

## **ONLINE PRIVACY POLICY AGREEMENT**

**Breaking Point LLC,**  
Doing Business As/Trading As:  
**Jennifer Lauer Tutoring**  
**Blue Horse Threat Mitigation Strategies**

June 15, 2020

Breaking Point LLC (breakingptllc.com), doing business as Jennifer Lauer Tutoring, and Blue Horse Threat Mitigation Strategies (Blue Horse TMS), collectively referred to as “The Company”, values the privacy of our users. This Privacy Policy (the “Policy”) was developed to help you understand how your personal information is collected and used as users of, and visitors to, our website and services. It also details what we will and will not do with the information we collect. This Policy has been developed to ensure that those affiliated with The Company are aware of our commitment, and the realization of our obligation, not only to meet, but exceed, most existing privacy standards.

We reserve the right to make changes to this Policy at any given time. If you want to make sure that you are up to date with the latest changes, we strongly advise frequent visits to this page. In addition, it would be beneficial to bookmark this page *right now*. If at any point in time The Company decides to make use of any personally identifiable information on file in a manner vastly different from that which was stated upon the initial collection of your information, users will be notified by email in a timely manner. At that time users shall have the option to permit the use of their information in the aforementioned separate manner.

This Policy applies to The Company, and it governs any and all data collection and usage by us. Through the use of breakingptllc.com and other websites owned, operated, and maintained by The Company, you are therefore consenting to the data collection procedures expressed in this Policy.

Please note that this Policy does not govern the collection and use of information by companies that The Company does not control, nor by individuals not employed or managed by us. If you visit a website that is mentioned or linked to, be sure to review all privacy policies for all associated and linked sites before providing the site/s with information. It is highly recommended and suggested that you review the privacy policies and statements of any website you choose to use or frequent to better understand the way in which those websites gather, garner, make use of, and share the information collected.

Specifically, this Policy will advise and inform you of the following:

1. What personally identifiable information is collected from you through our website;
2. Why we collect personally identifiable information and the legal basis for said collection;
3. How we use the collected information and with whom it may be shared;
4. What choices are available to you regarding the use of your data; and
5. The security procedures in place to protect the misuse of your information.

### **INFORMATION WE COLLECT**

It is always your personal decision in disclosing personally identifiable information to us, although, if you choose to *not do so*, we reserve the right not to register you as a user or provide you with any products or services. This website collects various types of information, such as:

- Voluntarily provided information which may include: name, address, email address, billing and/or credit card information, etc. which may be used when you purchase products and/or services and to deliver the services you have requested.
- **In the case of personal identification information for CHILDREN AGES THIRTEEN (13) AND UNDER**, information will be stored and used only after being submitted by a verified parent and/or guardian for the express purpose of using Jennifer Lauer Tutoring, an affiliate of The Company (see the section called: Children under the age of thirteen (13)).

In addition, The Company may have the occasion to collect non-personal anonymous demographic information, such as age, gender, household income, political affiliation, race and religion, as well as the type of browser you are using, IP address, or type of operating system, which will assist us in providing and maintaining superior quality service.

Please be assured that this site will only collect personal information that you knowingly and willingly provide to us by way of surveys, completed membership forms, and emails. It is our intent and the intent of this site to use personal information only for the purpose for which it was requested, and any additional uses specifically provided for in this Policy.

### **WHY WE COLLECT INFORMATION AND FOR HOW LONG**

We are collecting your data for several reasons:

- To better understand your needs and provide you with the services you have requested;
- To fulfill our legitimate interest in improving our services and products;
- To send you promotional emails containing information we think you may like when we have your consent to do so;
- To contact you to fill out surveys or participate in other types of market research, when we have your consent to do so; and
- To customize our website according to your online behavior and personal preferences.

The data we collect from you will be stored for no longer than necessary. The length of time we retain said information will be determined based upon the following criteria: the length of time your personal information remains relevant; the length of time it is reasonable to keep records to demonstrate that we have fulfilled our duties and obligations; any limitation periods within which claims might be made; any retention periods prescribed by law or recommended by regulators, professional bodies or associations; the type of contract we have with you, the existence of your consent, and our legitimate interest in keeping such information as stated in this Policy.

### **USE OF INFORMATION COLLECTED**

The Company does not now, nor will it in the future, sell, rent or lease any of its customer lists and/or names to any third parties.

The Company may collect and may make use of personal information to assist in the operation of our website and to ensure delivery of the services you need and request. At times, we may find it necessary to use personally identifiable information as a means to keep you informed of other possible products and/or services that may be available to you from breakingptllc.com.

The Company uses various third-party social media features including, but not limited to Instagram, Tik Tok, Twitter, FaceBook, Pinterest, and other interactive programs. These may collect your IP address and require cookies to work properly. These services are governed by the privacy policies of the providers and are not within the control of The Company.

## **DISCLOSURE OF INFORMATION**

The Company may not use or disclose the information provided by you except under the following circumstances:

- As necessary to provide services or products you have ordered;
- In other ways described in this Policy or to which you have otherwise consented;
- In the aggregate with other information in such a way that your identity cannot reasonably be determined;
- As required by law, or in response to a properly issued subpoena or search warrant;
- To outside auditors who have agreed to keep the information confidential;
- As necessary to enforce the Terms of Service;
- As necessary to maintain, safeguard, and preserve all the rights and property of The Company

## **NON-MARKETING PURPOSES**

The Company greatly respects your privacy. We do maintain and reserve the right to contact you if needed for non-marketing purposes (bug alerts, security breaches, account issues, and/or changes in The Company products and services). In certain circumstances, we may use our website, publications, or other media contact methods to post a notice.

## **CHILDREN UNDER THE AGE OF 13**

Blue Horse Threat Mitigation Strategies' website is not directed to, and does not knowingly collect personal identifiable information from, children under the age of thirteen (13). If it is determined that such information has been inadvertently collected on anyone under the age of thirteen (13), we shall immediately take the necessary steps to ensure that such information is deleted from the customer/visitor database of Blue Horse Threat Mitigation Strategies.

**Exceptions:** Any personally identifiable information regarding a person whose age is thirteen (13) years or younger will be immediately deleted from the breakingptllc system except in the case of information provided by a parent or guardian for the express purpose of using the services of breakingptllc or one of its affiliates or subsidiaries, such as identified as within The Company. Any information collected for persons thirteen (13) years of age or younger will be done so with the permission of a verified parent or guardian, this includes the visiting and/or use of the website.

## **Specific issues for personal identification information of CHILDREN THIRTEEN (13) YEARS OF AGE OR YOUNGER:**

An affiliate of The Company, Jennifer Lauer Tutoring, **IS DIRECTED and purposed to use personally identifiable information voluntarily provided by verified parents and/or guardians of CHILDREN THIRTEEN (13) YEARS OF AGE OR YOUNGER**, as well as children *over the age of thirteen (13)*, for the purposes of middle school, high school, and college-level STEM (Science,

Technology, Engineering, and Mathematics) education provided via the website and through various online services such as Discord, Google Hangouts, Skype, Zoom, and others.

### **UNSUBSCRIBE OR OPT-OUT**

All users and visitors to our website have the option to discontinue receiving communications from us by way of email or newsletters. To discontinue or unsubscribe from our website please send an email to us at: [breakingptllc@gmail.com](mailto:breakingptllc@gmail.com). If you wish to unsubscribe or opt-out from any third-party websites, you must go to that specific website to unsubscribe or opt-out. The Company will continue to adhere to this Policy with respect to any personal information previously collected.

### **LINKS TO OTHER WEBSITES**

Our website does contain links to affiliate and other websites. The Company does not claim nor accept responsibility for any privacy policies, practices, and/or procedures of other such websites. Therefore, we encourage all users and visitors to be aware when they leave our website and to read the privacy statements of every website that collects personally identifiable information. This Privacy Policy Agreement applies only and solely to the information collected by our website.

### **NOTICE TO EUROPEAN UNION USERS**

The Company's operations are located primarily in the United States. If you provide information to us, the information will be transferred out of the European Union (EU) and sent to the United States. (The adequacy decision on the EU-US Privacy Policy became operational on August 1, 2016. This framework protects the fundamental rights of anyone in the EU whose personal data is transferred to the United States for commercial purposes. It allows the free transfer of data to companies that are certified in the U.S. under the Privacy Shield.) By providing personal information to us, you are consenting to its storage and use as described in this Policy.

### **SECURITY**

The Company takes precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline. Wherever we collect sensitive information (e.g. credit card information), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the webpage.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers and servers in which we store personally identifiable information are kept in a secure environment. This is all done to prevent any loss, misuse, unauthorized access, disclosure or modification of the user's personal information under our control.

Breakingptllc.com also uses Secure Socket Layer (SSL) for authentication and private communications to build users' trust and confidence in the internet and website use by providing simple and secure access and communication of credit card and personal information. In addition, The Company is a licensee of TRUSTe.

## **ACCEPTANCE OF TERMS**

By using this website, you are hereby accepting the terms and conditions stipulated within the Privacy Policy Agreement. If you are not in agreement with our terms and conditions, then you should refrain from further use of our sites. In addition, your continued use of our website following the posting of any updates or changes to our terms and conditions shall mean that you agree and accept such changes.

## **HOW TO CONTACT US**

If you have any questions or concerns regarding the Privacy Policy Agreement related to our website, please feel free to contact us at the following email, telephone number, or mailing address:

**EMAIL:** [breakingptllc@gmail.com](mailto:breakingptllc@gmail.com)

**PHONE:** 301-335-7799

**MAILING ADDRESS:** 1091 Rosella Drive, White Pine, TN 37890