

PRIVACY POLICY

This privacy policy (this "Privacy Policy") governs your use of the software application Imago Today ("Application") for mobile devices that was created by Shoulet Blunt, LLC, a California limited liability company, dbas Career Pillar and Imago.

User Provided Information

The Application obtains the information you provide when you download and register through the Application. Registration with us is mandatory in order to be able to use the basic features of the Application.

When you register with us and use the Application, you generally provide user provided information including but not limited to: (a) your name, email address, age, user name, password and other registration information; (b) transaction-related information, such as when you make purchases, respond to any offers, or download or use applications from us; (c) information you provide us when you contact us for help; (d) information you enter into our system when using the Application, such as contact information, educational status, work history and other personal information needed for optimized use of the Application ("User Provided Information").

We may also use the User Provided Information you provided us to contact you from time-to-time to provide you with important information and required notices.

Automatically Collected Information

In addition, the Application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device's unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, current location and information about the way you use the Application ("Automatically Collected Information").

Does the Application collect precise real time location information of the device?

When you visit the mobile Application, we may use GPS technology (or other similar technology) to determine your current location in order to determine the city you are located within and display a location map with relevant system content, primarily displaying work based experience opportunities. We will not share your current location with other users or partners.

If you do not want us to use your location for the purposes set forth above, you should turn off the location services for the mobile application located in your account settings or in your mobile phone settings and/or within the mobile application.

Do third parties see and/or have access to information obtained by the Application?

Yes. We will share your information with third parties only in the ways that are described in this privacy statement.

We may disclose User Provided Information and Automatically Collected Information:

- as required by law, such as to comply with a subpoena, or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- with our trusted service providers who work on our behalf, who have agreed to adhere to the rules set forth in this privacy statement.
- if Shoulet Blunt LLC is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our web site of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

What are my opt-out rights?

You can easily stop all collection of information by the Application by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

Data Retention Policy, Managing Your Information

We will retain User Provided Information for as long as you use the Application and for a reasonable time thereafter. We will retain Automatically Collected Information for up to 36 months and thereafter may store it in aggregate. If you'd like us to delete User Provided Information that you have provided via the Application, please contact us at support@careerpillar.com and we will respond in a reasonable time. Please note that some or all of the User Provided Information may be required in order for the Application to function properly.

FERPA Compliance

We make every effort to ensure consistency with the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 C.F.R. Part 99 as may be amended) policies, which protect the privacy of student records. We also comply with California's Student Online Personal

Information Protection Act (SOPIPA) (embodied in Ca. Sen. Bill No. 1177), which protects the personally identifiable information of K-12 students.

Children

We do not use the Application to knowingly solicit data from or market to children under the age of 13. We comply with Children's Online Privacy Protection Act (COPPA) (15 U.S.C. §§ 6501-6505; 15 C.F.R. Part 312, as may be amended), which provides additional privacy protections to children under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at support@careerpillar.com. We will delete such information from our files within a reasonable time.

Security

We are concerned about safeguarding the confidentiality of your User Provided Information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to those authorized employees and contractors who need to know that information in order to operate, develop or improve our Application. Please be aware that, although we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

Changes

This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy here and informing you via email or text message. You are advised to consult this Privacy Policy regularly for any changes, as continued use is deemed approval of all changes. You can check the history of this policy by clicking [here](#).

Your Consent

By using the Application, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. "Processing," means using cookies on a computer/hand held device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information, all of which activities will take place in the United States. If you reside outside the United States your information will be transferred, processed and stored there under United States privacy standards.

Contact us

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at support@careerpillar.com.