

## cPanel University Privacy Policy

### 1. Introduction

- a. cPanel, L.L.C. (cPanel, we or our) is committed to providing information to its customers about how cPanel uses certain information. This cPanel University Privacy Policy (University Privacy Policy) describes the ways in which cPanel collects, uses, maintains and discloses information about you when you participate in a cPanel University course or courses at [university.cpanel.net](https://university.cpanel.net) (Course).
- b. When you sign up for a Course you acknowledge that you have read and understand the Policy.
- c. If you have a question about the University Privacy Policy, please email [privacy@cpanel.net](mailto:privacy@cpanel.net).
- d. cPanel complies with the EU-US Privacy Shield Framework and the Swiss-EU Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information, as defined below, transferred from the European Union and Switzerland to the United States, respectively (Privacy Shield). cPanel has certified that it adheres to the Privacy Shield principles of notice, choice, accountability for onward transfer, security, data integrity, purpose limitation, access, and recourse, enforcement and liability (Principles). If there is any conflict between this University Privacy Policy and the Privacy Shield Principles, the Principles shall govern. To learn more about Privacy Shield, please visit the U.S. Department of Commerce Privacy Shield website: <https://www.privacyshield.gov/>. For more information regarding our Privacy Shield certification, please see: <https://www.privacyshield.gov/list>.
- e. We implement and maintain appropriate technical and organizational measures to protect your Personal Information, as defined below, against accidental or unlawful destruction, loss, change or damage. All Personal Information covered by this University Privacy Policy will be stored on secure servers. All electronic transactions entered into via the cPanel University Website (Website) will be protected by SSL encryption technology.
- f. cPanel University is not directed at persons under 16 and we do not knowingly collect Personal Information from children under 16. If you become aware that your child has provided us with Personal Information, without your consent, please contact us using the details set out in Paragraph 9 so that we can take steps to remove such information and terminate any account your child has created with us.

### 2. What the cPanel University Privacy Policy covers

- a. This University Privacy Policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you (Personal Information) and information regarding our use of cookies and similar technologies.
- b. We collect, use, and store the information below:

Data	Use	Legal basis for processing	Length of time it is retained
<b>Registration information,</b> such as first and last name, email address, company affiliation, and job title.	We use this information to enroll you in and provide you with the features and functionality of the Course including allowing access to your certification status and Course progressions.	The legitimate interests of cPanel and your employer, namely to train users of cPanel products.	2 years.
	We use this information to allow your employer to associate you within their general PartnerNOC profile data, using your certification status and cPanel University “points” (XP) to help benefit their global leaderboard ranking on the cPanel University site leaderboards, as well as providing the ability for your employer to help track your progress through an employer dashboard interface.	The legitimate interests of cPanel and your employer, namely to train users of cPanel products.	2 years.
<b>Contact information,</b> namely email address.	To provide a means of direct contact to you from the cPanel University team for automated notifications regarding account update, recovery and security alerts.	Our legitimate interests in contacting you for service-related issues.	2 years.
<b>Course information,</b> such as percentage completed, status (“completed” and “not started”), and points awarded for course completion.	We use this information to provide the features and functionality of the Course, specifically: <ul style="list-style-type: none"> <li>• Recording and display of how far you have progressed in your Courses;</li> <li>• Recording whether you have commenced or completed a Course and transmission to your employer;</li> <li>• Calculated based on the courses you complete and displayed on the public leaderboard (depending on rank).</li> </ul>	The legitimate interests of cPanel and your employer, namely to train users of cPanel products.	1 year in respect of points awarded for course completion; 2 years for the remaining data.

3. Cookies

- a. cPanel University places the following Cookies, collectively the “University Cookies.”

1. The time zone reported by your client browser is stored by first-party as a persistent cookie with an expiration time of 24 hours.
  - b. University cookies are used to help better cater your profile data to your location.
4. Where we share information covered by the University Privacy Policy
  - a. We share Registration Information as follows:
    - i. Within cPanel; and
    - ii. Your employer, as applicable, and as defined by specified "PartnerNOC Affiliation" field set by you within the account profile details.
  - b. We share University Cookies within cPanel only.
5. How to access, change, update, retrieve and terminate the information covered by this University Privacy Policy
  - a. **Access, change and update.** To access, change and update information covered by this University Privacy Policy, log into the Website and click the "Your Profile" link in the menu at the top, where you will be guided to a profile page that allows you to edit each of the stored items to your preferences.
  - b. To retrieve and download information covered by this University Privacy Policy, log into the Website and click the "Your Profile" link in the menu at the top. You can view and save any data shown there, or contact us at [professor@cpanel.net](mailto:professor@cpanel.net) to request an XML or CSV export of the raw data.
  - c. **Termination and deletion**
    - i. To terminate your cPanel University account, email the [professor@cpanel.net](mailto:professor@cpanel.net) address with the subject line "Delete Account Data," originating from the email address owning the account, or with proof of account ownership included in the email.
      1. When you terminate your cPanel University account, the following information is immediately deleted:
        - a. All account data stored in our locally-hosted, cPanel University site Wordpress back-end database and file system, hosted at [university.cpanel.net](http://university.cpanel.net).
        - b. All account data stored in our remotely-hosted, third party service TalentLMS, hosted at [exams.cpanel.net](http://exams.cpanel.net).
      2. When you decide to permanently terminate your cPanel University account, all information is deleted and cannot be recovered after that point.

3. As noted above, some information covered by this cPanel University Privacy Policy is displayed publicly and will be sent to your employer. Information that is displayed publicly will be removed from the website on which it is displayed by us within 7-14 days. It is your obligation to contact your employer to request the deletion of information that was provided to your employer pursuant to this University Privacy Policy.
6. **International Transfers of your Personal Information.** The Personal Information we collect may be transferred to and stored in countries outside of the jurisdiction you are in, where we and our third party service providers have operations. If you are located in the European Union (EU), your Personal Information will be processed outside of the EU, including in the United States; these international transfers of your Personal Information are made pursuant to appropriate safeguards, such as the EU-US Privacy Shield. If you wish to inquire further about these safeguards, please contact us using the details set out at the end of this University Privacy Policy.
7. **Disclosure to Government Agencies and Law Enforcement.** Our Transparency Report discusses the standards we use to evaluate disclosures to governments and law enforcement agencies. It is incorporated into this University Privacy Policy.
8. Certain Rights that Apply if You are Located in the EU
  - a. Under the General Data Protection Regulation (GDPR)
    - i. In accordance with applicable privacy law, you have the following rights regarding Personal Information covered by the GDPR that we hold:
      1. **Right of access.** The right to obtain access to your Personal Information.
      2. **Right to rectification.** The right to obtain rectification of your Personal Information without undue delay where that Personal Information is inaccurate or incomplete.
      3. **Right to erasure.** The right to obtain the erasure of your Personal Information without undue delay in certain circumstances, such as where the Personal Information is no longer necessary in relation to the purposes for which it was collected or processed.
      4. **Right to restriction.** The right to obtain the restriction of the processing undertaken by us on your Personal Information in certain circumstances, such as where the accuracy of the Personal Information is contested by you, for a period enabling us to verify the accuracy of that Personal Information.
      5. If you wish to exercise one of these rights, please contact us using the contact details in Paragraph 9 of this University Privacy Policy.
      6. **Contacting a supervisory authority.** If you are resident in the EU, you have the right to make a complaint to the Supervisory Authority in your jurisdiction.

ii. Pursuant to Privacy Shield

1. For data that is received or transferred pursuant to the Privacy Shield, we have agreed to the Privacy Shield's principles of Notice, Choice and Onward Transfer. Pursuant to Privacy Shield:
  - a. **Notice.** Paragraph 2 describes the Personal Information we collect about you, how we use it, and the types of third parties with whom we share it.
  - b. **Choice.** Disclosure to third parties of Personal Information covered by Privacy Shield is set out in Paragraph 4. For Personal Information covered by Privacy Shield, and which is not required for the operation of cPanel University, we will provide you with an opportunity to decline to have us disclose this Personal Information to third parties for a purpose that is different than the one for which it was originally collected.
  - c. **Onward Transfer.** When cPanel discloses information to third parties to provide functions on its behalf, cPanel will take appropriate measures to protect the privacy of the Personal Information it transfers. These measures are set out in Paragraph 1. This Personal Information will only be shared with third parties to the extent reasonably necessary for them to perform the services contracted for, or when cPanel must comply with applicable law. Third parties will not be authorized by us to process Personal Information in any other way. cPanel is responsible for the processing of Personal Information that it transfers to third parties acting as an agent on its behalf.
2. If you wish to exercise one of these rights, please contact us using the contact details in Paragraph 9.

iii. Privacy Shield Jurisdiction and Enforcement

1. As part of our participation in the Privacy Shield, we are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).
2. In compliance with the EU-US and Swiss-US Privacy Shield Principles, cPanel commits to resolve complaints about your privacy and our collection or use of your Personal Information transferred to the United States. European Union or Swiss individuals with inquiries or complaints regarding this University Privacy Policy should first contact cPanel using the contact information listed in Paragraph 9.
3. cPanel has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU Privacy Shield, operated by the Council of Better

Business Bureaus. If your complaint is not satisfactorily addressed, please visit <https://www.bbb.org/EU-privacy-shield/for-eu-consumers> for more information and to file a complaint.

4. Finally and as a last resort, EU or Swiss individuals with residual complaints may invoke a binding arbitration option before the Privacy Shield Panel (as that term is defined in the Privacy Shield Framework).
5. Please note that we may be liable for the onward transfer of EU and Swiss personal data to agent third parties unless we can prove we were not a party to the actions giving rise to the damages.
6. cPanel may be required to reveal EU and Swiss Personal Information in response to lawful requests by public authorities and to meet national security and law enforcement requirements. Our policies regarding this topic are set out in our transparency report: <https://cpanel.com/transparency-report.html>

## 9. Other Information

- a. We may update this University Privacy Policy from time to time. When we change this University Privacy Policy in a material way, we will update the "last modified" date at the end of this University Privacy Policy and provide notice on our account management software. Changes to this University Privacy Policy are effective when they are posted on this page.
- b. California Residents – Your California Privacy Rights
  - i. Pursuant to California Civil Code Section 1798.83, residents of the State of California have the right to request from companies conducting business in California certain information relating to third parties to which the company has disclosed certain categories of Personal Information during the preceding year for the third parties' direct marketing purposes. Alternatively, the laws provide that a company may comply, as cPanel does, by disclosing in its privacy policy that it provides consumers choice (opt-out or opt-in) regarding sharing Personal Information with third parties for those third parties' direct marketing purposes, and information on how to exercise that choice. As stated above in this University Privacy Policy, cPanel provides you choice prior to sharing your Personal Information with third parties for their direct marketing purposes. If you do not opt-in or if you choose to opt-out at the time cPanel offers that choice, cPanel does not share your information with that identified third party for its direct marketing purposes.
  - ii. If you are a California resident and you have questions about our practices with respect to sharing information with third parties for their direct marketing purposes and your ability to exercise choice, please send your request to the following email address: [privacy@cpanel.net](mailto:privacy@cpanel.net) or write to us at the following mailing address:

cPanel, L.L.C.  
Attention: Privacy  
2550 N. Loop W  
Suite 4006  
Houston, TX 77092

- iii. Please put the statement "Your California Privacy Rights" in the subject field of your e-mail or include it in your letter if you choose to write to us at the designated mailing address. You must also include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labelled or sent properly, and do not have complete information.

- 10. This University Privacy Policy was last modified on 01-07-2019.