the Protection of Others. We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We only share information about you to government or law enforcement officials or private parties when we reasonably believe necessary or appropriate: (a) to respond to claims, legal process (including subpoenas and warrants); (b) to protect our property, rights, and safety and the property, rights, and safety of a third party or the public in general; and (c) to investigate and stop any activity that we consider illegal, unethical, or legally actionable.

Information Disclosed in Connection with Business Transactions. Information that we collect from our users, including Personal Data, is a business asset. If we are acquired by a third party as a result of a transaction such as a merger, acquisition, or asset sale or if our assets are acquired by a third party in the event we go out of business or enter bankruptcy, some or all of our assets, including your Personal Data, will be disclosed or transferred to a third party acquirer in connection with the transaction.

4. How we keep your Personal Data safe

We have appropriate security measures in place to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, improperly altered or disclosed. We also limit access to your Personal Data to employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

5. How long we will keep your Personal Data

We keep your Personal Data for as long as we need to provide the Services to you and fulfil the purposes set out in this Privacy Policy and our Terms. This is also the case for anyone that we share your information with and who carry out services on our behalf.

When we no longer need to use your Personal Data and there is no need for us to keep it to comply with our legal or regulatory obligations, we will either remove it from our systems or anonymize it so that it can no longer be associated with you. When removing Personal Data, we will take commercially reasonable and technically feasible measures to make said Personal Data irrecoverable or irreproducible.

6. Your rights and choices

If for any reason you are concerned that any information you provided to us is not correct and you wish to change or delete it, you have the ability to review and update your personal information to the extent we have it. If you would like to do so, please contact us as set forth below or otherwise view and update your information in your Account profile. You may also contact us to request access to, transfer of, or erasure of your personal information to the extent we have any. Specify the nature of your request and the information that is subject to your request.

We reserve the right not to allow access to your information or to limit your rights (e.g. if such disclosure is prohibited by law or if the rights of another individual might be violated). In some instances, this may mean that we are able to retain your personal information even if you withdraw your consent or request transfer or erasure. Please note that changes or access you request may not be effective immediately. Please also note that despite any request for removal of or change to personal information, we may need to retain certain information for

recordkeeping purposes and there may also be residual information that will remain within our databases and other records, which will not be removed or changed.

7. Legal Grounds

We rely on the following legal grounds to use your data:

- Where it is needed to provide you with our Service.
- Where it is in our legitimate interests to do so, such as: managing our products and services, and providing our Service to you.
- To comply with our legal obligations.
- With your consent or explicit consent, where applicable.
- For a public interest.

8. Your Rights Under Data Protection Laws.

Here is a list of the rights that individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not.

- The right to be informed about the processing of your personal information.
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed.
- The right to object to processing of your personal information.
- The right to restrict processing of your personal information.
- The right to have your personal information erased (the "right to be forgotten").
- The right to request access to your personal information and to obtain information about how we process it.
- The right to move, copy or transfer your personal information ("data portability").
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.

If you have any questions or concerns regarding these rights please contact us via the contact information below.

9. Children

Our Services are not directed at children under the age of 13, and children under 13 may not create an account or otherwise use our Services. Children between the ages of 13 and 18 must obtain permission from a parent or guardian before creating an account, registering for a Service, or sending any personally-identifying information through the Services.

Minors under 18 years old and/or their parent or legal guardian may request the removal of any information that they post or provide us by contacting us at the email address provided below.

Upon such request, we will remove from public view, any content posted by a minor, unless required by law to retain such content or information.

If a parent or legal guardian has any further questions or concerns about his or her child's use of the Services, we encourage the parent to contact us via the contact information below.

10. Changes to this Privacy Policy

Any Personal Data that we collect is covered by the Privacy Policy in effect at the time such information is collected. We may make changes to this Privacy Policy from time to time. You will be given reasonable notice of any material change.

11. Third Parties

In using our Services you may access links to websites and services that are owned or operated by third parties (each, a “Third Party Service”). Any information that you provide on or to a Third Party Service or that is collected by a Third Party Service is provided directly to the owner or operator of the Third Party Service and is subject to the owner’s or operator’s privacy policy. We’re not responsible for the content, privacy, or security practices and policies of any Third Party Service. To protect your information we recommend that you carefully review the privacy policies of all Third Party Service that you access.

12. Disclosures Specific to California Residents

The CCPA grants California residents certain privacy rights regarding the personal data we collect. We are committed to respecting these rights and complying with the CCPA. Under the CCPA you have the right to request that we disclose to you what personal data we collect, use, disclose, and sell. The CCPA also gives California residents a right to opt-out from the sale of their personal data. You also have the right to request deletion of personal data that is in our possession, subject to certain exceptions. Please note that your request to delete data may impact your use of the Services in some cases, and we may decline to delete information for reasons set forth in this Privacy Policy or as permitted by the CCPA. Finally, you have a right to not be discriminated against for exercising your rights under the CCPA.

We do not sell your Personal Data and have not done so in the past 12 months. The information listed in Section 1 falls under the following California Consumer Privacy Act (CCPA) categories: identifiers, commercial information, Internet or other electronic network activity information, geolocation data, and visual information.

13. Non-United States Users

Please note that the Services are directed towards users who reside in the United States. By using the Services, you consent to the collection, storage, processing, and transfer of your information in and to the United States, or other countries and territories, pursuant to the laws of the United States, where permitted by law. Some of these countries may not offer the same level of privacy

protection as your own. Therefore, you should not provide personally-identifying information through the Services. If you provide such information, you acknowledge that it is necessary to internationally transfer and process it in the United States. You also agree that you are responsible for compliance with applicable laws, including local laws regarding online conduct and content and U.S. export laws and regulations.

14. Contact Information

If you have any questions about this Privacy Policy, please contact us in writing at: Creators Writing Room LLC, 15260 Ventura Boulevard, Suite 1040, Sherman Oaks, CA 91403; via email at: info@theCWRoom.com ; or through our website: <https://www.thecwroom.com/contact> .