

## College Guidance Network Website Privacy Policy

Last Updated: August 1, 2020

Your privacy is important to us at College Guidance Network and a responsibility we take seriously, so we encourage you to review our Website Privacy Policy.

Our Website Privacy Policy is designed to provide transparency into our privacy practices and principles. We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these key terms first.

This College Guidance Network Website Privacy Policy (the "Website Privacy Policy") covers information that College Guidance Network, Inc. ("College Guidance Network", "we", "our", or "us") collects from users and visitors of websites operated and controlled by College Guidance Network that link to this Website Privacy Policy, including <https://www.College Guidance Network.com> (referred to collectively as the "Sites"). Please see our College Guidance Network Products Privacy Policy for information on our privacy practices as they relate to our College Guidance Network Service.

This Privacy Policy explains:

What information we collect and why we collect it.

How we use that information.

The choices we offer, including how to access and update information.

By accessing or using the Sites, you are consenting to the collection, use, disclosure and other handling of your information as described below. If you have any concern about providing information to us or having such information displayed on the Sites or otherwise used in any manner permitted in this Privacy Policy, you should not use the Sites.

### Types of Information We Collect

On our corporate website, we collect two types of information about you: (1) information that you may choose to voluntarily provide us while using the Site (described below under "Information You Provide to Us" [LINK to section below] and (2) information collected automatically as a result of your use of the Site (described below under "Information Collected Automatically"[LINK to section below]). We may also receive information about you from third-party sources as described below under "Information Received from Third-Party Sources" [LINK to section below].

### Information You Provide to Us

You may choose to voluntarily provide certain personal information to us — such as name, telephone number, or email address in order to access certain features of our Site or request information from us. For example, the Site allows you to request information about the College Guidance Network product; register for special events; participate in surveys and contests; and to submit an application for employment. To support these activities, College Guidance Network will ask for information about you and / or the company for which you work.

When you send us a message using the "Contact Us" page or via email, we retain the content of the message, your email address, and any information you provide to us such as your name, phone number,

your company, experience with our service, your contact preferences, and the response we send back to you. This helps us manage any follow-up questions you may have, measure how effectively we address your concerns and improve the Site. Any information retained would be used to assure the delivery of the services or information you requested and to optimize your experience and enhance the quality of the time you spend with us online. When you send us a message using the "Contact Us" page or via email, the email addresses and phone numbers collected are not further used to market to the individual beyond providing the services requested or responding to the requests.

This information is necessary for the adequate performance of the contract between you and us, for our legitimate interest in being able to provide and improve the Site, and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested services.

#### Information Collected Automatically

To provide a personalized and high-quality experience for our users, we (or our service providers) may use various technologies that automatically record or collect certain information from your browser or your device when you use the Site, read our emails, or otherwise engage with us. This information is necessary for the adequate performance of the contract between you and us, to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the Site. For example, this could include the frequency and duration of your visits to the Site (similar to TV ratings that indicate how many people watched a particular show). If you visit the Site on different devices, we may link the information we collect from those different devices to help us provide a consistent service across your different devices or to provide you relevant College Guidance Network advertisements. If we do combine any automatically-collected information with personal information, we will treat the combined information as personal information, and it will be protected as per this Privacy Policy.

The technologies and information we automatically collect include:

**Cookies and other similar technologies:** We (or our service providers) may use cookies or similar technologies to identify your browser or device. We (or our service providers) may also use these technologies to analyze trends, gather demographic information about our user base, track your movements around the Site, administer the Site, tailor the Site for you, and to help the Site work better for you - for example, by remembering your language preferences. We (or our service providers) also may use these technologies (never in student logged-in areas of our Service) in connection with advertising of our Services that may appear on other sites or in connection with advertising their products outside of our Service (e.g., if you view an embedded YouTube video player on our Site, YouTube may place cookies or similar technologies on your browser when you play the video off our site). For more information see the "Online Analytics, Advertising and Do-Not-Track" section below.

**Local storage:** We may also use, collect, and store information and preferences locally on your device using mechanisms such as browser-based web storage, including HTTP cookies and HTML5, and application data caches or plug-in based local storage such as Flash Cookies. Like many services, College Guidance Network uses these technologies to analyze trends, gather demographic information, understand your engagement with the Sites, administer the Sites, tailor the Sites for you, and to help the Sites work better for you - for example, by remembering your language preferences.

Third-parties with whom we partner to provide certain features on our Sites or to display advertising based on your web browsing also may use HTML5 or other local storage to collect and store

information. Please read our Online Tracking Technologies Policy for more details, including how to remove or modify your cookie settings and a list of the tracking technologies we use.

**Device Information:** We collect device-specific information such as your device type, device brand, operating system, hardware version, device settings, file and software names and types, battery and signal strength, and unique device identifiers. This helps us measure how Sites are performing and improve the Sites for you on your particular device.

**Location Information:** When you use our Site, we may collect and process information about your geographic location, for example through IP address, GPS, Bluetooth, or WiFi signals. We collect coarse (i.e., city-level) location data. We never collect precise geolocation data from students using our Service. We will not store or track your device location on an ongoing basis or without your permission. We do not share precise geolocation data with third parties, other than our service providers as necessary to provide the Site. If you no longer wish to allow us to track your location information, you may opt-out at any time by turning it off at the device level.

**Server Log Information:** Like most online services, when you use our Site, we automatically collect and store certain information in our server log files. Examples include:

Details of how you used our service, such as your activity on the Site, and the frequency and duration of your visits to the Site

IP Address

Device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL

This information helps us make decisions about what we should work on next - for example, by showing which features are most (or least) popular. We may use your IP address and share it with third-parties to help diagnose problems with our servers, for security purposes, to manage the Site, to enhance the Site and services based on usage pattern data, for analytics and for advertising.

**Cross-Device Collection:** To provide users with a seamless online experience, we may link your identifiers on different browsers and environments you are using to provide a seamless experience across multiple devices and browsers without collecting or processing any additional identifying personal data.

**Information Received from Third-Party Sources**

We may also obtain information, including personal information, from third-party sources to update or supplement the information you provided or we collected automatically. This may include aggregated anonymous information or certain personal information that may be provided to us. If we receive personal information from third-parties we will handle it in accordance with this Privacy Policy. If we directly combine information we receive from other third-parties with personal information that we collect on the Site, we will treat the combined information as personal information and handle it in accordance with this Privacy Policy. Additionally, we may use any aggregated anonymous information received by third-parties as set forth below under the heading "Aggregated Information and Non-Identifying Information". Local law may require you authorize the third-party to share your information with us before we can acquire it. We do not control, supervise, or respond to how third

parties providing your information process your personal information, and any information request regarding the disclosure of your personal information to us should be directed to such third-parties.

#### How We Use the Information We Collect

We use information, including personal information, collected through our Site for the purposes described in this Privacy Policy, including as set forth above under “Information Collected Automatically”. In addition, we may use the information, including personal information, we collect for the following purposes:

Provide the Sites;

Fulfill your requests and provide any information you request, such as responding to your emails, submissions, questions, comments, requests, complaints and provide customer service

Process your employment applications;

Personalize the Site, content, and experiences for you;

Communicate with you through email, notices posted on the website, and other means. Examples of these messages include: (1) updates about the status of your application; (2) notices about changes to our Sites and policies or about security alerts; and (3) promotional messages about us or our partners that we think you might find interesting;

Optimize or improve our Site and to research and develop innovative features and services;

For safety and security reasons, such as detecting, investigating and preventing activities that may violate our policies or be illegal;

Create, tailor, deliver, and study the effectiveness of advertising and promotional material both on and off of the Sites, as well as for analytics (including as described in the Online Analytics, Advertising and Do-Not-Track section below);

For any other purpose for which the information was collected.

To learn more about how we use your information for personalization and tracking, including advertising, please see our Online Tracking Technologies Policy. We process this information given our legitimate interest in improving the Sites and our users’ experience with it, in protecting the Site, where necessary for the adequate performance of the contract with you, and to comply with applicable laws.

Additionally, we will process your personal information for the purposes listed in this section related to marketing given our legitimate interests in undertaking marketing activities to offer you products and services that may be of your interest. You can opt-out of receiving marketing communications from us by following the unsubscribe instructions included in our marketing communications or changing your notification settings within your College Guidance Network account.

Please note that we may anonymize and/or de-identify information collected through the Sites or via other means so that the information no longer relates to you. Where we have anonymized and/or de-identified information so that it no longer identifies you personally, our use and disclosure of such

information is not subject to this Privacy Policy and may be used and disclosed to others without restriction.

### Sharing Your Information

We do not and will not sell your personal information collected from our Sites to third parties for their promotional purposes. We do not share personal information with third parties except for the limited circumstances set forth in this Privacy Policy, including:

**Third-Party Integrations on Our Site:** When you use third-party apps, websites or other services that use, or are integrated with, our Site, they may receive information about what you post or share. For example, when you share via Facebook or Twitter, these services receive the information that you share through this functionality and information that you are sharing from our Site. Information collected by these apps, websites or integrated services is subject to their own terms and policies. Please see here for more information on Social Media Features and here for more information on third-party services. Please see here for a list of third-party app integrations on our Site.

**Service Providers:** We work with vendors, service providers, and other partners to help us provide the Site and other services by performing tasks on our behalf. These service providers may be located inside or outside of the European Economic Area (“EEA”). We may need to securely share or provide information, including personal information, to them to help them perform these business functions, for example sending emails on our behalf, database management services, database hosting, providing customer support software, providing surveys, assisting with employment applications, and security. We may also authorize these third-party companies to collect information on our behalf. These providers have limited access to your personal information to perform these tasks on our behalf and are contractually bound to protect and use it only for the purpose for which it was disclosed. Additionally, these partners and service providers must adhere to confidentiality and security obligations in a way that is consistent with this Privacy Policy.

**Analytics Services:** To help us better understand your use of the Sites, we may use third-party analytics providers, such as Google Analytics. You can find out more about Google's position on privacy as regards its analytics service at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). These third-parties use the type of technologies described in the “Automatically Collected Information” section above. These services may collect, store and use information in order to help us understand things like how often you use the Site, the events that occur within the Site, usage, performance data, and from where the application was downloaded. The information collected by this technology will be disclosed to or collected directly by these service providers. A current list of analytics providers that we use is located here.

**Business Partners:** From time to time, College Guidance Network may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service from College Guidance Network, we may share information collected in connection with your purchase or expression of interest with our joint promotion partner(s). College Guidance Network does not control our business partners’ use of the information we collect, and their use of the information will be in accordance with their own privacy policies. If you do not wish for your information to be shared in this manner, you may opt not to purchase or specifically express interest in a jointly offered product or service. College Guidance Network does not share information with business partners unless you specifically opt-in to such sharing. If you do not wish for your information to be shared in this manner, you may choose not to opt-in. If you choose to share your information with

business partners in the manners described above, your information will be subject to the business partners' respective privacy statements.

**Social Media Platforms:** Where permissible according to applicable law, we may share certain limited personal information with social media platforms (such as Google or Facebook) and other websites, applications or partners, to generate leads, drive traffic to our Sites or otherwise market and advertise our products or services on those websites or applications (this will never include personal information of students). These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products and services that may be of your interest. These social media platforms with which we may share your personal information are not controlled or supervised by College Guidance Network. Therefore, any questions regarding how your social media platform processes your personal information should be directed to such a provider.

**Aggregated Information and Non-Identifying Information:** We may share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other de-identified or non-personally identifiable information (such as statistics about visitors, traffic and usage patterns), including with users, partners or the press in order to, for example, demonstrate how the Site is used, spot industry trends, or to provide marketing materials for College Guidance Network. Any aggregated information and non-personalized information shared this way will not contain any personal information.

**Legal Requirements:** We may disclose information, including personal information, if we have a good faith belief that doing so is necessary to comply with the law, such as complying with a subpoena or other legal process. We may need to disclose personal information where, in good faith, we think it is necessary to protect the rights, property, or safety of College Guidance Network, our employees, our community, or others, or to prevent violations of our Terms of Service or other agreements. This includes, without limitation, responding to law enforcement and government requests. Where appropriate, we may notify users about the legal requests, unless (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law; (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon College Guidance Network, or its users. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

**Fraud and Security Protection:** We may share the information to assist with security operations for scheduled penetration testing, auditing, and continuous improvement of our security practices, including without limitation, exchanging information with other companies and organizations for fraud protection. Authorized parties of the information would comply with our current privacy and security policies.

**Sharing with College Guidance Network Companies:** Over time, College Guidance Network may grow and reorganize. We may share your information, including personal information with affiliates such as a parent company, subsidiaries, joint venture partners or other companies that we control or that are under common control with us, in which case we will require those companies to agree to use your personal information in a way that is consistent with this Privacy Policy.

**Change of Control:** In the event that all or a portion of College Guidance Network or its assets are acquired by or merged with a third-party, or in any other situation where personal information that we have collected from users would be one of the assets transferred to or acquired by that third-party, we may disclose, share or transfer the information. This Privacy Policy will continue to apply to your information, and any acquirer would only be able to handle your personal information as per this policy (unless you give consent to a new policy). We will provide you with notice of an acquisition within thirty (30) days following the completion of such a transaction, by posting on our homepage, or by email to your email address that you provided to us. If you do not consent to the use of your personal information by such a successor company, you may request its deletion from the company. We may also make information, including personal information, available to a potential investor or purchaser (or their advisors) in advance of any such transaction completion.

**With your consent:** Other than the cases above, we won't disclose your personal information for any purpose unless you consent to it. Additionally, as discussed above, we will never sell your personal information to advertisers or other third parties.

#### Online Analytics, Advertising and Do-Not-Track

##### Online Analytics Providers

We may collect analytics data, or use third-party analytics tools such as Google Analytics, to help us measure website traffic and usage trends for the Sites and to understand more about the demographics of our users. You can learn more about Google's practices here and view its currently available opt-out options. These third-parties use technologies described in the "Automatically Collected Information" section above. The information collected by this technology will be disclosed to or collected directly by these service providers. A current list of analytics providers that we use is located here.

##### Advertising Technology Providers

Data about your activities on our Sites may be collected by us or by advertising technology providers for use in delivering online advertising tailored to your individual characteristics, activities, interests and other factors. These ad services may track your online activities over time and across the web by collecting information through automated means, including through the use of the various technologies described above, and they may use this information, and other information they receive from us or other sources, to deliver advertisements to you on our website, our emails, and other websites. We and third-party vendors may use first-party cookies and third-party cookies together, and other automated technologies, and in some cases additional information, (i) to inform, optimize, and serve ads based on past visits to our Sites or other factors and (ii) to report how ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our Sites or other factors.

You may visit the Network Advertising Initiative's Consumer Opt-Out page or the Digital Advertising Alliance's Consumer Opt-Out page to opt-out of receiving tailored advertising based on your Internet browsing activities from companies that participate in those programs. Some of our advertising-related activities may involve the services of companies that do not participate in those programs. For example, we may use the Google AdWords remarketing service to advertise on third-party websites (including Google) to previous visitors to our Website. You can set preferences for how Google advertises to you using the Google Ad Preferences page. The opt-outs apply only to the browser in which you set them.

For example, if you set the opt-out while using Firefox, but then use Chrome, the opt-out will not be active in Chrome. To opt-out in Chrome, you will need to repeat the opt-out process.

The opt-outs described in this Privacy Policy do not block or delete cookies, or prevent the use of cookies or other technologies for purposes other than selecting ads based on your interests as inferred by your online behavior. If you opt-out, data may still be collected about your web browsing activities and you will still see advertising. Ads may be delivered based on other factors, such as the content of the web page in which they are shown, or demographic information obtained through other means.

Please read our Online Tracking Technologies Policy for more details, including how to remove or modify your cookie settings and a list of the advertising tracking technologies we use.

#### Do Not Track Disclosure

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. However, we do not recognize or respond to browser-initiated DNT signals, as the Internet industry is still working to determine what DNT means, how to comply with DNT, and how to create a common approach to responding to DNT. For more information on "do not track", please visit [www.allaboutdnt.org](http://www.allaboutdnt.org).

#### Data Security and Retention

The security of your personal information is important to us. To prevent unauthorized access, disclosure, or improper use of your information, and to maintain data accuracy, we've established physical, technical, and administrative safeguards to protect the personal information we collect. Although we make concerted good faith efforts to maintain the security of personal information, and we work hard to ensure the integrity and security of our systems, no practices are 100% immune, and we can't guarantee the security of information. Outages, attacks, human error, system failure, unauthorized use or other factors may compromise the security of user information at any time.

If we learn of a security breach, we will attempt to notify you electronically (subject to any applicable laws) so that you can take appropriate protective steps; for example, we may post a notice on our homepage ([www.CollegeGuidanceNetwork.com](http://www.CollegeGuidanceNetwork.com)) or elsewhere on the Site, and may send email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

We will retain your personal information for the length of time needed to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

#### College Guidance Network's Commitments to Providing Transparency and Your Rights

As you can see, we try to be transparent about what information we collect, so that you can make meaningful choices about how it is used. You control the personal information you share with us. You can access or rectify this information at any time. You can also delete your account (if you have created one) or your personal information. We also provide you tools to object, restrict, or withdraw consent where applicable for the use of personal information you have provided to College Guidance Network.



You may exercise any of these rights described in this section by sending an email to [privacy@CollegeGuidanceNetwork.com](mailto:privacy@CollegeGuidanceNetwork.com) or making a request here. Please note that we may ask you to verify your identity before taking further action on your request.

Access, correct or delete your personal information

Object, restrict, or withdraw consent;

Take information out of College Guidance Network

Access, Correct or Delete Your Personal Information

College Guidance Network aims to provide you with easy access to any personal information we have collected about you and give you easy ways to update it or delete it, unless we have to keep that information for legitimate business purposes (e.g., we need at least an email address for your account if you maintain an account with us) or legal purposes. You have the right to correct inaccurate or incomplete personal information concerning you.

You have a right to request access to all your personal information we have on file by emailing us at [privacy@CollegeGuidanceNetwork.com](mailto:privacy@CollegeGuidanceNetwork.com) or by following the instructions here. In some cases, we won't be able to guarantee complete access due to legal restrictions - for example, you will not be allowed to access files that contain information about other users or information that is confidential to us.

You may, at any time, update, correct, or delete certain personal information that you have provided to us by contacting us at [privacy@CollegeGuidanceNetwork.com](mailto:privacy@CollegeGuidanceNetwork.com). When updating your personal information, we may ask you to verify your identity before we can act on your request. More detail on how we will verify you is set forth here. You may also exercise your control or choices with the communications we send you as set forth in "Communications from College Guidance Network" section below.

We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, even after you update or delete personal information you have provided us from our Service, your personal information may be retained in our backup files and archives for a reasonable period of time as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. If you are a California resident, we may also retain personal information as set forth under the California Consumer Privacy Act ("CCPA").

We may reject requests for access, change or deletion that are unreasonably repetitive (more than 2 times per year for access requests), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems). In some cases, we won't be able to guarantee complete access due to legal restrictions - for example, you will not be allowed to access files that contain information about other users or information that is confidential to us.

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort or if more than two (2) times a year for access requests.

## Object, Restrict, or Withdraw Consent

Where you have provided your consent to the processing of your personal information by College Guidance Network you may withdraw your consent at any time by changing your account settings or by sending a communication to College Guidance Network specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. College Guidance Network provides parents, teachers and other users with the opportunity to withdraw consent or 'opt-out' of receiving any future marketing communications from College Guidance Network and its partners at any time. Please see the "Communications from College Guidance Network" section below for more information. Additionally, you can always decline to share personal information with us, or even block all cookies. However, it's important to remember that many of the Site's features may not be accessible, or may not function properly - for example, we may not be able to remember your language preferences for you.

In some jurisdictions, applicable law may entitle you to require College Guidance Network not to process your personal information for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing College Guidance Network will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defense of legal claims. Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your personal information, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defense of legal claims; or (iv) you have objected to the processing as set forth below and pending the verification whether the legitimate grounds of College Guidance Network override your own.

## International Users

The Site is hosted and operated in the United States. If you use the Site from the European Union or the United Kingdom, or any other region with laws governing data collection, protection and use that may differ from United States law, please note that you may be transferring your personal information outside of those jurisdictions to the United States. Where we transfer, store and process your personal information outside of the United Kingdom, European Union or EEA, we have ensured that appropriate safeguards are in place to ensure an adequate level of protection for the rights of data subjects based on the adequacy of the receiving country's data protection laws, or EU-US and Swiss-US Privacy Shield principles.

By using the Site, you consent to the transfer of your personal information outside your home jurisdiction, including to the United States, and to the storage of your personal information in the United States, for the purpose of hosting, using and processing the personal information in accordance with this Privacy Policy. You further acknowledge that these countries may not have the same data protection laws as the country from which you provided your personal information, and that College Guidance Network may be compelled to disclose your personal information to U.S. authorities. You have the right to withdraw your consent at any time by contacting us as described in the "Contacting College Guidance Network" section below.

## EU – U.S. Privacy Shield and Swiss – U.S. Privacy Shield

College Guidance Network complies with the EU – U.S. Privacy Shield Framework and Swiss – U.S. Privacy Shield Framework (“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 and the United Kingdom and/or Switzerland as applicable to the United States in reliance on the Privacy Shield. College Guidance Network has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

College Guidance Network is responsible for the processing of personal information it receives, under the Privacy Shield Frameworks, and subsequently transfers to third-parties acting as an agent on its behalf. College Guidance Network complies with the Privacy Shield Principles for all onward transfers of personal information from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, College Guidance Network is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission and other authorized statutory bodies. In certain situations, College Guidance Network may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern, please contact our U.S.-based third-party dispute resolution provider, free of charge [here](#).

Under certain conditions, more fully described on the Privacy Shield website, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

## Canada

We endeavor to provide privacy protection that is consistent with Canada’s private sector privacy laws, including the Personal Information Protection and Electronic Documents Act (“PIPEDA”). For any questions regarding how we comply with PIPEDA, please contact us at [privacy@CollegeGuidanceNetwork.com](mailto:privacy@CollegeGuidanceNetwork.com).

## Communications from College Guidance Network

If you registered on the Site, provided an email or phone number to us, or otherwise opted-in to receive communications from us, we may send you messages and updates regarding your account, including privacy and security notices, updates regarding the Site or Service, and information regarding products, features or services from College Guidance Network (or third-parties we believe you may be interested in). These communication methods may include but are not limited to, email, postal mail, social media communications, telephone calls, and push notifications. If you have an account with us, we’ll also use your email address to contact you for customer service purposes, or for any legal matters that arise in the course of business. We may receive a confirmation when you open an email from us if your device supports it. We use this confirmation to help us understand which emails are most interesting and helpful.

You can always unsubscribe from receiving any of our 1) marketing emails or other marketing communications whenever you’d like by clicking the “Unsubscribe” link at the bottom of the email; 2)

marketing SMS texts by replying or texting 'STOP'; or 3) marketing push notifications by turning off push notifications on your device. You can also always send us an email at [privacy@CollegeGuidanceNetwork.com](mailto:privacy@CollegeGuidanceNetwork.com).

You can further indicate your preferences by contacting us using the information in the "Contacting College Guidance Network" section below. Please note that opting out of marketing communications does not affect your receipt of business communications that are important to your interaction with College Guidance Network, such as support/service communications, security updates, or account management communications. You may not opt-out of receiving these communications.

#### Social Media Features

The Site may now or in the future include social media features, such as the Facebook Like button or the Twitter Tweet button, or incorporate certain other functions that allow you to interact with the Service through your accounts on certain supported third-party social network or network storage sites (collectively "Social Media Features"). These Social Media Features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. You may be given the option by such Social Media Features to post information about your activities on our Site to a profile page of yours that is provided by a third-party social media network in order to share with others within your network. Social Media Features are either hosted by a third-party or hosted directly on our Site. Your interactions with these Social Media Features are governed by the privacy policy of the company providing each Social Media Feature. If you are not comfortable accessing such social media websites and using such Social Media Features, please don't use them!

#### Third-Party Services

The Site may contain links to websites, applications, and services, including social media services, provided by third parties, as well as embedded images or other third-party content and features. Your use of these features may result in the collection, processing, and sharing of information about you, depending on the features. Any information you choose to provide to or that is collected by these third parties is subject to that third party's policies governing privacy and security and is not covered by our Privacy Policy. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. The fact that we link to a website or other third-party content is not an endorsement, authorization or representation that we are affiliated with that third party, nor is it an endorsement of their privacy or information security policies or practices. We are not responsible for the content, features, privacy and security practices and policies of any third-parties. We encourage you to learn about third parties' privacy and security policies before providing them with personal information.

#### Children

The Sites are not directed toward individuals under the age of thirteen (13), and we request that such individuals do not provide personal information. Additionally, we do not knowingly collect (or knowingly allow any third party to collect) or maintain personal information from anyone under the age of 13. If we become aware that a child under 13 has provided us with personal information or that personal information has been collected from a child under 13, then we will delete this information from our files as quickly as possible. If you are the parent or legal guardian of a child under 13 who you believe has

provided personal information to College Guidance Network, please send an email to College Guidance Network at [privacy@CollegeGuidanceNetwork.com](mailto:privacy@CollegeGuidanceNetwork.com) or contact us as set forth in the “Contacting College Guidance Network” section below to have that child’s information deleted. Please see our College Guidance Network Products Privacy Policy for information about how we protect children’s information in the use of our Products.

#### Online Surveys and Feedback

We like feedback, which means we may conduct online surveys to solicit your opinions and comments. Participation in these surveys is of course optional. If you choose to participate, the information you provide will be aggregated with information from other users to make improvements to the user experience and develop appealing content, features, and promotions. Unless otherwise noted in a survey, your participation will remain anonymous.

You can also ask us questions and share comments or suggestions with us. Your questions, comments, and suggestions may not be kept confidential. We may use your questions, comments, and suggestions to improve the Site and our service, but we will have no obligation to compensate you for any such contributions.

#### California Privacy Rights

##### Your Rights and Choices

If you are a California resident, you have the right to request that College Guidance Network disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Please see this chart for the detailed categories of personal information we collect from each user type, including the sources from which the information was collected, the business purpose for which the information was collected and the third parties with whom we share or disclose personal information for a business purpose.

California consumers also have specific rights of access, deletion and data portability regarding their personal information under the CCPA. If you are a California resident, you have the right to request that College Guidance Network provide the specific pieces of information that we have collected about you. You also have the right to request deletion of your personal information collected or maintained by College Guidance Network. We provide these same rights to all users. Please see the College Guidance Network’s Commitments to Providing Transparency and Your Rights Section for more detail on how to exercise these rights, including how we will verify requests. If you are a California resident, you may also designate a natural person or business entity registered with the California Secretary of State to act on your behalf to exercise these rights.

We will not discriminate against you for exercising any of your rights under CCPA. Unless permitted by the CCPA, we will not:

Deny you goods or services.

Charge you different prices or rates for goods or services, including granting discounts or other benefits, or imposing penalties.

Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably related to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

#### Do Not Sell

As stated in our Services Privacy Policy, College Guidance Network does not sell, and will not sell, personal information of any College Guidance Network Services user to any third-party for any purpose - including for advertising or marketing purposes. Furthermore, we do not share or disclose personal information with any third-parties except in the limited circumstances described in this Privacy Policy and as set forth here. Additionally, we do not and will not sell your personal information collected from our Sites to third-parties for their promotional purposes. However, College Guidance Network may, for website visitors only (i.e. NOT logged in College Guidance Network users), use some personal information for retargeting or other College Guidance Network specific marketing purposes. If we do so and such activity is determined to be a sale under the CCPA, you will be given an opportunity to opt-out, as set forth on our "Do Not Sell" page. Please see our Online Analytics, Advertising and Do-Not-Track section for more detail.

#### "Shine the Light" Law

Pursuant to California Civil Code Section 1798.83(c)(2), College Guidance Network does not share with third parties for their own direct marketing purposes unless you affirmatively agree to such disclosure. If we do share personal information with third parties for their own direct marketing purposes and you authorize us to include your information, we will only share that information in connection with that specific promotion. To prevent disclosure of your personal information for use in direct marketing by a third party, do not opt-in to such use when you provide personal information on our Site. If you later decide that you do not want that third party to use your personal information, you will need to contact the third party directly.

California customers can receive more information about our compliance with this law or to make a request under California Civil Code Section 1798.83 by sending us an email at [privacy@CollegeGuidanceNetwork.com](mailto:privacy@CollegeGuidanceNetwork.com) or by writing to us as set forth in "Contacting College Guidance Network" Section below:

#### Changes and Updates to this Privacy Policy

We may revise our Privacy Policy from time to time as our business practices and legal requirements evolve. You can see when the last update was by looking at the "Last Updated" date at the top of this page. We won't reduce your rights under this Privacy Policy without your explicit consent. If we make any significant changes, we'll provide prominent notice by posting a notice on the Site and/or notifying you by email (using the email address you provided), so you can review and make sure you know about them. We encourage you to review this Privacy Policy from time to time, to stay informed about our collection, use, and disclosure of personal information through the Site. By continuing to use the Site

after the revised Privacy Policy has become effective, you acknowledge that you accept and agree to the current version of the Privacy Policy.

#### Contacting College Guidance Network

If you have any questions, comments or concerns regarding our Privacy Policy, practices or how we protect our community, please contact us at [privacy@CollegeGuidanceNetwork.com](mailto:privacy@CollegeGuidanceNetwork.com) - we'd love to help.

#### Further Privacy and Security Resources

For teachers, school leaders, parents, students, or administrators seeking more information on how we provide safety on College Guidance Network, we provide privacy and security related materials on our Privacy Center as well as our Security Whitepaper.