

PRIVACY POLICY

This Privacy Policy applies to www.pghstudent.com, collectively referred to as “the Website.”

This policy is effective as of: **December 20, 2013**

PGH GLOBAL (CAYMAN) LIMITED AND PGH GLOBAL, LLC. (“PGH GLOBAL”) is committed to protecting your privacy. This Privacy Policy discloses how we collect, share, and use information about you that PGH GLOBAL collects through the website and our use of and your ability to correct the information collected. The Website provides visitors with information about PGH GLOBAL and our products and services. In using and viewing the Website, you understand that PGH GLOBAL may use your “Personally Identifiable Information” (such as name, email address, street address, or telephone number) subject to the terms of this Privacy Policy.

Children's Online Privacy Protection Act

PGH requires that its web site operators never knowingly request personally identifiable information from anyone under the age of 13 without requesting verifiable parental consent. Accordingly, PGH will not knowingly collect any personally identifiable information from children under the age of 13. We recommend that no one under the age of 18 submit personally identifiable information to our Site. In the event that we determine that a user of this Site is under the age of 13, we will not maintain or use his or her personally identifiable information.

PGH Global is now a UnitedHealth Group Company.

Information Collected on the Website

Certain of the information provided by PGH GLOBAL on the Website is available without PGH GLOBAL collecting any Personally Identifiable Information from you. In using and viewing the Website, you understand that PGH GLOBAL may use your Personally Identifiable Information subject to the terms of this Privacy Policy. PGH GLOBAL does collect Personally Identifiable Information that you provide voluntarily through the Website. Some examples of times when PGH GLOBAL collects Personally Identifiable Information include when you:

- Request information about PGH GLOBAL through the Website;
- Subscribe to an e-mail newsletter ;
- Purchase PGH GLOBAL products and/or services;
- Send PGH GLOBAL an email message; or
- Otherwise provide PGH GLOBAL with Personally Identifiable Information.

You have a choice as to whether to provide PGH GLOBAL with any Personally Identifiable Information. Although you are not required to disclose any Personally Identifiable Information to us, some portions of the Website may not be available to you without your providing this information.

Due to the business-oriented nature of our business and the Website, the Website is not designed to appeal to anyone under the age of 18. We do not knowingly request or receive any information from children.

Use of Your Information

PGH GLOBAL uses any Personally Identifiable Information you provide in a limited number of ways. We may use your Personally Identifiable Information to:

- To respond to your emails sent to PGH GLOBAL;
- To make the site easier for you to use by not making you enter your Personally Identifiable Information more than once;
- To provide you with information about PGH GLOBAL and its products and services;
- To conduct a transaction that you have requested
- To verify your identity and grant access to your account;
- To alert you to updated information and other news and information from PGH GLOBAL; and
- For any other purpose PGH GLOBAL deems appropriate

In addition, PGH GLOBAL may hire other companies to perform services on our behalf such as operating certain aspects of the Site or sending you email. These other companies may be supplied with or have access to your Personally Identifiable Information for the sole purpose of providing these services to us or on our behalf. PGH GLOBAL may also use third-party ad servers or ad networks to deliver ads to you on PGH GLOBAL' behalf. These third-party ad servers may be supplied with or have access to your Personally Identifiable Information for the sole purpose of providing these services to us or on our behalf. They also may collect and use non-personally identifiable information about your visits to the Site in order to send advertisements that may be of interest to you.

We may also on occasion combine information about you that we have with information we obtain from other parties to enhance our ability to market to you those products or services that may be of interest to you.

Though we will make every effort to preserve user privacy, we may need to disclose Personally Identifiable Information when required by law or if we have a good-faith belief that the action is necessary to comply with a pending judicial proceeding, a court order or legal process served on PGH GLOBAL or to protect our rights or the rights of others, to fight fraud, identity theft, to ensure the integrity and operation of our business and systems, or to protect the rights, property or safety of PGH GLOBAL, its employees, members or others.

Control of your Personal Information

When you register, or otherwise give us Personally Identifiable Information, PGH GLOBAL will not share that information with third parties without your permission, other than for the limited

exceptions provided herein. Such Personally Identifiable Information will only be used for the purposes set forth herein. PGH GLOBAL may send periodic emails informing you of changes and updates regarding the Website.

How We Share Your Information

We will not disclose your Personally Identifiable Information to others without your permission, except as explained in this Privacy Policy.

Aggregate Information

On an aggregate basis only, we collect comprehensive demographic, business information and data, and other non-identifying information about users of the Website. PGH GLOBAL will never disclose any Personally Identifiable Information as part of this aggregate information but we may lend, sell, share or otherwise disclose aggregate information with others so we can perform research and provide the results to third parties, enhance and market the Website, and conduct accounting and process record keeping functions.

Other websites and links

We may include links to other websites that we think will be of interest to you or operated by our business partners, affiliates, advertisers, and others. These third parties have separate data collection and privacy practices independent from ours, and PGH GLOBAL cannot be responsible for their policies or activities. Please contact those third parties directly if you have questions about their privacy policies.

Cookies, Web Beacons, Clear Gifs, and IP Addresses

PGH GLOBAL may also use a feature of your browser called a “cookie.” Your cookie automatically identifies your computer - but not you - to our servers when you visit the Website and allows us to correlate your computer with certain usage patterns which are stored in our log files. We use cookies to gather general, aggregate statistics about the overall popularity and usage of the Website. PGH GLOBAL also uses more temporary cookies, often referred to as session cookies, to keep a user logged into the system and aid in the exchange of information between pages without loss of data. Such a cookie, however, is only stored for the current browsing session and is deleted once the browser is closed. PGH GLOBAL can also only read cookies from the Website. Search for Cookies under your Web browser's Help menu for more information on cookie management features available to you. If your browser is set to reject all cookies, the Website may not function properly.

PGH GLOBAL may also collect information through the use of clear gifs (also called Web Beacons and Web Bugs) in selected email messages we send to you. These are tiny graphic files, not visible to the human eye, that are included in HTML-based emails and used to let us know which emails we send are opened. Clear gifs may also see or read cookies on your computer. When authorized by PGH GLOBAL, third parties specializing in monitoring aggregate statistical use of our site with whom we contract, may use cookies, our web log files, web beacons, and other monitoring technologies to compile anonymous aggregate data.

Additionally, we may use IP address information to count and track aggregate visits to Website, to help diagnose problems with our server, and to administer the Website. PGH GLOBAL does

not link IP addresses to anything personally identifiable so while a particular user's session can be tracked, the user remains completely anonymous.

Accessing and Updating Information

PGH GLOBAL does not currently have an online method for users to delete their Personally Identifiable Information contained in our database. However, you may change or update the Personally Identifiable Information we have collected, request that we delete it, or request that we change how we use it by sending an email to customerservice@pghglobal.com with your instructions. Please note that this deletion may otherwise impact prior transactions performed on the Website.

Changes to this Privacy Policy

We encourage you to review our Privacy Policy not just the first time you visit the Website but periodically afterwards since we may modify our Privacy Policy from time to time. The date of the last update of the Privacy Policy will always be posted below:

THIS PRIVACY POLICY WAS LAST REVISED ON December 20, 2013.

If we make any substantive changes to our Privacy Policy in the future with regard to how we use your Personally Identifiable Information, we will incorporate those changes here. Your continued use of the Website after the changes are posted constitutes your agreement to the changes, both with regard to information we have previously collected from you and with regard to information we collect from you in the future. If you do not agree to the changes, please discontinue use of the Website. Lastly, if PGH GLOBAL is sold or merged with another company, your Personally Identifiable Information will be included as part of the sale but unless you're notified that the Privacy Policy is changed, your Personally Identifiable Information will be maintained in the same manner.

International Users

Like almost every website, our Website is accessible around the world. By visiting the Website and providing your information, you acknowledge and agree that your personal information can be stored for the purposes identified in this Privacy Policy. We process and store your information in North America and your information may be stored on servers located outside your residential jurisdiction and which may have less stringent privacy practices than your own. If you access the Website from outside the United States, your usage of the Website constitutes consent to the transfer of your data outside of your country and to North America.

Security

This Website has industry-standard security measures in place to protect the loss, misuse, and alteration of the information under our control, and we make good faith efforts to store your Personally Identifiable Information in a secure operating environment. Unfortunately, no data transmission over the Internet can be guaranteed to be absolutely secure. As a result, while we strive to protect your Personally Identifiable Information, we cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. If PGH GLOBAL provides you with a user name and password to access portions of the Website or as part of your subscription, PGH GLOBAL disclaims any responsibility for a breach of privacy as a result of your willingly or inadvertently disclosing your user name and password to others.

Contacting PGH GLOBAL

Please feel free to share any comments and concerns with us. If you have any questions about this Privacy Policy or the practices of the Website, please send us an email at info@pghglobal.com

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