DR. KIRSTEN L. STEIN, ED.D. ENCOMPASSING IT ALL, LLC

- PRIVACY AND COOKIE POLICY
- DIRECT NOTICE TO PARENTS AND LEGAL GUARDIANS

(see below)

PRIVACY AND COOKIE POLICY

Our Policy

Welcome to the website of Dr. Kirsten L. Stein, Ed.D., Encompassing It All, LLC website: http://DrKirstenStein.com/. This website showcases the offerings and services, including online courses, provided by Dr. Kirsten L. Stein, Ed.D. This Policy sets forth policy with respect to the information collected from visitors and users of those who choose to use it.

Policy Purpose

This privacy policy is for this website http://DrKirstenStein.com/ and the business of Dr. Kirsten Stein, Ed.D., Encompassing It All, LLC. It governs the privacy of those who choose to use it.

The policy sets out the different areas where user privacy is concerned, and outlines the obligations and requirements of the users, the website and website owners. Furthermore, the way this website processes, stores, and protects user data and information will also be detailed within this policy.

The privacy of Encompassing It All, LLC ("EIA") users is very important and we are committed to protecting that privacy. This Privacy Policy explains the manner in which EIA collects personal data and personal information ("Personal Data/Information") from Users and the purpose for that collection. We uphold the Children's Online Privacy Protection Act (COPPA) set by the FTC in the United States. By visiting EIA or submitting your Personal Data/Information, you accept the terms described in this Privacy Policy.

For purposes of this Policy, the term "User" means any entity, school, educational institution, adult, or student– either directly or through the parent or legal guardian if the student is under 18 years of age.

Operator Information

EIA showcases the offerings and services, including Educational Sucess Coaching and online courses, provided by Dr. Kirsten L. Stein, Ed.D. EIA collects and securely stores participants' Personal Data/Information (described below) through the http://DrKirstenStein.com/ website and online services directly from children and parents. EIA Advanced Academy is hosted in the United States.

EIA Encompassing It All, LLC PO Box 577892 Modesto, CA 95357

Phone: (408) 454-8735

Email: EncompassingItAll@gmail.com

As previously mentioned, for purposes of this Privacy Policy, the term "User" means any entity, school, educational institution, adult, or student—either directly or through the parent or legal guardian if the student is under 18 years of age.

Personal Data/Information Collected by Encompassing It All, LLC

EIA collects "Personal Data/Information" from Users to provide EIA Services. EIA collects Personal Data/Information such as first and last names, year of birth, gender, postal addresses, email addresses, and information included in messages to EIA personnel when voluntarily submitted by adults, parents, or legal guardians. EIA collects Personal Data/Information directly and voluntarily from students that may contain personal or identifying information such as information voluntarily provided when participating in the Services. We receive and securely store any information that parents or students choose to share, including any submissions that Users make or provide on or through EIA. Although Users cannot post personal data publicly on the EIA Services, EIA cannot control what Users post and share online. We encourage student Users and student-User parents and legal guardians to keep an open dialogue about best Internet practices.

Any User that would like to participate in the services at EIA ("Services") must contact Dr. Kirsten L. Stein, Ed.D. If the User is under 18 years of age, a parent or a legal guardian of that User must first contact Dr. Kirsten L. Stein, Ed.D. and remit payment for requested Services for the User. Payment is required for the use of the Services at EIA. A method of payment, including billing address, will be collected by a third-party service such as PayPal. When Users participate in the Services, third-party services such as the webinar service will automatically collect information about User's patterns of usage, IP address, browser type, order history, participation in promotions, session data, access times, and other information relating to usage, choices, and preferences. Users are encouraged to view the privacy policies of those sites and companies. If EIA uses this information, it will only be to maintain operations and service quality. Such third parties do not have any rights to use Personal Data/Information beyond what is necessary to assist EIA to provide Services.

By voluntarily providing us with Personal Data/Information, Users are consenting to EIA use of it in accordance with EIA Policies. Users providing Personal Data/Information to our Services acknowledge and agree that such Personal Information/Data may be transferred from the Users' current location to the offices and servers of EIA and the authorized third parties referred to herein.

EIA may use your Personal Data/Information to contact you in the future to tell you about services we believe will be of interest to you. If we do so, each communication (e.g. our newsletter) we send you will contain instructions permitting you to "opt-out" of receiving future information. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, please contact us at EncompassingItAll@gmail.com. Please note that we will continue to contact you via email to respond to requests and provide our Services.

Passively Collected Data

When Users interact with EIA website and authorized third parties, EIA websites receive and store certain data automatically. EIA may store such passively collected data itself or such information may be included in EIA databases, official third parties, or service providers. For example, we may use such information and pool it with other information to track the total number of visitors to our EIA website, for internal record-keeping purposes, and other patterns of usage as described below.

How EIA will Use the Information Collected from You

- Name: The User's name, pseudonym, or username will be used to customize the User's participation in the Services. In addition, EIA may send information to the User at the mailing address provided.
- Email Address: Email addresses are used mainly for communication between students, parents, and instructors as well as for setting up a private profile for each User. We may use the email address as an additional means of communicating with Users about EIA, including through our newsletter.
- Date of Birth: If provided, we will use a User's age to improve the Services. Such information will be combined with other Users' information in an anonymous manner and will not include any information that could be used to identify a specific User.
- *Gender:* We will use a User's gender to improve the Services and personalize the Users' experience such as addressing the User using their desired pronoun.
- *Mailing/Billing Address:* If provided, a User's mailing address may be used to allow EIA to mail material related to EIA.
- Other Uses of Personal Data/Information may include:
 - EIA uses third party vendors and service providers to perform certain functions on our behalf. For example, billing addresses will be collected by a third-party service such as PayPal to process payment required for the Services.
 - Correspondence with students and parents.
 - If required by law and as may be required by EIA third-party service providers such as EIA webinar provider.

Other Examples of Usage of Your Personal Data and Other Information

- Provide Services and a personalized experience to Users.
- Improve Services and enhance User experience.
- Fulfill an obligation under law or contract.
- Comply with a subpoena or law enforcement.
- Fulfill a contract that does not violate this Privacy Policy.
- Process payments.
- Communicate with Users, including marketing information.
- Analyze usage at EIA.

Cookies at EIA

In operating EIA, we and third parties that provide certain functionality to our Services at EIA may use a technology called "cookies." A cookie is a small file of information saved by your web

browser on your computer when you visit the web to help your device work efficiently. They are unique to your account or your browser and are used to "remember" you. Every time you go back to the same webpage on a website, your browser retrieves and sends the file to the website's server. Cookies cannot read, access, or modify any other data on your computer. Our cookies help provide additional functionality to EIA Services and help us analyze usage at EIA more accurately. Users have a variety of tools to control or opt out of cookie usage on their web browsers. Be sure to search for instructions on how to disable cookies on your preferred browsers. Please remember many of EIA Services may not function properly with cookies disabled for our websites. Learn more about cookies at http://www.allaboutcookies.org/.

Types of Cookies used at EIA

EIA routinely uses cookies on our website (http://DrKirstenStein.com/) and third-party Services. More information about the cookies used on our website platforms can be found at the respective websites.

Types of cookies we use for our websites and Services include:

- Necessary cookies: These cookies are required for you to be able to use some important features at EIA, such as logging into the webinar room. These cookies don't collect any personal information. Instead, these cookies help us authenticate you and keep you signed in.
- *Preferences and settings cookies:* These cookies help personalize your experience in our courses such as storing which language you prefer.
- Security cookies: These cookies support our security features and help us detect malicious activities.
- Analytics cookies: These cookies are used to track the use and performance of our
 website and services. EIA uses third-party cookies such as Google Analytics to gather
 information about activities and performance to help us analyze and improve our
 services.
- Social Sharing: EIA websites include buttons containing cookies linked to our social media services such as Facebook, Twitter, and Instagram. Users' interactions with those websites is governed by their respective policies. Please refer to their policy statements to understand how they use your information.
- Marketing: EIA also uses third-party cookies from services such as Google Analytics,
 Facebook Business, and Twitter Ads. These companies have their own policies. Please refer to their policy statements to understand how they use your information.

Remember, you can instruct your browser to indicate when a cookie is being sent or refuse all cookies. Please note: If you do not accept cookies, you may not be able to use some or all of our Services.

Do Not Track

Do Not Track is a browser setting preference you can set in most web browser to prevent you from being tracked across the web. Turning on Do Not Track through your web browser lets websites know that you don't want to be tracked from site to site. Search how to enable or disable tracking in your web browser settings or preferences. We treat the data of everyone who

comes to our site in accordance with this Policy, whatever their Do Not Track setting. To learn more about Do Not Track visit: https://allaboutdnt.com.

EIA Storage

Your Personal Data/Information may be transferred to and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where data protections laws may differ than those from your jurisdiction. EIA will transfer and process the Personal Data/Information in the United States.

Consent

In order to use and/or access the Services, the User will be asked to submit certain personal data/information about the User and to authorize EIA to use that information in a limited capacity.

Parental or Legal Guardian Consent:

EIA obtains verifiable parental or legal guardian consent before collecting Personal Data from Users under the age of 18. EIA requires Users provide credit card information in order to pay and be enrolled in an EIA service. Parents or legal guardians of Users under the age of 18, are required to review EIA Policies and electronically sign agreement to consent to EIA Policies. Users under the age of 18 will not be allowed to use EIA Services without parental consent.

Opting-Out of Providing the Requested Information

The information we request from the User is required for the User to participate in the Services unless noted. At any time, the User, either directly or through the parent or legal guardian if the student is under 18 years of age, may revoke the consent to participate in EIA Services, have deleted the User's Personal Data/Information, and/or refuse to allow EIA to further collect the User's Personal Data/Information. If the User does any of the foregoing, the User will either not be able to participate in the Services or the Services will be limited as a request to delete records may lead to a termination of an account and other services.

To opt out of providing Personal Data/Information, Users, either directly or through the parent or legal guardian if the student is under 18 years of age, must submit a written request by email to EncompassingItAll@gmail.com. Parents or legal guardians may find more information about parental consent on EIA Direct Notice to Parents and Legal Guardians (below).

Choices and Controls:

To request access to, change, or delete personal information, Users must submit a written request by email to EncompassingItAll@gmail.com. A valid request to delete personal information will be accommodated within a reasonable time. In addition to the foregoing, we will exercise commercially reasonable efforts to delete personal information belonging to Users when it is no longer needed for the purpose for which it was collected. Please find more information about parental choices and controls in our Direct Notice to Parents and Legal Guardians (below).

Security: Protecting Your Information

No data transmission over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure the ultimate security of any Personal Data/Information the User transmits to us. As such, the User, does so at their own risk. EIA has multiple security measures in place to protect the loss, misuse or alteration of information under our control (such as HTTPS). We will do everything we reasonably can to prevent security breaches and to assist authorities should any breaches occur. Should a breach occur, we will notify suitable authorities. We do not accept liability for disclosures beyond our reasonable control. We will also notify you if there is a threat to your rights or interests. Data/Information will be kept indefinitely. We encourage Users to be diligent and proactive about Internet security.

You are also responsible for helping to protect the security of your account credentials. For instance, never give out your password, and safeguard your user name, password, and personal credentials when you are using the Services, so that other people will not have access to your Personal Data/Information. Furthermore, you are responsible for maintaining the security of any personal computing device on which you utilize the Services.

The User and Third Parties

Except as provided in this Privacy Policy, EIA will not disclose the Personal Data/Information that it obtains from the User to third parties without the User's consent, or where we believe, in good faith, that the law requires us to disclose the information. EIA will not sell any Personal Data/Information that it collects to third parties outside of EIA or to unsolicited third parties. EIA may disclose information that we collect from Users to add functionality to our Services with third-party services such as the webinar service.

The webinar service is maintained by a separate company that maintains their own Privacy Policy. Users are encouraged to view the privacy policies of third-party sites and companies.

Webinar Recordings

EIA records the course webinars via a webinar provider. The webinar recordings are made available to the User in the webinar and EIA administration. We utilize reasonable means to limit the ability to create copies of or share the webinar recordings. While we expect EIA administration to abide by our standards of conduct, please note we cannot control or monitor what Users ultimately do with their webinar recordings and disclaim all responsibility in that regard.

Social Media

Although EIA Social Media sites are linked on the EIA websites, newsletters, and promotional materials, use of social media sites such as Facebook, TikTok, and Instagram is purely optional. It is up to the User to decide whether or not to engage with Social Media content. EIA shall not have any liability or responsibility for the privacy practices of Social Media companies.

Accuracy of Data

EIA will make every reasonable effort to keep Users' Personal Data/Information accurate and up-to-date, and EIA will provide you with mechanisms to correct, amend, delete, or limit the use of your Personal Data/Information. As appropriate, this amended Personal Data/Information will be transmitted to those parties to which we are permitted to disclose your information. Having accurate Personal Data/Information about Users enables EIA to provide the best possible service.

Other Terms and Conditions

Users access to and use of EIA Services is subject to the Terms of Service as described in EIA Policies.

Children's Online Privacy Protection Act

For the parents or legal guardians of Users under the age of 18: The United States Congress passed a law called the Children's Online Privacy Protection Act of 1998 (COPPA), designed to protect children's privacy during use of the Internet. EIA has implemented practices consistent with the guidelines provided by the Federal Trade Commission to date. User's parent or legal guardian must consent to share information about the User. Parents or legal guardians enrolling their child in EIA agree that EIA may receive Personal Data/Information from children under the age of 13 to provide EIA Services to them. EIA does not share children's personally identifiable information with third parties without written consent from the parent or legal guardian. If you are a parent or legal guardian of a user under 13 you may, at any time, revoke your consent to allow your student to use the Services, refuse to allow EIA to further use or collect your child's Personal Data/Information, or direct EIA to delete all identifiable information regarding your child that you have provided. To do so, please contact us at the contact information on this webpage. However, if you do any of the foregoing, your child will not be able to use the Services at EIA. To the extent that EIA collects, uses, or discloses Personal Data/Information from children under the age of 13, it is done in strict accordance with this Privacy Policy and for the sole purpose of providing Services to the User. Click the following links if you would like more information about COPPA or How to Protect Your Child's Privacy,

Internet Safety

We are committed to providing appropriate content to our Users. The content on http://DrKirstenStein.com/ are appropriate for general audiences unless otherwise noted. Our Services provide links to external Web sites and resources that are not maintained by EIA. The external resource links, including videos, are reviewed for appropriateness before being linked to EIA Services. However, content on Web sites changes. EIA encourages parents and legal guardians to preview third-party content. EIA is not responsible for the content or privacy practices of these Web sites and resources.

Amendments

EIA reserves the right to modify this Policy at any time. EIA will announce changes to this policy in the weekly newsletter and on the website. Users should review and revisit this policy regularly. Users agree to the terms of this Policy.

Use for new purposes

EIA may use your personal information for reasons not described in this Policy where permitted by law and the reason is compatible with the purpose for which we collected it.

Retention

Personal Data and Information will be kept for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, as well as a reasonable period thereafter. For example, we keep account information for as long as the account is active, and for a reasonable period thereafter to ease reactivation if you choose to reactivate your account.

Your rights

You may ask us to take the following actions in relation to your personal information that we hold:

 Opt-out: If at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, please contact us at EncompassingItAll@gmail.com. Please note that we will continue to contact you via email to respond to requests and provide our Services.

You can submit these requests by email to: EncompassingItAll@gmail.com. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions.

Please note, if the User does any of the foregoing, the User will either not be able to participate in the Services or the Services will be limited. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us as described in EIA Policy or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator here.

Other

If EIA or any of its assets is acquired by a third party, personally identifiable information and other data acquired by EIA may be one of the assets transferred.

Contact Us

If you have any questions about EIA Advanced Academy's Policies, please contact us at Encompassing ItAll@gmail.com or send mail to the address above.

Last updated: February 14, 2023

DIRECT NOTICE TO PARENTS AND LEGAL GUARDIANS

Dear Parents and Legal Guardians,

This open notice or letter is in accordance with the U.S. Federal Trade Commission (FTC) Children's Online Privacy Protection Act (COPPA) and outlines our practices regarding children's personal information. Through COPPA, United States Federal Law requires organizations like EIA Advanced Academy, Inc. ("EIA") to obtain parental or legal guardian consent to collect, use, or disclose personal data or information for or from any users under 13. In order for EIA to provide the most effective services and avenues of communication with your student, EIA would like to collect personal information about and from your student. EIA requires parental or legal guardian consent for the collection, use, and disclosure of your student's information.

Personal Data/Information Collected by EIA

To provide EIA Services, EIA collects and stores Personally Identifiable Information from Users, including minors. EIA does not knowingly collect, use, or disclose Personally Identifiable Information about students that are under 13 years of age outside of the bounds of COPPA. The Personally Identifiable Information that EIA collects includes first and last names, year of birth, gender, postal addresses, email addresses, virtual webinar material (including written text, photographs, audio files, or video files which may contain the student's voice or image), and information included in the secured chat areas as well as messages to EIA personnel, when voluntarily submitted by students, parents, or legal guardians. EIA collects Personally Identifiable Information directly and voluntarily from its students that may contain personal or identifying information such as information voluntarily provided, sent messages, assignment submissions, and uploaded photographs, audio files, or video files when participating in the Services at EIA.

When a student participates in the Services at EIA, information about the student's patterns of usage, IP address, browser type, session data, access times, and other information relating to usage, choices, and preferences are automatically gathered by EIA operating systems. EIA uses this information to maintain operations and service quality. EIA does not require a student to share any information beyond what is necessary to provide EIA Services to the student.

How EIA will Use the Information Collected

The student information submitted to EIA by students, parents, or legal guardians is only gathered in order for EIA to provide the most effective services, personalized experience, and avenues of communication with your student. EIA will disclose student Personally Identifiable Information with third parties who provide Services to EIA Users. For example, the webinar service provides EIA webinar rooms. EIA will also disclose Personally Identifiable Information as

required by law. EIA will not sell, trade, or share student's Personally Identifiable Information outside of EIA without the express consent of the student and parent/legal guardian. EIA encourages parents and legal guardians to preview third-party content. EIA is not responsible for the content or privacy practices of these Web sites and resources.

Opting-Out of Providing the Requested Information

The student's Personally Identifiable Information we request from students, parents, and guardians is required for students to participate in EIA Services. At any time, students, parents, or legal guardians may revoke the consent to participate in EIA Services, have the student's information deleted, and/or refuse to allow EIA to further collect information about the student. By not allowing EIA to gather or use student information, the student will either not be able to participate in EIA Services or the Services will be limited as a request to delete records may lead to a termination of an account and other services.

Choices and Controls

Students, parents, and legal guardians may update the student's profile information by logging into their corresponding account. To request access to, change, or delete the personal information, Students, parents, or legal guardians must submit a written request by email to EncompassingItAll@gmail.com. Consent from a parent or legal guardian will be sought if the request comes from a student. A valid request with the understanding that students may not be able to participate in EIA Services to delete personal information will be accommodated within a reasonable time.

Parental Consent

As noted above, EIA needs your consent before we permit your child to use EIA services. You may provide your consent by completing and signing EIA COPPA Parental Consent on the forms issued by EIA administration.

If we do not receive your consent within a reasonable time, EIA will delete your online contact information from our records.

More Information

For more information about COPPA, please visit: COPPA FAQ

Contact Us

If you have any questions about EIA Advanced Academy's Policies, please contact us at Encompassing ItAll@gmail.com or send mail to the address above.