

## California Consumer Privacy Act Policy

**Last Updated: January 1, 2023**

Qualfon Data Services Group, LLC and its parents, subsidiaries and affiliates (collectively, “we,” “us,” “our”) work hard to build and maintain a relationship of trust with you. This California Privacy Notice (the “Privacy Notice”) provides information to **California residents only** about our collection, use, and disclosure of your Personal Information (as defined below) in connection with your use of our website(s) (“Site”), such as [www.qualfon.com](http://www.qualfon.com) and mydegree.com, and any services, transactions, or other engagements you might have with us (collectively, “Services”). We encourage you to read our full [Privacy Policy](#) for additional important information about our privacy practices.

This Privacy Notice does not apply to our collection, use, or disclosure of Personal Information (as defined below) in performing data processing services on behalf of our clients (collectively, “Clients”). This Privacy Notice also does not apply to our collection, use, or disclosure of Personal Information related to job applicants, contractors, employees, or their dependents and beneficiaries.

### Privacy Notice Changes

This Privacy Notice is subject to change. We encourage you to review this Privacy Notice frequently for any revisions or amendments. Changes to this Privacy Notice will be posted on this Site and will be effective immediately upon posting. You will be deemed to have been made aware of and have accepted the changes by your continued use of our Site or Services.

### Information We Collect as a Business

#### Personal Information

We collect information that personally identifies, relates to, describes, or is capable of being associated with you (“Personal Information”), including:

- *Identifiers* (e.g., name, IP address, record identifier, mailing address, email address, phone number, date of birth, social security number);
- *Characteristics of Protected Classifications* under California or federal law (e.g., gender, military or veteran status, citizenship/national origin, marital status, age, religion, race, ethnicity, sexual orientation);
- *Commercial Information* (e.g., property location & characteristics, move date, SIC code, FIPS county name & code, property price, identifying characteristics of seller/purchaser, loan information, mortgage amounts, vehicle characteristics, history of vehicular moving violations, driver’s license history and status, interest in products or services offered by us or third parties);
- *Internet or Other Electronic Network Activity Information* (e.g., browsing history, search history, information about your interactions with our Site);
- *Geolocation Data* both approximate (e.g., location of residence) and precise;

- *Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information* (e.g., call recordings, text message transcripts);
- *Professional or Employment-Related Information* (e.g., military experience, nursing or other professional licensure, job title, employer);
- *Education Information* (e.g., highest level of education, high school/GED graduation year, area of education concentration, degree interest);
- *Health Information* (e.g., insurance information, personal health information, data in explanation of benefits statements);
- *Personal Information as Described in Cal. Civ. Code § 1798.80(e)* (only to the extent collected in an above category);
- *Inferences drawn from the above categories of Personal Information* that relate to your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes (e.g., consumer response models, propensity to purchase models);

The types of Personal Information we collect about you may vary based on how you use the Site and/or Services and your relationship with us.

Some of the personal information listed above may be considered sensitive under California law ("Sensitive Personal Information"). This includes driver's license, social security number, and other government identification card information, precise geolocation data, race, ethnicity, citizenship, religion, sexual orientation, and health information. Each type of sensitive personal information may overlap with a category of Personal Information listed above.

### **Business Information**

We also collect information about businesses and their representatives that engage with us such as EIN, TIN, address, phone number, email address, bank account information (collectively, "Business Information"). This information is generally not considered Personal Information because it relates to a business. If such Business Information relates to a business contact person, we will treat it as Personal Information.

### **Usage Data and Site Activity**

We automatically collect information in connection with the actions you take on the Site ("Usage Data"). For example, each time you use the Site, we may automatically collect the type of web browser you use, the type of device you use, your operating system, your Internet Service Provider, the pages you view, referring and exit pages, the date and time of your visit, and the number of clicks to, from, and within the Site, and the duration of your visits to the Site. If this information is capable of being associated with you, directly or indirectly, we treat it as Personal Information under the category of Internet or Other Electronic Network Activity Information. If this information is not capable of being individually associated with you, we treat it as Usage Data.

## Communication Recordings

We may record calls and retain the content of text messages or other written/electronic communications between you and us. By communicating with us, you consent to our recording and retention of communications.

## How We Use and Disclose Information as a Business

### Generally

We use Personal Information for internal purposes, such as to:

- Provide you with the Site and Services;
- Service consumer and business accounts;
- Market products and services to you;
- Perform marketing and other types of analytics;
- Operate information security and anti-fraud programs;
- Perform day-to-day business operations such as accounting, seeking legal advice, pursuing or defending legal claims, maintaining information security and anti-fraud programs, and facilitating business transactions; and
- Respond to governmental and other legal requests.

We may use Sensitive Personal Information as follows:

- Driver's license, social security number, and other government identification card information – to verify dependents and for processing related to mailings that relate to renewal of governmental identification cards.
- Precise geolocation data – to develop data sets for use in connection with sales of data to third parties and for our own marketing and consumer analytics modeling.
- Race, ethnicity, citizenship – to develop data sets for use in connection with sales of data to third parties and for our own marketing and consumer analytics modeling.
- Information that reveals sexual orientation – to develop data sets for use in connection with sales of data to third parties and for our own marketing and consumer analytics modeling.
- Health information – to develop data sets for use in connection with sales of data to third parties and for our own marketing and consumer analytics modeling.

We may also use Personal Information and/or Sensitive Personal Information as described to you at the point of collection, with your consent, or as otherwise required or permitted by applicable laws.

From time to time, we may de-identify Personal Information so that it can no longer be reasonably linked, directly or indirectly, with an identifiable person. We may use and disclose de-identified information for any purpose since it is no longer Personal Information. We will not re-identify de-identified information.

### Third-Party Disclosures

We may sell or share your Personal Information with other companies who do not provide services to us (“Third Parties”). When we use the word “share” in this Privacy Policy, we mean sharing solely for targeted or cross-context behavioral advertising purposes. In the past twelve months we have sold and shared Personal Information as follows:

Category of Third Party	Sale or Sharing (for targeted or cross-context behavioral advertising)	Purpose of Sale or Sharing	Categories of Personal Information Sold or Shared
Providers of goods and services to consumers including, but not limited to, companies in the insurance, healthcare, education, and automotive industries	Sale and Sharing	To enable the providers to market and sell their goods and services and engage in other uses related thereto	Identifiers; Characteristics of Protected Classification; Commercial Information; Internet or Other Electronic Network Activity Information; Geolocation Data; Professional or Employment-Related Information; Education Information; Health Information; Personal Information Described in Cal. Civ. Code § 1798.80(e); Inferences; Sensitive Personal Information.
Data brokers	Sale	To enable the data brokers to market and sell their services, and/or the goods and services of others, and engage in other uses related thereto	Identifiers; Characteristics of Protected Classification; Commercial Information; Internet or Other Electronic Network Activity Information; Geolocation Data; Professional or Employment-Related Information; Education Information; Health Information; Personal Information Described in Cal. Civ. Code § 1798.80(e); Inferences; Sensitive Personal Information.
Governmental Agencies	Sale	To facilitate communications by government agencies	Identifiers; Commercial Information; Internet or Other Electronic Network Activity Information; Personal Information Described in Cal. Civ. Code § 1798.80(e); Sensitive Personal Information.

Ad networks & ad technology providers including, but not limited to, social media companies and search engine providers	Sharing	To facilitate our advertising of our services or the goods and services of Third Parties	Identifiers; Characteristics of Protected Classification; Commercial Information; Internet or Other Electronic Network Activity Information; Geolocation Data; Professional or Employment-Related Information; Education Information; Health Information; Personal Information Described in Cal. Civ. Code § 1798.80(e); Inferences; Sensitive Personal Information.
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We do not knowingly sell or share Personal Information of individuals under the age of 16 to Third Parties.

#### **Right to Opt-Out of the Sale or Sharing of Personal Information**

You have the right to request that we do not sell or share your Personal Information to others. Please note that opting out of the sale or sharing of Personal Information will not impact any sale or sharing of your Personal Information that may have occurred prior to the date of your opt-out request. You may submit your request(s) by calling us toll-free at (405) 740-3210 or by using our online submission form.

#### **Personal Information Retention**

We retain your Personal Information in accordance with our record retention policies which are informed by our legal, regulatory, tax, and/or accounting obligations as well as business needs. The term for which we retain each element of your Personal Information may be longer or shorter than the term we retain other elements, and the term for which we retain your Personal Information may differ from the term for which we retain other people's Personal Information depending on your relationship with us.

#### **Contact Us**

If you have any questions about our privacy practices, please email us at [consumerprivacy@qualfon.com](mailto:consumerprivacy@qualfon.com) or call us at (888) 380-2190. For general questions regarding our Site, Services, or this Privacy Notice, please email us at [privacy@qualfon.com](mailto:privacy@qualfon.com), call us at (888) 380-2190 or send us a letter to the following address:

Qualfon  
Attn: Chief Compliance Officer  
13700 Oakland Avenue  
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