

## **COLLEGE AID PRO'S WEBSITE PRIVACY POLICY**

### **Effective and Last Updated: March 2022**

College Aid Pro, Inc. ("CAP") respects your privacy. In addition to providing numerous privacy features, CAP has created this Privacy Policy in order to demonstrate in writing our firm commitment to privacy. In particular, this Privacy Policy describes our privacy practices with regard to information about you or, if you are a financial consultant or advisor or other person providing client information, your clients, that could reasonably be used to identify you (or your clients) personally or that is associated with information that identifies you (or your clients) ("Personal Information").

Please take a moment to review the terms of this Privacy Policy. Please note that certain features or services discussed in this Privacy Policy may not be offered on the Site at any particular time.

### **Scope of this Policy**

This policy applies to the Site at collegeaidpro.com and any related sites operated by CAP that post a link to this Privacy Policy (collectively "the Sites") and to information we collect on the Sites, and in e-mail, text and other electronic messages between you and the Sites. It is CAP's policy to comply with applicable data protection legislation and regulations ("Applicable Law"). This regulates the processing of Personal Information relating to individuals and grants various rights in respect of that personal data. The Sites contain links to or from other websites or third parties over which we have no control.

CAP processes Personal Information both as a Processor and a Controller as defined in the General Data Protection Regulation ("GDPR"). The Controller is the entity (or legal person) with whom you provide your Personal Information and which determines the purposes and means of the processing of Personal Information. A Processor is the entity (or legal person) that processes the Personal Information on behalf of a Controller. For example, CAP acts as a Controller relative to the Personal Information you provide directly to us when you engage our services, while it acts as a Processor when it receives information from a financial consultant or other service provider that engages our services on your behalf.

CAP is not responsible for the privacy policies, content or practices of the Controllers or third parties or other websites, including financial consultants, to which you choose to link from the Sites or for whom you submit or otherwise provide your Personal Information to for processing by CAP or others. We encourage you to review the privacy policies of those other websites and third parties so you can understand how they collect, use and share your information.

### **Type of Information We Collect**

We collect Personal Information only if required to provide our products or services, fulfill our legitimate purposes and/or comply with Applicable Law. The types of information we collect will depend on the type of account you register for and/or the services you select or enroll in.

We collect the following general types of information about you when you provide it to us directly or visit our Sites: Personal Information, demographic information, behavioral information and indirect information. Sometimes we collect combinations of all these types of information. In each case, it is indicated on the Sites whether any personal or demographic data must be provided to use the requested service or not. This information may be collected directed from you if you are the account holder, or from a parent, guardian, advisor or consultant who submits information on behalf of a student.

Personal Information is information that can be used to identify you, or any other individual to whom the information may relate, personally. We do not collect Personal Information unless you choose to log into the Site or access the customer portal from the Site, request services or otherwise provide it to us. Some examples of Personal Information that we collect in some areas of our Site, depending on the services you use and local law, are: your name; address; e-mail address; telephone number; credit card information; contact information; login credentials; work information; support tickets, feedback and materials related to the performance of the services; and billing information.

We also collect financial information such as financial worth, assets, gross earnings, home equity, savings and investment information, tax returns and other information that details your or, if you are a financial consultant or advisor, your clients' assets and financial worth.

Demographic information is information that is not unique to you in the sense that it refers to selected population characteristics, such as size of your household, your ZIP code or postal code. CAP also collects, or logs, certain other information that cannot identify you personally when you visit our Sites. This information includes your Internet Protocol ("IP") address and any websites from which you accessed the Sites. An IP address is a number that is automatically assigned to your computer by the ISP computer through which you access the web. CAP logs these IP addresses and domain names and aggregates them for system administration and to monitor the use of our Sites. We use the aggregated information to measure the number of visits to our Sites, the average time spent on our Sites, the number of pages viewed, and various other site use statistics. This monitoring helps us evaluate how our Sites are used and continuously improve the content we provide.

If you are utilizing our White Glove (or Wake Me When It's Over) service, in addition to the information set forth above, CAP may also collect the following information or types of information from you or from a third party with your permission to allow CAP to perform the requested services for the student.

- additional Personal Information including: social security number; date of birth; driver license ID or other state or government-issued identification card number; alien registration number; Federal Student Aid (FSA) ID number, user ID and passwords; login credentials for educational institutes or financial aid service providers;
- financial information including federal tax information including previously filed tax forms, financial account information and balances, records of personal property, credit applications, credit checks and information from credit card reporting agencies;

- additional demographic information such as sex, race/ethnicity, parents’/guardians’ college experience;
- education information, which may include academic records, testing results, degrees, educational history, college search information, such as major the student intends to pursue, sports or performing arts in which the student plans to participate, and names of colleges to which a student intends to apply

In order to complete certain financial forms involved in the college application and financial aid process, we also may collect information from parents or guardians for the students.

If you are a Controller under Applicable Law or otherwise providing Personal Information of others to CAP, you hereby represent and warrant that: (1) the Personal Information has been collected in accordance with Applicable Law; (2) the transfer to CAP for the purpose of processing the Personal Information is authorized under Applicable Law; and (3) you will not ask CAP to process or take any or action with respect to the Personal Information that you are not permitted to take directly.

### **How Information is Used**

Personal Information may be disclosed to trusted persons working together with CAP if they are involved in the completion, delivery or customer support of your order of services offered through the Sites. Examples include third parties who assist in hosting our web servers, analyzing data, providing marketing assistance, sales tracking, processing credit card or other forms of payments, and providing customer service. We also may share aggregated anonymous information about visitors to the Sites with third parties so that they can understand the kinds of visitors to the Sites and how those visitors use the Sites. We also provide aggregated anonymous information involving demographics and/or financial information relative to the financial aid received.

By logging into the Sites, or expressly opting in when presented with choices, you have consented for us to use your information, subject to local law, in at least the following ways: to create a profile for you based on information that you have provided to us; to contact you about any Sites’ updates, informational and service-related communications, including important security updates; to provide you additional communications, information, and promotions such as newsletters; to inform you of other products or services available from CAP or its affiliates; to provide the services requested by you or to fulfill the purpose for which you provide it; in other ways we may describe when you provide the information or later consent; to enable you to provide feedback, to contact us and for us to respond to you; and to generate internal reports about the use of our Sites.

In addition, when you sign up for our White Glove (or Wake Me When It’s Over) service, we use the Personal Information and other information and materials you provide to perform the requested services on your behalf including, but not limited to: completing financial aid applications including the Free Application for Student Aid (FAFSA), the College Scholarship Service Profile (CSS), Institutional Documentation Service (IDOC), federal or other student loan applications, or individual educational institute applications of forms; appealing any financial aid determination; and submitting educational applications.

We disclose information if legally required to do so or if requested to do so by a governmental entity. Because CAP is a US company and information collected on our Sites is stored in whole or in part in the United States, the information will be transferred to the United States and become subject to U.S. law. By using the Sites, you consent to this transfer.

We may disclose such information in connection with the collection of any debts owed by you to CAP.

We may disclose and transfer such information to a third party who acquires all or a substantial portion of CAP's business, whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets. In addition, in the event CAP becomes the subject of an insolvency proceeding, whether voluntary or involuntary, CAP or its liquidator, administrator, receiver or administrative receiver may sell, license or otherwise dispose of such information in a transaction approved by the court.

We may disclose such information to third parties to market their products or services to you if you have consented to these disclosures.

In each of these situations, the recipients of your data may potentially be located in countries whose data protection legislation is different from your country. If you are a resident in any EU member state, for example, you must be aware that the EU authorities do not generally consider that the regulations of non-EU countries ensure an adequate or equivalent level of protection as compared to the EU data protection regulations.

Our collection, storage and use of Personal Information, and the processing by a Processor of Personal Information, shall be governed by the Privacy Policy and, for residents of EU members states, the GDPR.

### **Posting Personal Information to Public Areas of the Sites**

We do not display Personal Information without your permission. However, if you post any Personal Information in public areas of the Sites, such as in product or service reviews, online forums or chat rooms, such information may be collected and used by others over whom CAP has no control. We cannot control the use made by third parties of information you post or otherwise make available in public areas of the Sites.

### **Changes/Modifications**

You may have access to, review, correct, update, restrict the use of, change or delete your account profile information or other Personal Information with CAP at any time. Such steps may be done by logging into the Sites or customer portal and following the instructions therein, if available, or by contacting CAP at [privacy@collegeaidpro.com](mailto:privacy@collegeaidpro.com). You also may obtain, upon request, the Personal Information you provided to us in a structured, commonly-used and machine-readable format. Before providing you with a copy of your Personal Information or correcting, updating or deleting such information, we reserve the right to verify and authenticate your identity and the Personal Information to which you have requested access.

Please note that in accordance with our routine corporate record keeping practices, we may delete certain records that contain your Personal Information. Particularly, any Personal Information that is no longer needed for the purposes specified herein will be deleted.

If you delete or close your account or account profile information with CAP altogether, CAP may retain an archival copy which is not accessible by you or third parties on the Internet. The archival copy is retained only for as long as CAP reasonably considers necessary for audit and record purposes. We will retain logs, demographic, indirect, and statistical information about you and keep an archival copy of this information in an anonymous form. We will also retain aggregate anonymized information. If your Personal Information was previously accessed by others using our Sites, we are not able to delete the information or copies thereof from their systems.

### **How Long We Keep Personal Information**

Typically, we keep Personal Information for the length of any contractual relationship and, to the extent permitted by applicable laws, after the end of that relationship for as long as necessary to perform purposes set out in this Privacy Policy, to protect CAP from legal claims and administer our business. As the provision of services may for a particular student or user may be limited to certain times in a year, we may keep Personal Information until the account associated with the Personal Information has been inactive for at least twelve (12) months unless the provision of services relative to that Personal Information have been terminated or otherwise expressly instructed. When we no longer need to use Personal Information, we will delete it from our systems and records or take steps to anonymize the data unless we need to keep it longer to comply with a legal or regulatory obligation.

### **Other Important Information**

#### **Security**

You are responsible for ensuring that your log-in credentials (your user name and password) are kept confidential. CAP has implemented technical and organizational measures designed to secure Personal Information from accidental loss and from unauthorized access, use, alteration or disclosure. Notwithstanding such measures, the Internet is an open system and we cannot guarantee that unauthorized third parties will never be able to defeat those measures or use Personal Information for improper purposes. Please consider this prior to submitting Personal Information to us via the Sites.

We also use cookies and web beacons to administer our Sites and deliver a personalized experience. For additional detailed information on each of these, please see below.

#### **Children's Privacy**

The Sites are not intended for children under 13, and Personal Information from children under 13 will not knowingly be collected. Personal Information on children under 16 will only be knowingly

collected with the consent of their parent or guardian. Children’s privacy is a serious matter and parents are encouraged to play an active role in their children’s online experience at all times.

### **Use of Cookies, Web Beacons, and JavaScript**

*\*Cookies:* CAP uses “cookies” to help personalize and maximize your online experience and time online. A cookie is a text file that is either stored in your computer’s memory temporarily or placed on your hard drive by a Web page server. Cookies are not used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to your computer and can only be read by a web server in the domain that issued the cookie to you.

When you return to the Sites, cookies enable us to retrieve the information you previously provided, so you can easily use the features that you customized. Because of our use of cookies, we can deliver faster and more accurate results and a more personalized site experience. For example, a cookie helps us to recall your specific information (such as user name, password and preferences).

Most cookies expire after a defined period of time or you can delete cookie files stored on your computer any time. While most Web browsers are initially set up to accept cookies, you can reset your Web browser to refuse cookies or to indicate when a cookie is being set. However, if you choose to decline cookies, that may hinder performance and negatively impact your experience on the Sites. For example, without cookies, you will not be able to set personal preferences

We may allow third party cookies as part of online advertising campaigns to determine and track site traffic landing from affiliated websites or CAP’s advertising banners that have been placed on the websites of third parties.

*\*Web Beacons:* CAP’s Sites may also contain electronic images known as Web beacons (sometimes called single-pixel gifs) that allow us to count users who have visited those web pages and to deliver co-branded services. Web beacons are not used to access your Personal Information; they are a technique we use to compile aggregated statistics about our Sites’ usage. Web beacons collect only a limited set of information including a cookie number, time and date of a page view, and a description of the page on which the Web beacon resides. Because Web beacons are the same as any other content request included in the recipe page, you cannot opt out or refuse them. However, they can be rendered ineffective by either opting out of cookies or changing the cookie setup in your browser.

CAP uses analytic services providers (“Analytic Companies”) and Cookies in order to improve our services, user experience and analyze how the Sites are used. Aside from the approximate location (IP address), the information collected by the Analytic Companies is mostly anonymous traffic data including browser information, device information and language. The information collected is used to provide an overview of how people are accessing and using the Sites and is not used for profiling those who access the Sites.

We also use third parties who have agreed to be bound by confidential and use requirements, to analyze the information collected and provide information, insights and analytics regarding financial aid.

CAP uses Amazon Web Services (“AWS”) and Rackspace Technology (“Rackspace”) for cloud hosting services. AWS has self-certified compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks. AWS has also announced its compliance with the code of conduct of the Cloud Infrastructure Services Providers in Europe, intended to ensure AWS’s compliance with European privacy laws. Further information on AWS’s terms of use and data protection may be found under the following links: <https://aws.amazon.com/privacy/> and <https://aws.amazon.com/terms>. Information on Rackspace’s terms of use and data protection may be found under the following links: <https://www.rackspace.com/information/legal/privacystatement> and <https://www.rackspace.com/information/legal/websiteterms>.

### **Opting Out**

CAP provides users the opportunity to opt-out of or discontinue receiving communications from CAP that are unrelated to your transactions on the Sites. If you do not desire to continue receiving such communications from CAP, please follow the opt-out or unsubscribe link and/or instructions included in the e-mail correspondence or send your request to opt out of CAP at [privacy@collegeaidpro.com](mailto:privacy@collegeaidpro.com). It may be necessary to contact affiliates, business partners or other third parties directly in order to cease receiving communications from those third parties.

Please note that these opt-out or unsubscribe options do not apply to communications relating to the administration of services, contracts, support or other administrative and transactional notices, where the primary purpose of these communications is not promotional in nature.

### **Your European and California Rights**

We do not share Personal Information with third parties for their direct marketing purposes unless you affirmatively agree to, or opt in to, such disclosure. California customers may request further information about our compliance with California laws by e-mailing us at [privacy@collegeaidpro.com](mailto:privacy@collegeaidpro.com). Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this e-mail address.

For California residents, click here [https://collegeaidpstg.wpengine.com/wp-content/uploads/2022/09/CCPA\\_Policy\\_-\\_College\\_Aid\\_Pro\\_3-2022.pdf](https://collegeaidpstg.wpengine.com/wp-content/uploads/2022/09/CCPA_Policy_-_College_Aid_Pro_3-2022.pdf) to learn how we process information in accordance with California law.

In accordance with Article 77 of the General Data Protection Regulation, Europeans also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the GDPR.

### **Third Party Interaction**

As a user of the Sites, you may interact with, purchase goods and/or services, or participate in promotions of advertisers, members, partners, or sponsors showing their goods and/or services on the Sites. Unless otherwise stated, any such interaction, purchase or promotion, including the delivery of and the payment for goods and/or services, and any other term, condition, warranty or representation associated with such correspondence, purchase or promotion, is solely between you and the applicable third party. You agree that CAP, its subsidiaries, affiliates, officers, agents, co-branders or other partners, and employees have no liability, obligation or responsibility for any such interaction, purchase or promotion between you and any such third party.

### **Changes to the Privacy Policy**

CAP reserves the right to modify or amend this Privacy Policy at any time and for any reason. CAP will notify you about any significant changes by providing a prominent notice on the Sites. The changes will be effective as of posting on the Sites. Your continued use of the Sites following the posting of changes indicates your acceptance of these changes.