



Privacy Policy

TRANSACT PRIVACY POLICY - YOUR PRIVACY RIGHTS

Effective Date: January 8, 2020 Last Updated: January 8, 2020

SCOPE

Transact Campus Inc. is a subsidiary of Transact Holdings Inc. among other related entities and affiliates (collectively, "Transact"). This Privacy Policy will explain how Transact manages and uses the personal information we collect from you when you use our websites, mobile applications and online services (our "Platform").

The type of personal information we collect about you, and how we use and share this information, depends on your relationship with us. For example, we may collect, use and share different types of information based on whether you interact with our website, apply for a job with us or use our services through one of our clients, which may include K-12 schools, public and private universities and municipalities (our "Clients").

Transact cares about privacy and safeguarding personal information. Our Clients entrust us with the personal information of their employees and their users, who are often students. We take these obligations very seriously.

TYPES OF INFORMATION WE COLLECT

Transact collects information from you and about you. Here are some examples of the information we may collect through our Platform:

- **Contact Information.** For example, we may collect your name, mailing address, telephone number and email address.
 - **Account Information.** We may collect your account username and password.
 - **Identification Numbers.** We may collect your student identification number or other similar identification number. We may also collect government-issued identification numbers.
 - **Payment Information.** For example, we may collect your billing address and payment information. This may include payment card numbers, expiration dates and security codes.
 - **Information You Post.** We may collect information you post in a public space on our Platform, such as when you submit a comment on our user forums.
 - **Social Media Information.** We may collect information you post on our social media pages. We may also collect your social media profile information and information posted on your page.
 - **Application, Enrollment and Financial Aid Information:** We may collect information you include on application, enrollment and financial aid forms for Client programs to which you apply. This may include information about your education history and your family's finances.
 - **Employment Information.** If you apply for a job through our Platform, we collect the information you include in your application. For example, this may include the name and address of your employer and your employment history.
 - **Information You Submit.** We may collect information when you send us a message through the "Contact Us" page or similar features on our Platform. We may also collect information when you engage with a user forum or enter a promotion, contest or challenge. This may include photos, videos and other user-generated content that you submit.
 - **Event and Class Information.** We may collect information about events you have attended and classes in which you have enrolled. This may include the location, time and date of such events and classes.
 - **Demographic Information.** We may collect your birthdate, age, gender and zip code. We may also collect information that could identify you and relates to your hobbies, interests and shopping behavior.
 - **Device Information.** For example, we may collect the type of device you use to access our Platform. We may also collect your device identifier, IP address, browser, cookie information or information about your device's operating system. We may also collect information about your Wi-Fi network.
 - **Location Information.** For example, we may collect precise location information from your device. This may include information about your exact location when you use our Platform. We may also collect this information in the background when our mobile applications are not in use. For more information about your options related to the collection of your location information, see the Choices section below.
 - **Other Information.** If you use our website, we may collect information about the browser you are using. We might look at what site you came from, or what site you visit when you leave us. If you use our app, we might look at how often you use the app and where you downloaded it.
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HOW WE COLLECT YOUR INFORMATION

Transact collects your information in different ways. Below are some examples of how we may collect your information.

- **Directly From You.** For example, when you:
 - Register for an account.
 - Purchase products or services through our Platform.
 - Sign up to receive promotional communications.
 - Participate in one of our promotional sweepstakes, contests, surveys, or focus groups.

- Post in the user forum or other related services and features.
- Submit a request to our customer service teams, which may include enrollment helpdesks, admissions or financial aid management support teams or account reset teams.
- Interact with our social media pages.
- Apply for a job through our Platform.
- **Passively.** For example, when you:
 - Install and use our mobile apps.
 - Visit and navigate our Platform on any device.
 - Enable location-based features on our Platform.

We may also collect information about users over time and across different websites, apps and devices when you use the Platform. Third parties also collect personal information this way on our Platform.

- **From Third Parties.** We may receive information about you from other sources. For example, this may include receiving information from:
 - Our Clients, who may determine what type of information we receive and how we may use and share it.
 - Our affiliates and vendors, including affiliates in our group of companies or third parties that provide services on our behalf.
 - Our business partners, including online advertising networks, analytics vendors, and companies that co-sponsor our promotions or help us with marketing.
 - Social media sites, including Facebook, Instagram, Twitter and LinkedIn.
 - Third party sites, including those that allow you to integrate your third-party account with your Transact account.
 - Companies that provide information to supplement what we already know about you, including companies that provide consumer insight services. Certain third parties might link your name or email address to other information they have collected. That might include past purchases made offline or online. It might also include online usage information.
- **By Combining Information.** For example, we may:
 - Combine information that we collect offline with information we collect through our Platform.
 - Combine information we collect about you from the different devices you use to access our Platform.
 - Combine information we get from third parties with information we already have about you.

HOW WE USE YOUR INFORMATION

Examples of how we may use your information include:

- **At the Direction of Our Clients.** If we receive your personal information from one of our Clients, we will use this information to provide the products and services that we provide to the Client. In this case, the privacy policy of the Client will govern how we use your personal information.
- **To Provide Our Products and Services.** This could include fulfilling your requests for our products or services. This could include processing purchases or other transactions.
- **To Improve Our Products and Services.** We may use your information to make our Platform, products and services better. We may also use your information to customize your experience with us and tailor our Platform to your interests. We may also analyze how you use our or our Client's products and services.
- **To Understand Your Interests.** For example, we may use your information to better understand what products interest you.
- **To Respond to Your Requests or Questions.** This may include responding to your feedback or notifying you if you win a promotion.
- **To Communicate With You.** We may communicate with you about your account or our relationship. We may also communicate with you about the products and service that we or our Clients provide to you. We may contact you about this Policy or our Platform terms and conditions.
- **To Determine Your Eligibility.** We may use your information to verify your identity or determine your eligibility for some of our products, services and promotions. For example, this may include verifying your age, date of birth and state of residence. If you apply for a job through our Platform, we may use this information to evaluate your application.
- **For Marketing Purposes.** We may provide you with information or serve you ads about new products and special offers. We might tell you about new features or updates. These might be third party offers or products we think you might find interesting. We may also use your information to send you electronic communications, including through email or text message. We and our Clients or partners may engage in interest-based advertising using information gathered across multiple websites, devices, or other platforms. For more information about your choices related to these communications, see the Choices section below.
- **For Security Purposes.** This could include protecting our company and consumers who use our products and services. It may also include protecting our Platform.
- **To Send Push Notifications.** For example, if you use our mobile apps, we may send you push notifications about new products or special offers.
- **As Otherwise Permitted By Law or As We May Notify You.**

HOW WE SHARE YOUR INFORMATION

We may share your information in the following ways:

- **At the Direction of Our Clients.** If we receive your personal information from one of our Clients, we will share this information as directed by the Client. In this case, the privacy policy of the Client will govern how we share your personal information.
- **On Our Platform.** For example, we may publically display information you post on our social media sites or submit through our user forums. We may also display information you submit in connection with a promotion.
- **With Our Service Providers.** We may share your information with third parties who perform services on our behalf. For example, this may include companies that send emails or other electronic communications on our behalf or help us run our Platform. This may also include companies that assist us with payment processing.
- **With Our Business Partners.** For example, this may include a third party that co-sponsors a contest or promotion or helps us administer a health challenge. We may also share information with social media sites, advertisers, media buying agencies, advertising networks and advertising service providers. We may also share information with companies that help us learn more about our Clients.
- **With Third Parties for Marketing Purposes.** This may include third parties in whose products or services we believe you may be interested. These third parties may also share your information with others. These third parties may use your information for their own marketing purposes or the marketing purposes of others. This may include the delivery of interest-based advertising.
- **With Any Successors to All or Part of Our Business or One of Our Brands.** For example, if Transact merges with, acquires or is acquired, or sells a brand or part of its business to another business entity. This may include an asset sale, corporate reorganization or other change of control. We may sell or transfer our Client information as an asset or as part of a larger transaction action.
- **To Comply With the Law or To Protect Ourselves.** For example, this could include responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests. We might share information when we are investigating a potential fraud. This could include fraud we think has occurred during a sweepstakes or promotion. We may also share information if you are the winner of a sweepstakes or other contest with anyone who requests a winner's list.
- **For Other Reasons We May Describe to You.**

CHILDREN UNDER 13

The Platform where this Policy is located are meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 13, and strive to comply with the provisions of COPPA (The Children's Online Privacy Protection Act). If you are a parent or legal guardian and think your child under 13 has provided us with information, please contact us at privacy@transactcampus.com. You can also write to us at the address listed at the end of this website Policy. Please mark your inquiries "COPPA Information Request." Parents, you can learn more about how to protect children's privacy on-line [here](#).

CHOICES REGARDING YOUR INFORMATION

You have certain choices about how we use your information. Certain choices you make are browser and device specific.

Your Privacy Rights:

- You can request further details about the personal information we collect about you; access to, rectification of or deletion of certain personal information; or to restrict or opt-out of using or sharing your personal information in certain circumstances.
- In many of our products, you may be able to access, update, change or delete some of your information by logging into your account. If you cannot request your desired option through your account, please contact us at privacy@transactcampus.com or at the telephone number or address listed below. You may also submit your request through our "Contact Us" page. Note that we may send your request to the appropriate Client or may direct you to contact our Client directly.
- Please note that these rights are not absolute. In some circumstances, we or our Clients are not legally required to comply with your request. We may also take steps to verify your identity before processing your request.
- You can file a complaint with a local data protection authority or regulator regarding our processing of your personal information. That stated, if you have concerns or complaints, please let us know so we can work to address the issue.
- **Your California "Shine The Light" Rights:** If you reside in California, you have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please send us an email at privacy@transactcampus.com or write to us at the address listed below. Indicate in your email or letter that you are a California resident making a "California Shine the Light" inquiry.

Marketing Communications:

- You can opt out of receiving our marketing communications. Note that you will still receive transactional messages from us, including information about your account and responses to your inquiries. To opt out of receiving our marketing communications, you can follow the instructions contained in the communication.

Cookies & Other Tracking Technologies:

- We use third party advertising tools to collect information about your visits to our websites to serve you targeted advertisements based upon your browsing history and interests on other websites and online services or on other devices you may use. In some instances, we may share a common account identifier (such as an email address or user ID) with our third-party advertising partners to help identify and contact you across devices. We and our third-party partners use this information to make advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics and market research.

- To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you can visit the following resources at:
<http://www.networkadvertising.org/choices>
<http://www.aboutads.info/choices>
<http://www.youronlinechoices.com/uk>
- These tools will only opt you out from receiving interest-based ads on that specific browser or device, but you may still receive interest-based ads on your other devices. You must perform the opt-out on each browser or device you use.
- Some of these opt-outs may not be effective unless your browser is set to accept cookies. If you delete cookies, change your browser settings, switch browsers or computers or use another operating system, you will need to opt-out again.

Our Do Not Track Policy:

- **Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals.** If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.
- Options you select are browser and device specific.

Mobile Application and Location Based Services:

- If you have previously opted into Transact’s collection and use of location-based information through our mobile applications, you may opt-out by adjusting the settings on your mobile device.
- You may completely opt-out of all location-based information collection by Transact if you uninstall all Transact mobile apps from your devices.

SECURITY

The Internet is not 100% secure. We cannot promise that your use of our Platform will be completely safe. We encourage you to use caution when using the Internet. We use reasonable means to safeguard personal information under our control. A user id and a password are needed to access certain areas of the Transact Platform. It is your responsibility to protect your username and password.

STORAGE OF INFORMATION

Information we maintain may be stored in or outside of the United States. If you live outside of the United States, you understand and agree that we may transfer your personal information to the United States. This Platform is intended for use in the United States and is subject to the laws of the United States, which may not provide the same level of protections as those in your own country.

LINKS

Our Platform may contain links to other third party sites that are not governed by this Policy. If you click on a link to a third party site, you will be taken to a site we do not control. We are not responsible for the privacy practices used by third party sites. We suggest that you read the privacy policies of those sites carefully. We are not responsible for these third party sites.

HOW TO CONTACT US

If you have any questions, comments or concerns with respect to our privacy practices or this Policy, or wish to update your information, please feel free to contact us at privacy@transactcampus.com or by telephone at (888) 380-5245. You may also write to us at the following address:

Privacy Officer – Legal Department
Transact Campus Inc.
22601 N. 19th Avenue, #130
Phoenix, Arizona 85027

CHANGES IN POLICY

From time to time, we may change our Policy. We will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our Platform. Please check our Platform periodically for updates.



