

Privacy Policy

Effective Date: December 18, 2023

Please note that Nelnet Business Solutions, Inc. (d/b/a FACTS Management Company) (hereinafter, as "FACTS", "we", "our", or "us") offers Services related to education, including tuition management, payment administration and processing, financial needs assessment, school management, online application, and online enrollment. To provide these Services, we may store and maintain information about educational institutions (or other entities) we serve, along with personal information regarding administrators, staff members, parents/guardians, and students. Access to the data will be restricted to authorized associates and will be used only for the purpose of providing Services to you or the Institution.

Web Privacy Policy

This Web Privacy Policy ("Web Privacy Policy") is designed to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive from users of products and services (individually and collectively, the "Services") through our websites ("Website"), as well as from users of FACTS' Management's mobile device application(s) via the Services. This Web Privacy Policy applies to users when visiting the Website or receiving the Services.

We are committed to providing you a useful and enjoyable online experience. This Web Privacy Policy explains our collection and use practices regarding consumer information, including how and what we share with our related companies and with unrelated entities. Protecting your privacy is important to FACTS Management and our employees. We want you to understand what information we collect and how we use it.

This Web Privacy Policy is subject to change from time to time, so be sure to check back occasionally to ensure you have read the most current version. It is effective as of the date listed above and applies to our Services that link to this Web Privacy Policy. Even if you read and/or agreed to a prior privacy statement, you need to review this updated version. We reserve the right at any time, and in our sole discretion, to change or modify this Web Privacy Policy. If any such changes or modifications are made, we will update the "Effective Date" appearing at the top of this web page. Such changes or modifications shall be effective immediately upon posting to the Website, and supersede any prior versions of this Web Privacy Policy.

Information We Obtain

We may obtain certain personal information in connection with the Website or the Services, including:

- Contact information, such as name, email and postal address, and phone number;
- Login credentials, such as username and password
- Demographic information, such as date of birth, gender identification
- Payment card information, including card number and expiration date
- Bank account information, such as account number and routing number
- Government-issued identifiers, such as social security number, driver's license number
- Education-related information, such as student Identification number, student behavior information, grades or transcripts
- Other documents, information, or content that you upload to the Site or information requested in connection with the Services such as medical information, tax-related information, photos, religious affiliation

We may collect such information about you from the following sources:

- Information from this Website or paper forms
- Information about your transactions with us or others
- Information we receive from third parties, such as your academic institution

Why We Collect Information

We collect information so we can identify you as our customer, to establish, manage and protect your accounts, to complete your transactions, to create and offer you products and services you might be interested in, to personalize and improve upon your experience with us and to comply with various legal and regulatory requirements.

Non-Identifying Information

We may collect information from your visit or as part of the registration and administration of your account, in order to personalize and improve upon your experience with us, such as, without limitation, age and individual preferences ("Non-Identifying Information").

Cookies

The Services may place "Cookies" on a visitor's device. Cookies are small text files. Our Cookies save anonymized data about individual visitors, allowing our Services to recognize information about a visitor and help deliver personalized content and other services and functions. Cookies make your Internet experience quicker and more convenient. The Services use both session cookies, which terminate when a user closes his or her browser, and persistent cookies, which remain on the user's device until they expire or are manually deleted. The Services also contain coding from our business and technology partners which generates third party cookies. Third party cookies allow our business and technology partners to store Non-Identifying Information they can access when you visit this or other websites. Accepting a cookie from a web or device browser may give us access to personal information for analytics purposes.

Most website and mobile device browsers allow you to control cookies, including whether or not to accept them and provide the ability to remove them. You may set most browsers to notify you

if you receive a cookie, or you may choose to block cookies with your browser. Blocking cookies may result in a lower quality experience for you while you are using our Services.

Device and Connection Information

When you use our Services, we may identify the Internet Protocol (IP) address of your computer or handheld device. The IP address does not identify you personally, but it lets us identify the device you are using. We store IP addresses in case we need to track a connection for security purposes. We may also collect other device-specific information about the device you are using, including what type of device it is and hardware model, what operating system you are using, device settings, unique device identifies, geo-location data, and crash data. Whether we collect some or all of this information often depends on what type of device you are using and its settings. Check the policies of your device manufacturer or software provider to learn more about what information your device makes available to us.

Web Beacons (1×1 Pixels or GIFS)

Our Services may contain coding known as Web Beacons that use 1×1 pixel images to capture and transmit the online activity of users on our Services. These Web Beacons typically transmit information about form completions and other activities in order to measure advertising effectiveness or store analytics information. In addition, we may use Web Beacons in HTML-based emails. This allows us to evaluate the effectiveness of our email communications and our marketing campaigns by showing how many emails recipients have opened.

Log Files

Like most websites, our servers utilize log files. Log files store information including internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks. Log files are used to analyze trends, administer the Website, track Users' movement in the aggregate, and gather broad demographic information for aggregate use. We use log file information at times to help identify you as you browse and to gather broad technical and demographic information on who uses our website.

Google Analytics Feature

We may use Google Analytics to collect information about the use of the Website. Google Analytics collects information such as how often users visit the Website, what pages they visit when they do so, and what other sites they used prior to coming to the Website. We use the information we get from Google Analytics only to improve the Website. Google Analytics collects only the IP address assigned to you on the date you visit the Website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personal information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to this Website by disabling the Google Analytics cookie on your browser. You can also view and change the currently available optouts for Google Ads.

Other Analytics Tools

In addition to or in lieu of Google Analytics, we may use other similar web analytics tools to collect information about our Website. Regardless of the tool selected, we use this information only to improve the Website. Any analytics tools we use collect only the IP address assigned to you on the date you visit the Website, your name and email address.

Google Drive

If you choose to link your Google Drive account to a FACTS product for easy access to your files, FACTS may use Google's OAuth protocols to establish that connection. FACTS will not use this information in any manner inconsistent with this Web Privacy Policy or for any purpose other than allowing you access to your Google Drive. FACTS will not read, edit, delete, or copy files or information without your permission or as instructed by you. You may disconnect FACTS' site or application at any time by removing access through your Google account.

Do Not Track Signals

Do Not Track is a feature in your web browser, which enables you to opt-out of the third party tracking of your online activities over time and across third party websites. We do not track users across third party websites to provide targeted advertising, and therefore, do not process or comply with any web browser's "do not track" signal or other similar mechanism that indicates a request to disable online tracking of individual users who visit this Website or use our Services. Third parties cannot collect any personal information from this Website unless you provide it to them directly.

Uses of Information

We may use your personal information and aggregate it with information collected from other users to attempt to provide you with a better experience, to improve the quality and value of the services and to analyze and understand how our Website and Services are used. We may also use the combined information without aggregating it to serve you specifically, for instance to deliver a product to you according to your preferences or restrictions.

If you supply us with your e-mail address, we may let you know by e-mail about other products and services and product enhancements that may be of interest to you. You will have the opportunity to tell us you do not want to receive future messages with each message you receive. If you e-mail a question or comment to us, we will use your e-mail address to reply to you and we will temporarily store your e-mail address, your message, and our reply for quality assurance or to satisfy applicable laws and regulations. When we collect your e-mail address this way, we will not use it for marketing our products and services unless you have given us permission.

We may employ third party companies and individuals to facilitate our Services, to provide the Services on our behalf, to perform Website-related Services (e.g., without limitation, maintenance services, database management, web analytics and improvement of the Website's features) to assist us in analyzing how our Website and Services are used, or to perform other services (e.g., without limitation, sending postal mail and email, providing marketing assistance, and providing customer service). These third parties have access to your personal information only to perform these tasks on our behalf; provided, however, that if you are redirected to a site or application maintained by a third party, the privacy policy of such site or application will control the use of any information you provide.

We may share your information with companies that are affiliated with us, such as our direct or indirect subsidiaries or parent or sister companies. As we continue to develop our business, we may buy or sell companies, subsidiaries, or business units. Your Personal Information may be included as an asset in connection with mergers, acquisitions, reorganizations, or sales of assets including in the event of bankruptcy.

Sometimes the law or other circumstances also require that we disclose Personal Information about you to nonaffiliated third parties. Some examples are: when you ask or permit us to do so; in response to subpoenas or court orders; when we suspect fraud or criminal activity; to protect our property and rights or those of a third party; to protect the safety of the public or any person; or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical, or legally actionable activity.

Certain Non-Identifying Information would be considered a part of your personal information if it were combined with other identifiers (for example, combining your zip code with your street address) in a way that enables you to be identified. But the same pieces of information are considered Non-Identifying Information when they are taken alone or combined only with other Non-identifying information (for example, your viewing preferences). We may combine your personal information with Non-Identifying Information and aggregate it with information collected from other Users to attempt to provide you with a better experience, to improve the quality and value of the Services and to analyze and understand how our Website and Services are used. We may also use the combined information without aggregating it to serve you specifically, for instance to deliver a product to you according to your preferences or restrictions.

We may use your personal information to send you information about other products and services and product enhancements that may be of interest to you. We may also share your information with our affiliates to market financial products and services to you. You will have the opportunity to tell us you do not want to receive future messages with each message you receive. You may also opt out of receiving marketing materials by visiting the FACTS unsubscribe page. If you wish to change any of your personal information, you may change it by logging into your account; by contacting Customer Service, either through email, mail, or telephone; or by contacting your Educational Institution.

What We Share

We do not sell personal information to third parties. All personal information collected is used by us or our affiliates to perform services, send you information about new products and services, comply with laws or carry out internal functions.

We may employ third party companies and individuals to facilitate our Services, to provide the Services on our behalf, to perform Website-related Services (e.g., without limitation, maintenance services, database management, web analytics and improvement of the Website's features) to assist us in analyzing how our Website and Services are used, or to perform other services (e.g., without limitation, sending postal mail and email, providing marketing assistance, and providing customer service). These third parties may have access to your personal information only to perform these tasks on our behalf; provided, however, that if you are

redirected to a site or application maintained by a third party, the privacy policy of such site or application will control the use of any information you provide.

FACTS Parent Alert: Institutions using FACTS Parent Alert to send notifications to families in certain situations, including emergency situations. At the beginning of the school year, a test alert is sent out to parents/guardians or student contacts. If you did not receive the alert, please notify your school office to double check your contact information. Text alerts sent via Parent Alert use a SMS short code. The short code is either 31706 or 317065. If you are an emergency or pick up contact and you do not wish to receive school alerts you can opt out by texting STOP to 31706 or 317065. You can also reply HELP for help.

SMS Terms and Conditions: By subscribing to FACTS Parent Alerts SMS notifications, parent/guardian contacts agree to receive messages at the phone number provided. You may receive text alerts on activities, delays, events, and scheduled alerts from your student's institution. Message and data rates may apply. Message frequency varies. You can opt-out of receiving messages at any time by replying STOP. For help, please reply with HELP or contact your school.

We may share your information with companies that are affiliated with us, such as our direct or indirect subsidiaries or parent or sister companies. As we continue to develop our business, we may buy or sell companies, subsidiaries, or business units. Your personal information may be included as an asset in connection with mergers, acquisitions, reorganizations, or sales of assets including in the event of bankruptcy.

Sometimes the law or other circumstances also require that we disclose certain personal information about you to nonaffiliated third parties. Some examples are: when you ask or permit us to do so; in response to subpoenas or court orders; when we suspect fraud or criminal activity; to protect our property and rights or those of a third party; to protect the safety of the public or any person; or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical, or legally actionable activity.

VERMONT RESIDENTS: We will not disclose nonpublic personal financial information about you other than as permitted by law unless you authorize us to make that disclosure. Your authorization must be in writing or, if you agree, in electronic form. If you wish to authorize us to disclose your nonpublic personal financial information to nonaffiliated third parties, you may notify us at the address found under the "How to Contact Us" section below.

If you become an inactive User, we will continue to adhere to the privacy policies and practices described in this Web Privacy Policy.

Our Security Procedures

We are committed to providing you a useful and enjoyable online experience. We implement physical, procedural, and electronic safeguards to protect your information.

To access information and send e-mail via the Website, you will need a browser that supports the use of Transport Layer Security protocols. This encryption technology helps ensure the authenticity of your online sessions and secures data being transmitted over the public Internet.

You can help safeguard your personal information by taking a few simple precautions. Protect your account numbers, passwords, and customer access numbers. Never disclose confidential information to unknown callers. You should always use a secure browser and current virus detection software, and never open email from unknown sources.

Children's Privacy

Certain of our Services are intended to be used by children and teens located in the United States, including children under the age of 13 ("children" or "students"), for educational purposes only. We presume that schools act as agents on behalf of parents and that a school's authorization for the collection of students' personal information is based upon the school obtaining all legally-required consents.

What information do we collect?

When a student uses or interacts with our Services, the student may provide us with personal information. In connection with administering a Student Information System ("SIS") account, the student may provide us with:

- First and last name
- Home address
- Telephone number
- Birth date
- Email address
- Username and password
- Student Identification number

During a student's use of our Services, we may collect certain information using various automated technologies, such as cookies, log files, web beacons, and other technologies. This information includes: IP address, identifiers associated with the Student's devices, web browser characteristics, device characteristics, language preferences, referring/exit pages, clickstream data and dates and times of visits to our website and Services.

How do we use the information we collect?

We may use information we collect from students for the following purposes:

- To provide our Services;
- To notify and communicate with the school or parents about a child's use of our Services;

To whom do we disclose the information?

We may disclose information as follows:

- We may disclose information to third-party companies and individuals to facilitate our Services, provide the Services on our behalf, perform website-related services, assist us in analyzing how our website and Services are used, or perform other services.
- We may share information with companies that are affiliated with us, such as our direct or indirect subsidiaries or parent or sister companies.
- We also may share information when you ask or permit us to do so; in response to subpoenas or court orders; when we suspect fraud or criminal activity; to protect our property and rights or those of a third party; to protect the safety of the public or any person; or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical, or legally actionable.

Parental Choices

Parents can review or have the information collected from their child deleted. Parents may also refuse to permit further collection or use of such information. To do so, please contact us at:

Attention: Customer Service

Nelnet Business Solutions, Inc. (dba FACTS Management Company)

121 South 13th Street Lincoln, NE 68508

Telephone number: 866-441-4637

AskPrivacy@nelnet.net

Links to Other Websites and Services

We are not responsible for the collection and use of information by companies or individuals unaffiliated with us whose websites may contain links to the Website, including vendors where you may shop. Please remember that when you use a link to go from our Website to another website, our Web Privacy Policy does not apply to third party websites or services. Your browsing and interaction on any third party website or service are subject to that third party's own rules and policies. Please note that when you shop with a vendor who is linked to the Website, even though you may have started your visit with us, and even though our pages may still appear, your transactions are completed with a separate organization, not with us. In addition, you agree that we are not responsible and we do not have control over any third parties that you authorize to access your user content. If you are using a third party website or service, and you allow such a third party access to your user content, you do so at your own risk. This Web Privacy Policy does not apply to information we collect by other means (including offline) or from other sources other than through the Website and applications.

California Privacy Notice

Last Updated: December 18, 2023

This California Privacy Notice supplements the Web Privacy Policy ("Privacy Policy") and applies solely to personal information collected about California consumers, such as visitors to the publicly-accessible areas of our Websites, business partners and job applicants. This

California Privacy Notice does not apply to personal information collected about FACTS personnel.

This California Privacy Notice uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act of 2020) and its implementing regulations (collectively, the "CCPA").

This California Privacy Notice does not apply to information we collect, process or disclose pursuant to the Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act. Please see contact your educational institution for certain choices with respect to the use and sharing of your personal information.

Notice of Collection and Use of Personal Information

We may collect (and may have collected during the 12-month period prior to the Last Updated date of this California Consumer Privacy Notice) the following categories of personal information about you:

- Identifiers: identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers, and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, IP address, email address, account name, Social Security number, driver's license number, passport number, and other similar identifiers
- Additional Data Subject to Cal. Civ. Code § 1798.80: signature, or description, state identification card number, bank account number, credit card number, debit card number, or other financial information, education information, medical information and health insurance information
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, marital status, medical condition, disability, citizenship status, and military and veteran status
- Online Activity: Internet and other electronic network activity information, including, but not limited to, information regarding your interaction with websites, applications or advertisements
- Sensory Information: audio, electronic, visual, and similar information
- Employment Information: professional or employment-related information such as résumé information, occupation details, education details, certifications and professional associations, historical compensation details, previous employment details, emergency contact information, and pre-employment screening and background check information, including criminal records information
- Education Information: education information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may use (and may have used during the 12-month period prior to the Last Updated date of this California Consumer Privacy Notice) your personal information for the purposes described in the Privacy Policy and for the following business purposes:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytics services, providing storage, or providing similar services;
- Providing advertising and marketing services;
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- Short-term, transient use, such as non-personalized advertising shown as part of your current interaction with us;
- Helping to ensure security and integrity;
- Undertaking activities to verify or maintain the quality or safety of our services or devices and to improve, upgrade, or enhance them;
- Debugging to identify and repair errors;
- Undertaking internal research for technological development and demonstration;
- Managing career opportunities with us; and
- Managing our relationships with current or prospective partners, corporate customers and vendors and other business partner personnel.

We do not collect or process sensitive personal information for purposes of inferring characteristics about consumers.

To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

Retention of Personal Information

We will retain your personal information for the time period reasonably necessary to achieve the purposes described in the Privacy Policy and this California Privacy Notice, or any other notice provided at the time of collection, taking into account applicable statutes of limitation and records retention requirements under applicable law.

Sources of Personal Information

During the 12-month period prior to the Last Updated date of this California Privacy Notice, we may have obtained personal information about you from the following categories of sources:

- Directly from you, such as when you contact us
- Your devices, such as when you use our online services
- Our affiliates
- Vendors who provide services on our behalf
- Our business partners
- Data analytics providers
- Recruiting and talent agencies

- Job references, such as your employers
- Data brokers, such as background check services

Sale or Sharing of Personal Information

We do not sell your personal information. We do not share your personal information with third parties (such as online advertising services) for cross-context behavioral advertising purposes.

Disclosure or Personal Information

During the 12-month period prior to the Last Updated date of this California Privacy Notice, we may have disclosed the following categories of personal information about you for a business purpose to the following categories of third parties:

disclosure of personal information categories

Category of Personal Information	
Identifiers	 Our affiliates Vendors who provide so Professional Services O Our business partners Data analytics providers Data brokers, such as ba
Additional Data Subject to Cal. Civ. Code § 1798.80	 Our affiliates Vendors who provide se Professional Services O Data brokers, such as ba Our business partners
Protected Classifications	 Our affiliates Vendors who provide se Professional Services O Data brokers, such as ba
Online Activity	 Our affiliates Vendors who provide se Professional Services Of Data analytics providers
Sensory Information	 Our affiliates Vendors who provide se Professional Services On
Employment Information	Our affiliates

disclosure of personal information categories

Category of Personal Information	
	 Vendors who provide se Professional Services Or Data brokers, such as ba
Education Information	Our affiliatesVendors who provide seProfessional Services On
Inferences	Our affiliatesVendors who provide seProfessional Services Or

In addition to the categories of third parties identified above, during the 12-month period prior to the Last Updated date of this California Privacy Notice, we may have disclosed personal information about you to government entities and third parties in connection with actual or proposed corporate transactions, such as mergers, acquisitions, or divestitures.

California Consumer Privacy Rights

You have certain choices regarding your personal information, as described below.

- Access: You have the right to request, twice in a 12-month period, that we disclose to you
 the categories of personal information collected about you, the categories of sources from
 which the personal information is collected, the business or commercial purpose for
 collecting, selling, or sharing personal information, the categories of third parties to
 whom we disclose personal information, and the specific pieces of personal information
 collected about you.
- Correction: You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.
- Deletion: You have the right to request that we delete certain personal information we have collected from you.

How to Submit a Request

To submit an access, correction, or deletion request, please see the "How to Exercise Your Rights" section below.

Verifying Requests

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your deletion or correction request. If you have an account with us, we may verify your identity by requiring you to sign in to your account. If you do not have an account with us and you request access to,

correction of or deletion of your personal information, we may require you to verify your email address or phone number in our records and/or provide any of the following information:

- Full name & surname
- State of residence
- Physical address
- Telephone number
- Nature of your relationship with our company (Website visitor/Job Applicant/Employee/Former Employee/Contractor/Business Partner Personnel)
- Email address

In addition, if you ask us to provide you with specific pieces of personal information, we may require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

How to Exercise Your Rights

Subject to certain rights and limitations under applicable law, individuals may have the right to know and request access to, deletion of, and correction of certain personal information collected from or about them. For California residents, please see our <u>California Privacy Notice</u> section above for more information. To submit an access, correction, or deletion request, or to submit a request as an authorized agent on behalf of someone else, please call 866-441-4637 or email <u>AskPrivacy@nelnet.net</u>.

Information Transfers

Although your data is generally stored within the United States, an international data transfer may occur if third party, cloud-based storage companies that FACTS employs use servers located outside the United States. FACTS uses appropriate technical and organizational security measures including encryption of personal data and follows various industry standards and best practices to protect your personal data.

How to Contact Us

If you have any questions about this Web Privacy Policy please contact us by email at AskPrivacy@nelnet.net or via our Contact Us portal.