

myOptions Privacy Policy

Effective Date: August 20, 2020

To download and/or print this Privacy Policy (“Privacy Policy”), [click here.](#)

A previous version of this policy, dated January 1, 2020, can be downloaded [here](#).

Welcome! This Privacy Policy describes how My College Options, Inc. (“**myCollegeOptions**,” “**we**,” “**us**,” “**our**,” etc.) collects, uses, and shares information about you, including the choices myCollegeOptions offers with respect to that information, in connection with (a) the “**Personal Profile Information**” (defined below) you provide during “**Registration**” (defined below), and (b) your use of the “**Program**” (defined below).

The Programs. The myOptions Program (“**myOptions Program**”) refers to the registration process described below, subsequent updates to your Personal Profile Information (defined below), and use of the Service. The Encourage Program (“**Encourage Program**”) refers to the registration process described below, subsequent updates to your Personal Profile Information (defined below), and use of the Service. Collectively, the MyOptions Program and the Encourage Program, with any other programs offered by the Services, shall be referred to as the “**Program**”.

Registration. Registration for the myOptions Program consists of the completion and submission of an online or offline form distributed to U.S. secondary schools; OR directly accessing the Program online via the Service (as defined below). Registration for the Encourage Program consists of the completion of an online form, directly accessing the Encourage Program online via the Service or other methods that may be provided by us. By registering for a Program, you acknowledge and accept the Service’s [Privacy Policy](#) and consent to the collection and use of your data in accordance with the [Privacy Policy](#), and any additional privacy statements that may be posted on an applicable part of a Registration form or Service information collection page. If you do not agree and consent, do not participate in the Program or access or use the Service. Our Program is entirely voluntary and not required by your district, school or any agency.

Personal Profile Information. Your Personal Profile Information means the Personal Information and Demographic Information you provide when registering for the Program AND any updates you make to your Personal Profile Information online via the Service.

The Program. The Program refers to the Registration process, subsequent updates to your Personal Profile Information, use of the [encourage.myoptions.org](#), [myoptions.org](#), [mycollegeoptions.org](#), [admitted.ly](#) and/or [admittedly.com](#) websites, the myOptions mobile app, and any other online service location (e.g., website or mobile app) that posts a link to this Privacy Policy (“**Service**”), regardless of how you access or use it, whether via computer, mobile device, consumer electronics device, or otherwise.

By viewing, accessing, registering, creating an account or otherwise using the Program, you agree to our [Terms of Use](#) and consent to our collection, use and disclosure practices, and other activities as described in this Privacy Policy, and any additional

privacy statements that may be posted on an applicable part of the Program. If you do not agree and consent, discontinue use of the Program, and uninstall Program downloads and applications.

Our Data Practices. The most important benefit of registering for the any Program other than the Encourage Program is that we use and share your information to help you connect with colleges, universities and other providers of Education-related Products and Services (defined below) so you can receive information and resources directly from them and through this program. Information you and your family may receive includes information from colleges and universities, as well as other Education-related Products and Services such as: (a) student loans and financial aid, college admissions and tutorial services, extra-curricular enrichment and recognition programs; (b) career, employment and military opportunities; and (c) camps from non-profit organizations, companies offering educational products & services, and government agencies. The most important benefit of registering for the Encourage Program is to allow counselors, educators, mentors, parents and friends connect with students and, as such, any information of any person who registers under the Encourage Program will not be shared unless set forth herein. My College Options, Inc. is a non-profit educational organization and will not share your Personal Profile Information with commercial marketers for the purpose of offering to sell you non-Education-related Products and Services without your consent. For more information on our data practices, read our entire Privacy Policy. Below is a table of contents which you can click on to link to each section of the Privacy Policy. At the end of each section, you can click on a link to return to this table of contents.

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1. Our Commitment to the Protection of Student Information and Privacy

a. **Determining Appropriate Educational Use**

The primary mission of myCollegeOptions is to facilitate connections between registered students and accredited colleges and universities. These institutions can access student profile information and communicate with students directly and/or reach out through the Service itself. Any other education-related organizations wishing to connect with registered users of the Program are individually reviewed to determine whether or not they offer a “redeeming educational value” AND that they fit in one of the following approved categories defined within the Elementary and Secondary Education Act (ESEA) and other applicable law:

- i. Financial planning, student loans, and scholarships
- ii. Enrichment opportunities such as travel programs, camps, extra-curricular activities and conferences
- iii. Curriculum materials, books, Internet based educational programs, educational magazines providing low-cost literary products
- iv. Academic assistance, remedial help, and preparation for college-entrance examinations
- v. Recognition for high levels of performance
- vi. Participation in community service
- vii. Learning about civic responsibilities
- viii. Employment, career options and the military

The Program (other than the Encourage Program) also uses student profile information and college planning behavior for research purposes to have a greater understanding of the nation's high school and college-bound students. Collectively, the purposes set forth above in this sections are “**Education-related Products and Services.**” The Encourage Program uses profile and behavior for research purposes to get a greater understanding of the educational system.

B. **Advisory Council Members**

- . Jill Cook, Assistant Director American School Counselor Association
- i. Dr. Nicole Francis, President and CEO Visionary Policy Institute
- ii. Mr. Reggie Felton, Director, Federal Relations National School Boards Association
- iii. Harley Frankel, Executive Director College Match
- iv. Delia Pompa, Senior Fellow for Education Policy Migration Policy Institute

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2. Collection of Information

A. Information You Provide

The Program, and/or we or our Service Providers (defined below), may collect information you provide directly to us and/or our Service Providers via the Program. For example, we collect information when you use or register for the Service, subscribe to notifications, post on the Service, participate in activities, or communicate or transact with us through the Program. In addition, when you interact with Third-Party Services (defined below), you may be able to provide information to those third parties. For more information on Service Provider data collection and practices, [click here](#). For more information on Third-Party Services' data collection and practices, [click here](#). The Program, we and/or our Service Providers, and/or Third-Party Services, may collect information that may include: (i) personally identifiable information, which is information that identifies you personally, such as your first and last name, email address, phone number, and address (“**Personal Information**”); and (ii) demographic information, such as your gender, age, zip code and interests (“**Demographic Information**”). Except to the extent required by applicable law, Demographic Information is “non-Personal Information” (i.e., data that is not Personal Information under this Privacy Policy). In addition, Personal Information, including without limitation, Personal Profile Information, once “de-identified” (i.e., the removal, obscuring or modification of personal identifiers to make data no longer personally identifiable, including through anonymization, pseudonymization or hashing) is also non-Personal Information and may be used and shared without obligation to you, except as prohibited by applicable law. We make no assurances that the de-identified data is not capable of re-identification. To the extent any non-Personal Information is combined by or on behalf of myCollegeOptions with Personal Information myCollegeOptions itself collects directly from you via the Program, we will treat the combined data as your Personal Profile Information under this Privacy Policy.

B. Information Collected Automatically

The Program, we and/or our Service Providers, and/or Third Party Services, may also automatically collect certain information about you when you access or use the Service, and/or visit third party services (“Usage Information”). Usage Information may include IP address; device identifier; browser type; operating system; information about your use of the Service; and data regarding network connected hardware (e.g., computer or mobile device). Except to the extent required by applicable law, or to the extent Usage Information is combined by or on behalf of myCollegeOptions with Personal Profile Information, we do not consider Usage Information to be Personal Profile Information. For more information on Service Provider data collection and practices, [click here](#). For more information on Third-Party Services' data collection and practices, [click here](#). The methods that may be used on the Service to collect Usage Information include:

i. Log Information

Log information is data about your use of the Service, such as IP address, browser type, Internet service provider, referring/exiting pages, operating

system, date/time stamps, and related data, which may be stored in log files or otherwise.

ii. **Information Collected by Cookies and Other Tracking Technologies**

Cookies, web beacons (also known as “tracking pixels”), embedded scripts, location-identifying technologies, fingerprinting, device recognition technologies, in-app tracking methods and other tracking technologies now and hereafter developed (“Tracking Technologies”) may be used to collect information about interactions with the Service or emails, including information about your browsing and activity behavior.

a. **Cookies**

A cookie is a small text file that is stored on a user’s device which may be session ID cookies or tracking cookies.

Session cookies make it easier for you to navigate the Service and expire when you close your browser. Tracking cookies remain longer and help in understanding how you use the Service, and enhance your user experience.

Cookies may remain on your hard drive for an extended period of time. If you use your browser’s method of blocking or removing cookies, some, but not all types of cookies may be deleted and/or blocked and as a result, some features and functionalities of the Service may not work. A Flash cookie (or locally shared object) is a data file that may be placed on a device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your device. HTML5 cookies can be programmed through HTML5 local storage. Flash cookies and HTML5 cookies are locally stored on your device other than in the browser, and browser settings won’t control them. To identify certain types of locally shared objects on your computer and adjust your settings, please visit: [here](#). The Service may associate some or all of these types of cookies with your devices.

b. **Web Beacons (“Tracking Pixels”)**

Web beacons are small graphic images, also known as “Internet tags” or “clear gifs,” embedded in web pages and email messages. Web beacons may be used, without limitation, to count the number of visitors to the Service, to monitor how users navigate the Service, and to count content views.

c. **Embedded Scripts**

An embedded script is programming code designed to collect information about your interactions with the Service. It is temporarily downloaded onto your computer from our web server, or from a third party with which we work, and is active only while you are connected to the Service, and deleted or deactivated thereafter.

d. Location-identifying Technologies

GPS (global positioning systems) software, geo-filtering and other location-aware technologies locate (sometimes precisely) you for purposes such as verifying your location and delivering or restricting content based on your location.

e. Fingerprinting

Collection and analysis of information from your device, such as, without limitation, your operating system, plug-ins, system fonts and other data, are for purposes of identification and/or tracking.

f. Device Recognition Technologies

Technologies, including application of statistical probability to data sets, as well as linking a common unique identifier to different device use (e.g., Facebook ID), attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices is the same user or household).

g. In-app Tracking Methods

There are a variety of Tracking Technologies that may be included in mobile applications, and these are not browser-based like cookies and cannot be controlled by browser settings. Some use device identifier, or other identifiers such as “Ad IDs” to associate app user activity to a particular app and to track user activity across apps.

C. Information myCollegeOptions Collects from Partners and Other Sources

We may also obtain information about you from other sources, including Service Providers and Third-Party Services, and combine that with your Personal Profile Information. Notwithstanding anything to the contrary, except for such data combined by or on behalf of myCollegeOptions with your Personal Profile Information, this Privacy Policy is not intended to limit our activities regarding such third-party-sourced information (including Personal Information) and limitations on our activities regarding your Personal Profile Information (e.g., on sharing) described in this Privacy Policy do not apply. The Program is not responsible or liable for the accuracy of the information provided by third parties or for third party policies or practices.

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3. Use of Information

We may use information about you, including Personal Profile Information and other Personal Information, for purposes permitted by applicable law and not inconsistent with this Privacy Policy or written statements we have made when collecting Personal Information from you, including without limitation:

A. Allow you to participate in the features and services we offer

- B.** Facilitate, manage, personalize and improve your experience;
- C.** Process your registration, analyze your interests and/or fulfill your requests;
- D.** Transact with you, provide services or information you request, respond to your comments, questions and requests, serve you content and/or advertising and send you notices;
- E.** Improve the Program and for any other internal business purposes;
- F.** Tailor our content, resources and offers;
- G.** Fulfill other purposes disclosed at the time you provide Personal Information or otherwise where we have a legally permitted purpose or are required to do so; and
- H.** Prevent and address fraud, breach of policies or terms and threats or harm.

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4. Sharing of Information

We may share non-Personal Information, and Personal Information that is not deemed your Personal Profile Information hereunder, with third parties for any purpose as permitted by applicable law and not inconsistent with this Privacy Policy or written statements we have made when collecting Personal Information from you. The Program sharing of your Personal Profile Information is, however, subject to the following:

A. Education-related Products and Services

We share your information with colleges, universities and others that offer Education-related Products and Services. A value of this is that you may receive information and/or offers from colleges, universities and others that offer Education-related Products and Services. Absent your consent, however, (which may be by means of third party interaction described in the next subsection) we will not share your Personal Profile Information with third parties for their own direct marketing of non- Education-related Products and Services.

B. Your Disclosure or Consent

As more fully described in [Section 5](#) (Co-branded Pages, Third Party Services, Advertising and Analytics), your activities on the Service may, by their nature, result in the sharing of your Personal Information, including Personal Profile Information, with third parties, and by engaging in these activities you consent to that and further sharing, and your Personal Information, including Personal Profile Information, may be disclosed to third parties. Such third party data receipt and collection is subject to the privacy and business practices of that third party, not myCollegeOptions. Further, if you post content on publicly available portions of our Service, that content will be available for view and use by us and third parties, will be non-confidential and you consent to the unlimited use and sharing of it by us or third parties; provided, however, that California minors may have certain post removal rights for content they post on our Service. See “Children” at [Section 8](#) for more information. For more information on our rights to

use and share the content you publicly post on the Service, see [Section 2](#) of our Terms of Use.

C. **Corporate Transactions**

We may share your Personal Profile Information, including without limitation, your non-Personal Information and Personal Information that is not Personal profile Information, in connection with or during negotiations of, any proposed or actual merger, purchase, sale, joint venture or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another company (“**Corporate Transactions**”).

D. **Other**

We may also share any information about you (including, without limitation, your Personal Profile Information) for any purposes not inconsistent with this Privacy Policy, or otherwise not prohibited by applicable law, including without limitation:

- i. To our agents, vendors, consultants, and other service providers (collectively “Service Providers”) who may receive, or be given access to your information, including without limitation, Personal Information, Demographic Information, and Usage Information, in connection with their work on our behalf, provided however, we do not authorize our Service Providers to use Personal Profile Information provided by us to the Service Providers to send you direct marketing messages other than as part of our Program related to Education-related Products and Services absent your consent. Service Providers may associate their own Tracking Technologies with you to collect information from you. For more information on Tracking Technologies and your choices regarding them, read [Section 2](#) and [Section 10](#).
 - ii. We and third parties may convert your Personal Profile Information and your Personal Information to non-Personal Information, including without limitation through hashing it or substituting a unique identifier for the personal information and we and third parties may use and share that data as permitted by applicable law, including to match data attributes from other sources and to send targeted advertisements. For your options regarding targeted advertising, see [Section 10.B](#). For such practices by third parties, consult their privacy policies.
 - iii. To comply with the law, law enforcement or other legal process, and in response to a government request.
 - iv. To our affiliated entities.
 - v. If we believe your actions are inconsistent with our terms of use, user agreements, applicable terms or policies, or to protect the rights, property, life, health, security and safety of myCollegeOptions, the Service or its users, or any third party.
5. **Co-branded Pages, Third Party Services, Advertising and Analytics**
From time to time, our Service may include co-branded pages, or sections of a page, related to one of our marketing partners. We will try to show clearly, by placing our

marketing partner's name or logo in a prominent place or otherwise, whether a page, or section of a page, is co-branded. If you provide your information on or through one of these co-branded opportunities, the information you submit (which may include pulling from your Personal Profile Information if you so elect) may be shared by you with that marketing partner, and it may associate its own Tracking Technologies with you. In such case, that party's privacy policy and its terms and conditions of use apply to you with respect to that third party. Some of these marketing partners may be commercial marketers, or have relationships with commercial marketers, so by sharing your information with them, you may be consenting to receive direct marketing that is not restricted to Educational-related Products and Services. The Service may also include hyperlinks to, or include on or in connection with the Service (e.g., apps and plug-ins), websites, locations, platforms, applications or services operated by third parties ("**Third Party Service(s)**"). These Third-Party Services may use their Tracking Technology to independently collect information about you and may solicit Personal Information from you. Certain functionalities on the Service permit interactions that you initiate between the Service and certain Third-Party Services, such as third party social networks ("**Social Features**"). Examples of Social Features include: enabling you to send content such as contacts and photos between the Service and a Third Party Service; "liking" or "sharing" our content; logging in to the Service using your Third Party Service account (e.g., using Facebook Connect to sign-in to the Service); and to otherwise connect the Service to a Third Party Service (e.g., to pull or push information to or from the Service). If you use Social Features, and potentially other Third-Party Services, information you post or provide access to may be publicly displayed on the Service or by the Third Party Service that you use. Similarly, if you post information on a third-party service that references the Service (e.g., by using a hashtag associated with myCollegeOptions in a tweet or status update), your post may be used on or in connection with the Service or otherwise by us. Also, both myCollegeOptions and the third party may have access to certain information about you and your use of the Service and any Third-Party Service.

Our Service may engage and work with Service Providers and other third parties to serve advertisements on the Service, and/or on third-party services. Some of these ads may be tailored to your interests based on your browsing of the Service and elsewhere on the Internet over time, sometimes referred to as "interest-based advertising" and "online behavioral advertising" ("Interest-based Advertising"), which may include sending you an ad on a third party service after you have left the Service (i.e., "retargeting"). See [Section 10](#) for information on certain choices offered by third parties regarding Interest-based Advertising.

Our Service may use Google Analytics and other Service Providers for analytics services. These analytics services may use cookies and other Tracking Technologies to help us analyze Service users and how they use the Service. Information generated by these services (e.g., your IP address and other Usage Information) may be transmitted to and stored by these Service Providers on servers in the U.S. (or elsewhere) and these Service Providers may use this information for

purposes such as evaluating your use of the Service, compiling statistic reports on the Service's activity, and providing other services relating to Service activity and other Internet usage. See [Section 10](#) for information on certain choices offered by Google Analytics and other third parties regarding analytics.

Except to the extent we combine information from Service Providers, Third-Party Services or other third parties with Personal Profile Information, in which case we will treat the combined information as Personal Profile Information under this Privacy Policy (See [Section 2.C](#)), data obtained by us from a third party, even in association with the Service, is not subject to our limitations regarding Personal Profile Information under this Privacy Policy. Otherwise, the information collected, stored and shared by third parties remains subject to their privacy policies and practices, including whether they continue to share information with us, the types of information shared, and your choices on what is visible to others on third-party services.

We are not responsible for and make no representations regarding the policies or business practices of any third parties, including without limitation, analytics Service Providers and Third- Party Services associated with the Service, and encourage you to familiarize yourself with and consult their privacy policies and terms of use. See [Section 10](#) for more on certain choices offered by some third parties regarding their data collection and use, including regarding Interest-based Advertising and Analytics.

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6. Data Security and Monitoring

We take reasonable measures to protect Personal Profile Information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Nevertheless, transmission via the internet and online digital storage are not completely secure and we cannot guarantee the security of your information collected through the Service. To help protect you and others, we and our Service Providers may (but make no commitment to) monitor use of the Service, and may collect and use related information including Personal Profile Information and other Personal Information for all purposes not prohibited by applicable law or inconsistent with this Privacy Policy, including without limitation, to identify fraudulent activities and transactions; prevent abuse of and investigate and/or seek prosecution for any potential threats to or misuse of the Service; ensure compliance with the [Terms of Use](#) and this Privacy Policy; investigate violations of or enforce these agreements; and otherwise to protect the rights and property of myCollegeOptions, its partners, and members. Monitoring may result in the collection, recording, and analysis of online activity or communications through our Service. If you do not consent to these conditions, you must discontinue your use of the Service.

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7. International Transfer

The Program is based in the U.S. and the information we and our Service Providers collect is governed by U.S. law. If you are accessing the Service from outside of the U.S., please be aware that information collected through the Service may be transferred to, processed, stored and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Service or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing and storage of your information, including Personal Information, in the U.S. as set forth in this Privacy Policy.

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8. Children

The Service is intended for a general audience and not directed to children less than 13 years of age. The Program does not intend to collect personal information as defined by the U.S. Children's Online Privacy Protection Act ("COPPA") (Children's Personal Information) in a manner that is not permitted by COPPA. If you are a parent or guardian and believe we have collected Children's Personal Information in a manner not permitted by COPPA, please contact us [here](#) and we will remove such data to the extent required by COPPA. Any California residents under the age of eighteen (18) who have registered to use the Service, and who posted content or information on the Service, can request removal by contacting myCollegeOptions [here](#), detailing where the content or information is posted and attesting that you posted it. myCollegeOptions will then make reasonable good faith efforts to remove the post from prospective public view or anonymize it so the minor cannot be individually identified to the extent required by applicable law. This removal process cannot ensure complete or comprehensive removal. For instance, third-parties may have republished or archived content by search engines and others that myCollegeOptions does not control.

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9. Accessing and Changing Your Information

We may provide web pages or other mechanisms allowing you to delete, correct or update your Personal Profile Information. California minors should see "Children" at [Section 8](#) regarding removal of certain content they have posted on the Service. We will make good faith efforts to make requested changes in the myCollegeOptions then-active databases as soon as practicable, but it is not always possible to completely change, remove or delete all of your information or postings from our databases and residual and/or cached data may remain archived thereafter. Further,

we reserve the right to retain data (a) as required by applicable law; and (b) for so long as reasonably necessary to fulfill the purposes for which the data is retained except to the extent prohibited by applicable law.

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10. Choices Regarding Your Information

A. Tracking Technologies Generally

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options so you may need to set them separately. Also, tools from commercial browsers may not be effective with regard to Flash cookies (also known as locally shared objects), HTML5 cookies or other Tracking Technologies. For information on disabling Flash cookies, go to Adobe's website [here](#). Please be aware that if you disable or remove these technologies, some parts of the Service may not work and that when you revisit the Service, your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations. App-related Tracking Technologies in connection with non-browser usage (e.g., most functionality of a mobile app) can only be disabled by uninstalling the app. To uninstall an app, follow the instructions from your operating system or handset manufacturer. Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. Note, however, there is no consensus among industry participants as to what "Do Not Track" means in this context. Like many online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you can visit [here](#), but we are not responsible for the completeness or accuracy of this third party information. Some third parties, however, may offer you choices regarding their Tracking Technologies. One way to potentially identify cookies on our Site is to add the free [Ghostery plug-in](#) to your browser, which according to Ghostery will display for you traditional, browser-based cookies associated with the websites (but not mobile apps) you visit and privacy and opt-out policies and options of the parties operating those cookies. The Program is not responsible for the completeness or accuracy of this tool or third party choice notices or mechanisms. For specific information on some of the choice options offered by third party analytics and advertising providers, see the next section.

B. Analytics and Advertising Tracking Technologies

Analytics and Advertising Tracking Technologies You may exercise choices regarding the use of cookies from Google Analytics by going [here](#) or downloading the Google Analytics Opt-out Browser Add-on. You may choose whether to receive Interest-based Advertising by submitting opt-outs. Some of the advertisers and Service Providers that perform advertising-related services for us and our partners may participate in the Digital Advertising Alliance's

("DAA") Self-Regulatory Program for Online Behavioral Advertising. To learn more about how you can exercise certain choices regarding Interest-based Advertising, visit [here](#), and [here](#) for information on the DAA's opt-out program for mobile apps. Some of these companies may also be members of the Network Advertising Initiative ("NAI"). To learn more about the NAI and your opt-out options for their members, see [here](#). Please be aware that, even if you are able to opt out of certain kinds of Interest-based Advertising, you may continue to receive other types of ads. Opting out only means that those selected members should no longer deliver certain Interest-based Advertising to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). The Program is not responsible for effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs. However, we support the ad industry's [Self-regulatory Principles for Online Behavioral Advertising](#) and expect that ad networks we directly engage to serve you Interest-based Ads will do so as well, though we cannot guaranty their compliance.

C. **Mobile Apps**

With respect to our mobile apps ("**App(s)**"), you can stop all collection of data generated by use of the App by uninstalling the App. Also, you may be able to exercise specific privacy choices, such as enabling or disabling certain location-based or other services, by adjusting the permissions in your mobile device or in App settings. However, other means of establishing or estimating location in connection with Service use (e.g., IP address, connecting to or proximity to wi-fi, Bluetooth, beacons, or networks, etc.) may persist. See also the prior section regarding the DAA's mobile Interest-based Advertising choices.

D. **Communications**

You can opt out of receiving certain promotional email communications from us at any time by following the instructions provided in emails to click on the unsubscribe link, or if available by changing your communication preferences by logging onto your account. Please note that your opt-out is limited to the email address and will not affect subsequent subscriptions. If you opt-out of only certain communications, other subscription communications may continue. Even if you opt out of receiving promotional communications, we may, subject to applicable law, continue to send you non-promotional communications, such as those about your account, transactions, servicing, or our ongoing business relations. By providing a phone number you consent to be contacted at that number, including promotional phone calls related to us and educational related companies we think you may find of interest, and administrative texts regarding the Program or Service that do not include advertising messages. For promotional calls, you may opt-out of pre-recorded calls by following the automated prompts and for live promotional calls you may opt-out by telling the operator. Such an opt-out will prospectively end our promotional calls to you, and we will no longer share your number with educational related companies for their promotional calling, unless you subsequently opt back in. However, you will need to opt-out of any educational related companies that received your number prior to your opting out with us directly with those third parties. For text messages, you

may withdraw consent by replying “STOP” to our texts, but if you thereafter provide a number to receive texts you will have opted back in. We may offer separate text subscription programs for different purposes, in which case you must opt-out of each one separately. If you have provided multiple numbers, you must opt- out of each number separately. These calls and texts may be made using autodialers and/or pre- recorded messages. You are not required to consent as a condition of purchasing any property, goods or services and no purchase is necessary to subscribe. Calls from or to us may be recorded; if you do not consent to call recording, discontinue the call.

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11. Your California Privacy Rights

California residents have additional rights as explained [here](#)

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12. Changes to the Privacy Policy

We reserve the right to revise and reissue this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy, but material changes will only apply prospectively, and we will not use previously collected Personal Information in a way materially different than the Privacy Policy in effect at the time of collection, unless you otherwise consent. Your continued use of the program or Service indicates your consent to the Privacy Policy then posted. If you do not agree, discontinue use of the Service and uninstall Service downloads.

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13. Contact Us

If you have any questions or comments about this policy, please email us [here](#).

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