

LAKE PINES BRAILLE – PRIVACY POLICY

13 FEBRUARY 2023

We respect the importance of your personal data. This privacy policy (**Privacy Policy**) applies to your personal data that we collect through or in connection with the operation of our website at www.lakepinesbraille.com (the **Website**) and the Accessible Equation Editor service available on the Website (the **Service**).

We want you to understand our Privacy Policy and, specifically, what information we gather in connection with the Website and Service, how that information is used, with whom we share that information and what we do to protect it. We're accountable for the protection of your Personal Data under our control and are committed to following this Privacy Policy and complying with the law. This Privacy Policy is not a contract between us and you.

In this Privacy Policy, **we, us** or **our** means Lake Pines Braille, LLC, and **you** or **your** means a person who accesses or uses the Website or the Service.

What Categories of Information Are Involved?

We collect information to operate the Website and the Service. Examples of types of information are as follows (not all of these we collect):

- **Personal Data.** Personal Data is any information that is related to an identified or identifiable natural person, such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, telephone number, driver's license number, passport number, or other similar identifiers. We use the broadest definition under applicable law.
- **Sensitive Personal Data.** Sensitive Personal Data is Personal Data that reveals genetic, biometric, and health data, as well as revealing racial and ethnic origin, political opinions, religious or ideological convictions, or trade union membership.
- **Contact Information.** Contact Information is your name, email address, telephone number, and other contact information that you provide us with.
- **Payment Information.** Payment Information is any credit card, debit card, or related banking information you provide us with. Most people will not be providing us with payment information.
- **Network and Device Information.** Information about your device and information that is necessary to provide you with the Website and the Service, such as a session ID token, source and destination addressing information, IP address, MAC address, the software you are using, and related device and network information.
- **Feedback.** You may volunteer, or we may ask for, information on your experience using the Website or the Service. At no time are you obliged to provide such information. **Feedback** means comments, complaints, requests, suggestions, or other feedback sent by you to us regarding the Website or the Service.
- **User Data.** User Data is all information and data that is not Personal Data that you access, send, receive, or generate when using the Website or the Service.
- **Location Data.** We may collect data regarding your location while you are using the Website or the Service (more specifically, the location of the device that is accessing the Website or the Service).

How Do We Collect Information?

We may collect information about you in a number of different ways, including:

- when you visit the Website or use the Service
- what you provide to us when signing up to obtain information, or to participate in seminars, promotional events, or similar events
- from communications between you and us, including when you provide us with Feedback
- from public sources
- automatically in connection with your use of your device and the Website or the Service
- from our service providers

Collection of certain information is essential to the operation of the Website or the Service, to respond to you, or troubleshoot issues. Except where we are not required to do so under applicable law, we will obtain your consent before we collect other Personal Data.

How Do We Use This Information?

We may use the following information as described below:

- **Your Personal Data.** We do not sell your Personal Data to third parties. Your Personal Data is only used and disclosed in connection with the operation of the Website and the Service including, as applicable, to send you

information that you request, register you for events you sign up for, process payments, verify your identity, answer questions about our business, the Website, or the Service, troubleshoot problems, customize, measure, and improve the Website and Service, inform you about updates, seek feedback, compare information for accuracy, and enforce the Terms of Service.

When you provide us with Personal Data, you give us your informed consent to collect, use, and disclose your Personal Data in accordance with this Privacy Policy. Except where we are not required to do so under applicable law, we will notify you and obtain your consent before we disclose or use your Personal Data in any other way.

- **User Data.** User Data that is associated with your Personal Data is only used and disclosed in connection with the operation of the Website and the Service, including to troubleshoot problems, customize, seek feedback, data analysis, and research to measure and improve the Website and the Service, user communications, and enforce the Terms of Service. User Data associated with your Personal Data will not otherwise be shared with third parties. User Data that is not associated with your Personal Data is treated as De-Personalized Information, see below.
- **Contact Information.** Contact Information is used to verify, process, and charge for things, to contact you regarding events you have signed up for, to send you information that you request, to register you for events you sign up for, and to communicate with you regarding these. Contact Information will be shared with our service providers only to the extent they need this information to perform their services for us.
- **Payment Information.** Payment Information is used to verify, process and charge for things you purchase from us. Payment Information will be shared with our service providers only to the extent they need this information to perform their services for us.
- **Network and Device Information.** Network and Device Information is used and disclosed in connection with the operation of the Website and the Service, including troubleshooting, customization, data analysis, and research to measure and improve the Website and the Service and enforce the Terms of Service.
- **Feedback.** We can use Feedback in any manner and for any purpose without any obligation to account for such use or to compensate you for it. We reserve the right to utilize Feedback, on an anonymous basis, for marketing purposes, for instance by displaying selected comments on the Website, in marketing materials, or in other communications. We will not disclose any Personal Data in Feedback to third parties (other than to third parties who are involved in providing services where such feedback relates to those providers) without your consent.
- **Passive Information.** Passive Information is information that is automatically generated in connection with your use of the Website or the Service. We only use Passive Information, on an aggregated basis, to provide you with better service or for statistical information.
- **Location Data.** We use location data for troubleshooting, customization, seeking feedback, data analysis, and research to measure and improve the Website and the Service, for communications, and to enforce the Terms of Service.
- **De-Personalized Information.** We may collect information of any type, anonymize that information, and use it alone or with similar anonymized information obtained from other users (**De-Personalized Information**). No Personal Data will be included in any De-Personalized Information. We can disclose De-Personalized Information to any third party and use it for any purpose we deem appropriate in our sole discretion.
- **Other Parties' Ability to Collect Personal Data.** We do not authorize any third parties to collect Personal Data about a user's activities over time and across different sites when a user visits the Website.

You agree that we can, subject to applicable law, use your Personal Data to operate the Website and the Service (including sharing your Personal Data with our service providers and/or agents; conduct analysis and research; prevent fraud or misuse; protect our rights or property or the safety of you or others; and send you communications regarding events you have signed up for, information you have requested, or other requests you have made, or for reasonably relevant things we believe you might find to be of interest (see **Marketing** below). We may also disclose Personal Data if we believe in good faith that we are required to do so by law, or that doing so is necessary to comply with legal process, respond to requests from law enforcement or governmental agencies, to respond to claims, or to protect our rights.

Your Personal Data is stored and processed in the countries in which we or our affiliates or service providers maintain facilities. We reserve the right to transfer and store your Personal Data outside the country in which you reside.

As we continue to develop our business, we might sell or buy subsidiaries or business units. In such transactions, as well as in the event we or substantially all of our assets are acquired by a third party, your Personal Data and other information will generally be one of the transferred business assets. We reserve the right to include your Personal Data and other information, collected as assets, in any such transfer to a third party. Additionally, your Personal Data and other information could be disclosed as part of a bankruptcy involving us.

Marketing

If you opted-in to receive marketing communications from us, from time to time we may send you information about Lake Pines Braille news, events, reports, and services that we think you might find to be of interest. You have the right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please click the unsubscribe link in the marketing email we sent you or send a request to marketing@lakepinesbraille.com asking to be unsubscribed

What Categories of Third Parties Do We Share Your Personal Data?

The categories of third parties with whom we may share your Personal Data, depending on the situation, are our service providers to the extent such disclosure is necessary to operate the Website or the Service or to communicate with you regarding events you have signed up for, information you have requested, or other requests you have made.

Consent for Electronic Communications.

We use Contact Information to communicate with you regarding events you have signed up for or information you have requested. By providing Contact Information, you consent to receive such communications at such e-mail address and/or telephone number.

What Are Cookies and How Do We Use Them?

Cookies are pieces of information that are transferred to your computer or mobile device through a browser. For further information, visit www.allaboutcookies.org. We may use Cookies to collect and store certain information. We may use both session cookies (which expire when you close your web browser) and persistent cookies (which stay on your device until you delete them).

We use cookies so that we can identify the device being used and to reestablish service (auto-log-in). Cookies also enable us to gain information about your use of the Service and to enhance it to meet your preferences. These cookies persist until you delete them. We do not use web beacons. The Help option on the toolbar of most browsers will tell you how to prevent or limit the browser from accepting cookies, how to have the browser notify you when you receive a cookie, or how to disable cookies altogether.

It is possible that you may be able to access third party websites, online services, or applications using the Website. The use of cookies, web beacons, or similar technologies on such other websites, online services, or applications is subject to any applicable privacy policies that they may have, not this Privacy Policy.

How Your Personal Data Is Protected.

We take physical, organizational, and technical measures to protect the Personal Data you provide to us. We cannot guarantee the absolute security of our database, nor can we guarantee that any information supplied will not be intercepted while being transmitted over wireless networks or the Internet.

How Long Is Personal Data Kept?

We will retain your Personal Data only for as long as is necessary to operate the Website and the Service; maintain records until they cannot be lawfully challenged and legal proceedings may no longer be pursued; carry out marketing activities; comply with applicable law, regulatory requests, and relevant orders from government authorities; and enforce or fulfill any of the other purposes detailed in, the Terms of Service.

International processing

We may share your Personal Data with our affiliates, service providers/data processors, and agents who are located, or who process such data, outside of the US. We will take steps to ensure that your Personal Data receives an adequate level of protection in jurisdictions in which it is processed. When we share Personal Data with such third parties, we do so in a manner consistent with our privacy protocols and in compliance with applicable law.

Data security

We take commercially reasonable physical, organizational, and technical measures to protect your Personal Data in our possession. We limit access to your Personal Data to those employees, affiliates, service providers/data processors, agents, and other third parties who have a business need to know. They are permitted to only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

We cannot guarantee the absolute security of the Website or the Service, nor can we guarantee that any information supplied will not be intercepted while being transmitted over wireless networks or the Internet. We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Legal basis for processing

If you are in the EU or UK, the legal basis we rely on to process your Personal Data is article 6(1)(f) of the GDPR or the UK DPA, as applicable, which allows us to process Personal Data when it is necessary for the purposes of our legitimate interests.

Data rights for EU, EEA, and UK residents:

Your right of access

You have the right to ask us for copies of your Personal Data.

Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure

You have the right to ask us to erase your Personal Data in certain circumstances. This right enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your Personal Data to comply with applicable law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.

Your right to restriction of processing

You have a limited right to ask us to restrict the processing of your information in certain circumstances. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) where you have contested the accuracy of your data, processing will be restricted until we have determined the accuracy of the data; (b) where you have objected to processing of your data, processing will be restricted until we have determined the outcome of your objection; (c) where our use of the data is unlawful but you want us to restrict processing rather than erasing the data; or (d) where you require data for the purpose of a legal claim, you can request restriction even when we no longer need the data. Where you have obtained restriction of processing of your data, we will inform you before lifting the restriction.

Your right to object to processing

You have the right to object to certain types of processing of your Personal Data.

You have the right to object to processing of your Personal Data where the processing is carried out in connection with tasks: in the public interest; under official authority; or in the legitimate interests of others.

You also have a right to object to processing of your Personal Data where the processing relates to direct marketing. Where we are using your Personal Data for the purpose of marketing something directly to you, or profiling you for direct marketing purposes, you can object at any time, and we will stop processing as soon as we receive your objection.

You may also object to processing of your Personal Data for research purposes, unless the processing is necessary for the performance of a task carried out in the public interest.

To object to processing, you must contact us and state the grounds for your objection. These grounds must relate to your particular situation. Where you have made a valid objection, we will cease processing your Personal Data, unless we can provide compelling legitimate reasons to continue processing your Personal Data. We can also lawfully continue to process your Personal Data if doing so is necessary for certain types of legal claims.

Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organization to another or give it to you. This right only applies where processing of Personal Data (supplied by you) is carried out by automated means, and where you have either consented to processing, or where processing is conducted in connection with a contract between you and us. This right only applies to the extent that it does not affect the rights and freedoms of others.

Your rights in relation to automated decision making

You have the right to not be subject to a decision based solely on automated processing. Processing is “automated” where it is carried out without human intervention and where it produces legal effects or significantly affects you. Automated processing is permitted only with your express consent, when necessary for the performance of a contract, or when authorized by the EU or Member State law.

Withdraw consent at any time when we are relying on consent to process your Personal Data

This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain information, materials, goods, or services to you. We will advise you if this is the case at the time you withdraw your consent.

Processing Personal Data for criminal law enforcement purposes

If we are processing your Personal Data for criminal law enforcement purposes, your rights are slightly different.

Exercising your rights

Contact us at legal@lakepinesbraille.com if you wish to exercise any of your rights. Be as specific as possible in relation to your request and the specific Personal Data involved. You may be asked to provide evidence of your identity.

We generally have one (1) month to respond to you, but this period may be extended in certain circumstances. You are not required to pay any charge for exercising your rights, but where requests from you are considered ‘manifestly unfounded or excessive’ we may either charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested, or refuse to act on your request.

Data rights for California residents:

The California Consumer Privacy Act (**CCPA**) provides users who are California residents with specific rights regarding their Personal Data.

If you reside in California, you may exercise the following rights:

- A *right to know* about the Personal Data we have collected, used, shared, or sold about you, and why we collected, used, shared, or sold it.
- A *right to delete* your Personal Data collected by us (subject to certain exceptions outlined below).
- A *right to receive* Personal Data in a format that will allow its transfer to third parties by you.
- A *right to opt-out* of the sale of Personal Data, where a “sale” under the CCPA means “selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Data to another business or a third party for monetary or other valuable consideration.” We do not sell your Personal Data.
- A *right to sue* for security breaches of Personal Data.

Access to specific information and data portability rights

You have the right to request that we disclose to you your Personal Data we have collected about you over the past twelve (12) months from the date of your request. Once we receive and confirm your request, we will disclose to you, as applicable:

- The categories of Personal Data we collected about you.
- The categories of sources for the Personal Data we collected about you.
- Our business and commercial purposes for collecting that Personal Data.
- The categories of third parties with whom we shared that Personal Data.
- The specific pieces of Personal Data we collected about you.
- If we “sold” or disclosed your Personal Data for a business purpose, up to two separate lists disclosing:
 - if we “sold” your Personal Data, identifying the Personal Data categories that each category of recipient “purchased”; and
 - if we disclosed your Personal Data for a business purpose, identifying the Personal Data categories that each category of recipient obtained.
- That we have not “sold” any of your Personal Data.

Deletion request rights

You have the right to request that we delete any of Personal Data that we collected from you and retained, subject to certain Exceptions (listed below). Once we receive and confirm your request, we will delete your Personal Data from our records except to the extent an Exception applies.

We may deny a deletion request if retaining the information is necessary for us or our service providers for the following **Exceptions**:

- to complete the transaction for which we collected the Personal Data, provide information, materials, goods, or services that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise respond to your requests;
- to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- to debug products to identify and repair errors that impair existing intended functionality;
- to exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- to comply with *the California Electronic Communications Privacy Act* (Cal. Penal Code § 1546 et. seq.);
- to engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- to enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- to comply with a legal obligation; or
- to make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- deny you goods or services;
- charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- provide you a different level or quality of goods or services; or
- suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may still offer you certain financial incentives that can result in different prices, rates, or service quality levels as permitted by the CCPA. We do not currently offer such financial incentives.

Exercising access, data portability, and deletion rights

To exercise your rights described above, please submit a request to us that specifies your request type (disclosure, deletion, etc.) as detailed below. Requests may be sent by either:

- emailing us at: legal@lakepinesbraille.com; or
- mailing us at: Lake Pines Braille, LLC, 15516 Nell Lynn Ln, Tyler, Texas 75707 USA

Only you, or someone legally authorized to act on your behalf, may make a request related to your Personal Data. You may also make a request on behalf of your minor child. We cannot respond to your request or provide you with Personal Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you. You may be required to provide additional information necessary to confirm your identity before we can respond to your request. You may only make a request for access or data portability twice within a twelve (12) month period. The request must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Data or an authorized representative; and
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Making a request does not require you to create an account with us. Also, we will only use Personal Data provided in a request to verify the requestor's identity or authority to make the request.

Your authorized agent

You have the right to designate an authorized agent to make a request under the CCPA on your behalf.

Response timing and format

We will confirm that we received your request within ten (10) days and will respond within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response electronically or, at your option, by mail.

Any disclosures we provide will only cover the twelve (12) month period preceding our receipt of the request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Data that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Can This Privacy Policy Be Modified?

We reserve the right to modify this Privacy Policy at any time. Use of the Website after we have published a modified Privacy Policy constitutes acceptance of such modified Privacy Policy.

How We Notify You of Modifications.

We will publish the modified Privacy Policy on the Website. The modified Privacy Policy becomes effective upon publishing. If the modifications are material, we will provide more prominent notice as appropriate under the circumstances (for example, for a period of time following publication the icon or link to the Privacy Policy may be highlighted or include the word such as “modified,” “revised,” “updated” or similar).

How Can We Be Contacted?

You can contact us by email at legal@lakepinesbraille.com or by mail at Lake Pines Braille, LLC, 15516 Nell Lynn Ln, Tyler, Texas 75707 USA.

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