

PRIVACY POLICY

Last Modified: December 4, 2015

Bentley Performance Systems Inc (DBA Speed Secrets), a Washington corporation located at 4308 243 rd Avenue SE, Issaquah, WA, USA (**referred to as "Company", "we" or "us"**), provides the Learn.SpeedSecrets.com Website located at www.SpeedSecrets.com. (**Collectively, the "Website"**), subject to your compliance with all the terms, conditions and notices contained or referenced herein (**the, "Policy"**).

We are committed to protecting and respecting your privacy. This Privacy Policy describes the types of information we may collect from you or that you may provide to us when you visit the Website, and our practices for collecting, using, maintaining, protecting and disclosing such information. This Privacy Policy applies to information we collect: (i) through our Services, (ii) in text and electronic messages between you and our Services, and (iii) via mobile applications you download from our Websites, which provide dedicated non-browser-based interactions between you and our Services. This Privacy Policy does not apply to any information collected by us offline or via third-party sites that may be accessed through hyperlinks on our Services.

By accessing or using our Services, you agree to this Privacy Policy.

IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT ACCESS OR USE OUR SERVICES.

Please read the information below:

1. Information we collect about you
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1. INFORMATION WE COLLECT ABOUT YOU

We collect several types of information about visitors and/or users of our Services. We may collect this information either directly when you provide it to us or automatically as you navigate through the Websites or App.

(a) Personally Identifiable Information. 'Personally Identifiable Information' refers to information by which you may be personally identified, such as your name, email address, or school. We will collect and process such data about you when you register for a Service/create an account, subscribe to a newsletter, submit feedback, enter a contest, fill out a survey, or send us a communication. When ordering products or services on the Websites or App, you may also be asked to provide a credit card number and other payment-related information. You may also provide information to be published or displayed ("**posted**") on public areas of the Websites (such as blogs, forums, message boards, and the like), or transmitted to other users of the Websites using 'sharing' features ("**collectively, "User Contributions"**"). Your User Contributions are posted and transmitted to others at your own risk. We cannot control the actions of other users of the Websites with whom you may choose to share your User Contributions. Depending upon the activity, some of the information we ask you to provide is identified as mandatory and some as voluntary. If you do not provide the mandatory data with respect to a particular activity, you will not be able to engage in that activity.

We may also collect your Internet Protocol ('IP') address. We use your IP address to diagnose problems with our servers, software, to administer our Services and to gather demographic information.

We do not collect more Personally Identifiable Information than is reasonably necessary to participate in an activity on the Websites. If you are a school and you use a Website service within the United States for children under the age of 13, you are responsible for obtaining consent from the parents/legal guardians of each child you wish to allow to participate in using any of our Services. A child using our Services will be able to participate in certain activities such as taking online educational and informational courses.

(b) Non-Personally Identifiable Information. We may collect, or our third party ad server and/or content server may collect, certain Non-Personally Identifiable Information, that does not by itself identify a specific individual. Such information tells us about your equipment, browsing actions, the resources that you access and use through the Services, your operating system and browser type. Our third party ad servers will provide us with summary, but not individual, reports that will tell us how many ads were presented and clicked upon at our Websites. The information that we collect automatically is 'statistical' in nature. It helps us to deliver a better and more personalized service to users, by enabling us to estimate usage patterns, customize our Services according to your individual preferences, and speed up your searches.

(c) Device Information. When you download our App and use our Services, we automatically collect information on the type of device you use and the operating system version, so we know the best application version to provide you with. We do not ask you for, access or track any location based information from your mobile device at any time while downloading or using our App or Services.

2. WHERE WE STORE DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"). It may also be processed by staff operating outside the EEA who work for us or for one of our service providers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Website will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

3. HOW WE USE YOUR INFORMATION

We use information held about you in the following ways:

- To ensure that content from our Services is presented in the most effective manner for you and for your computer or mobile device
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes
- To carry out our obligations arising from any contracts entered into between you and us, including for billing and collection
- To analyze and potentially offer appropriate offers and or additional products or services.
- If you pay for Services using a credit card, we will transmit your credit card data to the appropriate credit card company and/or credit card payment processing company
- To allow you to participate in interactive features of our Services, when you choose to do so
- To notify you about changes to our Services
- In any other way we may describe when you provide the information

If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

4. DISCLOSURE OF YOUR INFORMATION

We will share your Personally Identifiable Information with third parties only in the ways that are described in this Privacy Policy. We do not sell, trade, rent or disclose your information to others, except as provided herein:

(a) We provide some of our Services through contractual arrangements with service providers and other third parties. We and our service partners use your Personally Identifiable Information to operate our Websites and to deliver Services. For example, we must release your credit card information to the card-issuing bank to confirm payment for products and services purchased on our Websites; release your address information to the delivery service to deliver products that you ordered; and provide order information to third parties that help us deliver the services.

(b) We will disclose Personally Identifiable Information in the following circumstances: (i) if it is required by law enforcement or judicial authorities, or to cooperate with a law enforcement investigation; (ii) if we have a good faith belief that we are required or permitted to do so by law or legal process; (iii) to protect the rights, reputation, property or safety of Website or others; (iv) to defend or enforce our rights or your obligations; (v) if the disclosure is required by mandatory professional standards; (vi) to a 3rd party with your prior consent to do so; or (vii) if we are under a duty to disclose or share your Personally Identifiable Information in order to enforce or apply, or any contracts or agreement that may exist between you and Website including this Privacy Policy and our Website Use Policy. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

(c) In the event that Website decides to sell all or part of its stock or assets or enter into a merger, we reserve the right to include Personally Identifiable Information and Non-Personally Identifiable Information among the assets transferred to the acquiring or surviving company.

(d) We may provide Non-Personally Identifiable Information about our customers' sales, traffic patterns, and related Website information to third party advertisers.

If you have any inquiries regarding our privacy practices, please contact us directly.

5. UPDATING OR CORRECTING YOUR PERSONALLY IDENTIFYING INFORMATION

You may change any of your or your Personally Identifiable Information online by logging into your account in accordance with instructions posted elsewhere on our Websites.

6. CANCELING YOUR ACCOUNT OR DELETING PERSONALLY IDENTIFIABLE INFORMATION

If you are a member and would like to cancel your membership, log in to your account and go to your account. You can also contact your sales representatives or contact our support team.

Depending on the products you have purchased, and would like to cancel your membership, you may need to contact your sales representatives or contact our support team. To have any personally identifiable information deleted, please contact our support team.

7. CHOICES REGARDING CONTROL OF YOUR PERSONALLY IDENTIFIABLE INFORMATION

With respect to your communications preferences, you can unsubscribe from newsletters by following the instructions included in the newsletter you receive or you can log into your account and update your newsletter and email subscription options. If your e-mail address has changed and you would like to continue to receive newsletters, you will need to access your account and update your e-mail address information in your account and sign-up again for the newsletter. Occasionally we may send out e-mails concerning website disruptions.

If you indicated upon registration that you are interested in receiving offers or information from us and our partners, we may occasionally send you direct mail about products and services that we feel may be of interest to you. Only Website (or agents working on behalf of us and under confidentiality agreements) will send you these direct mailings, and only if you did not later 'opt-out' of such offers.

We do not send unsolicited commercial e-mails ("spam"). We offer commercial e-mail recipients the opportunity to opt-out of further communications in every e-mail. Please note that we may not include the opt-out information in non-commercial Service e-mails (i.e., e-mails concerning your order, the Website Terms of Service, etc.).

You also have choices with respect to cookies, as described below. By modifying your browser preferences, you have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject all cookies some parts of our Websites may not work properly in your case.

8. INFORMATION RELATED TO DATA COLLECTED THROUGH THE WEBSITE PLATFORM SERVICE

For certain services Website collects information under the direction of its clients (e.g., an entity that subscribes to the Services for use by the entity's personnel). In this respect, Website acts as a data processor and has no direct relationship with the individuals whose Personally Identifiable Information it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his or her query to the relevant Website client (the data controller). If the client makes a request to us to remove the data, we will respond to their request within 30 days.

Website will retain Personally Identifiable Information we process on behalf of our clients for as long as needed to provide our services to our client. We will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

9. DATA SECURITY

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using Secure Sockets Layer (SSL) technology.

To make online purchases you must use an SSL-enabled browser in order to protect the confidentiality of your personal and credit card information while it is transmitted over the Internet.

Access by you to your account is available through a password and/or unique user name selected by you. We recommend that you do not divulge your password to anyone, that you change your password often using a combination of letters and numbers, and that you ensure you use a secure web browser. We cannot be held accountable for activity that results from your own neglect to safeguard the secrecy of your password and user name. If you share a computer with anyone, you should always log out of your account after you are finished, in order to prevent access to your information from subsequent users of that computer.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your Personally Identifiable Information, you acknowledge that: (a) there are security and privacy limitations of the Internet which are beyond our control; (b) the security, integrity and privacy of any and all information and data exchanged between you and us through this Website cannot be guaranteed and we shall have no liability to you or any third party for loss, misuse, disclosure or alteration of such information; and (c) any such information and data may be viewed or tampered with in transit by a third party.

In the unlikely event that we believe that the security of your Personally Identifiable Information in our control may have been compromised, we will notify you as promptly as possible under the circumstances. To the extent we have your e-mail address, we may notify you by e-mail and you consent to our use of e-mail as a means of such notification.

10. COOKIES AND OTHER TECHNOLOGIES

When you use our Websites we may use cookies and other technologies in order to facilitate and customize your use of our Services.

What is a cookie? A cookie is a small data text file, which a website stores on your computer or mobile device (if your Web browser permits) that can later be retrieved to identify you to us.

Our cookies store randomly assigned user identification numbers, the country where you are located, and your first name to welcome you back to our Websites. The cookies make your use of the Websites easier, make the Websites run more smoothly, and save your logged-in state so that you do not have to log in each time that you visit the Websites.

The use of cookies by our partners, affiliates, tracking utility company and service providers, is not covered by our Privacy Policy. We do not have access or control over these cookies. Our partners, affiliates, tracking utility company, and service providers, use session ID cookies to make it easier for you to navigate our site, in order for you to use the shopping cart, etc.

You can disable and/or delete all types of cookies by using your browser settings. Cookies are generally easy to disable and/or delete but how you do so varies from browser to browser. The "help" function within your browser should tell you how to do it. The best way may be to close your browser and then search for "cookie folder" or "cookie manager" or simply "cookie". Please also visit www.allaboutcookies.org for more information about cookies and how to disable them. If you do disable cookies, our Websites will not recognize you and you may not have access to all portions of the Websites.

What are clear gifs? Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive,

clear gifs are embedded invisibly on Web pages and are about the size of the full-stop or period at the end of this sentence.

We partner with third party ad networks to manage our advertising on other sites. As part of their service, they use cookies and clear gifs. We will not provide any third-party ad server with any of your Personally Identifiable Information or information about your purchases. We and our third party ad server will collect and use your IP address and certain Non-Personally Identifiable Information about you, such as your browser type, the server your computer is logged onto, the area code and zip code associated with your server and whether you responded to a particular advertisement.

What is a Flash cookie? Local storage objects, also known as “Flash cookies”, are similar in function to browser cookies in that they store some information about you or your activities on our Websites. We use Flash cookies in certain situations where we use Flash to provide some content such as video clips or animation. The options within your browser may not prevent the setting of Flash cookies. To manage Flash cookies please click here:http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html.

11. MOBILE ANALYTICS

We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the App, the events that occur within the App, aggregated usage, performance data, and where the App was downloaded from. We do not link the information we store within the analytics software to any Personally Identifiable Information you submit within the App.

12. LINKS TO THIRD PARTY WEB SITES AND ADVERTISERS

Except as otherwise discussed in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. Our Websites may contain hyperlinks to other third-party web sites, which may collect and disclose information in a manner that is different from our Websites. We are not responsible for the collection, use, or disclosure of information collected through these third-party web sites, and we expressly disclaim any and all liability related to such collection, use, or disclosure. We recommend that you read the privacy policies of the other web sites you visit. Additionally, other companies that place advertising on our Websites may collect information about you when you view or click on their advertising through the use of cookies. We cannot control this collection of information. You should contact these advertisers directly if you have any questions about their use of the information that they collect.

13. NOTICE TO CALIFORNIA RESIDENTS - CALIFORNIA PRIVACY RIGHTS

If you are a California resident and have provided us with Personally Identifiable Information, California law gives you the right to request and receive from us, once per calendar year, information as to how we have shared your Personally Identifiable Information with third parties for their direct marketing purposes. If applicable, such information

would include a list of names and addresses of all third parties with whom such information was shared during the prior calendar year as well as a list of the categories of Personally Identifiable Information shared. To make such a request, please contact our support team and include the phrase "*California Privacy Request*" in the subject line. Your request must also include your name, physical mailing address and email address. We will respond to you within thirty days of receiving such a request.

14. CHANGES TO THIS PRIVACY POLICY

It is our policy to post any changes we make to our Privacy Policy on this page (with a notice that the Privacy Policy has been updated on the home pages of the Websites). You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Websites and this Privacy Policy to check for any changes.

Your continued use of the Services after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by the modified Privacy Policy.

15. COMMUNITIES, FORUMS, CHAT ROOMS, AND MESSAGE BOARDS

If you or your child choose to disclose Personally Identifiable Information on communities, message boards, forums, and the like, which may be accessible via the Websites, you should be aware that such information, along with any information disclosed in your communication, can be collected and used by third parties and may result in unsolicited messages from third parties. You acknowledge and accept that any submissions to chat rooms or other public areas on the Websites are accessible to all third parties. If you do not want yours or your child's comments to be viewed by third parties, you are advised not to make any submissions. Ultimately, you are solely responsible for all activity conducted by you via communities, forums, message boards, chat rooms, etc. Please be careful and responsible whenever you are online.

16. SOCIAL MEDIA FEATURES

Our Websites include Social Media Features, such as the *Add This* button or interactive mini-programs that run on our Websites. These features may collect your IP address, which pages you are visiting on our Websites, and may set cookies to enable the features to function properly. Social Media Features are either hosted by a third party or hosted directly on our Websites. Your interactions with these features are governed by the privacy policy of the company providing it.

17. GIFT CERTIFICATES AND PLAYLISTS

If you choose to send a gift certificate or playlist to an individual, we will ask you for the individual's name and email address. We will automatically send a one-time email to the individual either with notice of their gift certificate along with an activation key or an invitation to visit the Websites. The recipient will be asked to create a user name and

password to activate their subscription, and during this process, they will also be asked if they want to receive any newsletters or other emails from Website. Website stores name and email address of the recipient for the sole purpose of sending this one-time email and tracking the success of our referral program.

18. HOW DO YOU CONTACT US WITH QUESTIONS?

If you have any questions about this Privacy Policy, the practices of or your dealings with our Websites, please contact us by sending a letter to:

Bentley Performance Systems Inc., DBA Speed Secrets

4308 243rd Avenue SE Issaquah, WA, USA

Phone Number: 425-283-7482