

ROSETTA STONE PRIVACY POLICY

This Privacy Policy (the "Policy") explains our data collection, use, and disclosure practices for Rosetta Stone interactive online products and services, including without limitation the websites, software, hosted services, mobile and internet applications, trials and demos, content, games, audio and video, and associated documentation (each a "Service") owned and operated by Rosetta Stone LLC and/or any of its subsidiaries and affiliates ("RSL"). By accessing or using any Service, you signify that you have read, understand, and accept the terms of this Policy. **If you are receiving access to a Rosetta Stone Service from or through an educational institution, government agency or business enterprise that is a party to a Rosetta Stone Enterprise License or similar agreement, and the terms of that Enterprise License Agreement conflict with the terms of this Policy, the terms of the Enterprise License Agreement will prevail with respect to the conflicting term(s).** As used in this Policy, the term "Service" refers to the specific Service that you are accessing or using.

We are committed to the privacy and security of personal information we receive and process, and for appropriately and promptly addressing requests and instructions regarding personal data, in accordance with applicable legal requirements. In order to better ensure the proper handling of data requests, we have created a Personal Information Request web form to enable us to support requests from individuals seeking information and action with respect to personal data we have collected for those individuals and how we use that information. If you are contacting us to request information or action with respect to personal data we have collected about you, or to exercise your data protection rights, we ask that you

please click **HERE**

and submit your request(s) through the Personal Information Request web form.

If you have other specific questions about this Policy, please contact us by email at **privacyofficer@rosettastone.com**. We encourage you to periodically review this statement as it may change at any time at our sole discretion.

Our site contains links to third party sites, which are not subject to this privacy policy. Rosetta Stone does not endorse and is not responsible for the privacy practices or content on these sites. We recommend that you read the privacy policy of any such sites that you visit.

Information provided by you may be requested from one of our websites under the Rosetta Stone brand name, or from one of our reputable co-marketing partner sites that represent our brands on their own websites under their company and/or brand name. In the event that you provide us with personal information for the purposes of free registration and you later make a purchase, whether directly from us or facilitated by one of our e-commerce partners, your privacy rights will be protected according to our stated policies and the stated privacy policies of these partners, which will be posted and available for your review at the time of purchase.

1. Information Collected

Personal information is collected by Rosetta Stone. We collect personally identifiable information about you (your "Data") through:

- The use of inquiry and registration forms.
- The purchase process when you buy any of our products or services
- The provision of your details to us either online or offline

We also receive and store any information you enter through the Service or give us in any other way.

This includes information that can identify you ("personal information"), including your first and last name, telephone number, home, shipping and billing addresses, email addresses, job title, company name, IP address and browser information, payment details such as credit card information, market research data

such as customer usage patterns. We also may ask you to provide additional information about yourself, including your age, hobbies, and interests in learning languages. You can choose not to provide this additional information to us, but in general, some information about you is required in order for you to subscribe to or register and participate in the features offered through the Service.

Other than your personal information as described above, RSL reserves the right to record, read, copy, disclose, and otherwise use any text, speech, data, images, and other materials that you transmit orally or by text or post to or through the Service or any of its components.

We automatically collect some information about your computer when you visit the Service. For example, we will collect your IP address, Web browser software, and the referring web Service. We also may collect information about your activity on this Service, such as the classes, games or chat rooms in which you participate. One of our goals in collecting this automatic information is to help improve your user experience. Finally, when you visit the Service, we may assign your computer a "cookie" (a small, unique identifier text file) to remember who you are. For example, if you register on the Service, we may record your password in a cookie for verification purposes. We also may include other information in our cookie files; for example, if you arrived at the Service via a link from third party site, we may include the URL of the linking page.

Please note that, unless the Service makes specific references to children and collects age information, the Service is not available for children under 16 years old in the United States or under another age specific to certain other countries in those locations. Accordingly, RSL will not knowingly collect or maintain personal information from children under the required minimum ages through a Service that is not intended for children. Please see below for more information on our policies regarding children's privacy. If you believe we might have any information from or about a child below the minimum age, please contact us at privacyofficer@rosettastone.com.

2. Use of Personal Information

We use your Data for purposes which may include:

- Providing our customers with a personalized service.
- Processing orders, registrations and inquiries.
- Conducting market research surveys.
- Running competitions.
- Measuring interest in and improving our website, products, and services.
- Providing you with information about products and services we offer. You may stop the delivery of marketing emails by following the instructions accompanying a particular communication or by submitting your personal information request here: [\[link\]](#).
- Resolving disputes, collecting fees, and troubleshooting problems.

We use the information you provide when placing an order to complete that order. We do not share this information with outside parties except 1. To the extent necessary to complete that order or to provide you with services by way of our service providers (e.g., payment processing, third-party shipping, business analytics, customer support), or 2. To successors in title to our business, or 3. In accordance with legal and regulatory requirements, or 4. As necessary, in Rosetta Stone's sole discretion, to protect the perceived rights, safety and property of Rosetta Stone, users of our websites, and the public, or 5. With the parent organization, affiliate or subsidiary entities of Rosetta Stone to manage and control Data as joint users.

Other than as set out above, you will be notified when Personal Information about you will be shared with third parties, and you will have an opportunity to choose not to have us share such information.

We also use information in aggregate form (so that no individual user is identified):

- To build up marketing profiles
- To aid strategic development
- To audit usage of the site

When you are logged in, we will use personal information about you for the following general purposes: to process your subscription or registration to the Service; to provide you with the products and services you request; to tailor your learning experience; to respond to your questions and comments; to communicate with you via regular mail and email (or other electronic means) about our programs and services; to measure interest in and improve our offerings; to solicit information from you, including through surveys; to resolve disputes, collect fees, or troubleshoot problems; to prevent potentially illegal activities; to enforce our Terms of Use; and otherwise as described to you at the point of collection.

Please review "Your privacy rights" below.

3. Disclosure of Personal Information

We may display your profile information (minus your email address and password) to other community members of the Service and to support other Service functions. We also may disclose your personal information as follows:

- (a) For processing orders, registrations and inquiries related to the Service;
- (b) To third-party vendors who provide services or functions on our behalf, including customer service, business analytics, marketing, and services to us in connection with operating the Service. These companies have access to information needed to perform their functions and are not permitted to share or use the information for any other purpose;
- (c) To business partners with whom we may jointly offer a product or service offering. You can tell when a third party is involved because the third party's name will appear on informational materials. If you choose to take advantage of these offerings, we may share information about you, including personal information, with those named partners. Please note that we do not control the privacy practices of these third-party business partners;
- (d) When advisable or necessary to conform to legal and regulatory requirements;
- (e) As necessary, in RSL's sole discretion, to protect the perceived rights, safety and property of RSL, the Service's hosts and carriers, users of the Service, and the public;
- (f) As necessary for resolving disputes, collecting fees, and troubleshooting problems;
- (g) In connection with a change of control or operations, including without limitation in any merger, acquisition, reorganization, restructuring or any other transfer of RSL's assets, or a transfer of the Service operations;
- (h) Otherwise with your consent;
- (i) To the educational institution, government agency or business enterprise through which you are receiving access to the Service when your access is granted through an Enterprise License or similar agreement between RSL and such entity; and
- (j) To our instructors, to tailor their instructional materials and interactions with you.

Other than as set out above, you will be notified when personal information about you will be shared with third parties, and you will have an opportunity to choose not to have us share such information.

We also may share aggregate or anonymous information with third parties, including advertisers and investors. For example, we may tell our advertisers the number of visitors to the Service. This information does not contain any personal information and is most often used to develop content and services that we hope you find of interest.

4. A Special Word about Chat Rooms and Email

Please keep in mind that whenever you voluntarily disclose personal information online, that information can be collected and used by others. By posting personal information online or disclosing such information in 'voice chats' with other when using the Service, that information can be seen, collected and

used by others besides us. RSL cannot be responsible for any unauthorized third party use of such publicly-accessible information.

5. Use of Cookies and Other Tracking Devices

We use cookies and other tracking devices to help personalize your use of our sites. A cookie is a small piece of information which is sent to your computer's hard drive by the web server so that the website can remember who you are. This information may include information relating to your use of our sites, information about your computer such as the computer's IP address and browser type, demographic data and, if you arrived at our site via a link from a third party site, the URL of the linking page. If you are a registered user this may include your name and email address for verification purposes.

We use information from cookies for purposes which may include:

- Identifying returning users and registrants
- Enabling you to move more easily around our site
- Tracking your use of our site to better develop our sites in accordance with your requirements
- Building up a demographic profile

If you do not want to help us learn how to improve our site, products, offers and marketing strategy, you may adjust cookie preferences, or choose to set your Web browser to not accept cookies. Further information on how to prevent cookies from being stored on your computer can be found on <http://www.allaboutcookies.org> under the 'manage cookies' section. Alternatively, go to the help menu within your Internet browser.

From time to time we may permit third party companies to set cookies on Rosetta Stone sites for purposes which may include market research, revenue tracking or to improve functionality of the site.

You can revisit your cookie preferences at any time by clicking the cookie preference center link available in the footer of the website's page.

United States

Depending on the State you reside in, data protection regulations may classify certain cookies (for example, Advertising cookies) as 'selling/sharing' personal information, 'cross-context behavioral advertising' or 'targeted advertising'. In light of this, we provide a [Do Not Sell or Share My Personal Information link](#).

Where required, we recognize browser-based opt-out signals such as GPC.

6. Access to Personal Information

You may obtain a copy of any personal information about you that you provide through the Services or otherwise request that RSL update or make changes to such personal information by using our Personal Information Request web form available here: [LINK](#).

7. Your privacy rights

Where required by applicable law, you have the right to obtain confirmation of the existence of certain Personal Data relating to you, to verify its content, origin, and accuracy, as well as the right to access, review, port, delete, or to block or withdraw consent to the processing of certain Personal Data (without affecting the lawfulness of processing based on consent before its withdrawal), by contacting us as detailed below. **In particular, you have the right to object to our use of Personal Data for direct marketing and in certain other situations at any time. Contact us below for more details.** Please note that certain Personal Data may be retained as required or permitted by applicable law.

If you are an End User receiving access to our services through a Corporate, Governmental, Educational or other Organizational Enterprise Client of Rosetta Stone, and you wish to request access, limit use, limit disclosure or remove your End User Personal Data, please contact the Enterprise Client organization that submitted your personal data to us, and we will support them as needed in responding to your request.

Please visit [this page](#) in order to submit a request to exercise your applicable rights and to contact us with general privacy-related questions. We may request certain information for the purpose of verifying the identity of the individual or their agent, parent or guardian, where applicable, seeking access to his or her Personal Data.

Please note that certain Personal Data may be retained as required or permitted by applicable law.

If you reside in a US State and want to exercise an opt-out right available to you, please visit [this page](#).

If you have other questions or requests concerning your personal information, please contact the Privacy Team by email at privacyofficer@rosettastone.com.

If you are a resident of the European Economic Area (EEA) with questions regarding your rights in Personal Data under GDPR, please contact the Rosetta Stone Data Protection Officer, Sofia Simoes, by email at DPO@rosettastone.com.

- (a) As noted above, you can choose not to provide RSL with personal information, although it may be needed to register as a member on the Service and to participate in certain features offered through the Service.
- (b) You can access or update your personal information by using our Personal Information Request web form available here: [link](#).
- (c) You may stop the delivery of commercial email communications that RSL sends by following the instructions accompanying a particular communication or by using our Personal Information Request web form available here: [link](#).
- (d) The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

In addition, RSL will comply with the mandatory requirements of the applicable laws of any state, federal or other governmental jurisdiction regarding your personal information.

8. Appeals of Privacy Rights Decisions

If you submit a request to exercise your privacy rights under this Privacy Policy (including requests described in the “Your Privacy Rights” section) and we decline to take action on your request, depending on applicable law, you may have the right to appeal our decision subject to applicable law.

You may submit an appeal by contacting us by e-mail at privacyofficer@RosettaStone.com. When submitting an appeal, please include “Privacy Rights Appeal” in the subject line of your email, as well as:

- Your name and contact information
- The privacy request you submitted
- The date of our response
- The reason you believe our decision should be reconsidered

We may request additional information as necessary to verify your identity or evaluate your appeal.

We will review your appeal and respond within the timeframe required by law. If your appeal is denied, we will provide information about any further rights you may have, including the ability to submit a complaint to a relevant data protection authority or regulator, where applicable.

We will not discriminate against you for exercising your privacy rights, including submitting an appeal.

9. Security

You should be aware that there is always some risk involved in transmitting information over the Internet. While no website can guarantee security, RSL has implemented reasonable administrative, technical, and physical security procedures to help protect personal information from loss, misuse or alteration by unauthorized third parties. For example, RSL maintains policies and protocols to restrict access to personal information only to authorized personnel, and only for permitted business functions.

10. Transfer of Data

The Internet is a global environment. Using the Internet to collect and process personal Data necessarily involves the transmission of Data on an international basis. As an international company, we operate globally, including through affiliates, and engage service providers in multiple jurisdictions worldwide. As a result, the personal information we collect may be transferred to, processed in, or stored in countries outside the jurisdiction in which you are located. Where personal information is transferred internationally, we take steps to ensure that appropriate safeguards are in place to protect it and that the transfer complies with applicable data protection laws. These safeguards may include contractual protections, recognized data transfer mechanisms, or other lawful measures designed to ensure an adequate level of protection for your personal information such as standard data protection clauses adopted by the European Commission. If you would like further information about the safeguards we use in connection with international data transfers, please contact us using the details provided in section 15 of this Privacy Policy.

11. Children Using the Service

In the United States, the Children's Online Privacy Protection Act imposes certain restrictions on web sites and online services that are directed at children under 13 or where the operators know that they are collecting personal information from children under the age of thirteen (13). Unless the Service makes specific references to children and collects age information, in which case further required disclosures will be provided, the Service is not directed at or intended for children under 13 years old in the United States or other minimum age specific to certain other countries in those locations. Accordingly, RSL will not knowingly collect personal information from children under the required minimum ages through a Service that is not intended for children without the consent of a parent or authorized guardian. We do not knowingly allow children under the age of thirteen (13) or other required minimum age to publicly post or otherwise distribute personally identifiable contact information through the Service, and we do not condition the participation of a child under thirteen (13) or other required minimum age in the Service's online interactive activities on providing personally identifiable information. If we become aware that we have inadvertently received personally identifiable information from a user under the minimum age without the consent of a parent or authorized guardian, we will use that information to respond directly to that child to inform him or her that the Service is not intended for children under the minimum age, and we will delete that information from our records.

12. Third Party Websites

Websites to which this Service links do not operate under this Policy. We recommend that you examine the privacy statements posted on those other websites to understand their procedures for collecting, using, and disclosing personal information.

13. Changes to This Policy

RSL may update this Policy in the future to reflect changes in our privacy practices, our website functionality, or applicable legislation, so please check back often. We will notify you about material changes to this Policy by sending a notice to the email address you provided to us or by placing a prominent notice on the Service.

14. Retention

Rosetta Stone keeps your personal data for as long as your account remains active to ensure the Service

continues to function properly. In some cases, certain information may be stored for a longer period if it is required to deliver the Service, protect Rosetta Stone's or others' legitimate interests, meet legal obligations, handle disputes, address misuse or service disruptions, or fulfill contractual commitments. Additionally, anonymized data may be kept indefinitely.

15. How You Can Contact Us

If you have questions about this Policy, please email us at privacyofficer@rosettastone.com. You may request a copy or send a correction of the personal information we hold about you by contacting the Privacy Officer at privacyofficer@rosettastone.com or writing to:

Privacy Officer
Rosetta Stone LLC
777 Mariners Island Blvd
Suite #600
San Mateo, CA 94404
USA

If you wish to report communications or actions of other users that you believe may be in violation of this Policy or our Terms of Use, you may contact RSL by clicking on the "Contact Us" link at the bottom of the Service's webpages.

16. California Consumers

17.

Notice to California Consumers

If you reside in California, we are required to provide additional information to you about how we use and disclose your information, and you may have additional rights with regard to how we use your information. We have included this California-specific information below.

- **CA Personal Information.** Consistent with section 1 of this **Privacy Policy**, we collect certain categories and specific pieces of information about individuals that are considered "Personal Information" in California ("**CA Personal Information**"), specifically:
 - ***Personal and Other Identifiers or Characteristics:*** such as first name and last name, personal or professional contact information, mailing address, telephone number, e-mail address, unique personal identifier, IP, device, and online activity information, age, date of birth, gender, demographics, username and password to our Websites or services;
 - ***Commercial Information:*** such as payment details, credit card information and purchase or transaction history.
 - **Sources.** We may collect certain categories of CA Personal Information from you and other third parties as described in section 1 of this **Privacy Policy**.

- **Use of CA Personal Information.** Consistent with sections 2 and 3 of this ***Privacy Policy***, we may use CA Personal Information for business or commercial purposes. Please see sections 2 and 3 for more details.
- **CA Personal Information Sold or Disclosed For Business Purposes.**
 - In the preceding twelve months, we may have shared CA Personal Information for business purposes, or we may have “sold” (as defined under CCPA) some categories of CA Personal Information.
- **California Consumer Rights.** Subject to certain exceptions, as a California resident, you may have the following rights to your CA Personal Information: (i) *Access*. Request access to your CA Personal Information that we collect, use, disclose, or sell; (ii) *Deletion*. Request deletion of your CA Personal Information; and (iii) *CA Personal Information Sold or Disclosed For Business Purposes*. Request information about the CA Personal Information we have “sold” (as defined under CCPA) or disclosed for business purposes within the preceding 12 months. To the extent permitted by applicable law, we may be required to retain some of your CA Personal Information and certain CA Personal Information is strictly necessary in order for us to fulfil the purposes described in this Privacy Policy.
- **Exercising California consumer rights.** If you are a California resident and wish to exercise any of these rights, please: (a) submit your request using our webform available **[here]**; (b) log into your account to make any updates or submit a request; (c) contact us as described in the ***Privacy Policy*** section 15 above, or (d) call the following toll-free number 800-280-8172. When submitting your request, you may be asked to provide certain information, which may include additional proof of identification, so that we can verify your identity and validate the request. We are not responsible for requests that are not sent or submitted properly, or that do not have complete information. Please note that you are limited by law in the number of requests you may submit per year. We will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, based solely upon you exercising your rights to your CA Personal Information.
- **Do Not Sell My Personal Information.** If we “sell” (as defined by CCPA) your CA Personal Information to a third party, as a California Resident, you have the right to opt-out of the sale of your CA Personal Information. If you wish to exercise this right, please click **[here]**, contact us as described in the ***Privacy Policy*** section 15 above, or call the following toll-free number 800-280-8172. To the extent that you elect to designate an authorized agent to make a request on your behalf, they must identify that they are contacting us as agent and will be required to provide appropriate documentation including written signed authorization by you, proof of your identity, and verification of their identity; or a valid, designated power of attorney as

required under the California Probate Code. We may require additional proof of authority or may need to contact you directly to validate the request. If you are under the age of 16, we will not sell your CA Personal Information without proper consent.

Last reviewed and effective as of: May 5, 2026
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