

CollegeNET, Inc. Privacy Policy

Effective May 25, 2018, CollegeNET, Inc. and its subsidiaries (collectively, “CollegeNET” or “we” or “us” or “our”) have updated our Privacy Policy (“Policy”).

PLEASE READ THIS POLICY CAREFULLY. IT IS YOUR CHOICE WHETHER OR NOT TO PROVIDE PERSONAL INFORMATION TO US. IF YOU CHOOSE TO DO SO, YOU ARE GIVING US YOUR EXPRESS CONSENT TO USE, PROCESS, AND DISCLOSE YOUR PERSONAL INFORMATION AS SET FORTH IN THIS POLICY. IF YOU CHOOSE NOT TO PROVIDE YOUR PERSONAL INFORMATION TO US, YOU MAY NOT BE ABLE TO USE OUR SERVICES

1. Introduction

This Policy details our commitment to protecting the privacy of individuals who visit our Websites, who register to use our services, and who provide personal information to us online or offline. We explain what personal information we collect, how we use it, and other relevant information. We encourage you to read the summaries below and to click on “Learn More” if you would like more information on a particular topic.

2. Scope of This Policy

This Policy applies to the Websites that link to this Policy.

For the purposes of this Policy, the term “Websites” shall refer collectively to www.collegenet.com as well as the other websites that CollegeNET operates and that link to this Policy, including but not limited to:

www.corp.collegenet.com
www.collegenet.cn
www.usacademy.com
www.standout.com
www.mycoalition.org
www.applyweb.com
www.contribute.com
www.25live.collegenet.com/name of client institution

In this Policy, personal information means information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, and online identifier or to one or more factors specific to his/her physical, physiological, genetic, mental, economic, cultural, or social identity. Personal information does not include aggregate information or de-identified information, meaning that the information can no longer be attributed to an identifiable natural person without the use of additional information.

Personal information is required for us to be able to provide the services to you. In addition, some of the services we provide require that we disclose your personal information to third parties, such as to companies that help us to provide our services and to client institutions whose forms we host on our Websites. If you are not willing to provide your personal information and have it disclosed to third parties in accordance with this Policy, you will not be able to use our services.

Our Websites may contain links to other websites, and the information practices and the content of such other websites are governed by the privacy statements of such other websites. We encourage you to review the privacy statements of such other websites to understand their information practices.

While we strongly support the protection of privacy on the Internet, we do not have control over, and cannot be responsible for, the actions of our client institutions or other third parties. We encourage you to review each such client institution's or third party's privacy statement and to otherwise understand its privacy practices, before providing personal information directly to it or in our forms on which it is named.

3. Personal Information We Collect

We collect personal information to operate effectively and provide you with the best experiences with our services. You provide some of this information directly, such as when you create an account, start or submit a form hosted by us, or contact us for support. We get some of the information, such as your IP address, by recording how you interact with our services. We may also get information about you from our client institutions or other third parties.

Information That Your Provide To Us

We ask for and may collect personal information about you such as your name, address, phone number, email address, instant messaging ID, and electronic payment information when you register for an account to access or when you use one or more of our services.

We ask for and may collect personal information from you when you start or submit web forms on our Websites, via email, or as you use interactive features of the Websites, including, participation in surveys, discussions, contests, requesting customer support, or otherwise communicating with us. This personal information may include non-text components such as images and videos.

A third party intermediary is used to manage electronic payment processing. This intermediary is not permitted to store, retain, or use your cardholder data for any purpose except for electronic payment processing on our behalf.

By voluntarily providing us with your personal information, you represent that the personal data is accurate and that you are the owner of such personal data or otherwise have the requisite consent to provide it to us.

Information That We Collect From You On Our Websites

Logs:

As is true with most websites and services delivered over the Internet, we gather certain information and store it in log files when you interact with our Websites and services. This information includes internet protocol (IP) addresses as well as browser type, internet service provider, URLs of referring/exit pages, operating system, date/time stamp, information you search for, locale and language preferences, identification numbers associated with your devices, your mobile carrier, and system configuration information. Occasionally, we connect personal information to information gathered in our log files as necessary to improve our Websites and services. In such case, we would treat the combined information in accordance with this Policy.

Analytics:

We collect analytics information when you use our Websites or our mobile applications to help us improve them. We may also share anonymous data about your actions on our Websites and our mobile applications with third party service providers of analytics services. We do not link analytics information to your personal information.

Information Collected From Other Sources

We may also obtain other information, including personal information, from third parties and combine that with information we collect through our Websites. For example, we may receive information from client institutions you have expressed interest in and test scores that you want associated with your application. In addition, we may have access to certain information from a third party social media or authentication service if you log into our services through such a service or otherwise provide us with access to information from the service.

The Websites may include social media features, such as the Facebook Like button, and widgets, such as the Share This button or interactive mini-programs that run on our Websites. These features may collect your IP address, which page you are visiting on the Websites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Websites. Your interactions with these features are governed by the privacy statement of the companies that provide them.

Any access that we may have to such information from a third party social media or authentication service is in accordance with the authorization procedures determined by that service. By authorizing us to connect with a third party service, you authorize us to access and store your name, email address, and other personal information that the third party service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on these third party services to understand and change the information sent to use through these services.

4. How We Use Personal Information

We use the personal information we collect for a variety of purposes. The legal basis for our processing of personal information will depend on the specific context in which we collect it. We will retain personal information for as long as it is needed.

General Uses

We may use the information we collect about you (including personal information, to the extent applicable) for a variety of purposes, including to: (a) provide, operate, maintain, and improve our services and develop new services; (b) enable you to access and use our services; (c) process and complete transactions and send you related information; (d) send transactional messages, including responses to your comments, questions, and requests; provide customer service and support; and send you technical notices, updates, security alerts, and support and administrative messages; (e) monitor and analyze trends, usage, and activities in connection with the Websites and services; (f) investigate and prevent fraudulent transactions, unauthorized access to our services, and other illegal activities; (g) personalize the Websites and services, including by providing features or advertisements that match your interests and preferences; and (h) for other purposes for which we obtain your consent, such as marketing communications. You can revoke your consent to receive

marketing communications from us by following the unsubscribe instructions included in our marketing communications.

Legal Basis for Processing (GDPR)

If the General Data Protection Regulation (GDPR) is applicable, our legal basis for processing your personal information will depend on the personal information concerned and the specific context in which we collect it. However, we will normally process your personal information only where: (a) we have your consent to do so; (b) we need the personal information to perform a contract with you (e.g. to provide the services you have requested); or (c) the processing is in our or a third party's legitimate interests (and not overridden by your data protection interests or fundamental rights and freedoms). In some cases, we may also have a legal obligation to process your personal information, or may otherwise use your personal information to protect your vital interests or those of another person.

Where we rely on your consent to process your personal information, you have the right to withdraw or decline your consent at any time. Please note that this does not affect the lawfulness of the processing based on consent before its withdrawal.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our (or a third party's) legitimate interests which are not already described in this Policy, we will make clear to you at the relevant time what those legitimate interests are.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided further below.

How Long We Retain Your Personal Information

We will retain your personal information for as long as is needed to fulfill the purposes set forth in this Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

For personal information that we process on behalf of a client institution, we will retain such personal information in accordance with the terms of our agreement with them, subject to applicable law.

5. Sharing Of Information Collected

We share your personal information as necessary to provide the services you request, including sharing information with third party service providers; when required by law; to protect rights and safety; and with your consent.

To Provide the Services Your Request

Personal information is required for us to be able to provide the services to you. You are required to provide personal information in order to create an account with us. When you use our services to submit a form that we host for a client institution, the information you entered into that form will be disclosed to that client institution. In addition, please note that when you enter information into a form that we host for a client institution, the information you enter into that form will be disclosed to that client institution regardless of whether or not you ever complete the form and submit it. You may access a form that is “in progress” and modify the information you have entered into it by following the instructions on the form. After you submit the form, you will not be able to access or modify the information submitted on that form without assistance from CollegeNET. Once your personal information has been disclosed to a client institution, the privacy statements and information practices of that institution will govern the institution’s use of the information disclosed.

Third Party Service Providers

We share information, including personal information, with our third party service providers that we use to provide hosting for and maintenance of our Websites, application development, backup, storage, payment processing, analytics, and other services for us. These third party service providers may have access to or process your personal information for the purpose of providing these services for us. We do not permit our third party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

Compliance with Laws and Law Enforcement Requests; Protection of Our Rights

In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Use, or as otherwise required by law.

Community Forums

The Websites may offer publicly accessible blogs, community forums, comments sections, discussion forums, or other interactive features (“Interactive Areas”). You should be aware that any information that you post in an Interactive Area might be read, collected, and used by others who access it. To request removal of your personal information from an Interactive Area, contact us at privacy_help@collegenet.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

With Your Consent

We share personal information with third parties when we have your consent to do so.

6. Transfer of Information (GDPR)

Personal information we collect will be processed in the United States and possibly transferred to entities in other jurisdictions. BY PROVIDING YOUR PERSONAL INFORMATION TO US, YOU CONSENT TO ANY TRANSFER AND PROCESSING IN ACCORDANCE WITH THIS POLICY.

CollegeNET is based in the United States. The European Commission has recognized the EU-U.S. Privacy Shield Framework as providing an adequate level of data protection for transfers of data to the United States. However, CollegeNET does NOT currently participate in the EU-U.S. Privacy Shield Framework.

WE HEREBY INFORM YOU THAT THERE ARE POTENTIAL RISKS TO YOU ASSOCIATED WITH TRANSFERRING YOUR INFORMATION TO THE UNITED STATES DUE TO THE ABSENCE OF AN ADEQUACY DECISION AND APPROPRIATE SAFEGUARDS. THESE RISKS INCLUDE THE RISK THAT YOU WILL NOT BE ABLE TO EXERCISE YOUR DATA PROTECTION RIGHTS UNDER APPLICABLE LAW TO PROTECT YOURSELF FROM UNLAWFUL USE OR DISCLOSURE OF YOUR INFORMATION.

IF YOU ARE VISITING OUR WEBSITES FROM THE EUROPEAN UNION OR OTHER REGIONS WITH LAWS GOVERNING DATA COLLECTION AND USE, YOU ARE AGREEING TO THE TRANSFER OF YOUR PERSONAL INFORMATION TO THE UNITED STATES AND POSSIBLY OTHER JURISDICTIONS.

7. Your Privacy Rights

Right to Access and Right to Delete

If you provide us with personal information in connection with your use of our Websites or services, you have the right to access this information and the right to have this information deleted, subject to certain limitations. For some of our services, you have the ability to access, change, and delete the information in your account. Some of our services require you to contact us to request access or deletion.

We will not deny you access to your personal information unless applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. Notwithstanding a request to delete information, we may retain information for as long as you maintain an account for our services, as needed to provide you with the services you requested, to comply with our legal obligations, resolve disputes, and enforce our agreements, or because the information is in an Interactive Area. To make a request to have personal information maintained by us deleted, please email privacy_help@collegenet.com. Requests to delete your information will be handled within thirty (30) days. Please note that we cannot change or delete information that you provided in a form that has already been submitted. If you want to update or delete information on such a form, you must contact the client institution to which the form was submitted.

If you request access to or deletion of personal information that we store and process on behalf of a client institution, we will direct you to submit your request to the client institution. Upon receipt of a request from one of our client institutions for us to provide or delete your personal information, we will respond to their request within thirty (30) days. We will retain personal information that we store and process on behalf of our client institutions for as long as needed to provide the services to our client institutions. We will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

California Privacy Rights

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at privacy_help@collegenet.com.

If you are between the ages of 13 and 17, reside in the state of California, and have registered for a CollegeNET account, you may request and obtain removal of content and information that you posted on our Interactive Areas or provided while using services that you participated directly in, such as our Scholarship Election System or USAcademy®. To request removal of such content and information, you must send an email to privacy_help@collegenet.com that complies with the following: (i) the email must be sent from the email address associated with the CollegeNET account; (ii) the subject line of the email must say "Content Removal Request"; and (iii) the body of the email must include the user name of the CollegeNET account. CollegeNET will send you an email to acknowledge receipt of your content removal request. You must then send a reply email to CollegeNET's acknowledgement email to confirm your content removal request. We will remove the content and information posted by you within seven (7) business days after receipt of your reply email confirming your content removal request.

We do not guaranty the complete or comprehensive removal of content and information posted by you in the following circumstances: (i) if any applicable law requires us to maintain the content or information; (ii) if the content or information was stored or posted by a third party who also registered for a CollegeNET account, including any content or information that was originally posted by you and then stored, republished, or reposted by such third party (such as a friend or other third party in a post about you); (iii) if we have anonymized the content or information so that you cannot be individually identified; (iv) if you fail to follow the instructions for submitting a request for removal of the content or information; and (v) if you received compensation or other consideration for providing the content or information (such as being awarded a scholarship in our Scholarship Election System). Please note that we cannot remove information you entered into a form after you have submitted that form. If you want to update information on such a form, you must contact the client institution to which the form was submitted.

GDPR Privacy Rights

If you are from certain territories (such as the European Union), you may have additional rights available to you under applicable laws, including:

- **Rights of access and rectification:** You may have the right to request that we provide you with information about whether we store or process any of your personal information and to have any inaccuracies in your personal information corrected.
- **Right of erasure:** In certain circumstances, you may have a broader right to erasure of personal information that we hold about you – for example, if it is no longer necessary in relation to the purposes for which it was originally collected. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions, or to comply with our legal obligations.
- **Right to object to processing:** You may have the right to request that we stop processing your personal information and/or to stop sending you marketing communications.
- **Right to restrict processing:** You may have the right to request that we restrict processing of your personal information in certain circumstances (for example, where you believe that the personal information we hold

about you is inaccurate or unlawfully held).

- Right to data portability: In certain circumstances, you may have the right to be provided with your personal information in a structured, machine readable and commonly used format and to request that we transfer the personal information to another data controller without hindrance.
- Right to revoke consent: Where our processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. This does not affect the lawfulness of the processing based on consent before its withdrawal.

If you would like to exercise such rights, please complete the request form at www.applyweb.com/gdpr/eu_exercise_rights.html. We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

You also have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

8. Children's Personal Information

We do not knowingly collect any personal information from children under the age of 13. If you are under the age of 13, please do not submit any personal information through our Websites or services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy.

If you are over the age of 13 but under the age of 16 and reside in the European Union, your parent or legal guardian may need to expressly consent to your using our Websites or services. Please direct them to www.applyweb.com/gdpr/parental_consent.html.

Notice to Parents and Legal Guardians

If you consented to our collection, use, disclosure, or other processing of your child's personal information, you may review or have deleted the personal information we have about your child, and you can refuse to permit further collection, use, disclosure, or processing of such personal information in accordance with applicable law. If you have questions or wish to exercise these rights, please contact us at privacy_help@collegenet.com.

9. Other Important Privacy Information

Below you will find additional privacy information you may find important.

Security

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information provided to us, both during transmission and once it is received.

Passwords

Your account information, if you create an account, is accessible online through the use of a password. To

protect the confidentiality of personal information that you provide in connection with a user account, you must keep your password confidential and not disclose it to any other person. We are not responsible for the consequences of any passwords that you disclose or which are lost or stolen. Please advise us immediately if you believe your password has been misused or otherwise misappropriated.

Cookies

We may use cookies, Web beacons, or other technologies to identify users, to collect information about their preferences and history, and to customize their experiences. We use cookies to prevent you from having to repeatedly enter your login information, to save searches temporarily, to administer our Websites and help us understand how visitors use them, and to improve our Websites and our services.

We may use third parties, including network advertisers and other third party ad servers, to deliver ads or other functionality to you. These third parties may use cookies, Web beacons, or other technology to collect information about your visits to our Websites and may use that information to present news and advertisements that may be of interest to you (including while you are no longer on our Websites) or to integrate with social networking sites. This Policy does not apply to, and we are not responsible for, cookies, Web beacons, or similar technologies in third party services, and we encourage you to check the privacy policies of such third parties to learn about their use of cookies and other technology.

You may refuse to accept cookies by following the procedures specific to your Web browser. If you do so, your browser may react strangely, and you may not be able to complete, save, or submit a form or use some services on our Websites.

P3P

Some of our Websites may support the Platform for Privacy Preferences (“P3P”). P3P allows website operators to convey their privacy policies, to the extent possible, in standardized, machine-readable code. This allows P3P-enabled browsers like Internet Explorer to “interpret” the code and automatically compare it to privacy preferences selected by the user in the browser’s settings. In some cases, users may not have selected privacy preferences but instead rely on the default settings in the browser. A P3P-enabled browser automatically informs the user if the website’s privacy practices do not meet the browser’s settings. The user may use this information to decide whether or not to view the website.

Even if our Website supports P3P, the resulting code does not convey all of our privacy practices. There are certain inherent limitations in trying to explain human concepts about privacy in machine-readable code. For example, P3P is not capable of coding policies with regard to the collection of children’s information and parental consent. Moreover, different browsers may interpret our P3P code in different and, at times, conflicting ways. Because of these limitations, P3P does not fully, and may not accurately express all of our data practices. Accordingly, P3P results obtained through use of your browser should only be considered as a shorthand expression of our privacy practices, whereas this Policy is the primary source of information and will take precedence over P3P for all purposes.

Our Scholarship Election System

Our Scholarship Election System is a Web-based service that awards scholarships to winning candidates. In order to participate in our Scholarship Election System, you must register for a CollegeNET account and provide some personal information such as your name, email address, and mobile phone number to us.

The Scholarship Election System allows a registered user to become a candidate for scholarships for which he or she is eligible, to vote for other scholarship candidates, to post comments, videos, essays, candidate statements, and other information, and to indicate a relationship to a candidate.

Scholarship Election System registration is separate from other CollegeNET account registration. To register for the Scholarship Election System, you are required to provide certain personal information, including but not limited to your full name, city of residence, email address, and valid mobile telephone number (capable of receiving text messages). You may also provide optional information, including the name of your high school, a photo of yourself (or another image), and a general statement (regarding, for example, the reasons why users should vote for you to receive a scholarship). Your mobile telephone number is used to send you a text message containing a passcode. You must enter that passcode on the Scholarship Election System Website in order to confirm your registration.

Your Scholarship Election System user name, photo or other image, high school, and general candidate statements, posts you make to discussions, other information you may put in your profile, and any relation to a candidate you indicate on the Website, will all be publicly available on the Website. Please keep this in mind when you choose a user name and if you choose to disclose your photo, statements, discussion postings, and other information in connection with the Scholarship Election System. Please do not write or post any images or information that you do not want publicly available.

Our USAcademy® Service

USAcademy® is a Web-based service that allows users to access information about US culture, US colleges and universities, and the experience of attending college in the United States. In order to participate in USAcademy, you must register for a CollegeNET account and provide some personal information to us.

USAcademy allows a registered user to access information about US culture, US colleges and universities, and the experience of attending college in the United States and to participate in interactive areas of the site.

Your USAcademy user name, photo or other image, other information you may put in your profile, questions you ask, and posts you make to discussions, will all be publicly available on the Website. Please keep this in mind when you choose a user name and if you choose to disclose your photo, statements, discussion postings, and other information in connection with USAcademy. Please do not write or post any images or information that you do not want publicly available on the Website.

Business Transactions

We may assign or transfer this Policy, as well as your account and related information and data, including any personal information, to any person or entity that acquires all or substantially all of our business, stock or assets, or with whom we merge.

Statement Changes

We will modify this Policy if our privacy practices materially change in the future. We will notify you of any such modification by posting the modified Policy on our Websites and indicating at the top of the Policy the date it was last updated. We may also notify you of modification or changes by sending you an email or other notification. We encourage you to review the Policy each time you visit one of our Websites, to see if this Policy has been updated since your last visit to make sure you understand how your personal information will be processed.

10. Contact Us

If you have questions regarding this Policy or about our privacy practices, please contact us by email at privacy_help@collegenet.com.

CollegeNET, Inc.
Attn: Privacy Officer
805 SW Broadway, Suite 1600
Portland, Oregon 97205
United States