

This Privacy Policy explains how TWO BY TWO CHARACTER DEVELOPMENT (“Two by Two”, “us”, “we”, “our”) collects, shares, and uses any information that relates to you when you use www.twobytwoeducation.org (“website”, “site”, “service”), engage with us on social media, or otherwise interact with us (your “Personal Data”). This Privacy Policy also explains the rights you have concerning the Personal Data that we process and how you can exercise these rights.

Last Updated: 03/18/2025

Principles

TWO BY TWO manifests its commitment to privacy and data protection by embracing the following principles.

- TWO BY TWO uses Personal Data lawfully, fairly, and in a transparent manner.
- TWO BY TWO collects no more Personal Data than necessary, and only for a legitimate purpose.
- TWO BY TWO retains no more data than necessary or for a longer period than needed.
- TWO BY TWO protects Personal Data with appropriate security measures.

Data We Collect

This policy applies only to information collected on the website. We collect two types of information from visitors to our sites:

1. Personal Data.
2. Non-personal Data.

“Personal Data” is information that identifies you personally and that you provide to us, such as your name, address, telephone number, email address, and sometimes your Internet Protocol (IP) address. We may collect this information when you create a profile on our site, visit our site, or complete a purchase.

“Non-personal Data” can be technical in nature. It does not identify you personally. Examples of non-Personal Data may include (but are not limited to) cookies, web beacons, and demographic information.

Usage Data

To improve your experience with our website we may also collect information on how you navigate the site, information about your connection, and the technical means you use to access our site. This data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Location Data

We may use and store information about your location if you give us permission to do so. We use this data to improve and customize your shopping experience. You can enable or disable location services when you use our service at any time by way of your device settings.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our site and we hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from our site and stored on your device.

Other tracking technologies are also used such as beacons, tags, and scripts to collect and track information and to improve and analyze our site. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

Data Use

TWO BY TWO uses the collected data for various purposes:

- To provide and maintain our service
- To notify you about changes in policies and order details
- To provide customer support
- To gather analysis or valuable information so that we can improve our site and services
- To monitor the propriety of site usage
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

Data Storage, Transfer, and Retention

The Personal Data that we collected from you is generally stored within a country of the European Union or the European Economic Area ("EU/EEA"), or the United States of America ("USA"), but may also, whenever necessary, be transferred to and processed in a country outside of the EU/EEA or USA. Any such transfer of your Personal Data will be carried out in compliance with applicable laws and without undermining your statutory rights.

Your information, including Personal Data, may be transferred to - and maintained on - computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside and choose to provide information to us, please note that we transfer the data, including Personal Data, to and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

TWO BY TWO will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information. We will hold on to your information for as long as you continue to be a TWO BY TWO customer and for as long as we are required to keep it to ensure we meet our legal requirements across the globe.

Data Access

Your Personal Data is available and accessible only by those who need the data to accomplish the intended processing purpose. To the extent necessary, your Personal Data may be shared with suppliers and subcontractors (processors and sub-processors) carrying out certain tasks on TWO BY TWO's behalf and with independent third-parties, including, but not limited to, using personal information you share with us or that we indirectly collect to verify your identity and for fraud prevention purposes.

Data Security

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Data Disclosure

Under certain circumstances, TWO BY TWO may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

TWO BY TWO may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of TWO BY TWO
- To prevent or investigate possible wrongdoing in connection with the site
- To protect the personal safety of users of the site or the public
- To protect against legal liability

Your Data Protection Rights

Right to access

You have the right to request information about the Personal Data we hold on you at any time. You can contact TWO BY TWO and we will provide you with your Personal Data via e-mail.

Right to portability

Whenever TWO BY TWO processes your Personal Data, you have the right to get a copy of your data transferred to you or to another party. This only includes the Personal Data you have submitted to us.

Right to rectification

You have the right to request rectification of your Personal Data if the information is incorrect, including the right to have incomplete Personal Data completed.

Right to erasure

You have the right to erase any Personal Data processed by TWO BY TWO at any time except for the following situations:

- you have an ongoing matter with TWO BY TWO
- you have an open order which has not yet been shipped or partially shipped
- you have an unsettled debt with TWO BY TWO, regardless of the payment method
- if you are suspected or have misused our services within the last four years
- your debt has been sold to a third party within the last three years or one year for deceased customers
- your credit application has been rejected within the last three months
- if you have made any purchase, we will keep your Personal Data in connection to your transaction for book-keeping purposes

Your right to object to processing based on legitimate interest

You have the right to object to the processing of your Personal Data that is based on TWO BY TWO's legitimate interest. TWO BY TWO will not continue to process the Personal Data unless we can demonstrate legitimate grounds for the process which overrides your interest and rights or due to legal claims.

Right to restriction

You have the right to request that TWO BY TWO restricts the process of your Personal Data under the following circumstances:

- if you object to processing TWO BY TWO's legitimate interest, TWO BY TWO shall restrict all processing of such data pending the verification of the legitimate interest.
- if you have claimed that your Personal Data is incorrect, TWO BY TWO must restrict all processing of such data pending the verification of the accuracy of the Personal Data.
- if the processing is unlawful you can oppose the erasure of Personal Data and instead request the restriction of the use of your Personal Data instead.
- if TWO BY TWO no longer needs the Personal Data but it is required by you to defend legal claims.

CCPA Privacy Information

This section applies only to TWO BY TWO customers who are California residents and supplements the details provided in our Privacy Policy and contains the information that the Californian Consumer Privacy Act ("CCPA") requires us to make available to customers. Any terms defined in the CCPA have the same meaning when used in this notice.

Collected Information

We may collect the following personal information about you when you use our site:

- identifiers such as a name, address, unique personal identifier, email, phone number, your device's IP address, software, and identification numbers associated with your devices
- protected classifications, such as gender
- commercial information such as records of products or services purchased, obtained, or considered by you
- Internet or other electronic information regarding your browsing history, search history, the web page visited before you came to our Site, length of visit and number of page views, click-stream data, locale preferences, your mobile carrier, date and time stamps associated with transactions, and system configuration information
- your geolocation, to the extent you have configured your device to permit us to collect such information
- audio recordings of your voice if you call us, as permitted under applicable law
- professional or employment-related information if required and provided inferences
- about your preferences, characteristics, behavior, and attitudes.

You can find more information about the personal information we collect and how we collect it in the section above titled "Data Use".

Personal Information Use

We collect your personal information for the business purposes described above in the section titled "Data Use". The CCPA defines a "business

purpose” as the use of personal information for the business’s operational purposes, or other notified purposes provided the use of personal information is reasonably necessary and proportionate to achieve the operational purpose for which the personal information was collected or another operational purpose that is compatible with the context in which the personal information was collected.

Sharing Personal Information

We may disclose your personal information to an organization for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient organization to keep that personal information confidential and not use it for any purpose except performing the contract with us.

We disclose your personal information for a business purpose to the categories of third parties listed above in the section titled “Data Access”.

Your Rights

If you are a California resident, you have rights in relation to your personal information; however, your rights are subject to certain exceptions. For instance, we cannot disclose specific pieces of personal information if the disclosure would create a substantial, articulable, and unreasonable risk to the security of the personal information, your account with us, or the security of our network systems.

Right Against Discrimination

You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for

exercising your right to know, delete, or opt-out of sales.

Right to Know

You have the right to request in writing: a list of the categories of personal information, such as name, address, email address, that a business has disclosed to third parties during the immediately preceding calendar year for the third parties' direct marketing purposes, the names and addresses of all such third parties.

In addition, you have the right to request:

- the categories of personal information we have collected about you
- the categories of sources from which personal information is collected • the business or commercial purpose for the information collection
- the categories of third parties with whom we have shared personal information
- the specific pieces of personal information we hold about an individual

You have the right to request a copy of the specific personal information we collected about you during the twelve (12) months before your request.

Right to Delete

You have the right to request us to delete any personal information we have collected from you or maintain about you, subject to certain exceptions.

To assert your right to know or your right to delete your personal information, please contact according to the 'Exercise Your Rights' section below.

To confirm your identity, we may ask you to verify personal information we already have on file for you. If we cannot confirm your identity from the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud prevention purposes.

Right to Opt-Out of Selling

You have the right to opt-out of having your personal information sold. We do not sell your personal information. In addition, California Civil Code Section 1798.83 permits customers of TWO BY TWO who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. Please allow 30 days for a response. To make such a request, contact us according to the 'Exercise Your Rights' section below.

Exercise Your Rights (Contact Us)

We take data protection very seriously and therefore we have dedicated Customer Service personnel to handle your requests in relation to your rights stated above. You can always reach them at info@twobytwoeducation.org.