Copy of Data Privacy Policy

CollegeSource's Commitment to Data Privacy

Last update 10 Oct 2018

CollegeSource, Inc. ("CollegeSource") is committed to protecting the personal information you provide to the company. As used in this Privacy Statement, "Personal Data", means any information about an identified or identifiable natural person.

General Terms
These General Terms apply to anyone (except CollegeSource employees) whose Personal Data is processed by CollegeSource.

Purposes of Personal Data Collection and Use
CollegeSource collects, uses and processes Personal Data for the purposes of:
• Providing information about our products, services and events
• Providing products, services and support to our customers
• Administrative purposes relating to processing transactions with our customers
• Communicating with business partners, vendors, agents and contractors about business matters
• Analysis of information in order to improve business practices, products and services
• Conducting related tasks for legitimate business purposes
• Other purposes disclosed at the time of collection
• Compliance with legal requirements and protection of rights and property

Security of Personal Data
CollegeSource is committed to safeguarding the Personal Data that it receives. While CollegeSource cannot guarantee the security of Personal Data, CollegeSource has implemented reasonable technical and organizational measures to protect Personal Data in CollegeSource's possession from loss, misappropriation and unauthorized access, disclosure and destruction.

CollegeSource utilizes a combination of online and offline security technologies, procedures and organizational measures to help safeguard Personal Data. For example, facility security is designed to prevent unauthorized access to CollegeSource computers. Electronic security measures — including, for example, network access controls, passwords and access logging — provide protection from hacking and other unauthorized access. CollegeSource also protects Personal Data through the use of firewalls, role-based restrictions and, where appropriate, encryption technology. CollegeSource limits access to Personal Data to employees, subcontractors, and third-party agents that have a specific business reason for accessing such Personal Data. Individuals who have been granted access to Personal Data will be made aware of their responsibilities to protect such information and will be provided training and instruction on how to do so.

If CollegeSource learns of an unauthorized disclosure of Personal Data that is within CollegeSource's possession or control, CollegeSource will perform all actions required by applicable laws, including taking prompt measures to remedy the unauthorized disclosure and providing required notices.

CollegeSource hires other companies to provide certain services on our behalf. CollegeSource will provide these companies only with the information they need to deliver the services, and they are contractually prohibited from using that information for any other purpose.

CollegeSource exclusively stores and processes data in the United States. CollegeSource does not maintain facilities or personnel in any other country.

CollegeSource's products and services are not intended for children under the age of 13. CollegeSource does not knowingly collect any information from children. If we learn that we have collected or received Personal Data from a child under 13 without verification of parental consent, we will delete that information.

Under certain circumstances, we may be required to disclose your Personal Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

Your Access to and Control Over Your Personal Data
You have the right to access the Personal Data that CollegeSource has collected about you. You may do the following at any time by contacting us at privacy@collegesource.com:
• See what information we have about you, if any
• Change, correct, or request that we delete any Personal Data we have about you
• Express any concern you have about our use of your Personal Data

Contact Us
Should you have any questions or concerns about this Privacy Statement, please contact our data protection officer as follows:

CollegeSource, Inc.
Attn: Data Protection Officer
8090 Engineer Rd.
San Diego, CA 92111
privacy@collegesource.com

Requests to unsubscribe from ("opt-out" of) communications from CollegeSource can be managed using the link in email communications. You may also mail your enquiry/request to the above address.

Changes to this Privacy Statement
CollegeSource may revise this Privacy Statement from time to time in order to comply with new laws and regulations; to conform to industry best practices; to reflect changes in CollegeSource product and service offerings; and for other reasons. The revised Privacy Statement will become effective when it is posted on the CollegeSource website.

Website Visitors & Representatives of Potential Customers
This section of the Privacy Statement describes our practices in connection with information we may collect through your use of our website (collectively, our "Site"). By using our Site, you consent to our collection and use of the information described in this Privacy Statement. This section also describes our practices about Personal Data of representatives of potential customers, whether we interact with those representatives directly through the Site or in other ways.

Although CollegeSource has endeavored to create a secure and reliable site for you, the confidentiality of any communication or material transmitted to or from CollegeSource via the Site or email cannot be guaranteed.

Collection and Use of Information
CollegeSource collects your Personal Data (such as your name, address, or telephone number) through our Site if you provide it to us voluntarily.

In addition, as you use our Site we automatically collect certain information regarding your visit, including information about your equipment, operating system, browsing actions including log data and usage patterns. The information we collect automatically is statistical data. We use this information for internal purposes, such as to improve our Site. We may use cookies to assist us in collecting this information. A cookie is a small file placed on the hard drive of your computer. You have the ability to delete cookie files from your hard drive at any time or avoid cookies by configuring your browser to reject them or to notify you when a cookie is being placed on your hard drive.

Our Site uses Google Analytics Demographics and Interest Reporting to help us understand, in aggregate, the age, gender and interests of Site visitors. This Google Analytics tool does not reveal to CollegeSource your name. CollegeSource does not combine the information collected through use of Google Analytics with Personal Data. The information received from Google Analytics is used improve our Site and the type of information displayed to Site visitors so we can better serve those interested in CollegeSource. You can prevent Google Analytics from recognizing you on return visits to our Site by using the Google Analytics' Opt-out designed for your browser.

CollegeSource may also use Facebook features and tools, including pixel tags added to the Site, that allow data about actions of Site visitors to be sent to Facebook to track conversions and to allow CollegeSource to create custom audiences for the products or services CollegeSource may advertise on Facebook. We may also provide Facebook with other data we have collected about you for this purpose, using Facebook tools that allow data such as email addresses and phone numbers to be locally hashed on our system before we upload and pass such data to Facebook. Facebook's use of such data is governed by Facebook's Data Use Policy.

At any time, while accessing our Site, any user may decline participation in any activity that would require active submission of Personal Data (e.g., responding to a survey email or engaging in an e-commerce transaction). Your decision not to participate will not affect your ability to use any other feature on our Site.

CollegeSource may offer you opportunities to engage in blogs, forums, and social media accounts that are designed to be visible to other users, including comments and postings. You should be aware that any Personal Data you choose to submit via those media can be read, collected, and used by other participants, and could be used to send you unsolicited messages. We are not responsible for the Personal Data you choose to submit when you engage in such activities.

External Websites
Some hyperlinks and banner advertisements may link to third-party websites. You should be aware that these third-party websites are not controlled by CollegeSource and are not subject to this Privacy Statement. You should check the privacy policies of the third-party websites to see how your Personal Data will be collected and used.

CollegeSource Customers
The contracts between CollegeSource and its customers may contain terms regarding the protection of Personal Data. When that is the case, the applicable contract provision shall supersede any conflicting provision in this Privacy Statement.

CollegeSource's Role as a Service Provider to Its Customers
CollegeSource offers product solutions to its customers to store and manage their electronic documents, document metadata, and data relevant to managing an institution of higher education. CollegeSource is a US company. Customers' Personal Data will not be transferred, accessed and stored outside of the US for any purpose. Whenever CollegeSource handles Personal Data, we take appropriate steps to ensure that customers' information is treated securely and in accordance with this Privacy Statement and all applicable laws and regulations.

The Customer's Responsibilities with Respect to Its Personal Data
CollegeSource's customers may choose to include Personal Data with the customer data provided to CollegeSource. This Personal Data may include employee name and contact details for the purpose of administering the customer's account with CollegeSource.

CollegeSource processes Personal Data that its customers have chosen to share with CollegeSource. CollegeSource has no direct or contractual relationship with the subjects of this Personal Data (the "Customer Data Subjects"). As a result, when customer data includes Personal Data, the customer is solely responsible for satisfying all legal obligations owed directly to Customer Data Subjects under applicable data protection laws.
It is the CollegeSource customer's responsibility to ensure that Personal Data it collects or directs CollegeSource to collect can be legally collected. The customer also is responsible for providing to Customer Data Subjects any notices required by applicable law and for responding appropriately to Customer Data Subjects' requests to exercise their rights with respect to Personal Data. In addition, the customer is responsible for ensuring that its disclosure of Personal Data to CollegeSource is consistent with any privacy policy the customer has established and any notices it has provided or is required to provide to Customer Data Subjects.

CollegeSource is not responsible for its customers' privacy policies or practices; or for customers' compliance with such policies/practices. CollegeSource does not review, comment upon, or monitor its customers' privacy policies or its customers' compliance with such policies. CollegeSource does not review instructions or authorizations sent to CollegeSource by customers or other parties to determine whether the instructions or authorizations are in compliance with, or conflict with, the terms of a customer's published privacy policy or of any notice provided to Customer Data Subjects.

Sharing of Personal Data with Third-Parties
CollegeSource shares Personal Data with our subcontractors, business partners and third-party agents and contractors only to the extent required in order to deliver products or services requested by customers. Before transferring Personal Data to these third-parties, CollegeSource will obtain assurances from the recipient that it will safeguard Personal Data in a manner consistent with this Privacy Statement and otherwise to support CollegeSource business activities. If CollegeSource learns that a recipient is using or disclosing Personal Data in a manner contrary to this Privacy Statement, CollegeSource will take steps to prevent such use or disclosure.

CollegeSource also may disclose Personal Data as required by law, for example, in response to a court order, an administrative proceeding or subpoena. Before making any such disclosure, CollegeSource will, as soon as practical, inform the customer when permitted by law, so the customer may take such actions as it deems necessary to protect the rights of Customer Data Subjects.

Data Integrity
CollegeSource's customers are responsible for ensuring that they collect only that Personal Data needed to accomplish the purposes disclosed to Customer Data Subjects. They also are responsible for providing CollegeSource with instructions for the processing of Personal Data consistent with the purposes stated in the customers' notice to Customer Data Subjects. CollegeSource will process Personal Data only in accordance with the customer's instructions.

CollegeSource will retain Personal Data as necessary to fulfill the purposes described in this Privacy Statement or in our customer agreements. CollegeSource will return or destroy Personal Data stored by CollegeSource in accordance with applicable law.

Access to and Correction of Personal Data
Customers have the right to access and review, correct, amend or delete their Personal Data that CollegeSource holds by contacting CollegeSource. Customers are responsible for providing CollegeSource with accurate and complete Personal Data, and for contacting CollegeSource if correction of such information is required. CollegeSource will cooperate with its customers' reasonable requests for assistance in permitting Customer Data Subjects to exercise their rights under applicable data protection laws to amend or delete their Personal Data. Please note that, where permitted, we may charge a fee for fulfilling access requests and that we reserve the right to disallow unreasonable requests for access. If a Customer Data Subject's Personal Data was provided to us by an CollegeSource customer, we may facilitate access to such data by directing the Customer Data Subject to the customer that provided the Personal Data to us.

How CollegeSource Uses Customer Data
CollegeSource uses Personal Data submitted to us for general business purposes, including:
• to deliver or provide products and services ordered by customers, including administering the delivery of electronic products and services requiring logins and passwords, confirming compliance with licensing terms, and responding to technical queries
• to perform accounting and export compliance function
• to notify customers of new products and services from CollegeSource and our business partners and for other general marketing purposes, such as advertising CollegeSource's customer events and engaging with customers via online communities and social media and
• to comply with legal requirements.

People in the European Economic Area ("EEA") or Switzerland
CollegeSource does not currently have clients in or collect Personal Data from sources in the EEA or Switzerland. Therefore, the EU-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield Frameworks are not applicable. We recognize that if CollegeSource were to begin collecting data from these sources, that these privacy shields would govern how CollegeSource collects, uses, and discloses Personal Data that we receive in the United States ("U.S.") from the EEA and Switzerland.