

## **Privacy 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 Privacy Policy (the “Privacy Policy”) governs 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](http://mydegree.com), and any services, transactions, or other engagements you might have with us (collectively, “Services”).

This Privacy Policy explains what information we collect about you, how we use or disclose such information, how to exercise any rights you may have with respect to your Personal Information (including any rights to opt-out of certain uses of your information), and the safeguards we have in place to reduce the risk of unauthorized access and use.

This Privacy Policy 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 Policy also does not apply to our collection, use, or disclosure of Personal Information related to job applicants, contractors, employees, or their dependents and beneficiaries.

Please carefully read this Privacy Policy, which is part of our Terms of Use, before using our Site and/or Services. If you do not agree with our Terms of Use and/or this Privacy Policy, you must refrain from using our Site/Services. By accessing or using our Site or Services, you agree to our use of your information consistent with our Terms of Use and this Privacy Policy.

### **Privacy Policy Changes**

This Privacy Policy is subject to change. We encourage you to review this Privacy Policy frequently for any revisions or amendments. Changes to this Privacy Policy 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. If we determine that a change to this Privacy Policy will result in using your Personal Information acquired before the change being used in a materially new way, we will provide you notice before using your Personal Information in the new way.

### **Conflict Between This Policy and Local Laws and Regulations**

When federal, state, and local laws and regulations require a higher level of protection for your Personal Information, they take precedence over this Privacy Policy. In addition, the specific requirements of this Privacy Policy apply only when local laws and regulations permit.

### **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 relevant privacy laws ("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.

### **De-Identified Information**

We may de-identify or anonymize Personal Information so that it is no longer capable of being associated with you and therefore is no longer Personal Information. We may use and disclose de-identified or anonymized information without restriction. We will not attempt to re-identify previously de-identified or anonymized information.

### **How We Collect Information**

#### **Voluntary Disclosure**

We may ask you to provide us with Personal Information when you communicate with us (online or offline), make a purchase from us, and at other times. You are not required to provide us your Personal Information; however, if you choose not to provide the requested information, you may not be able to use some or all of the features of the Site or Services or we may not be able to fulfill your requested interaction.

#### **Third-Party Data Sources**

We may collect Personal Information from third-party data sources such as data brokerages, marketing/advertising agencies, analytics firms, ad networks, and government agencies.

#### **Cookies & Other Automated Tools**

We use cookies (a small text file placed on your computer to identify your computer and browser) and other automated tools such as tracking pixels to improve the experience of the Site and Services, such as saving your preferences from visit to visit to present you with a customized version of the Site. Many web browsers are initially set up to accept cookies. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, certain features of the Site may not work as intended if you delete or disable cookies.

We use the following types of cookies:

- *Advertising Cookies* : Advertising cookies are used to learn more about you and advertise products/services that might interest you.
- *Functional Cookies* : Functional cookies enable certain features or non-essential functionality on our Site. For example, we might use these cookies to recognize you and remember your preferences or settings when you return to our Site or to provide you a more personalized experience.
- *Analytics Cookies* : Analytics cookies help us understand how our Site is working and who is visiting our Site. Google Analytics is one tool we use, and you can learn more by reviewing Google's [Privacy Policy](#).

We employ software technology that enables us to track certain aspects of a user's visit to the Site. This technology helps us better manage content on the Site by informing us what content is effective, how consumers engage with the Site, and how consumers arrive at and/or depart from the Site. The software typically uses two methods to track user activity: (1) "tracking pixels" and (2) "clear gifs." Tracking pixels are pieces of executable code that are embedded in a web page that track usage activity including which pages are viewed, when they are viewed, and how long the pages are viewed. Clear gifs are tiny graphics with unique identifiers which are embedded in web pages and email messages that track whether or not a user has viewed a particular web page or email message. User activity information may be associated with additional information about a user's session and Personal Information, if provided by the user.

If you arrive at the Site by "clicking through" from another website, then certain information about you that you provided to that other website, such as the terms you were searching on that led you to the Site, may be transmitted to us and we may use it. You should review the Privacy Policy of any website from which you reached the Site to determine what information was collected by that website and for what purpose(s) you agreed that website could use that information. We may retain information about you provided to us by other websites and will only use it in accordance with this Privacy Policy. Such information may be associated with other Usage Data or Personal Information.

### **Targeted and Cross-Context Behavioral Advertising**

We may work with third-party advertisers, search providers, ad networks, and our Clients ("Advertisers") to learn more about you and show you ads or other content that we believe would be relevant to you. Advertisers may collect and use information about your use of the Site or Services as well as other websites and services. These companies may use cookies, tracking pixels, and other online tracking technologies to collect and use your information. We and/or Advertisers may also append other data to the data collected by Advertisers to create an interest profile of individual users. Our Privacy Policy does not cover any use of information that an Advertiser may collect from you. Advertisements may be shown via the Site or on third-party websites. If you do not want to reduce your targeted advertising, please visit the [Digital Advertising Alliance \("DAA"\) Consumer Choice Page](#). The DAA website allows you to opt-out of one or more targeted advertising networks. Opt-outs are device and browser specific; therefore, you will need to set your opt-out preferences for each device and browser. Deleting browser cookies can remove your opt-out preferences; however, the DAA offers [browser extensions](#) that help preserve the opt-out preferences you set on the DAA's Consumer Choice Page. Please note that opt-outs only apply to interest-based advertising. You may still receive other types of online advertising. Please also see the Additional

Consumer Rights section below regarding rights you may have under state laws to opt out of the sharing of Personal Information for targeted or cross-context behavioral advertising purposes.

### **Information from Advertisements**

If you arrive at the Site via an advertisement (e.g., banner ad), we may collect information regarding the advertisement with which you interacted and your interactions (e.g., item clicked, date and time).

### **Social Media Widgets**

The Site may include social media features, such as the Facebook, YouTube, LinkedIn, and Twitter widgets. These features may collect information about your IP address and the pages you visit on our site as well as other Personal Information. A cookie may be set to ensure that a feature properly functions. Your interactions with features are governed by the privacy policies of the companies that provide them. Before you choose to interact with these features, you should review the relevant social media company's privacy policy.

### **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.

### **Testimonials**

If you provide a testimonial, we may post it publicly on the Site or in other advertising material. By providing a testimonial, you give us permission to use it in any manner and for any purpose, including in marketing and advertising communications.

### **Service Providers**

We may establish a relationship with other businesses to provide services to us which may include corporate affiliates (“Service Providers”), including, but not limited for:

- Payment processing;
- Facilitating marketing and non-marketing communications;
- Marketing design and development;
- Business analytics (both marketing and non-marketing related);
- IT and network administration such as data storage and management, website hosting, and data security;
- Professional services such as legal and accounting;
- Obtaining legal records;
- Collection of accounts; and
- Day-to-day business operations such as courier services, facilities management, and document destruction.

We only provide our Service Providers with the information necessary for them to perform these services on our behalf. Each Service Provider is expected to use reasonable security measures appropriate to the nature of the information involved to protect your Personal Information from unauthorized access, use, or disclosure. Service Providers are prohibited from using Personal Information other than as specified by us.

In the past twelve months we have disclosed each category of Personal Information we collect (listed above) with one or more Service Providers.

### **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:

<b>Category of Third Party</b>	<b>Sale or Sharing (for targeted or cross-context behavioral advertising)</b>	<b>Purpose of Sale or Sharing</b>	<b>Categories of Personal Information Sold or Shared</b>
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.

Additionally, we may disclose Personal Information to Third Parties for a business purpose that does not constitute a sale or sharing of that Personal Information.

For example, we cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose Personal Information and any other information about you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate to respond to legal requests (including court orders, investigative demands and subpoenas, and national security or law enforcement requests), to protect the safety, property, or rights of ourselves, consumers, or any other third party, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with law.

We may also disclose Personal Information and Usage Data to businesses controlling, controlled by, or under common control with us. If we are merged, acquired or sold, or in the event of a transfer of some or all of our assets, we may disclose or transfer Personal Information and Usage Data in connection with such transaction.

In the past twelve months, we have disclosed the following categories of Personal Information to Third Parties for a business purpose that is not a sale or sharing of Personal Information:

Third Party Categories	Personal Information Categories
Government Agencies and Courts	None in prior 12 months.
Parties to Litigation	None in prior 12 months.
Parties to a potential or actual transaction involving the merger or acquisition of our business or substantially all of our business	None in prior 12 months.



If you direct us to disclose your Personal Information to a Third Party, we may, in our sole discretion and in accordance with applicable law, follow your instruction.

#### Security

We recognize the importance of safeguarding the confidentiality of Personal Information from loss, misuse, or alteration. Accordingly, we employ commercially reasonable administrative, technical, and physical safeguards to protect such Personal Information from unauthorized access, disclosure, and use. Even with these safeguards, no data transmission over the Internet or other network can be guaranteed 100% secure. As a result, while we strive to protect information transmitted on or through our Site or Services, you do so at your own risk.

#### Our Websites

Please be aware that third-party websites accessible through the Site or recommended through our Services may have their own privacy and data collection policies and practices. We are not responsible for any actions, content of websites, or privacy policies of such third parties. You should check the applicable privacy policies of those third parties when providing information.

#### 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.

#### Children's Privacy

The Site and Services are not intended for children under the age of 16 and we do not knowingly collect Personal Information from children under the age of 16. If we become aware that we have inadvertently received Personal Information from a child under the age of 16, we will delete such information from our records.

#### Additional Consumer Rights

If you are a resident of California, Colorado, Connecticut, Utah, or Virginia you have additional rights to access and control your Personal Information. Exemptions may apply. We are unable to act upon a request submitted to us relating to Personal Information we process on behalf of a Client unless directed to do so by the Client. If you submit a request related to Personal Information we process on behalf of a Client, we will inform you of the identity of the applicable Client so that you may submit your request directly to them.

#### **Right to Know**

You have the right to request twice per 12-month period that we disclose to you certain information about our collection, use, disclosure, and sale of your Personal Information over the past 12 months, including: (i) the categories or specific pieces of Personal Information we collected about you; (ii) the categories of sources from which your Personal Information was collected; (iii) the business or commercial purpose(s) for which we collected your Personal Information; (iv) the categories of Third Parties with whom we shared

your Personal Information; (v) the categories of Third Parties to whom we sold your Personal Information; and (vi) our business or commercial purposes for selling/sharing Personal Information.

We are not permitted to provide access to specific pieces of Personal Information if the Personal Information is sensitive or creates a high risk of potential harm from disclosure to an unauthorized person such as financial information, social security numbers, and driver's license numbers. We will not provide specific pieces of Personal Information unless you expressly request them.

### **Right to Deletion**

You have the right to request that we delete any Personal Information we have collected about you. Please understand that we are not required to honor a deletion request if a legal exemption applies such as if we need the information to complete a requested or reasonably anticipated transaction, prevent security incidents or fraud, or comply with legal obligations.

### **Right to Correct**

You have the right to request that we correct inaccurate Personal Information we maintain about you. After you request to correct inaccurate Personal Information, we will provide instructions explaining how to provide us with optional documentation to support your request. If you provide documentation, we will consider it.

We may decline to correct your Personal Information if we determine based on the totality of the circumstances that your Personal Information on file is more likely than not accurate. We may also decline to correct your Personal Information if we determine that your request is fraudulent or abusive. If your request to correct your Personal Information is denied, you may request that we note in our records and notify any Service Providers and Third Parties to whom we disclosed your allegedly inaccurate Personal Information that its accuracy has been disputed.

We may decide to delete your allegedly inaccurate Personal Information instead of correcting it.

### **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.

We will recognize browser-based opt-out signals as required by law, specifically Global Privacy Control. If we receive an opt-out signal and are able to identify the consumer to whom the signal relates, we will treat the signal as a request to opt out of the sale or sharing of all Personal Information we have on file for the consumer and disable cookies and other tracking tools placed by Third Parties. If we receive an opt-out signal and are not able to identify the consumer to whom the signal relates, we will treat the signal as a request to opt out limited to the Personal Information we collect from the consumer during the online session during which the signal is present and to disable cookies and other tracking tools placed by Third Parties.

### **Right to Limit Use of Sensitive Personal Information**

If you are a California resident, you have the right to request that we limit the use of your Sensitive Personal Information as defined under California law to only exempt purposes such as to provide the goods and services reasonably expected by the average consumer who requests such goods and services, to prevent fraud, and to verify or maintain the quality or safety of goods or services we provide.

If you are a Connecticut, Colorado, Utah, or Virginia resident, and you make a request to limit the user of your Sensitive Personal Information as defined under your applicable state's law, we will treat that request as a revocation of your consent for us to collect and process your Sensitive Personal Information and will delete your Sensitive Personal Information subject to any exemptions available under applicable law.

### **Right to Appeal**

You have the right to appeal our decision to deny, in full or in part, your exercise of consumer rights by submitting a request to appeal. If we deny your appeal, we will provide you with a written explanation of the reasons for our decision. If you are not satisfied with our explanation for the denial of your appeal, you may contact your state Attorney General to submit a complaint about the appeal results.

### **Non-Discrimination Notice**

We will not discriminate against any consumer for exercising their privacy rights under law or this Privacy Policy.

### **Submitting a Consumer Rights Request**

You may submit your request(s) by calling us toll-free at (888) 380-2190 or by using our [online submission form](#)

After you submit your request, we may contact you to obtain additional information necessary to verify your identity. For example, we may require you to verify certain information in our files or submit a signed declaration under penalty of perjury verifying your identity. We will not process Right to Know, Deletion, or Correction requests without verifying your identity, so please respond promptly. If you do not timely respond to our requests for information, we may deny your request.

We will process verified Right to Know, Right to Correct, and Right to Deletion requests within 45 days of receipt, subject to any applicable exemptions and extensions permitted by law up to 90 days. If you request access to specific Personal Information and that information creates a high risk of potential harm from disclosure to an unauthorized person, we will withhold that information and replace it with a category identifier. For example, if we withhold a social security number, we will inform you that we have a social security number on file. If you have an online account with us, we will provide the response to your request via the online account, otherwise, we will give you the option to choose between mail and electronic delivery. We will retain a copy of your request for at least two years as required by law.

We will process requests to opt-out of the sale or sharing of Personal Information and to limit our use of Sensitive Personal Information within 15 business days of receipt.

We will process verified Right to Appeal requests within the timeframes established by your state's privacy law, but generally within 45 days of receipt.

**Authorized Agents**

If you are an authorized agent submitting a request for another California resident, you must provide a written authorization from the consumer (along with proof of your identity) or a copy of a lawful power of attorney. You may provide this documentation via email at [consumerprivacy@qualfon.com](mailto:consumerprivacy@qualfon.com) after submitting the request. We may contact you or the consumer on whose behalf you claim to act to verify your authorization.

**Non-Discrimination Notice**

We will not discriminate against any consumer for exercising their privacy rights under law or this Privacy Policy.

**California “Do Not Track” Disclosure**

Do Not Track is a web browser privacy preference that causes the web browser to broadcast a signal to websites requesting that a user’s activity not be tracked. At this time, our Site and Services do not respond to “do not track” signals.

**Additional Nevada Consumer Rights**

If you are a resident of Nevada, you may have the right to direct us not to sell your Personal Information to Third Parties subject to legal exemptions. You may exercise this right by sending an email to [consumerprivacy@qualfon.com](mailto:consumerprivacy@qualfon.com) with the subject line “Nevada Opt Out.” Although Nevada law gives us 60 days to respond to your request, plus an additional 30 days in certain instances, we will strive to respond to your request as soon as reasonably possible. We may request additional information in order to verify your identity or locate your Personal Information prior to acting on your request.

**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 (405) 740-3210. For general questions regarding our Site, Services, or this Privacy Policy, please email us at [privacy@qualfon.com](mailto:privacy@qualfon.com), call us at (405) 740-3210 or send us a letter to the following address:

Qualfon  
Attn: Chief Compliance Officer  
13700 Oakland Avenue  
Highland Park, MI 48203