



Privacy Policy

Version date: 22nd February 2023

1. Overview of data protection

Studyoda's Commitment to Privacy. Studyoda is deeply committed to maintaining the privacy and security of personal information we collect. We have prepared this Privacy Policy and Notice ("Policy") to describe our practices regarding our collection and use of the personal information of individuals who interact with our mobile apps or website (collectively referred to as our "Site", "Service") and to inform you of your rights with respect to our data collection practices. This Policy provides information about the types of information that we collect, and what we may do with that information. It also describes with whom we share it, and how we keep it secure.

Scope of this Privacy Notice. This Privacy Notice governs our processing of personal information in connection with our Studyoda service. This Privacy Notice does not relate to anonymized, aggregated, or de-identified data, or any other information that does not allow us to identify you.

Data Controller. Studyoda is the data controller in relation to the data processing activities described in this Privacy Notice.

Updates to this Privacy Notice. From time to time, this Privacy Notice may be updated to reflect changes to our products and services, the way we operate, or to meet new legal and regulatory requirements. You will find the latest version of this Privacy Notice here in this document online.

2. Personal Information we collect about you

The type of personal information we collect about you depends upon your relationship with us.

Prospective Students

We collect personal information about prospective students who use the Studyoda service in the following manner:

Directly from you: We collect certain personal information directly from you when you register for the Studyoda service, including your name, date of birth, email address, telephone number, GPA and test scores, your academic and career preferences, and information relating to financial aid. You also may provide personal information to us in connection with your use of the Studyoda service, for example, if you complete surveys or polls or communicate with academic institutions.

Indirectly from you: We collect information about the pages you visit and how you access and use our services using cookies and third-party analytics tools (e.g., log files,



event data, GPS data, clear gifs and scripts). This information includes information about the device(s) you use to access the service including unique device identifiers, IP address, operating system, browser, internet service provider, referring/exit pages, clickstream data and cookies. Depending on your device settings, we may also collect information about your geographical location.

Sensitive Information: We may obtain information relating to your gender or gender identity, and information relating to your health, such as any disabilities, where we are permitted to do so by law or where you give your consent.

Third Party Integrations, Links and Features. You may connect third party integrations to your Studyoda account (e.g., Google SSO), which may ask for certain permissions to send information to your Studyoda account. Studyoda's use and transfer of information received from Google APIs will adhere to the Google API Services User Data Policy. Studyoda also provides links to certain third parties that offer scholarships. These third party features operate independently from us. The privacy practices of the relevant third parties, including details on the information they may collect about you, are subject to the privacy statements of these parties, which we suggest you review. To the extent any linked online service or third-party feature is not owned or controlled by Studyoda, we are not responsible for these third parties' information practices.

In addition to the information that we collect as described above, we also collect information about you from our third-party integrators and vendors, such as Google Analytics, Fullstory and similar services. Personal data that we collect through these channels includes for example, IP address, access times, browser type and language, device type, device identifiers.

3. How the personal data is collected?

We use different methods to collect data from and about you. To help make it easier for you to understand what data we collect and how we collect it, we have set out some examples below:

Method of collecting data

Direct interactions:

- Fill in forms,
- Contact us by phone,
- Contact us by email,
- Have contact with us in person
- We collect personal data about you.

Examples of how we collect data this way

You provide us with personal data when you:

- Create an account on our website or our app;
- Link your Studyoda account to your Social Network account;
- Request marketing to be sent to you;
- Enter a competition, quiz, promotion or survey;

- Provide feedback;
- Upload a review.

What data do we collect this way:

- Identity Data
- Contact Data
- Technical Data
- Profile Data
- Usage Data
- Marketing and Communications Data

Other/s method/s of collecting data

Use of our website/app

As you use our website/app, we may automatically collect data about your computer / mobile phone equipment and how you use and view our website and/or

Examples of how we collect data this way

We collect this personal data this way by using:

- Cookies;
- Server logs; and;
- Other similar technologies;

What data do we collect this way:

- Technical Data
- Profile Data
- Usage Data

4. Usage of Personal Information we collect about you

For each of the categories of personal information set forth above, we use your personal information in order to provide you with meaningful and relevant Services, which includes information about schools, universities, service providers, where to live and where to work. In addition, we may use your personal information for the following purposes:

- to respond to any questions or comments that you submitted to us on our Site or otherwise;
- to carry out any obligations entered into between us, such as providing you with Services that you have requested;
- to notify you of changes to our Services;
- to seek your views or comments on the Services we provide and send you communications by post, e-mail or text message which you have requested or that may be of interest to you, including newsletters, or promotions of our Services or events;
- to measure the adequate performance of our interactions with you;
- to obtain or maintain insurance coverage, manage risks or obtain professional advice and defend our rights and establish, exercise and defend our legal claims;
- to facilitate your use of your web account on the Site; or
- to otherwise provide, create and maintain a trusted online environment and comply with our legal obligations.

- We use personal information that we collect in order to analyze use of the Studyoda service and expected interest in the relevant academic institution being toured, enhance the service, develop new products or services, and to perform market, trend and statistical research and analysis.
- We use personal information that we collect for our internal record keeping purposes, and for accounting, audit and other internal function
- When you have given your consent for us to do so, we may contact you to provide marketing materials about the Studyoda or our partner services.
- Studyoda may obtain information about your online activities to provide you with advertising about products and services that may be tailored to your interests. This type of advertising is commonly referred to as interest-based advertising or targeted advertising. You may see our ads on other websites because we use third-party ad services. These services track your online activities over time and across multiple third-party websites and apps by collecting information through automated means, including through the use of cookies, web server logs, web beacons and other similar technologies. The ad services use this information to show you ads that may be tailored to your individual interests. The ad services may collect information including data about your visits to websites that serve Studyoda advertisements, such as the pages or ads you view and the actions you take on the websites or apps. This information may be used for purposes of conversion tracking. This process also helps us track the effectiveness of our marketing efforts. To learn how to opt out of interest-based or targeted advertising, please visit www.aboutads.info/choices, www.networkadvertising.org/choices/, and <http://preferences-mgr.truste.com/>.

In using your personal information, we may share some or all of it with authorized, partnered representatives of schools, work-places, and other entities that you may designate whose services relate to the Studyoda Services.

5. With whom we share your information?

- a. **As per your instruction or use of the Services/Consents:** We may share all categories of your personal information to selected outside companies, either by selling it or otherwise transferring it, to advertisers and other business partners that assist us in providing you with meaningful and relevant Services (each, collectively an “Advertiser”). Our Advertisers include realtors, loan providers and other complementary service companies, schools, work places, and social media platforms such as Facebook. The sharing of your personal information with these Advertisers is conducted in accordance with the contact preferences that you set when you create your user profile, or when you express an interest in any content displayed on our Site, or when you enter a response to any affirmative authorization that you provide by typing it in a space provided or clicking on an icon designed to show your interest in an item on the web page or in the app. In addition, any personal information you share publicly through our Site may be indexed through third party search engines, such as Google or Bing. We do not control the practices of third-party search engines, and they may use caches containing your information, including any outdated information. You acknowledge that personal information that you submit when you participate in an

opinion survey or user review, a blog or any online message board that we provide through our Site or Services may be available, via the Internet, around the world. We cannot prevent the disclosure to or use (or misuse) of such personal information by others, nor can we ensure it is deleted if you later ask us to delete your personal information as provided for in this Policy.

- b. **Third party processors:** We also share your personal information with third party processors who act on our behalf (including contractors and service providers) to provide our web and app services and to help with our operations on our behalf (“Processors”). These Processors need access to and use of your personal information, and include third parties to provide us with technical support, to give us additional personal data about you, and to perform analytics and other work that we may need to outsource. These Processors are bound by law and/or contract to protect the confidentiality and security of your personal information. They only process your personal information to provide requested services for us, and only act on our documented instructions. In addition, we use certain third-party Processors, such as Google’s reCAPTCHA service, to validate login credentials of individuals and to frustrate bots; in these cases, your privacy rights are determined by the Processor’s privacy policy. We also share all categories of your personal information with other business partners that perform certain functions for us (“Business Partners”). These Business Partners are themselves responsible to determine the purposes and/or means of the processing your personal information and for the lawfulness of that processing. They include insurance companies, financial institutions, and other professional advisors.
- c. **Third party websites:** We provide links to other websites, such as social networking sites (e.g., Facebook, Twitter and Google), or our third-party partner websites (such as scholarship providers, schools, and Business Partners), and these other websites may provide links to our Site. Third party sites operate according to their own terms of use and privacy policies and Studyoda has no control over these third-party websites. If you wish to opt-out of any information sharing conducted by any third-party website that you link to from us, or to us from them, you must do so in accordance with their specific opt-out policies and procedures. By using our Site and Services, you acknowledge and agree that we are not responsible for the availability of such third-party sites, and do not endorse and are not responsible or liable for any content, advertising, products or other materials on or available from such sites. You further acknowledge and agree that Studyoda will not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any content, advertising, products, or other materials on or available from such sites.
- d. **De-identified information about you:** We also share aggregated or de-identified information (i.e., information that does not personally identify you directly), or statistical information about you, including statistical data and historical use data,

with others for a variety of purposes, including for their own uses, for example, for improving their services for you and others.

- e. **As required by law or legitimate business interest:** In addition, we may disclose any or all categories of your personal information where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. Likewise, we may disclose all such categories of your personal information to our professional advisers as is reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. Further, we may share some or all of your personal information in connection with or during negotiation of any merger or similar transaction involving sale or transfer of some or all of our business or assets. If another company acquires our company or assets, that company will possess the personal information collected by us and will assume the rights and obligations regarding your personal information as described in this Privacy Policy.

6. Opt-Out – your choices

If you do not initially opt-out or at some point after giving us your personally identifiable information you later decide to limit the sale of your information to our third party Advertisers, or you no longer desire to continue to receive additional information from us about Studyoda and our Advertisers, you may “opt out” by submitting your request by emailing us at contact@studyoda.com and putting the words “remove my name” in the subject line of your email and a request to opt-out in the body of the email. Please note however that an Advertiser may have saved a copy of your account and account-related information from before you opted out. In the case of our email newsletters, you may opt out by clicking on the “opt out” link at the end of each email. If you agree to receive autodialed or pre-recorded calls and/or text messages from an Advertiser and later wish to opt-out, you should follow the direction in such call(s) or text message(s) or contact the school or other Advertiser directly.

Please note, you cannot opt out of our sharing of your personal information with our Processors or Business Partners, or our sharing of deidentified information, or your personal information as required by law or legitimate business interests, as described previously. With respect to information captured and shared through cookies, pixel tags and other tracking technologies, and your ability to limit the sharing of your information through those channels, please refer to our cookie policy. Also, if you opt out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt out.

7. Retention of personal information

We retain your personal information as reasonably necessary to fulfill the purposes for which we collected it and you provided it, and to comply with our legal obligations. In no event will we keep your personal information for longer than is reasonably necessary for the purposes defined in this Policy. You also have the right to request that we delete your personal information, subject to certain exceptions, such as our need to prevent and protect against fraud or other illegal activity, to complete business transactions with you, and for such other purposes as allowed by law. You can correct or update your personal information by updating your profile or by contacting us via email contact@studyoda.com.

8. Security of your information

To help protect the privacy of your Personal Data collected by us, we maintain reasonable physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal information to those employees who need to know that information in order to provide Services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information.

9. Limitation of liability

YOU UNDERSTAND AND AGREE THAT ANY DISPUTE OVER THE PRIVACY OF YOUR INFORMATION IS SUBJECT TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND THE STUDYODA USER AGREEMENT (INCLUDING ANY INDEMNIFICATION AND LIMITATIONS ON DAMAGES CONTAINED IN THAT AGREEMENT).