

OnePlan Portfolio Solutions Privacy Policy

Thank you for choosing to be part of our community at OnePlan Portfolio Solutions, LLC. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at contact@oneplan.ai

This Privacy Policy (“**Privacy Policy**” or “**Policy**”) applies to the corporate website accessible at <https://oneplan.ai/> (“**Website**”) and the cloud-based technology learning platform also accessible through that website, the video players used to view OnePlan courses, and the mobile applications (“**Platform**”, and together with the Website, collectively, the “**Site**”), all owned and operated by OnePlan Portfolio Solutions, LLC, a Delaware limited liability company (“**OnePlan**”, “**we**”, “**us**” or “**our**”). This Privacy Policy describes how OnePlan collects and uses personal information collected through the Website and the Platform (the “**Information**”). It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal Information.

This Privacy Policy sets out:

- The Information we collect about you
- How we use the Information we collect
- Who we give your Information to Control of your Information
- Your access to your Information and how long we keep it
- How we protect your Information
- Where we store your Information
- Use of Cookies
- Links to other websites
- Information about our participation in EU-US Data Privacy Framework;
- Public forums
- Payment processing
- Information about enforcement and dispute resolution
- Changes to this Privacy Policy
- Contact us

Data protection laws require companies to describe their role and responsibility when handling personal Information. To that end, please read this Privacy Policy carefully to understand our views and practices regarding your personal Information and how we will treat it. By engaging with the Website and the Platform you acknowledge you have read and understand this Privacy Policy.

When users access our Website and view information about us and our technology, communicate with us, download whitepapers, review marketing materials and register for events etc., OnePlan is acting as the “**data controller**”. When we are providing our SaaS platform to our users, OnePlan is acting as the “**data processor**”.

When an individual engages with the Platform because their employer has subscribed to a OnePlan product or service, or a Company Partnership Subscription (see below), then;

The user’s *employer* is the **data controller** with respect to the Information provided to us by that user. This information typically includes first name, last name, and business email address. When the user’s employer is considered the data controller in this way, OnePlan acts as a **data processor** under applicable data protection laws, meaning that we use the Information provided to us to provide a service to your employer.

When OnePlan processes data on behalf of a customer, data subject requests must be directed to the customer (the **data controller**). OnePlan will assist as required under the Data Processing Agreement.

OnePlan is the **data controller** for Information provided directly by the individual or as a result of interacting with the Platform, including assessment data, a secondary email address, additional profile details such as job title, personal website URL, a short bio, social platform handles, and demographic Information such as your gender, year of birth, and

your work industry. To be clear, none of these additional profile details are required to utilize our Site, but we can offer you an enhanced experience if you provide it.

When an individual signs up as a user of the Platform via an Individual Plan, OnePlan is the **data controller** for all personal Information provided by that user and collected by the Platform as the user accesses and uses it.

The Information we collect about you.

We value your trust. In order to honor that trust, OnePlan adheres to ethical standards in gathering, using, and safeguarding any Information you provide.

We collect and process the following personal Information from you:

Information you give to us:

In Short: We collect the personal Information that you provide to us such as name, address, contact information, passwords and security data, and payment information.

This is Information about you that you give us directly when you interact with us. You may give it to us by filling out a form on our Site, corresponding with us by phone, e-mail, or at an in-person event. It includes information necessary to register for a subscription, pay for a subscription, or place an order for other services we provide. It also includes information shared when you participate in a discussion board, share on social media via our Site, enter a competition or promotion, submit a query, report feedback about a problem within our Site, or any of the other interactive services made available on and through our Site. When you create an account for our Platform, we require that you provide your first name and last name, and your email address. When you purchase a subscription, we will need payment and billing information, which typically includes an address and valid credit card information. Additionally, you can provide additional personal information to complete a profile within our system.

Information we collect about you from your use of our Site.

We will automatically collect information from you each time you visit our Site. This includes technical information, information about your visit, and information about your activity on our Site, such as courses searched and viewed, page response times, download errors, length of visit to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), methods to browse to and away from a page, and methods used to contact our sales and support teams. Technical information may also include the Internet protocol address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating systems, and device platform.

Information we receive from other sources.

This is information we receive about you from third parties that we work closely with to provide, promote, and improve our services. These third parties include business partners, vendors who assist in technical and payment services, advertising networks, analytics providers, and search information providers.

How we use the Information we collect.

Information you give to us:

OnePlan uses the personal Information you provide in a manner that is consistent with this Privacy Policy. We use your personal Information to provide our services on our Site, including services arising from any obligations set forth in a contract between you and us. These services may include providing access to our course library, administration of your account, billing, and notifying you of changes to our service or your account. This data will also be used to allow you to participate in the interactive features of our Site or to provide you with information you may have requested from us, including whitepapers, access to webinars, or the like.

We also use your personal Information together with other personally non-identifiable information to help us better understand our users, to personalize and improve your experience with our Site, and to improve the content and functionality of our Site. This may include providing information about our goods and services that we feel may interest you and enhance your interaction with our Site. We will communicate with you about these goods and services via email, direct mail, telephone, or on our Site. These communications may include newsletters, promotional emails, product

updates, or market research requests. We will use your Information for this purpose only if you have given your consent to receive marketing material from us at the point we collected your Information, where required by law, or otherwise in our legitimate interests, provided these interests do not override your right to object to such communications.

In the course of providing our services, we may use Azure OpenAI services, however, your personal Information is not used to train any shared models.

Information we collect about you from your use of our Site:

We will use this information in our legitimate interests (where we have considered these are not overridden by your rights), to administer our Site, and for internal operations, including troubleshooting, data analysis, testing, research, and statistical survey purposes. We will also use this information to keep our Site safe and secure, for measuring the effectiveness of how we present content and how we market and advertise. We use non-personally identifiable information in our log files to analyze trends, to administer our Site, to track users' movements in and around our Site, and to gather demographic information about our user base as a whole. We also utilize unstructured machine learning technologies to understand user behaviors and to provide user-specific recommendations and other personalization of our Site experience.

Information we receive from other sources:

We will combine this information with Information you give to us and information we collect about you in our legitimate interests (where we have considered that these are not overridden by your rights). We will use this information and the combined Information for the purposes set out above (depending on the types of information we receive).

Who we give your Information to:

We consider your personal Information to be a vital part of our relationship with you and as such, we do not sell your personal Information to third parties. There are, however, certain circumstances in which we may share your personal Information with certain third parties, as follows:

Agents, Consultants and Related Third Parties (This section applies to use of our Website only):

We sometimes hire other companies to perform certain business-related functions, such as sending email on our behalf, payment processing, or conducting market research. Where permitted by law and authorized in customer agreements, we may also share your email address with third parties, such as Facebook, LinkedIn, and Twitter in order to provide custom marketing materials for you on their platforms. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function. These companies are not permitted to use any personal Information that we share with them for any other purpose aside from providing services to us.

When OnePlan is providing its SaaS service to you as a data processor, we will also be using third party processors that, under data protection laws, are referred to as subprocessors. A current list of OnePlan's subprocessors is available at: <https://trust.oneplan.ai/subprocessors>.

Business Plans and Company Partnership Subscriptions.

We partner with certain third parties to provide our services to their employees or their community members. As part of such partnerships, a third party may pay for the subscription for its employees or community members or otherwise contract with OnePlan to make your subscription available to you, and OnePlan may share information about your use of our services with the third party. If your subscription was provided by your employer or community sponsor including company partnerships, we may share Information you provide, or information that we may otherwise collect through your registration and use of our services, with such third party. This information may include course viewing history, course viewing time, course or assessment completion, course quality ratings and feedback, certifications, performance-related metrics, and other personal Information.

Business Transfers.

As our business evolves, we may sell or acquire businesses or assets. Your personal Information may be transferred to a buyer or other successor in the event of a corporate sale, merger, reorganization, dissolution, or similar event in which personal Information held by us about our Site users is among the assets transferred.

Legal Requirements.

In certain situations, OnePlan may be required to disclose personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We reserve the right to disclose your personal Information as required by law and when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order, or similar legal process served on us or our Site.

We will take reasonable steps to ensure that we only collect that personal Information that is relevant for the purposes for which it is to be used. Furthermore, we will not process your personal Information in a way that is incompatible with these purposes.

Control of your Information.

When you register, or otherwise give us personal Information, we will not share that Information with third parties without your permission, other than for the limited exceptions already listed. Your Information will only be used for the purposes stated in this Privacy Policy. When OnePlan is acting as a **Data Processor**, we will only process personal information in accordance with the instructions given by the data controller. When OnePlan is acting as a **Data Controller**, we will act in accordance with your permission to offer you our services and as otherwise instructed by you. We will also give you the ability to opt out before we disclose your personal Information to a third party or otherwise use your personal Information for purposes that are fundamentally different from the purpose for which it was originally collected.

If you would like to discontinue receiving communications from us, you may update your email preferences by using the “Unsubscribe” link found in emails we send to you, or on the Communications Preferences Dashboard located in your member profile on our Site, or by contacting us at support@oneplan.ai. Please note that we may not include the opt-out information in e-mails that are transactional in nature and are not marketing communications (i.e., e-mails concerning your order, the website’s Terms of Use, etc.). You will not have the ability to opt-out of receiving transactional emails via the Communications Preferences Dashboard. If you have questions or concerns regarding a transactional e-mail, please contact us.

Your access to your Information and how long we keep it.

Upon request, OnePlan will provide you with information about whether we hold, or process on behalf of a third party, any of your personal Information. To request this information please contact us at support@oneplan.ai.

We will provide you with the means to ensure that your personal Information is correct and current. If you have registered to use the Platform, we will provide a way for you to access and change your profile on our Platform. We will also allow you to completely delete your profile along with all personal Information associated with that profile, although this option may significantly degrade your experience with our Platform. You may request deletion by accessing your profile and clicking on the link available there. Alternatively, you may contact us at support@oneplan.ai. We will respond to your request within a reasonable timeframe. Requesting deletion of your account means your personal information is permanently deleted and cannot be retrieved.

If you would like to view your personal Information that we hold at any time, you may access your profile from our Site.

We retain your information while your account is active or as needed to provide you services. Thereafter, we will retain your personal Information for thirty (30) days after your contract with us expires, or has been terminated by either of us. After such thirty (30) day time period, your Information, including your personal Information, together with all other data in your account will be permanently deleted.

Data backups and logs are retained on limited rotation schedules (typically up to 30 days) and cannot be modified.

How we protect your information.

The security of your personal Information is important to us. When you enter sensitive information (such as a credit card number) on our checkout page, your Information is sent over an authenticated and encrypted connection using Transport Layer Security (TLS).

We store your personal Information only on servers with limited access that are located in controlled facilities, and use a variety of technologies and procedures, including but not limited to, Multi-Factor Authentication (“MFA”), encryption of

data at-rest, least privilege user access, audit logging and vulnerability scanning to protect your personal information from loss, misuse, unauthorized access, disclosure, alteration and destruction.

OnePlan maintains SOC 2 (System and Organization Controls 2) Type II, ISO 27001 certifications to ensure that our data protection system and procedures meet industry standards and best practices.

Nonetheless, no communication via the Internet can ever be 100% secure, and no security measures can ever be assured to be effective. Accordingly, you are advised to use caution and discretion when determining what personal information you disclose to us.

If you have any questions about security on our Site, contact us as follows:

Email: support@oneplan.ai

Phone: (866) 731-7011

Where we store your Information

The data that we collect from you is transferred to, and stored in the OnePlan tenant region you select during provisioning and implementation of your OnePlan products. OnePlan maintains five (5) geographically diverse tenant locations for this purpose:

- Australia: <https://au.oneplan.ai>
- United States: <https://my.oneplan.ai>
- Canada: <https://ca.oneplan.ai>
- Netherlands: <https://eu.oneplan.ai>
- GCC: <https://us.oneplan.ai>

*The GCC is a specialized version of Microsoft 365 with enhanced security features. It is purpose built for US Agencies and their contractors. All data is stored in the continental United States and is managed by highly screened and trained personnel. GCC helps agencies stay compliant with federal regulations while using modern cloud tools and handling highly sensitive data.

Cross-Border Transfers of Personal Data:

When serving as a **Data Processor**, OnePlan shall not process personal data originating from the European Economic Area, the United Kingdom, or Switzerland ("**European Personal Data**") outside of those jurisdictions unless such transfer complies with applicable Data Protection Laws. OnePlan maintains an active certification under the EU–U.S. Data Privacy Framework, the UK Extension, or the Swiss–U.S. Data Privacy Framework (collectively, the "**DPF**"), and shall (a) maintain such certification during any time that it may or will process European Personal Data, (b) post copies of current certifications in its Trust Center ([Trust Center - OnePlan Portfolio Solutions](#)), and (c) process all such European Personal Data in accordance with the DPF Principles.

If the DPF is invalidated, suspended, or otherwise unavailable, OnePlan shall implement an alternative lawful transfer mechanism, including the European Commission’s Standard Contractual Clauses (Module 2 or 3, as applicable), together with any required UK Addendum or Swiss Addendum. OnePlan shall implement supplementary measures where required to ensure that the level of protection for European Personal Data is essentially equivalent to that guaranteed within the originating jurisdiction. OnePlan shall promptly notify its users of any change in its ability to comply with this Section.

Use of Cookies

The Site uses cookies to collect and store certain information. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you. Cookies allow us to create a unique device ID, enable you to be remembered when using that computer or device to interact with our Site and online services, and can be used to manage a range of features and content, including storing searches and presenting personalized content.

Our Site uses cookies to distinguish you from other users of the Site. This helps us to provide you with an optimized and personalized user experience when you interact with our Site. Our use of cookies also enables us to improve our Site and offer all of its users a better experience.

Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. We also give you information about how to disable cookies in the table below. However, you may not be able to take full advantage of the features and functionality made available on our Site if you choose to do so.

A number of cookies we use last only while you are on our Site and expire when you close your browser or exit our Site. Other cookies are used to remember you when you return to our Site and will last for longer. We use these cookies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate interests (where we have considered that these are not overridden by your rights), and, in some cases, where required by law, or where you have expressly consented to their use. The full OnePlan Portfolio Solutions cookie policy is available at: <https://oneplan.ai/cookie-policy/>

We use the following types of cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our Website and under our Terms with you. They include, for example, cookies that enable you to log into secure areas of our Site, use a shopping cart, or make use of electronic billing services.

Analytical/performance cookies. These are cookies that enable us to recognize and count the number of visitors that come to our Website, and to see how those visitors move around our Site when they are using it. This helps us for our legitimate interests of improving the way our Site works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These cookies are used to recognize you when you return to our Website. This enables us, subject to your choices and preferences, to personalize our content, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our Website, the pages you have visited, and the links you have followed. We will use this information, subject to your choices and preferences, to make our Site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

We may also work with advertising networks that gather information about the content on our Site you visit and on information on other websites and services you visit. This may result in you seeing advertisements on our Site or our advertisements when you visit other websites and services of third parties. For more information about how to turn this feature off, see below or visit <https://preferences-mgr.truste.com> and learn more about opting out of targeted ads. There you will find links for resources specifically for citizens of the United States, Canada, and the European Union.

Disabling cookies

The effect of disabling cookies depends on which cookies you disable but, in general, our Site may not operate properly if all cookies are switched off. If you only disable third party cookies, you will not be prevented from making purchases on our Site. If you disable all cookies, you will be unable to complete a purchase on our Site.

If you want to disable cookies on our Site, you need to change your web browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below:

For Microsoft Edge:

- Choose the menu “Tools” then “Internet Options”
- Click on the “Privacy” tab
- Select the appropriate setting

For Google Chrome:

- Choose Settings> Advanced

- Under “Privacy and Security,” click “Content Settings”.
- Click “Cookies”

For Safari:

- Choose Preferences > Privacy
- Click on “Remove all Website Data”

For Mozilla Firefox:

- Choose the menu “Tools” then “Options”
- Click on the icon “Privacy”
- Find the menu “Cookie” and select the relevant options

For Opera 6.0 and further:

- Choose the menu Files”> “Preferences”

Privacy

- Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on our Site.
- Except for essential cookies, all cookies used on our Site will expire after two (2) years.

Links to other websites

This Privacy Policy applies only to our Site. The Site may contain links to other web sites not operated or controlled by us. The policies and procedures described here do not apply to web sites or other services that OnePlan does not operate or control. These links from our Site do not imply that we endorse or have reviewed those web sites or other services. We suggest contacting those services directly for information on their privacy policies.

Public forums

The Site may, from time to time, make chat rooms, message boards, news groups, or other public forums available to its users, whether by way of our own services or by way of the services or features of a third party. Any information that is disclosed in these areas becomes public information and you should exercise caution when using these areas and avoid posting any personal or sensitive information. If a separate login is required to use these areas, please be aware that you may need to also log out separately.

Payment processing

When you purchase a subscription directly from OnePlan, payment details you provide in the designated checkout page on our Site will be encrypted using the Transport Layer Security (TLS) protocol before they are submitted to us over the internet. Payments made on our Site are made through one of our payment gateway providers, Cybersource, Adyen, or PayPal (“Payment Processors”), which may be changed from time to time. You will be providing credit or debit card information directly to the Payment Processor which operates a secure server to process payment details, encrypting your credit/debit card information and authorizing payment. Information which you supply to the Payment Processor is not within our control and is subject to the Payment Processor’s own privacy policy and terms and conditions.

Information about enforcement and dispute resolution

We will conduct compliance audits of our relevant privacy practices to verify compliance with this Privacy Policy. Any OnePlan employee that we determine has acted in violation of this Privacy Policy will be subject to disciplinary action up to and including termination of employment.

Any questions or concerns regarding our use or disclosure of personal information should be addressed to Customer Support at support@oneplan.ai. We will investigate and attempt to resolve any complaints and disputes regarding the use and disclosure of personal information in accordance with the provisions of this Privacy Policy.

OnePlan has committed to refer unresolved Privacy Shield complaints to TRUSTe, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgement of your complaint from us, or if we have not resolved your complaint, please contact TRUSTe for more information or to file a report. The services of TRUSTe are provided at no cost to you.

Changes to this Privacy Policy

As our Site evolves, this Privacy Policy will need to evolve as well to cover new situations. To ensure that you are kept informed of changes, check this Privacy Policy periodically as we will update the date at the top of the document any time we make a change. If we make material changes to this Privacy Policy, we will post the revised policy on this page and will send a notice via email or our Site to all registered users of the Platform. Your continued use of our Site after any such changes constitutes your acceptance of the new Privacy Policy. If you do not agree to abide by these or any future version of the Privacy Policy, you do not have permission to use or access (or continue to use or access) our Site.

Contact us

Questions or comments regarding this Privacy Policy should be submitted to OnePlan by e-mail or phone as follows:

Email: support@oneplan.ai

Phone: 866-731-7011

Physical Address: 251 N City Dr., Suite 128F #113, San Marcos, CA 92078