

## Success in Education Privacy Policy for the Code to Success Program and its courses

The following Privacy Policy (the "Policy") describes how Success in Education ("SIE") collects, uses, and shares personally identified information and non-personally identifiable information collected through the websites (collectively referred to as "Data"), mobile websites, and mobile applications we operate (collectively, the "Site") and the services, features, or content we offer (collectively with the Site, the "Services") through the Code to Success Program. The Policy supplements the Terms of Use posted elsewhere within the Site. Please read the Policy and the Terms of Use before using the Site. By visiting the Site or using the Services, you agree to be bound by all of the terms, conditions, and notices contained or referenced in the Policy and consent to having your Data transferred to and/or processed in the United States. If you do not agree to this Privacy Policy, do not use the Services. We may change the Policy at any time by posting revisions to the Policy on the Site. Therefore, you should review the Policy from time to time. Your continued use of the Site constitutes your acceptance of the revised Policy. If you do not accept all of the terms, conditions, and notices set forth in the Policy, you must exit the Site immediately. We will post a notice for 30 days at the top of this page notifying users when this Policy has been updated or modified in a material way.

### Collection of Information from Children.

The Code to Success site, programs, and registrations is not directed to, or intended for use by, children (defined as anyone under thirteen (13) years of age). Children should not use or submit any information through the Site or its Services. If you are under the age of 13, you may only use the Services with permission from a parent or legal guardian. SIE does not knowingly collect personally identifiable information from users under the age of 13. If a child under 13 submits information through any part of the Services, and we become aware that the person submitting the information is a child, we will attempt to delete this information as soon as possible.

*Information Collected.* Type of Information Collected. We may collect two general types of information when you use the Site: (1) Personally Identifiable Information ("PII"), which includes your first and last name, home or other physical address, telephone number, email address, parent/guardian information, school district, other identifiers that permit physical or online contact with you, or any information collected online and maintained in personally identifiable form in combination with any of the preceding categories. You also may view or engage with our Site and its Services through third-party social networking sites or social media plug-ins and applications. When you engage with the Site and its content through such third-party sites, plug-ins or applications, we may have access to certain information from your social media profile, such as your name, photo, gender, birthday, location, videos, your list of friends, etc. This information is included in the definition of PII; and (2) non-personally identifiable information ("non-PII") such as your IP address (a number used to identify your computer when you are on the Internet), the type of browser you are using, the type of operating system you are using, the web pages you have visited, sites visited before and after you visit the Site, the type of handheld or mobile device used to access the Site, or other device-specific information. Certain features available within the Site will require you to submit PII as a condition of participation. Some of the features may be offered by us, while others may be offered by third parties. (For example, you may be required to submit PII in order to enter a contest we conduct, to redeem a prize, scholarship, or opportunity we offer, or to receive news updates by email from a third-party news source.) When you

choose to submit PII to a third party in connection with your use of the Site, the third-party's privacy policy, rather than this Policy, will control the use of your PII. YOU CAN ALWAYS REFUSE TO PROVIDE PII TO US, BUT THIS MAY RESULT IN DECREASED FUNCTIONALITY OF THE SITE FOR YOU.

*How Information is Collected.* We collect information both actively and passively. For example, we will collect information about you that you voluntarily provide while on the Site and registration for the Code to Success program and its courses. In addition to information provided directly by you, we (and third parties that offer features through the Site) may collect non-PII through use of "cookies," "web beacons," "Flash cookies," or other electronic means. Cookies. In general, a cookie is a small amount of data sent to your browser from a web server and stored on your computer's hard drive, where it can be used to identify your computer. Cookies can be used to measure website usage, improve navigation around websites, and personalize a returning visitor's experience on the website. In most cases, you can set your browser to turn off cookies or to notify you before you receive one so that you can decide whether to accept it or not. If you block or reject our cookies, some of the features on the Site may not work for you. You can refer to the instructions for your browser to learn more about these functions. If you set your browser to turn off cookies, web beacons, and similar technologies will detect your visits to the Site, but they will not associate your activity on the Site with information that otherwise would be stored in cookies. We do not control tracking technologies used by third parties on the Site.

*Flash Cookies.* The Site were to enable Adobe Flash Player ("Flash") it would use locally stored objects, also called "Flash cookies," which uses Flash to provide special content such as video streaming, video on demand, video clips, or animation. Flash, and similar applications use Flash cookies to remember visitors' Site settings, preferences and usages. Flash cookies are managed directly through Adobe's website, rather than through your web browser.

*Third Party Advertising and Third-Party Web Sites.* This Site provides links to third-party websites. Internet advertising companies and the third-party websites on whose behalf they advertise (collectively "Third Parties") may use the technology described above to send (or "serve") directly to your browser the advertisements that appear on our Site. When this happens, Third Parties automatically receive non-PII, such as your IP address, and other information from your computer and browser, including your cookie information. They also may use cookies, JavaScript, Pixel Tags, and other technologies to deliver advertisements; collect information about the effectiveness of their advertisements; collect anonymous information about your visits to the Site, such as the number of times you have viewed an ad; or customize the advertising content you see. Third Parties will not collect your name, address, or other PII, unless you affirmatively provide it to them. Third Parties set and access their cookies on your computer, not through the Site. Use of Third-Parties' cookies are subject to their own privacy policies. For more information about these specialized cookies and other technologies, and to learn more about behavioral advertising or to opt out of this type of advertising visit <http://www.networkadvertising.org> or [http://networkadvertising.org/optout\\_nonppii.asp](http://networkadvertising.org/optout_nonppii.asp). When using a mobile application, you may receive tailored in-application advertisements. Each operating system provides its own instructions on how to prevent the delivery of tailored in-application advertisements. You may review the instructions and/or the privacy settings for your operating system to find out how to opt out of tailored in-application advertisements. Please note that this Site contains links to other websites that do not follow our Privacy Policy. For instance, clicking on an advertisement, link, or other elements on the Site may take you to an entirely different site. Links to other sites may use our Site logo or style as a result of a cobranding agreement. These sites may send their own cookies to you, and you may collect data and make use of

that data in ways that this Site would not. After you leave our Site, this Privacy Policy will no longer apply to PII or any other data collected from or provided by you. Please check the other website's applicable Privacy Policy to determine how it will handle such data.

*How Information Is Used and Shared.* Information collected may be used to do the following: Create and manage your registrations; Provide the courses and resources you request; Process payment for purchases you have made to access certain Code to Success courses; Protect against or identify possible fraudulent transactions; Analyze the use of our Site; Develop new products and services; Understand how you arrived at the Site; Manage the Site and Services; Enforce our Terms of Use; and Enforce the terms of this Policy. Registration information is also shared with the school district the student registers from to ensure they receive high school credit and track which students have participated in a Code to Success program. The student name and student email listed on the Code to Success registration is sent to our curriculum providers for account creation, access, and access online mentors – providers include Bottega, Skillstruck, Amazon Web Services, and QA at the Point. In the event that SIE is considering a sale of its business, in its entirety or a component thereof, or substantially all of its assets are acquired, or a portion thereof, Data, including PII, may be one of the transferred assets, and may therefore be used by a third-party acquirer in accordance with this Privacy Policy. Such use by a third party may include review of PII, using such PII to contact you either before or after such a transfer or sale, use or transfer of non-PII before or after such a transfer or sale, or for other purposes. WE, THE OPERATOR, WILL NOT DISCLOSE NONPUBLIC PERSONAL INFORMATION ABOUT YOU, THE CONSUMER, TO ANY THIRD PARTY FOR COMPENSATION. In addition, we may share your information as described below:

*Information You Elect to Share:* You may choose to share information with Third Parties by clicking on links to those Third Parties from within the Site. In addition, you may elect to share information, including PII, through the Services offered on the Site by, for instance, posting comments on comment boards, or listing classified advertisements. Some activity on the Site, including content you have posted, is public by default. Some of this content may include PII.

*Information Disclosed to Vendors, Partners, Service Providers, and Others for Business Purposes:* We contract with vendors to provide services related to the Site and may share information with such vendors in order to provide products or services to you or to help maintain the Site.

*Information Disclosed for the Protection of the Site and for Others.* We may disclose PII in the following situations: (1) as required by law or to respond to legal process or lawful requests, including from law enforcement; (2) when we believe it is necessary to prevent, investigate, or address the following: (a) possible illegal activities, including, but not limited to, fraud, (b) violation of our Terms of Use, (c) violation of this Policy, or (d) threats to the physical safety of any person; and (3) to protect our rights or property.

*Forums.* The Site may include forums (such as message boards, chat rooms, comment boards, and reviews) that enable users to post a comment or communicate with each other. The Operator is under no obligation to moderate or edit the forums and will not be responsible for the content or use of any material posted on any forum within the Site. The Operator retains the right to delete at any time, and for any reason, any material posted within the Site.

*Information Security.* We take information security seriously, and use reasonable administrative, technical, and physical safeguards to protect the PII we collect from unauthorized access, use or

disclosure. However, we have no control over the security of other websites on the Internet that you might visit even when a link may appear to those websites on our Site, or through our Services. If you share your computer or use a computer that is accessed by the general public, remember to sign off and close your browser window when you have finished your session. This will help to ensure others cannot access your PII. Additionally, and as you are likely aware, no system can be completely secure. Therefore, although we take commercially reasonable steps to secure your information, we do not promise, and you should not expect, that your PII, searches or other communications will always remain secure. In the event of a breach of the confidentiality or security of your PII, we will notify you if reasonably possible and as reasonably necessary so you can take the appropriate protective steps. We may notify you under such circumstances using the e-mail address(es) we have on record for you. You should also take care with how you handle and disclose your PII. Please refer to the Federal Trade Commission's website at <http://www.consumer.ftc.gov/> for information about how to protect against identity theft. California Privacy Rights.

Under California law, California residents may request once a year, free of charge, certain information regarding our disclosure of personal information to third parties for direct marketing purposes. Specifically, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes, along with the names and addresses of these third parties. To make such a request, please email us at [info@sieutah.org](mailto:info@sieutah.org) or write to us at: *Success in Education, 111 E Broadway, Salt Lake City, Utah 84111*. We reserve our right not to respond to requests submitted other than to the email or postal address specified above. You should put "California Privacy Rights" in the subject line and in your request. You must provide us with the specific information regarding yourself so we can accurately respond to your request. California Do Not Track Disclosure. Certain web browsers may allow you to enable a "do not track" option that sends signals to the websites you visit indicating that you do not want your online activities tracked. This is different than blocking cookies as browsers with the "do not track" option selected may still accept cookies. Right now, there is no industry standard for how companies should respond to "do not track" signals, although one may be adopted in the future. SIE does not respond to "do not track" signals at this time. If we do so in the future, we will modify this Policy accordingly. More information about "do not track" is available at [www.allaboutdnt.org](http://www.allaboutdnt.org). We do not authorize the collection of your PII for third party use through advertising technologies without you providing consent directly to such third parties.

*Users From Outside the United States.* This Site is hosted in the United States and is governed by U.S. law. If you are using the Site from outside the United States, please be aware that your information may be transferred to, stored and processed in the United States where we locate and operate our servers and databases. By using the Site, you consent to the transfer of your information to our facilities and to the facilities of those third parties with whom we share information as described in this policy. Contact Information. Questions concerning the Policy or the Site, including any request to review or change your PII, should be directed to [info@sieutah.org](mailto:info@sieutah.org).