

PRIVACY POLICY

OUR POLICY

This Privacy Policy (the “Privacy Policy”) describes how Qwiklabs Inc. (“Qwiklabs,” “we”, “us” and/or “our”) collects, uses, and discloses information about you, including when using our Services governed under the [Qwiklabs Terms of Service](#) (the “Terms of Service”) or when accessing other websites that link to this Privacy Policy, such as <https://www.cloudskillsboost.google/>. All capitalized terms in this Privacy Policy shall have the meaning set forth in the Terms of Service, or the meaning set forth in this Privacy Policy if no definition is provided in the Terms of Service. This Privacy Policy sets forth our policies with respect to information including personally identifiable data (“Personal Data”) and other information that is collected from you when using or registering for the Service.

For clarity, this Privacy Policy does not apply to Personal Data that we process on behalf of our enterprise and organization customers (“Organizations”). Organization end users who have questions about the way their Personal Data is collected, processed, and disclosed should direct their questions to the Organization whose account they use the Services through.

INFORMATION WE COLLECT

When you interact with us through the Service, we may collect Personal Data and other information from you, as further described below:

- We collect Personal Data from you when you voluntarily choose to provide such information such as when you contact us with inquiries, respond to one of our surveys, register for access to the Service or use certain features of the Service.

Wherever we collect Personal Data we make an effort to provide a link to this Privacy Policy. We also collect information about your activity in our Services, which may include details on how you used our Services, Internet protocol address, and the labs and quests you've taken, class history and badges earned. We may also collect information about you from trusted partners, including other learning platforms.

- **Non-Identifiable Data:** When you utilize the Service, we may receive certain personally non-identifiable information about your use of the Service. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you. We may store such information ourselves or it may be included in databases owned and maintained by our affiliates, Agents or service providers. We may use such information and pool it with other information to track, for example, the total number of visitors to the Service, the number of visitors to each page of the Service, and the domain names of our visitors' Internet service providers. It is important to note that no Personal Data is available or used in this process.
- **Cookies:** In operating the Service, we may use cookies. A cookie is a piece of information that the computer or computers that host our Service give to your browser when you access the Service. Our cookies help provide additional functionality to the Service and help us analyze usage of the Service more accurately. For instance, our Service may set a cookie on your browser that keeps you from needing to remember and then enter a password more than once during a visit to the Service. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some features of the Service.
- **Aggregated Personal Data:** In an ongoing effort to better understand and serve the users of the Services, we may conduct research on our end users' demographics, interests and behavior based on the Personal Data and other

information provided to us. This research may be compiled and analyzed on an aggregate basis, and we may share this aggregated data with our affiliates, agents and business partners, including Google, LLC. This aggregate information does not identify you personally. We may also disclose aggregated user statistics in order to describe our Service to current and prospective business partners, and to other third parties for other lawful purposes.

OUR USE OF YOUR PERSONAL DATA AND OTHER INFORMATION

We will use the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the Personal Data you provide to answer your question or resolve your problem. Also, if you provide Personal Data in order to obtain access to the Service, we will use your Personal Data to provide access to such Service and to monitor your use of such Service. We may also use your Personal Data and other personally non-identifiable information collected through the Service to help us improve the content and functionality of the Service, to better understand our users and to improve the Service. We may use this information to contact you in the future to tell you about services we believe will be of interest to you.

We use information to help improve the safety and reliability of our Service. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm Qwiklabs, our users, or the public. When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

We may communicate with you through email and notices posted via the Service. These communications may include a series of welcome emails that help inform you about various features of the Service. Please be aware that you may receive certain emails

from us related to the proper functioning of your account. We, along with your Lab Sponsor and their affiliates, may send you promotional information unless you have opted out of receiving such information. If you wish to opt-out of receiving promotional emails, please click the "unsubscribe" link at the bottom of the email or send us a message using the contact information below.

OUR DISCLOSURE OF YOUR PERSONAL DATA AND OTHER INFORMATION

There are certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, including as set forth below:

- With your consent: We will share personal information with companies, organizations or individuals outside of Qwiklabs when we have your consent to do so. We require opt-in consent for the sharing of any sensitive personal information.
- Service Providers, Agents and Related Third Parties: We may hire other companies to perform certain business-related functions. Examples include mailing information, maintaining databases and processing payments. If we employ another company to perform a function of this nature, we may need to provide them with access to certain Personal Data.
- Lab Sponsors, Business Partners and Related Third Parties: We may enter into agreements with business partners and other third parties to make the Service available to you. For example, our Service may be provided to you in conjunction with a Lab Sponsor and/or its affiliates. Accordingly, we may share with such business partners and third parties, including any Lab Sponsor and/or affiliates, information including Personal Data so the business partner or other third party can effectively work with us to manage or operate the corresponding Service or otherwise make the Service available for your use.
- Legal Requirements: We may also disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply

with a legal obligation, (ii) protect and defend our rights or property, (iii) act in urgent circumstances to protect the personal safety of users of the Service or the public, or (iv) protect against legal liability.

- Business Transfers: As we develop our business, we might sell or buy businesses or assets. In the event of a sale, merger, reorganization, dissolution or similar event relating to all or a portion of our business, assets relating to the Service, including Personal Data, may be part of the transferred assets.
- Affiliates: Qwiklabs is a part of Google and we may share Personal Data between and among our current and future parents, affiliates, and subsidiaries and other companies under common control and ownership, including with Google, LLC.

MANAGING AND DELETING YOUR INFORMATION

Reviewing, and Updating Your Information

When you're signed into your Qwiklabs account, you can always review and update information by visiting your account profile.

Exporting, Removing & Deleting Your Information

You can export a copy of content in your Qwiklabs account if you want to back it up or use it with a service outside of Qwiklabs by contacting us at support@qwiklabs.com. You may update, correct, or delete your profile information and preferences at any time by accessing your account settings page or editing your Qwiklabs account profile through the Services.

You can also delete your labs by using the available tools in our Services. If desired, you can delete your entire Qwiklabs account, including all information associated with your account such as lab and quest progress, class history, and badges earned by choosing that option in your account settings page.

Please note that while your deletions are reflected promptly in active member databases, in some cases, we retain data for limited periods when it needs to be kept for legitimate business or legal purposes. See “Data Retention” below for more information.

There are other ways to control the information Qwiklabs collects whether or not you’re signed in to a Qwiklabs account, including configuring your browser to indicate when Qwiklabs has set a cookie in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our Service relies on cookies to function properly.

DATA RETENTION

Information Retained Until You Remove It

As we describe above, you can delete your entire Qwiklabs account, including all information associated with your account such as lab and quest progress, class history, and badges earned by using the available tools in our Services. In some cases, rather than provide a way to delete data, we store it for a predetermined period of time. For each type of data, we set retention timeframes based on the reason for its collection.

Information Retained For Extended Time Periods for Limited Purposes

Sometimes business and legal requirements require us to retain certain information for specific purposes for an extended period of time. Reasons we might retain some data for longer periods of time include:

- Security, fraud & abuse prevention
- Financial record-keeping
- Complying with legal or regulatory requirements
- Ensuring the continuity of our services

YOUR CHOICES

When you sign up for the Service, we ask you to provide Personal Data. If you do not wish to provide such Personal Data, you may not use the Service. If we want to use Personal Data in a manner different than the purpose for which it was collected, we will ask for your consent prior to doing so. If we propose to use Personal Data for any purposes other than those described in this Policy and/or in the specific notice provided through the Service, we will offer you an effective way to opt out of our use of your Personal Data for those other purposes.

EXCLUSIONS

This Privacy Policy shall not apply to any unsolicited information you provide to us through this Service or through any other means. This includes, but is not limited to, information posted to any public areas of the Service (collectively, "Public Areas"), any ideas for new products or modifications to existing services, and other unsolicited submissions (collectively, "Unsolicited Information"), including all Creator Content as that term is defined in the Terms of Service. All such Unsolicited Information shall be deemed to be non-confidential and we shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution. Please also note that any Personal Data or other information you provide to be displayed in your publicly available online profile will be displayed for others to see and thus will not be subject to the terms of this Privacy Policy. We cannot and will not be responsible for what third parties do with any Personal Data or other information that you choose to make publicly available. As such, we advise that you exercise great care in determining what information you choose to make publicly available through the Service.

CHILDREN

We do not knowingly collect Personal Data from children under the age of 16, or the age of consent in your country, and do not target the Service to children under such age. If

you are under the relevant age of consent in your country, please do not submit any Personal Data through the Service. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide Personal Data on the Service without their permission. If you have reason to believe that a child under the age of consent has provided Personal Data to us through the Service, please contact us at support@gwiklabs.com, and we will endeavor to delete that information from our databases.

LINKS TO OTHER WEBSITES

This Privacy Policy applies only to the Service. The Service may frame or contain references or links to other websites not operated or controlled by us ("Third Party Sites"). The policies and procedures we describe here do not apply to Third Party Sites. The links from the Service do not imply our review or endorsement of Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

SECURITY

We take reasonable steps to protect the Personal Data provided via the Service from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. These steps include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store Personal Data. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from the Service may not be secure. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any Personal Data to us via the Internet.

DATA INTEGRITY

We process Personal Data only for the purposes for which it was collected and in accordance with this Privacy Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the Personal Data needed to provide or improve our Services. We take reasonable steps to ensure that the Personal Data we process is accurate, complete, and current, but we depend on our users to update or correct their Personal Data whenever necessary.

COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

Data Transfers

Your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this Privacy Policy. We also comply with the EU-US and Swiss-US Privacy Shield Frameworks relating to the transfer of data (see “EU-U.S. AND SWISS-U.S. PRIVACY SHIELD FRAMEWORKS” below for more information).

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

European Requirements

If European Union (EU) or United Kingdom (UK) data protection law applies to the processing of your information, you can exercise your right to request access to, update, remove, and restrict the processing of your information. You also have the right to

object to the processing of your information or export your information to another service. Please contact us at support@qwiklabs.com to exercise these rights.

If you have any questions, you may contact us at support@qwiklabs.com. If you have concerns regarding your rights under local law, you can contact your local data protection authority. For the purposes of EU data protection law, Qwiklabs has appointed Google Cloud EMEA Ltd. as its local representative in the EU/EEA. Google Cloud EMEA Ltd. is located at Gordon House, Barrow Street, Dublin 4, Ireland (Registered Number: 660412). For the purposes of UK data protection law, Qwiklabs has appointed Google UK Ltd. as its local representative in the UK. Google UK Limited is located at Belgrave House, 76 Buckingham Palace Road, London, SW1W 9TQ, UK (Registered Number: 03977902).

We process your information for the purposes described in this Privacy Policy, based on the following legal grounds:

With your consent

We ask for your agreement to process your information for specific purposes and you have the right to withdraw your consent at any time.

When we're pursuing legitimate interests

We process your information for our legitimate interests while applying appropriate safeguards that protect your privacy. This means that we process your information for things like:

- Providing, maintaining, and improving our Service to meet the needs of our users
- Developing new products and features that are useful for our users
- Understanding how people use our Service to ensure and improve the performance of our Service

- Customizing our Service to provide you with a better user experience
- Marketing to inform users about our Service
- Detecting, preventing, or otherwise addressing fraud, abuse, security, or technical issues with our Service
- Protecting against harm to the rights, property or safety of Qwiklabs, our users, or the public as required or permitted by law
- Performing research that improves our Service for our users and benefits the public
- Fulfilling obligations to our partners like Lab Sponsors
- Enforcing legal claims, including investigation of potential violations of our Terms of Service

When we're providing a service

We process your data to provide a service you've asked for under a contract. For example, we process your information in connection with labs and trainings provided by your Lab Sponsor.

When we're complying with legal obligations

We'll process your data when we have a legal obligation to do so, for example, if we're responding to a legal process or an enforceable governmental request.

CALIFORNIA REQUIREMENTS

The California Consumer Privacy Act (CCPA) requires specific disclosures for California residents.

This Privacy Policy is designed to help you understand how Qwiklabs handles your information. We explain the categories of information we collect, the sources of that information, and how we use and share that information. We do not sell your personal information. The CCPA also provides the right to request information about how

Qwiklabs collects, uses, and discloses your personal information. And it gives you the right to access your information and request that we delete that information. Finally, the CCPA provides the right to not be discriminated against for exercising your privacy rights.

We describe how you can exercise your rights to access, review, update and delete your information, as well as how to contact us to export and download a copy of it. When you contact us regarding any of these rights, we'll validate your request by verifying that you're signed in to your Qwiklabs account.

The CCPA requires a description of data practices using specific categories. This table uses these categories to organize the information in this Privacy Policy.

Categories of personal information we collect	Business purposes for which information may be used or disclosed	Parties with whom information may be shared
Identifiers such as your name and email address, as well as unique identifiers tied to the browser or device you're using.	Protecting against security threats, abuse, and illegal activity: Qwiklabs uses and may disclose information to detect, prevent and respond to security incidents, and for protecting against other malicious, deceptive, fraudulent, or illegal activity. For example, to protect our services, Qwiklabs may receive or disclose information about IP addresses that malicious actors have compromised.	Third parties to whom you consent to sharing your information, such as Lab Sponsors.

<p>Commercial information such as your payment information.</p>	<p>Auditing and measurement: Qwiklabs uses information for analytics and measurement to understand how our services are used, as well as to fulfill obligations to our Lab Sponsors and other partners. We may disclose non-personally identifiable information publicly and with these partners, including for auditing purposes.</p>	<p>Service providers, trusted businesses or persons that process information on Qwiklabs' behalf, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.</p>
<p>Internet, network, and other activity information such as your lab and quest completion status and times.</p>	<p>Maintaining our services: Qwiklabs uses information to ensure our services are working as intended, such as tracking outages or troubleshooting bugs and other issues that you report to us.</p>	<p>Law enforcement or other third parties, for the legal reasons described in "Our Disclosure of Your Personal Data and Other Information."</p>
<p>Geolocation data, such as may be determined by IP address, depending in part on your device and account settings.</p>	<p>Research and development: Qwiklabs uses information to improve our services and to develop new features that benefit our users.</p>	

<p>Other information you create or provide, such as your comments and ratings on Labs.</p>	<p>Use of service providers: Qwiklabs shares information with service providers to perform services on our behalf, in compliance with our Privacy Policy and other appropriate confidentiality and security measures. For example, we may rely on service providers to help provide customer support.</p>	
<p>Inferences drawn from the above, like Lab recommendations.</p>	<p>Legal reasons: Qwiklabs also uses information to satisfy applicable laws or regulations, and discloses information in response to legal process or enforceable government requests, including to law enforcement.</p>	

If you have additional questions or requests related to your rights under the CCPA, you can contact Qwiklabs at support@qwiklabs.com.

BRAZILIAN REQUIREMENTS

If Brazilian data protection law applies to the processing of your information, we provide the controls described in this policy so you can exercise your right to:

- Obtain confirmation on whether we process your information
- Request access to, update, review, and remove your information
- Object to or restrict the processing of your information
- Export your information to another service

For users based in Brazil, the data controller responsible for your information is Qwiklabs Inc, unless otherwise stated in a service-specific privacy notice. In other words, Qwiklabs Inc. is responsible for processing your information and for complying with applicable privacy laws.

We process your information for the purposes described in this policy, including:

- Providing, maintaining, and improving our services to meet the needs of our users
- Developing new products and features that are useful for our users
- Understanding how people use our services to ensure and improve the performance of our services
- Customizing our services to provide you with a better user experience
- Marketing to inform users about our services
- Detecting, preventing, or otherwise addressing fraud, abuse, security, or technical issues with our services
- Protecting against harm to the rights, property or safety of Qwiklabs, our users, or the public as required or permitted by law, including disclosing information to government authorities
- Performing research that improves our services for our users and benefits the public
- Fulfilling obligations to our partners like Lab Sponsors
- Enforcing legal claims or obligations, including investigation of potential violations of our Terms of Service

Contact information

If you have questions, you can contact Qwiklabs at support@qwiklabs.com. And you can contact your data protection authority if you have concerns regarding your rights under Brazilian law.

CHANGES TO OUR PRIVACY POLICY

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and you can contact us at support@qwiklabs.com if you would like to access a previous version of this Privacy Policy. If changes are significant, we'll provide a more prominent notice.

ACCESS TO INFORMATION

We strive to keep your Personal Data accurately recorded. Through the Service, we provide you with access to update your profile and revise Personal Data previously submitted to the Service.

CONTACTING US

Please contact us at support@qwiklabs.com with any questions or comments about this Privacy Policy, your personal information, our use and disclosure practices, or your consent choices.

EU-U.S. AND SWISS-U.S. PRIVACY SHIELD FRAMEWORKS

As described in our parent company Google LLC's [Privacy Shield certification](#), we comply with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks ("Privacy Shield") as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union (including the European Economic Area) and the United Kingdom as well as Switzerland, as applicable, to the United States in reliance on Privacy Shield. Qwiklabs has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. Qwiklabs remains responsible for any of your personal information that is shared under the Onward Transfer Principle with third parties for external processing on our behalf, as described in the "Our Disclosure of Your Personal Data and Other Information" section. To learn more about the Privacy Shield program, and to view our parent company Google LLC's certification, please visit the [Privacy Shield](#) website.

If you have an inquiry regarding our privacy practices in relation to our Privacy Shield certification, we encourage you to contact us at support@qwiklabs.com. Qwiklabs is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC). You may also refer a complaint to your local data protection authority and we will work with them to resolve your concern. In certain circumstances, the Privacy Shield Framework provides the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in [Annex I to the Privacy Shield Principles](#).

*As of July 16, 2020, we no longer rely on the EU-U.S. Privacy Shield to transfer personal data that originated in the EEA or the UK to the U.S.

Last Updated: April, 2022