



Revised: April 2023

Kaplan Educational Foundation (“KEF”, “we” or “us”), an independent 501(c)(3) organization, recognizes the importance of protecting the privacy of your personal information, and we have prepared this Privacy Policy to provide you with important information about privacy practices for [www.KaplanEdFoundation.org](http://www.KaplanEdFoundation.org), [www.yourguidetocollegetransfer.org](http://www.yourguidetocollegetransfer.org), <https://kaplanedfoundation.communityforce.com>. This Privacy Policy applies when you use any website, mobile, or tablet application or other online service that references this Privacy Policy (collectively, the “Services”).

This Privacy Policy explains what personal data we collect as part of the Services and the purpose for that collection. We also explain how we use your personal data and your choices about that use. By visiting the Services or submitting your personal data, you consent to the practices described in this Privacy Policy.

We at KEF provide a range of education and related services for students. This Privacy Policy does not apply to information collected by other websites or online services. To the extent you are directed to a third-party website, we encourage you to familiarize yourself with the applicable entity’s privacy policy posted on its website.

### **Information We Collect**

We may collect personal information about our users in various ways. For example, we may collect information that you provide to us, information that we collect through your use of the Services, and information that we collect from publicly available sources or third parties.

**Information You Provide to Us.** In order to take advantage of the Services offered or provided by KEF, you may be asked to provide personal information. For example, if you request information from us through the Services, we may collect your name, e-mail address, mailing address and phone number. If you are a student working with us, we will also ask for information relevant to your college, university, scholarship and financial aid applications, classes, interests, and other relevant information.

**Information About Use of the Services.** In addition to the information you provide to us, we may collect information about your use of the Services. For example, we may collect:

- ***Device Information*** – We may collect information concerning your computer and other devices used to access the Services. For example, we may collect your hardware model, IP address, other

unique device identifiers, operating system version, and browser type and settings of the device you use to access the Services.

- **Usage Information** – We also may collect information about the Services you use, your interactions with content offered through the Services, and other online activity. For example, we may collect information about how many visitors visit a specific page on the Services, how long they stay on that page, and which hyperlinks, if any, they click on. We collect this information, in part, through the use of technologies such as cookies and web beacons, which are discussed in greater detail below.

**Information From Third-Party Sources.** We may receive information about you from publicly and commercially available sources, as permitted by law, which we may combine with other information we receive from or about you. For example, we may receive information about you from a social media site if you connect to the Services through that site.

### **How We Use Information**

**To Provide You Access to the Services and Manage Your Requests on the Services.** We may use your information to evaluate your application(s) to KEF, colleges, universities, and/or for financial aid or other scholarships. We may use information if you apply for a job or have a student inquiry about one of our services. Other uses include, for example, responding to transactional requests and delivering, analyzing, and improving our website(s) and other services.

**To Better Understand Our Users.** We may use information we gather to determine which areas of the Services are most frequently visited to understand how to enhance the Services.

**To Protect the Rights of the Services and Others.** We may use your personal information as we believe is necessary or appropriate to protect, enforce, or defend the legal rights, privacy, safety, or property of the Services, our employees or agents, or other users and to comply with applicable law.

**Consent.** We may otherwise use your information with your consent or at your direction.

### **Security**

We have adopted physical, technical, and administrative safeguards to help protect against theft, loss, misuse, and unauthorized access to or disclosure of the information we collect and receive. However, please note that no data transmission or storage can be guaranteed to be 100% secure. As a result, while we are concerned with the security of your personal data and strive to protect your information and privacy, we cannot and do not guarantee the security of any information you disclose or transmit to our Services and cannot be responsible for the theft, destruction, or inadvertent disclosure of your information, or any other disclosures out of our control.

### **Sharing with Third Parties**

We may disclose your personal information to the following third parties:

**Universities and Scholarship and Financial Aid Providers.** We may share information with colleges and universities, scholarship providers, and the United States Department of Education (“Department of Education”) for the purpose of providing you the Services you seek. These entities are expected to protect the confidentiality, integrity, and security of any information we share with them. However, we are not responsible for their privacy practices, and they may use your information for their own purposes, including providing you with special offers, promotional materials and other information that may be of use to you. We encourage you to review their privacy policies.

**Service Providers.** We may use service providers to perform a variety of services for KEF and the Services, such as providing data analysis and form submissions. As a result, we may share your personal information with those businesses for the limited purpose of performing those services.

**Other Parties When Required by Law or As Necessary to Protect Our Services.** There may also be occasion for KEF to disclose your personal data to third parties if it believes in its sole discretion that such disclosure is required by law, or is necessary to enforce its user agreement or privacy policy.

**Otherwise With Your Consent or At Your Discretion.** In addition to the sharing described in this Privacy Policy, we may share information about you with third parties whenever you consent to or direct such sharing.

We also may share other information with third parties in a manner that does not identify particular visitors, including, for example, aggregate information about how the Services are used.

### **Online Tracking**

We may use cookies, web beacons, and similar tracking technologies to facilitate administration and navigation on the Services, to better understand and improve the Services, and to provide you with a customized online experience.

**Cookies.** A cookie is a string of information that is sent by a Web site and stored on your hard drive or temporarily in your computer’s memory. We may employ cookie technology to help you move faster through our Services. We may employ cookie technology to estimate our total audience size and traffic and to help us improve the Services’ experience by measuring which areas are of greatest interest to users. You can turn off the ability to receive any of these cookies by adjusting the browser in your computer, but you should note that if you do so, this may materially affect the functionality of the Services and the information you can access through them. Information about prohibiting the collection of cookies is set out below. If you wish to find out more about cookies, please visit the Interactive Advertising Bureau’s web site at [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Prohibiting the collection of cookies.** If you would like to prevent KEF from collecting cookies when you visit our site, please update the privacy setting in your chosen web browser. You can directly control cookie acceptance from there:

Google Chrome: [www.google.com/chrome/browser/privacy/](http://www.google.com/chrome/browser/privacy/)

Mozilla Firefox: [www.mozilla.org/en-US/privacy](http://www.mozilla.org/en-US/privacy)

Internet Explorer:

[windows.microsoft.com/en-gb/windows/change-internet-explorer-privacy-settings#1TC=windows-7](http://windows.microsoft.com/en-gb/windows/change-internet-explorer-privacy-settings#1TC=windows-7)

Google Analytics: [tools.google.com/dlpage/gaoptout](http://tools.google.com/dlpage/gaoptout)

**Web Beacons and Other Tracking Technologies.** We also may use other tracking technologies. For example, we may use technologies called beacons (or “pixels”) that communicate information from your device to a server. Beacons can be embedded in online content, videos, and emails, and can allow a server to read certain types of information from your device, know when you have viewed particular content or a particular email message, determine the time and date on which you viewed the web beacon, and the IP address of your device. We use web beacons for a variety of purposes, including to analyze the use of our Services and in conjunction with cookies.

**Do Not Track Signals.** Some web browsers may transmit “do not track” signals to the websites and other online services with which a user communicates. There is no industry standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established and accepted, we may revisit our policy on responding to these signals.

**Third Parties that Provide Content or Functionality.** Some of the content and functionality on our Services may be provided by third party service providers. When you use our Services, such third parties may collect or receive certain information about you and/or your use of the Services, including through the use of cookies, beacons, and similar technologies. This information may be combined with information collected across different websites, online services, and other linked or associated devices. These third parties may use your information to improve their own services. However, we do not permit such parties that receive or collect your information in connection with their services to share or use your information for other purposes.

### **Links to Other Websites**

We may make content or services from other websites, including resources, colleges or universities, and sponsors, available to you from links located on this site. These other websites are not subject to this Privacy Policy. We recommend that you review the Privacy Policy at each such website to determine how that site protects your privacy.

### **Transfer of Data Outside of Your Home Country**

Your information is stored, processed and accessed in the United States. By using the Services, you consent to the collection, transfer, storage, and processing of information in the United States.

If you are located in the EU and applicable law specifies relevant legal grounds for processing personal data, the legal grounds for our processing activities are to meet our legal obligations, and for our legitimate business purposes, including to improve our operation and Services and to detect and prevent fraud. We rely on your consent to send your personal information to colleges, universities, scholarship providers, and/or the Department of Education so that they may send you direct marketing or other messages about educational offerings and related services. Please see the “Your Ability To Choose” section below for more information on how to withdraw your consent at any time. You may lodge a complaint with a supervisory authority if you consider that our processing of your personal information infringes applicable law.

### **Questions about Data Collection and Processing**

You may ask questions about the data you have submitted through the Services by contacting us. Please see the “How to Contact Us” section below for contact information.

### **Your Ability To Choose**

**Disclosure of Information for Marketing Purposes.** If you wish to change your preferences about being contacted or withdraw your consent to be contacted, we encourage you to follow the instructions in any email or other message you receive, and contact the applicable educational institution sending you the information directly, since they are subject to separate privacy policies. If you do not receive a response or are not unsubscribed promptly, you may also let us know by sending us a written request by email to [info@kaplanedfoundation.org](mailto:info@kaplanedfoundation.org). When composing your email, please include the phrase “Unsubscribe Request” in the subject line and body of the request and state to which educational institution the unsubscribe request applies.

**Access, Update, or Correct Information and Other Data Subject Rights.** You may have certain rights as a data subject under local law. For example, you may have the right to access, update, or correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law, or the right to data portability. If you would like to access, review, or update your information or otherwise exercise your rights, please contact us as set out in the “How to Contact Us” section below.

### **Other Important Information**

**Children’s Privacy.** We do not knowingly collect any personal information from children under the age of 13 without parental consent, unless permitted by law. If we learn that a child under the age of 13 has provided us with personal information, we will delete it in accordance with applicable law.

### **Changes to Our Privacy Policy**

We may update this Privacy Policy from time to time without prior notice to reflect changes in our information practices. Any changes to the Privacy Policy will become effective when posted. We recommend that you revisit this Privacy Policy periodically to ensure that you are aware of our current privacy practices. Your continued use of the Services following the posting of changes will mean that you accept the updated Privacy Policy.

### **How to Contact Us**

If you have any questions about this Privacy Policy or our information-handling practices, please contact us by email as follows: [info@kaplanedfoundation.org](mailto:info@kaplanedfoundation.org). We are not responsible for the privacy practices of third parties, which are subject to their respective privacy policies.