

This document was updated on December 23, 2020 and is effective December 2020.

PRIVACY POLICY

GoToCollegeFairs, LLC (“GTCF”), values the privacy of registrants, users and other visitors ("you") to our various registration websites or mobile applications (the “Websites”). We also believe in transparency and are committed to providing users of our Websites choices about how we collect and handle personal information.

This Privacy Policy (the "Policy") describes our practices for collecting, handling, and disclosing the personal information that we receive from you when you use our Websites and web-based services. This Policy does not apply to any aggregate or de-identified information or information that you may provide to us offline or through any other website or service operated by GTCF or third parties that do not specifically refer to this Policy.

If you do not agree with the terms and conditions of this Policy or the [Terms and Conditions of Use](#), you should not access or use our Websites or associated services. You may use the links below to jump to the corresponding sections of this Policy.

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Personal information is generally defined as information that, by itself or in combination with other information, identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked with a particular consumer, device or household. Personal information does not include information that has been aggregated or de-identified in accordance with applicable laws. The types of personal information we collect depend on the nature of your interaction with the Websites.

In the preceding 12 months, we may have collected, used and shared, and we continue to collect, use and share, the following categories of personal information from you in the following ways:

WHAT INFORMATION IS COLLECTED AND HOW

Student Registrants: To register for a GTCF automated college fair, you must first create an account with GTCF by completing an online registration form that asks you to submit the following categories of personal information: Identifiers (such as your name, address, email address and birthdate). A failure to provide this information will prevent you from being able to create an account and register for an event. At your option, you may also provide the following types of information, but it is not required for registration:

- Identifiers (such as your account username, account password, or phone number);

- Customer Records Information (such as your name, address, phone number or education records);
- Characteristics of Protected Classifications (such as your gender or race);
- Commercial Information (such as dates and names of college fair attendance or registrations); and
- Education Information (such as your education history, schools attended, graduation term, class rank, grades and grade point average, standardized test scores, student type (transfer or high school), intended majors, academic interests, college start term, enrollment plans (including countries and institutions of interest), or sports or activities with which you are involved).

Upon successful registration, you will receive a GTCF-generated electronic barcode that is unique to you and your information and will be used to share your information to your chosen colleges and universities, as well as the sponsoring college fair association.

High School Counselors: To register with GTCF as a high school counselor, you must first complete an online registration form that asks you to submit the following categories of personal information:

- Identifiers (such as your name, email address and phone number);
- Customer Records Information (such as your name, address, phone number or employment information); and
- Employment-Related Information (such as the name and address of the institution by which you are employed or your title).

A failure to provide this information will prevent you from being able to register as a counselor.

Colleges/Orders: To make purchases through the Website, you will need to complete an order form that requests certain information from you, including:

- Identifiers (such as your name, email address, phone number and shipping address);
- Commercial Information (such as the products or services you intend to purchase); and
- Customer Records Information (such as your name, billing address, and payment card number with accompanying security/CVV code and expiration date, or records of past purchases and orders).

WHY YOUR INFORMATION IS COLLECTED AND HOW IT IS SHARED

Student Registrants: The above-referenced Identifiers are used to create an account with us that allows your information to be shared with those colleges and/or universities that you choose at the college fair, as well as the sponsoring college fair association, via an electronic barcode generated by GTCF. By allowing a college or university to record the electronic barcode provided upon your registration, or by initiating a virtual chat or by clicking “send info” in a virtual college fair, you agree and give permission – or “opt-in” – for us to share your information with those colleges or universities. The

above-referenced Identifiers, Customer Records Information, Characteristics of Protected Classifications, and Education Information (if you provided this information) may be shared with those colleges and/or universities that you choose at the college fair, as well as the sponsoring college fair association. Additionally, your information is shared with participating universities whose offering reflects at least three of the preferred attributes as indicated in your registration form. GTCF provides this service to help students become aware of schools that are potentially a good fit. This matchmaking algorithm is applied, and data distributed, after students have attended the college fair. Your information will NOT be shared with colleges/universities that are not a match to at least three of your preferred attributes. If you would rather not be matched in this way, please follow the instructions found in the [GDPR Rights](#) policy marked *Right to Erasure ('to be forgotten')*. By registering for a college fair, you agree and give permission – or “opt-in” – for us to share your Identifiers and Commercial Information with your high school counselor. Your information may also be used to verify your identity, to respond to requests, to enforce the Terms and Conditions of Use, and to facilitate and maintain your account.

In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose: Identifiers, Customer Records Information, Characteristics of Protected Classifications, Commercial Information, and Education Information.

GTCF does not sell registrant information to third parties.

High School Counselors: The above-referenced Identifiers, Customer Records Information, and Employment-Related Information are used to verify that the registrant is a valid counselor of the submitted institution. Your information may also be used to verify your identity, to respond to requests, to enforce the Terms and Conditions of Use, and to facilitate and maintain your account.

In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose: Identifiers, Customer Records Information, and Employment-Related Information.

GTCF does not sell counselor information to third parties.

Colleges/Orders: When you choose to make purchases via the Website, we collect the above-referenced Identifiers, Commercial Information and Customer Records Information in order to process and fulfill your order. We submit that information to an online payment processing company, via secure means, to authorize your payment request with the appropriate credit card merchant. Although we retain records of your previous purchases or orders, we do not store your payment card information; once the transaction has been completed, the payment information is permanently deleted. Your information may also be used to verify your identity, to respond to requests, to enforce the Terms and Conditions of Use, and to facilitate and maintain your account.

In addition, we may share the above-referenced categories of information for the following purposes:

- If we are required to do so by law or if we reasonably believe that disclosing such information is necessary to: (i) conduct investigations of possible breaches of law; (ii) identify, contact, or bring legal action against someone who may be violating an agreement they have with us; or (iii) to avoid imminent physical harm to any person or to protect our rights, safety, or property. This includes disclosures to relevant third parties (e.g., forensics investigators, external legal counsel, law enforcement) to investigate, respond to, and/or to prevent a security/data breach, or to cooperate with government or law enforcement authorities pursuant to other legal matters;

- In the course of corporate transactions, in the event that we merge with, acquire, are acquired by, or become a legal affiliate with a third party, or if such a transaction is proposed;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections;
- As necessary or appropriate to protect the rights, property or safety of us, our customers or others; or
- As otherwise described to you at or before the point when we collect your Personal Information.

We will not collect additional categories of personal information or use the personal information for materially different, unrelated, or incompatible purposes without first providing you notice.

Canadian Citizens and Users Located in the European Economic Area (“EEA”): In addition to the above-referenced bases for processing your information, please note that the internal processing and sharing of your personal information is contractually necessary in order to provide the services requested and/or use the Websites. In addition, we will only collect and share your personal information with your consent. You may withdraw your consent to the processing of your personal information at any time. The revocation of your consent will not affect prior processing activities, including disclosures previously made with your consent, and may impede your ability to use our Websites, register for events, or share your information with colleges, universities, or your high school counselor.

HOW LONG YOUR INFORMATION IS STORED

Absent a valid request to delete or erase your personal information, we retain the personal information that we collect for as long as it is needed to fulfill the purposes for which it was collected or as may be permitted or required by law, which may include, without limitation, efforts to comply with our legal and regulatory obligations, to resolve disputes, and to enforce our agreements.

YOUR RIGHTS REGARDING YOUR INFORMATION

You can review and make changes to your account profile by logging into the Website via your self-created username and password.

Special Notification for California Residents – Your CCPA & “Shine the Light” Privacy Rights

If you are a California resident, the California Consumer Protection Act (“CCPA”) and “Shine the Light” law may afford you certain additional rights over your personal information. As such, a Notice of Additional Privacy Rights for California Residents can be found here: [CCPA](#).

Special Notification for Users in the EEA – Your GDPR Privacy Rights

If you are located in the EEA, the General Data Protection Regulation (“GDPR”) may afford you certain additional rights over your personal information. As such, a Notice of Additional Privacy Rights for Users Located in the EEA can be found here: [GDPR](#).

Special Notification for Canadian Citizens – Your PIPEDA Privacy Rights

If you are a Canadian citizen, the Personal Information Protection and Electronic Documents Act (“PIPEDA”) may afford you certain additional rights over your personal information. As such, a Notice of Additional Privacy Rights for Canadian Citizens can be found here: [PIPEDA](#).

CHILDREN UNDER THE AGE OF 16

The GDPR and Children’s Online Privacy Protection Act (COPPA), as well as other data privacy regulations, restrict the collection, use, or disclosure of Personal Information from and about children on the internet. Our Websites are not directed to children aged 16 or younger, nor is information knowingly collected, used or shared from children under the age of 16 without permission from a parent or guardian. No one under age 16 may access, browse, or use the website or provide any information to or on the website. If you are under 16, you are not permitted to our Websites and should not provide any information on the Websites. If we learn we have collected or received personal information from a child under the age of 16 without a parent or legal guardian's consent, we will take steps to stop collecting that information and delete it.

Where appropriate, GTCF takes reasonable measures to determine that users are adults of legal age and to inform minors not to submit such information to the Website or in response to advertisements. If you are concerned that Personal Data may have been inadvertently provided to or collected by GTCF, please contact us immediately so appropriate steps may be taken to remove such information from our database.

For more information about the COPPA, please visit the Federal Trade Commission’s website at: <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>.

DATA SECURITY, TRANSFER & “DO NOT TRACK” SIGNALS

We understand that the privacy and security of your personal information is important to you. In keeping with this understanding, and with our legal obligations, we utilize appropriate administrative, technical and physical safeguards, including technical & organizational measures, to ensure a level of security appropriate to the risk and to protect your personal information as required by applicable law.

Except as described above, your personal information is not transferred to any person or entity. Where we transfer your personal information to third parties (as described above), we will take reasonably appropriate administrative, technical and physical security measures to protect your information. This may include contractually requiring the recipients to only act on our instructions, to implement appropriate measures for the protection of your information and not to sell your information.

Unfortunately, no data transmission over the Internet can be guaranteed to be completely private or secure. As a result, we cannot guarantee or warrant the security of any information you transmit to or from our Site, and you do so at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide. The safety and security of your information also depends on you. Where you use a password for access to certain parts of the Website, you are responsible for keeping this password confidential. Do not to share it with anyone.

Our offices are located in the United States, so your information may be transferred to, stored, or processed in the United States. While the data protection, privacy, and other laws of the United States

might not be as comprehensive as those in your non-U.S. country, we take necessary and appropriate steps to protect your privacy. We will not engage in any international transfers of data without adhering to applicable data protection laws, including the standard contractual clauses, as appropriate.

GTCF uses a limited number of third-party Service Providers to assist us in providing our services to Users as described in this Policy. By using our Website, you understand and consent to the collection, storage, processing, and transfer of your Personal Data to our facilities in the United States and those third parties with whom we share it as described in this Policy.

Because we do not engage in any tracking activities, our Sites do not support or respond to “do not track” or similar technical requests you may activate through your computer or browser settings.

LINKS TO OTHER SITES

Our Websites may contain links to third-party websites that are controlled and maintained by others. Any link to other web sites is not an endorsement of such websites. Any personal information provided by you while visiting those sites will be governed by that party’s privacy policy. If you are unsure whether a web site is controlled, affiliated, or managed by us, you should review the privacy policy and practices applicable to each linked website.

CHANGES TO THIS POLICY

We will post any changes we make to this Policy on this page. If we make material changes to how we use our users' personal information or if we collect new types of information, we will notify you through a notice on the Websites’ home page as well.

FOR MORE INFORMATION/HOW TO CONTACT US

If you have any questions or comments about this Policy, or if you wish to make a complaint about how we have handled personal information about you, please contact us using the contact details below and we will do our best to assist you:

GoToCollegeFairs, LLC
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