

## **PRIVACY**

AlwaysEducation provides online platforms that facilitate interaction between students, faculty, administrators, alumni, and other university-connected individuals and provides tools for enhancing the learning experience. This Privacy Policy describes how AlwaysEducation, LLC ("AlwaysEducation," "us," and "we") collects, uses, and shares personal information of users of those online platforms.

### **1. Data we collect**

#### **A. Personal, Biographical, and User Information.**

We will collect information you provide to us, including your name, phone number, email address and school information (including, without limitation, your school, major, and graduation year), employment information, and personal profile information provided or created by you for use when accessing our online platforms (including, without limitation, a profile photo, interests, skills, professional experience, and educational background).

When you access our online platforms, we may collect data reflecting your activities while using the platforms, and we may store data on your behalf. That includes, without limitation, files, preferences, and messages that you save while using the platform. Likewise, when you post certain content using our platforms, the information contained in your posting may be stored on our servers and other users of our platforms may be able to see it. That includes public information you choose to share through your posted profile.

We may collect information regarding the devices you use to access our platforms, including, without limitation, any applicable phone number or other device identifying information. If you contact us via email, we will collect your name and email address, as well as the content of the email, in order to send you a reply. We also may collect other information that you provide to us, including, without limitation, your operating system and version, product registration number, and other information we request from you if you contact us for support.

#### **B. Data Collected Automatically.**

When you use our platforms, our systems automatically collect certain data that assist us with the administration of the platforms. The types of data that are collected automatically upon accessing the platforms include geographic location, how the platform is used, device-identifying information, information about the type of device used, date and time stamps for the visit, the browser type used, the operating system used, Internet Protocol (IP) address, and domain name.

To improve the content and functionality of the platforms and enhance user experiences, to conduct market research, and to communicate information to potential users of the platforms, some of the automatically collected data, including, without limitation, IP addresses, browser type, Internet service provider (ISP), operating system, date and time stamp, and clickstream data are stored in log files.

We may log information using "Cookies." Cookies are small data files stored on your hard drive by a website. When you visit a website, the website sends the cookie to your computer. Your computer stores it in a file located inside your web browser. Cookies do not collect any information stored on your computer or device or in your files. They also do not contain any information that would directly identify you as a person. Cookies show your computer and device only as randomly assigned numbers and letters and not as a proper name. Cookies are intended to make the platforms more useful to you by tailoring the experience to you. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience when using our platforms.

We use analytics to help assess how users use the platforms. Analytics can involve the use Cookies to collect information on the frequency of accessing the platforms, for example. Like other data we collect, data collected from analytics is used to provide you with a more personal and interactive experience when using our platforms.

## 2. How We Safeguard Your Information

We respect your personal information and employ measures to protect it from loss, misuse, or alteration. When appropriate, these steps can include technical measures such as firewalls, intrusion detection and prevention systems, and unique and complex passwords. We also use organizational and physical measures that include training staff on data processing obligations, identification of data incidents and risks, restricting staff access to your personal information, and ensuring physical security of locations where personal data are accessible.

## 3. How We Use Personal Information

We use the personal information we collect for the purposes described in this Privacy Policy or disclosed to you in connection with your use of our platforms. For example, data we collect may be used include to:

- Operate, maintain, and improve our platforms, products, and services;

- Monitor and analyze trends, usage, and activities in connection with the platforms;

- Conduct troubleshooting;

- Facilitate the creation of and secure your access to our platforms;

- Identify you as a user in our system;

- Respond to comments and questions and provide customer service;

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Send information such as technical notices, updates, security alerts, and support and administrative messages;

Communicate about the products and services we provide;

Protect, investigate, and deter against fraudulent, unauthorized, or illegal activity;

Provide and deliver products and services you request; and

Develop and improve marketing and advertising for our platforms.

We may store and process personal information in the United States and other countries.

We may create anonymous data records from your personal information by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to enhance the content of our platforms.

We reserve the right to use anonymous data for any purpose and disclose anonymous data to third parties in our sole discretion.

We may receive testimonials and comments from users who have had positive experiences with our platforms. We will obtain the user's consent prior to posting this information or the testimonial. When we publish this content, we may identify our users by their first and last name as well as the user's title, school, or company, and major. We may post user feedback from time to time. We may share your feedback with your first and last name as well as the user's title, school or company, and major. If we choose to post such information along with your feedback, we will obtain your consent prior to posting your name with your feedback.

#### 4. Sharing Personal Information

Our platforms are intended to allow you to connect and share content and information. You are the person most aware of your own privacy needs. You should be mindful of those privacy needs as you choose with whom you will connect and what information you will share and make public. We cannot control the privacy or security of information you choose to make public while using the platforms. If you share information about others, you get consent for any information you may share about them.

We may disclose, without limitation, aggregated and analytical information about our users and other information that does not identify any individual. We also may disclose personal information that we collect or you provide:

To third parties designated by you;

To our subsidiaries and affiliates;

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To third parties to process payments related to the platforms;

To contractors, service providers and other third parties we use to support our business;

To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us about users is among the assets transferred;

If we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request; and

To other individuals if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of AlwaysEducation, our customers or others.

Content you submit to public areas of the platforms are posted in public areas and are not subject to the restrictions set forth in this Privacy Policy.

Certain portions of the information you provide to us may also be displayed in your profile. Once publicly displayed, that information can be collected and used by others. We cannot control who reads your posting or what other users may do with the information that you post voluntarily. Therefore, it is very important that you do not put personal information in your posts. Once you have posted information publicly, while you may still be able to edit and delete it, you will not be able to edit or delete such information cached, collected, and stored elsewhere by others.

## 5. Control Over Personal Information

You have control over your profile and do not have to post personal information.

You should visit the "Profile" page to understand your options for communications you send and receive. In particular, you may review and update your personal information.

You can control whether we collect certain kinds of analytics and usage information through cookies and similar technologies, you can adjust your settings on your privacy settings page.

You can modify your settings in most web browsers to accept or deny cookies or to request your permission each time a site attempts to set a cookie. You can also manually delete previously stored cookies at any time. Please note that if you choose to block cookies, doing so may impair the platform's availability or functionality.

Our platform may contain links to third party websites. When you click on a link to any other website or location, you will leave our platform and go to another site, and another entity may collect information from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy

do not apply to these outside websites or content, or to any collection of data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content, or websites.

We are committed to protecting the security of your personal information. We use a variety of industry-standard security technologies and procedures to help protect your personal information from loss, misuse and unauthorized access, use, disclosure, alteration, and destruction. While we use reasonable efforts to protect your personal information, we cannot guarantee its absolute security.

## 6. Children as users of the platform

Use of the AlwaysEducation platforms is not intended for people under the age of 13 unless the account is managed by a parent or adult custodian. Further, we do not knowingly collect personal data from children under the age of 13. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personal data to us, please contact us at the email address below, and we will delete such personal data. A student younger than 13 years of age can be granted access to the platforms only if their account is managed by a parent or other adult custodian. If a child under 13 submits personal information and we learn that the account has been created fraudulently, we will make every attempt to delete the information as soon as possible. If you believe that an account has been created without consent for any child under 13, please contact us at [support@alwayseducation.com](mailto:support@alwayseducation.com).

We are required under the Children's Online Privacy Protection Act (COPPA), with limited exceptions, to obtain verifiable parental consent in order to collect, use or disclose personal information from children. COPPA allows the child's school, school districts and other educational institutions (individually, "School," or collectively, "Schools") to obtain consent for the online collection of personal information from children who are students of the School.

If a child wants to use our platforms, he/she must first obtain an account from the School ("Account"). Before an Account is provided to a School, we require that the School (on behalf of the child's parent or legal guardian ("Parent")) (a) to consent to the collection, use and disclosure of personal information of the Child, through the platform, in accordance with this Privacy Policy, and (b) agree that the Child's online activities are subject to our terms of service.

As required under COPPA, we allow Parents to make certain choices regarding the personal information submitted by their children as described in this subsection. Parents should make any permitted requests with the School and have the School, as the Parent's agent, pass on those requests to us. We may rely on the instructions that we receive from the School that we reasonably believe are given by a child's Parent to the School. For example, if a representative of the child's School contacts us and provides the Account information we request, we may assume that the person calling is acting on behalf of the child's Parent.

## 7. Users Outside of the United States.

If you are a non U.S. user of the Services, by using our Services, you acknowledge and agree that your personal information may be processed for the purposes identified in this Privacy Policy. In addition, your personal information may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of personal information may be less stringent than the laws in your country. By providing your data, you consent to such transfer.

## 8. Family Educational Rights and Privacy Act of 1974 (FERPA)

Pursuant to FERPA, any protected educational records created using the AlwaysEducation platforms will be retained by the institution as required under federal law. No personally identifiable information from educational records provided to AlwaysEducation will be redistributed to any third party. Any use of educational records for purposes of AlwaysEducation's data analytics or study will be aggregated and stripped of any personally identifiable information.

Maintaining records created by the student through the AlwaysEducation platforms for the student's continued access beyond graduation is subject to the student's direct acceptance of the AlwaysEducation terms of service. At the potential termination of an agreement with an educational institution or an individual, at the reasonable request of the educational institution or individual, AlwaysEducation agrees to make reasonable efforts to return or destroy any FERPA-protected educational records then in its possession.

**CONTACT INFORMATION.** To ask a question or comment about this Privacy Policy or our privacy practices, contact us at [support@alwayseducation.com](mailto:support@alwayseducation.com).

**CHANGES TO THIS PRIVACY POLICY.** We may change this Privacy Policy from time to time for any reason. If we make any changes, we will change the Last Updated date above and post the new Privacy Policy. You should consult this Privacy Policy regularly for any changes.