# **MyinTuition**

# **PRIVACY POLICY**

MyinTuition.org (the "Site"), understands that sharing your personal information online takes a great deal of trust. We take online privacy extremely seriously, and we strive to ensure the security and confidentiality of your personal information on the Site as detailed in this Privacy Policy. This Privacy Policy discusses, among other things, how data obtained during your visit to the Site may be collected and used. By visiting and using the Site, you affirm that you are of sufficient legal age to create and are fully able and competent to form a binding contract and that you agree to be bound by the terms of this Privacy Policy. This Privacy Policy is incorporated into and subject to the Terms of Service governing the use of this Site. We recommend that you read this Privacy Policy carefully. If you do not accept the terms of this Privacy Policy, you are directed to discontinue accessing or otherwise using the Site or any materials obtained from it. If you are dissatisfied with the Site, your only recourse is to disconnect from the Site and to refrain from visiting the Site in the future.

This Privacy Policy applies to the Site only. Since the Site contains links to other websites ("External Links") not protected under this Privacy Policy, once you click on an External Link, whether through an advertisement, content link, or any other means, you will no longer be on this Site and will no longer be protected under this Privacy Policy. MyinTuition is not responsible for the privacy practices of the other sites to which we link, so we encourage you to carefully read and fully understand the privacy terms of every website you visit through an External Link contained on the Site. Additionally, if and only if, you give your explicit and direct consent, MyinTuition may share information among websites with which we partner, but we will never do so without your prior permission.

No registration is required to use the site and we collect no Personally Identifiable Information. The only information we will collect, other than the information entered into the calculator, will be Non-Personal Information (as defined below) such as through the use of Cookies and/or Advertising Trackers (as such terms are defined below).

We reserve the right to make non-material changes to this Privacy Policy that do not affect your Personally Identifiable Information (as defined below), in which case MyinTuition is under no obligation to notify you of such changes. We will inform you if we make a significant change to this Privacy Policy (i.e. a change that expands the permissible uses or disclosures of Personally Identifiable Information) by placing a prominent notice on the Site. Your continued use of the Site following the provision of such notice will indicate your acceptance of these changes.

MyinTuition is based in the Commonwealth of Massachusetts in the United States of America. MyinTuition has designed and runs the Site to comply with US-based data protection rights laws. Privacy laws vary from country to country, and your own country's privacy laws and regulations may be different than US law. If you are unsure whether this Privacy Policy is in conflict with applicable local rules, you should not submit your information. If you are located within the European Union, you should note that your information will be transferred to the United States of America, which is deemed by the European Union to have inadequate data protection. Individuals located in countries outside of the United States of America who submit personal information do thereby consent to the general use of such information as provided in this Privacy Policy and to its transfer to and/or storage in the United States of America.

# COLLECTION OF NON-PERSONAL INFORMATION

Even though you do not register with the Site, we reserve the right to collect non-personally identifiable information about you ("Non-Personal Information"), which Non-Personal Information may be obtained by the use of Cookies and Advertising Trackers (as defined below) when you use the Site. Such Non-Personal Information generally is collected for all users, but does not personally identify you by name.

#### a. Cookies.

When you use the Site, we may use "Cookies", small packets of information and anonymous identification numbers that a website's computer stores on your computer, in any one or more of the following ways: (1) to generate dynamically the content we display for you; (2) to monitor how many users open our emails; (3) to monitor how many users explore which pages of the Site; (4) to monitor how many users click on which advertisements and to generate dynamically advertisements that are most relevant to you; (5) to aid with navigation of the site; and (6) to serve as session timers. You can always choose not to receive a Cookie file by enabling your web browser to reject Cookies or to prompt you before accepting a Cookie. Please note that if you refuse to accept Cookies from the Site, you may be unable to access many of the features or specific tools offered on the Site, even though you generally still should be able to use the Site effectively and productively. In short, Cookies help us to deliver the content to you that is most relevant to your queries. We do not connect Non-Personal Information from Cookies to Personally Identifiable Information as we have no Personally Identifiable Information, and we do not use Cookies to collect or store personal information about you.

#### b. Advertising Trackers.

The information collected by Advertising Trackers can be used in any one or more of the following ways: (1) to allow us to determine accurately how many people are using the Site, as well as selected sponsors' and advertisers' websites, (2) to determine how many people open our emails, and (3) to determine the purposes for which these actions are being taken. Our Advertising Trackers are not used to track your activity outside of the Site's domain or the domains of our sponsors and/or advertisers. We will never link Non-Personal Information from Advertising Trackers to Personally Identifiable Information without your permission.

#### c. Computer and Connection and Log Files.

We also reserve the right to determine what type of computer and web browser you are using, what website referred you to the Site, and what your connection speed is. This information is collected purely to enhance your experience on the Site. In addition, MyinTuition may use IP addresses to analyze trends, administer the Site, track users' movements and gather broad demographic information for aggregate use. We do not link you IP address to other Personally Identifiable Information about you.

### PERSONAL INFORMATION

We may store any information you enter on the Site or provide or make available to us in any other way, whether by email, postal mail, phone, or any other means, including information that can personally identify you, such as your first and last name, telephone number, postal and email addresses, topics of interest, and any other information you may give us (collectively, "Personally Identifiable Information").

#### a. Emails You Send to MyinTuition

When you send us information by email, we may use that information to appropriately address your specific request or concerns, and may retain the content of your email messages together with your email address and our responses. By emailing us, you are explicitly giving us permission to use your Personally Identifiable Information at our discretion to attempt to find a response to your inquiry. Additionally, this Privacy Policy does not apply to content, business information, ideas, concepts, or inventions that you send to MyinTuition by email. If you want to keep any such information private or proprietary, do not send such information in an email to MyinTuition.

#### b. Composite Data.

MyinTuition may combine, in a non-personally-identifiable format, any information that users of the Site provide to us in order to create Composite Data (as defined below) that may be disclosed or sold or otherwise provided to third parties. "Composite Data" does not contain any personal information that could be used to contact or identify you, but rather refers to information your computer automatically provides to us and which is not tied back to a specific individual, as well as aggregated or complied data such as the type of information that users of the Site may have requested in the past or the ways in which users use the Site. Examples include referral data (the websites you visited just before and just after our site), the pages viewed on the Site, time spent on the Site, and IP address, which may be used to create aggregate reports on user demographics and traffic patterns for advertisers, Providers and other partners, and for purposes of system administration. For example, MyinTuition may use the information we gather from you and other users to create a composite profile of all the users who have selected to receive information about a certain type of educational service. These third parties may use this information to understand the needs of our users as an aggregate whole, in order to design appropriate programs and activities on their websites.

MyinTuition will not disclose your Personal Identifiable Information to any third party without your prior permission, except as otherwise permitted by this Privacy Policy.

# HOW WE USE YOUR INFORMATION

While MyinTuition does not collect Personally Identifiable Information, however the information we collect via the calculator is stored and retained. By providing us with such information, you expressly grant MyinTuition and all other persons or entities involved in the operations of the Site the right to transmit, monitor, retrieve, store and use such information in connection with the operation of the Site. In particular, MyinTuition may use other information about you (1) to provide you with the products, services or procedures that you request; (2) to communicate with you in general; (3) to respond to your questions and comments; (4) to measure interest in and improve our products, services, and the Site generally; (5) to notify you about special offers and products, services or procedures that may be of interest to you; (6) to otherwise customize your experience with the Site; (7) to enforce our Terms of Service; and (8) as otherwise described to you at the point of collection. In addition, we may ask you to confirm your personal information when you contact us, as this will allow us to protect your confidentiality by verifying your identity.

Except as set forth in this Privacy Policy or as specifically agreed to by you, in the <u>Terms of Service</u>, MyinTuition will not disclose any information about you unless you specifically direct us to do so, either on the Site or otherwise.

There may also be links to other third party organizations within the Site, in banner advertisements, or placed beside the names or logos of sponsors, supporters, etc.. If you click on one of these links to a third-party website, any personal information you provide on those third party websites will not be governed by this Privacy Policy, and we strongly encourage you to review the privacy policies of those websites before submitting any personal information.

MyinTuition also may share your information in the following situations:

- a. Legal Compulsion: In response to legal proceedings, such as subpoenas, court orders, or search warrants; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us.
- b. Investigations: When it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to defend or assert the rights, property, or safety of our organization, our customers, or others; and in connection with our Terms of Service. Should we be legally compelled to disclose your personal information to a third party, we will attempt to notify you about such an action unless doing so would violate the law or court order.
- c. Corporate Transactions: In connection with a corporate transaction--such as a merger, divestiture, or asset sale--or in the unlikely event of bankruptcy.

#### HOW YOU CAN ACCESS YOUR INFORMATION

MyinTuition does not maintain any personally identifiable information about you.

If you have a complaint or problem, please contact us at admin@myintuition.org.

#### HOW WE PROTECT YOUR INFORMATION

We protect your personal information by not collecting any personally identifiable information.

# CHILDREN'S PRIVACY (COPPA)

The Site does not cater to children under the age of 13, and we are deeply committed to protecting the privacy of children. Should a child whom we know to be under the age of 13 send personal information to us, we will use that information only to respond directly to that child to inform him or her that we must have parental consent before receiving his or her personal information. Neither MyinTuition nor any of its affiliates nor services are designed or intended to attract children under the age of 13. Should a person under the age of 13 require the use of the Site, we encourage that child's parent or legal guardian to establish an account to be used by such parent or legal guardian on behalf of such minor, and it becomes that parent's or guardian's responsibility to monitor the use of such an account. The parent or guardian is also responsible for maintaining the accuracy of any information so submitted. Furthermore, any information that MyinTuition or any of our affiliates provides is directed at the parent or guardian, whom we hold responsible for interpreting and using that information. We take no responsibility for a child who knowingly falsifies his or her information in order to obtain information from us or from any of our Provider's or other partner's websites.

# HOW TO CONTACT US

If you have questions about this Privacy Policy or any other concerns related to the Site, please email us at admin@myintuition.org.