

## **SkillsPass Privacy Statement**

Privacy is important to Bluedrop Performance Learning (“Bluedrop”) and it is important that you understand the purposes for which we collect, use and sometimes disclose your personal information. This privacy statement is directed to individuals whose learning and training records are maintained using SkillsPass. In this privacy statement, we refer to the individuals whose certification records we maintain as “learners”; “employers/sponsors” refers to those that are associated with an individual learner and “training organizations” are the organizations that perform training and grant certifications.

### **Who We Are**

SkillsPass is an online platform that enables training organizations, employers/sponsors and learners to maintain records of training certification in a manner that maintains the integrity of such certifications. Employer and sponsors often send employees to training courses with training organizations, which result in earned certifications. These certifications are then available to the employer/sponsor, the employee and, in some cases, prospective employers. Because a learner may earn a number of certifications over their career from multiple training organizations, funded by multiple employers/sponsors, we have identified a need to create a central repository of certifications so that they are available to the learner, the employer/sponsor and prospective employers.

### **General Policy Statement**

You should understand why and how we collect, use and disclose personal information. Please note that this privacy statement may be revised from time to time, particularly to address changes in our business, our services, the law, or technology. If that happens we will post the revised policy on our privacy statement page. Revisions are effective upon posting and your continued use of SkillsPass will be subject to the changed terms of the revisions. You agree that by using SkillsPass you are consenting to our collection, use and disclosure of your personal information.

### **What personal information Does SkillsPass Collect From or About You?**

Generally, we receive personal information about learners and their certifications from training organizations. The information that it receives includes:

- Name and address of the learner
- Employer or sponsor of the training, if applicable
- Email address of the learner, if applicable
- Phone number of the learner, if applicable
- Certification earned and expiry date, including information about the course or program taken

We require the training organizations that provide us with personal information to give learners information about SkillsPass and this privacy statement.

Individual learners may create an account to access their certifications. To do so, we may require additional information to connect the account with the relevant certifications on file. We will also require the creation of a username and password.

Bluedrop does not collect or store any financial information (i.e. credit card numbers) from or about learners and we only collect the minimum personal information reasonably necessary to fulfill the purposes described in this privacy statement.

### **Purposes of our collection, use and disclosure of personal information**

**General:** We collect, use and disclose personal information for the purpose of maintaining a secure, long-term record of training certifications connected to individual learners and their employers/sponsors. This information will be available to the learners, their employer/sponsor and to prospective employers. We will communicate with learners about their accounts and to give notices about messages received from prospective employers.

**Communications from prospective employers:** Employers and their recruiters are often looking for individuals with particular skills and certifications. The SkillsPass platform will allow prospective employers and their recruiters to connect with individuals with those certifications through the SkillsPass platform. When this feature is enabled, you will be able to modify your communications preferences and opt-out from this feature.

Our policy is not to share personal information collected through SkillsPass with third parties other than the employers/sponsors and training organizations associated with your certifications. However, we may have to disclose personal information (a) in response to a subpoena, court order or legal process, to the extent required by law; (b) to protect user security or the security of other persons, consistent with applicable laws; (c) in connection with a sale, joint venture or other transfer to some or all of Bluedrop or the assets of Bluedrop; or (d) in order to enforce our Terms of Use.

### **Protection of personal information**

We use technical and other measures to protect your personal information from unauthorized access, use, disclosure, and modification.

### ***Your rights to your personal information***

If you wish to modify or delete any personal information maintained by SkillsPass, you may do so by either modifying your profile or contacting us at support@bluedrop360.com. Because the integrity of the certification is a key feature of SkillsPass, you cannot yourself modify any certifications associated with you. If there is anything that is erroneous or inaccurate, or if you wish to delete your records, please contact us at support@bluedrop360.com. Making any corrections will require communicating with the relevant employer/sponsor and training organization(s).

### ***Non-personal information***

SkillsPass may use any de-identified information about learners, including aggregate or statistical information for any purpose.

### **How to Contact Us Regarding Privacy**

If you have any questions or concerns about this privacy statement or would like to contact us regarding your personal information, you can contact us at the following addresses: By email: support@bluedrop360.com If, to the extent required by law or otherwise, we notify you that the

security of the information you submit has been compromised, then you agree that we may give you such notice by email instead of by regular mail.

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