

# COLLEGE AID PRO'S PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

**Effective and Last Updated: March 22, 2022**

We respect your concerns about privacy. This California Consumer Privacy Act (“CCPA”) Privacy Notice (the “Privacy Notice”) supplements the information contained in College Aid Pro’s (“CAP”) Website Privacy Policy and applies solely to all visitors, users and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the CCPA and any terms defined in the CCPA have the same meaning when used in this Notice.

## **Sources and Categories of Personal Information We Collect**

When you visit our Sites, we may collect personal information directly from you that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device (“personal information”). Personal information does not include:

- Publicly available information from government records; or
- Deidentified or aggregated consumer information.

The categories of personal information we may collect from you when you visit our Sites are:

- Personal identifiers, such as a real name, alias, postal address, unique personal identifier, IP address, email address, account name, or other similar identifiers;
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, not including publicly available information that is lawfully made available to the general public from federal, state, or local government records.
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a California resident’s interaction with an internet web site, application, or advertisement;
- Geolocation data;
- Professional or employment-related information; and
- Non-public education information.
- Inferences drawing from any of the information above to create a profile.

We may also collect personal information directly from you and from other sources through offline means. This includes contact information (such as name, postal address, email address and telephone number), commercial information, publicly available information and demographic

information, from public sources and third parties (such as data aggregators) who help facilitate our marketing and analytics efforts.

### **Business or Commercial Purposes for Collecting Personal Information**

We use the personal information you provide to us through our Sites for various business or commercial purposes. The purposes for which we use this personal information are described in the “How We Use The Information We Obtain” section of our [Privacy Policy](#).

We use the personal information we collect about you through offline means to: provide goods and services or otherwise transact business with you; provide you information about our products and services; conduct marketing and advertising; perform market research; perform data analytics; help enhance or improve our Sites, products and services; manage our recruiting efforts and career opportunities; prevent fraud; and perform IT and administrative support functions.

### **Categories of Third Parties with Whom We Share Personal Information**

CAP generally does not directly sell your Personal Information for money. However, CAP uses services that help deliver interest-based ads to you and may transfer Personal Information to business partners and affiliates for their personal use. In addition, CAP may share your personal information with affiliates from which you link to the Sites.

We may disclose your personal information to our subsidiaries and affiliates, and service providers, so we can provide you information about our products and services, as well as perform various business functions, such as data analytics, marketing and advertising, market research, mailings, recruiting and hiring, fraud prevention, and other IT and administrative support functions. The personal information disclosed to them may include your contact information (such as name, postal address, email address and telephone number), and demographic information. We do not authorize our service providers to use or disclose the information except as necessary to perform services or functions on our behalf, or to comply with legal requirements.

We also may share personal information with third parties: (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

### **Rights Under the CCPA and How to Exercise Them**

If you are a California resident whose personal information is covered by the CCPA and this Privacy Notice, you may have certain rights under the CCPA as listed below. We will comply with your request in accordance with, and to the extent permissible under, applicable law. You can exercise your rights listed below, or reach out to us with questions or concerns about our privacy

policies and practices, by calling us at (888) 717-0389 or clicking [here](#). You will not receive discriminatory treatment by exercising any of your rights hereunder.

### ***Access***

You have the right to request that we disclose to you the following information about the last 12 months:

- The categories and specific pieces of personal information we have collected about you;
- The categories of sources from which your personal information was collected and of third parties with whom we have shared your personal information; and
- The business or commercial purpose for collecting or selling your personal information.

### ***Deletion***

You have the right to request that we and our service providers delete any personal information which we have collected from you. We and our service providers will not delete your personal information if it is necessary or permissible for us or our service providers to maintain the personal information pursuant to the CCPA or other applicable law.

### ***Information About Our Sharing Of Personal Information***

You have the right to request that we disclose to you the following information about the last 12 months:

- Whether we have sold your personal information (please note that we do not sell your personal information); and
- The categories of personal information we have disclosed about you for a business purpose and the categories of third parties to whom the personal information was disclosed.

When you submit a CCPA request, we will ask you to provide certain verification information, such as your name, phone number, postal address, email address, and date of birth. This information will be used to help us detect potential fraud, verify your identity, and fulfill and respond to your request. Upon receiving a CCPA request, we or our third party verification agent may contact you using the phone number you provide to further verify your identity and answer a few authentication questions.

If you decide to designate an authorized agent (other than through power of attorney) to submit a CCPA request on your behalf, we require that you provide the authorized agent written permission to do so and verify your own identity through the process described in the paragraph above. We also require the authorized agent to submit proof that you have authorized them to act on your behalf.

### ***California Privacy Rights***

We may share personal information with third parties for their direct marketing purposes where permitted or upon your consent. You may request, once per calendar year, disclosure of what, if any, information was shared for direct marketing purposes and with whom the information was shared by contacting us at [privacy@collegeaidpro.com](mailto:privacy@collegeaidpro.com).

### *Changes to Our Privacy Notice*

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Sites and update the notice's effective date. **Your continued use of our Sites following the posting of changes constitutes your acceptance of such changes.**