

## **Privacy Policy**

**TuitionFit.org**

**PLEASE READ THIS PRIVACY POLICY  
CAREFULLY BEFORE USING THIS WEBSITE OR APPLICATION**

**This Policy may have been amended since the last time you used the Services.**

Effective: May 23, 2019

This privacy policy (this "Policy") describes the information we collect, how it is used and shared, and your choices regarding this information. By submitting, or allowing a third person to submit, your personal information to MC4L, LLC, dba TuitionFit, or any parent, subsidiary or affiliate thereof (collectively, "MC4L", also referred to as "we," "us," or a similar construction), you consent to our use and disclosure of your personal information, and, as applicable, represent that you have obtained the consent of the respective owner or subject of said information, as set forth in this Policy. If you do not agree with the terms of this Policy, please do not submit any personal information, or permit the same to be submitted, to us.

This Policy is incorporated into, and is a part of, the Terms of Use (the "Terms") located at [www.tuitionfit.org/terms](http://www.tuitionfit.org/terms) which govern the tuitionfit.org website, and related websites, mobile sites, applications, content, and products and services. Capitalized terms used in this Policy, but not defined in this Policy, have the meanings as defined in the Terms. Our liability from or arising out of this Policy or any breach hereof is subject to the general limits of liability stated in the Terms.

### **1. Scope**

This Policy applies to all users of the Services, but excludes websites, mobile sites, applications, and products and services with separate privacy policies which do not incorporate this Policy. This Policy does not apply to third party websites, mobile sites, applications, or products and services even if accessed via our Services.

Personal information means information that identifies you as an individual, or that we can combine with readily available information to identify you as an individual, and is more fully described below and in the Account Agreement. This Policy does not cover any information which is not personally-identifiable or financial information (such as anonymized or aggregated demographic information), or any ideas, suggestions, or comments you may submit about the Service (including without limitation User Content), which information we may use for any purposes in our sole discretion.

### **2. Updates**

We reserve the right to change this Policy at any time. If we make any material changes to this Policy, we will post a new Policy on the Services and update the effective date set forth above. Therefore, we encourage you to check the effective date of this Policy whenever you visit the Website to see if it has been updated since your last visit. To the extent permitted under applicable law, by using Services after such notice, you consent to our updates to this policy.

### **3. The Information We Collect**

The types of information we may collect and how we collect it include:

- In general, we collect information to allow you to use the Services, process your Account registration, authorize your payment, bill you, respond to your inquiries, communicate

with you about the Services and other products and services, and maintain your Account with us.

- If you register an Account, we may collect information about you and as necessary to create and/or maintain your Account, such as your name, address, email address, and other contact information, and your billing information, like your credit card number, CVV code, and expiration date.
- Depending on the type of Account you register, we may collect information about individual students (directly from the student in cases where the student is the Account holder, or indirectly in cases where the Account holder is a parent, counselor, educational advisor, or other third party who submits personal information on behalf of a student). When we refer to "students" in this Policy, we are generally referring to college applicants, whether or not they are currently enrolled as a student, unless the context indicates otherwise. This student information may include:
  - demographic data, such as name, address, city, state, zip, sex, race/ethnicity, parents'/guardians' college experience
  - financial information, such as expected family contribution from the Free Application for Federal Student Aid
  - academic information, such as name and type of high school, ACT and SAT scores, high school and college GPA
  - college search information, such as major the student intends to pursue, sports or performing arts in which the student plans to participate, and names of colleges to which a student intends to apply
  - financial award information from colleges applied to, such as a financial aid award letter or other admission offer letter
  - student's rankings of institutions
- In addition to the information described in this Policy, depending on the type of Account you have, as applicable, we may collect other personal information about you. Please review your Account Agreement (if applicable), especially the "Privacy" section, to understand what additional information we may collect.
- We may collect information about your device and how you interact with our Services such as: IP address, browser type, device location, unique device identifier, cookie data, associated identifying and usage information from your mobile phone, laptop, or other device, and other device information that you give us consent to access. In some cases, we collect this information through cookies, pixel tags, and similar technologies that create and maintain unique identifiers.
- We may collect other information with your consent, as may be described within the Services.
- We may also collect your information from licensees, affiliates, partners, service providers, and independent third-party sources.
- We may combine the information we collect with other information in our possession.

#### **4. How We Use Your Information**

The overall mission of MC4L includes, but is not limited to, making the educational institution admissions process more transparent by collecting, and then providing on an anonymized basis, application, admissions, tuition, financial aid, and other information so as to allow, among other things, school applicants to compare their offers to those made to others in similar circumstances, schools to see how their offers compare to those by other schools, and others to analyze that data in useful and productive ways. Additionally, schools are offered the ability to communicate with individual student applicants on an opt-in basis. Accordingly, the ways we use your information may include:

- Depending on the type of Account you have, if you submit a tuition offer, financial aid award letter and/or related materials, we may use that information to calculate the

financial offer information for each educational institution which we display to other users of the Services (on a student anonymized basis).

- We may use the demographic, financial, and academic information submitted by, or on behalf of, a student in order to create and display search results with information of similar students (on a student anonymized basis).
- We may use the demographic, financial, and academic information submitted by, or on behalf of, a student to create anonymized, aggregated, or de-identified data for use by academic institutions, industry analysts, counselors, and others, on a commercial (such as licensed) basis or to combine that information with information from other third parties.
- In addition to the uses and activities described in this Policy, depending on the type of Account you have, we may use other personal information we collect from or about you in other ways as specified in other documents provided by MC4L. Please review your Account Agreement, especially the "Privacy" section, to understand what additional information we may use and how we may use it.
- We may use student information to enable user-to-user communications on an opt-in basis, for example enabling an educational institution to communicate with a student, on an opt-in basis (within the discretion of the student).
- We may also use your information to:
  - Provide our products and services, develop new products and services, and provide you with information, reminders, confirmations, and other operational communications regarding our products and services and your participation in them.
  - Improve the quality, safety, and security of our products and services.
  - Provide customer support and service and communicate with you.
  - Administer your Account, including verifying your identity.
  - Process your payments for products and services.
  - Perform marketing, including interest-based marketing and advertising (with necessary consents and subject to opt-out, as applicable, depending upon the medium of communication).
  - Comply with legal, regulatory or contractual requirements.

Where stated or legally required, we will anonymize your information in a way that it can't reasonably be associated with you. We may use anonymized information or share it with third parties for any legitimate business purpose.

Communications with you in connection with these uses may be via mail, telephone, email, text and other electronic messages, or via our websites and applications.

## **5. Information Sharing and Disclosure**

We may share and disclose the information we collect as follows:

- Depending on the type of Account you have (if any) and what information you have provided:
  - a student's demographic, financial, and academic information (submitted by, or on behalf of, a student) may be shared with academic institutions, counselors, industry analysts, and other students (on a student anonymized basis).
  - if you submit a tuition offer, financial aid award letter, and/or related materials, that information, including the name of the educational institution (with the student's name, address, id numbers redacted), may be shared with educational institutions and other students, and the student's ranking of the institution may be shared with educational institutions.
  - certain contact information of educational institutions may be shared with students when the institution sends a message to students who have opted-in to receive such communications.

- In addition to the uses and activities described in this Policy, depending on the type of Account you have, we may share and disclose other personal information we collect from or about you in other ways as specified in other documents provided by MC4L. Please review your Account Agreement, especially the "Privacy" section, to understand what additional information we may share and disclose.
- We may share the information we collect with our parents, subsidiaries and affiliates.
- We may share your personal information with our service providers and business partners, including our vendors, consultants, marketing partners, research firms, and other service providers or business partners. This may include, for example:
  - Validation of appropriate registration for Accounts and use of the Services
  - Fraud prevention
  - Payment processors and facilitators.
  - Cloud storage providers.
  - Marketing partners and marketing platform providers.
  - Data analytics providers.
  - Research partners, including those performing surveys or research projects in partnership with MC4L or on MC4L's behalf.
  - Vendors that assist MC4L to enhance the security of the Services.
  - With our insurance partners to offer, obtain, provide, or facilitate insurance or in connection with our services, and to help determine and provide relevant coverage in the event of an incident.
  - Consultants, lawyers, accountants, and other professional service providers

MC4L may disclose your personal information with third parties in circumstances such as when it is necessary to provide the Services, fulfill a transaction you have requested, offer you personalized services, or in other circumstances that are permitted by law and consistent with the purposes for which we collected the information. If you register an Account, some of the information you supply may be shared with regulatory bodies and/or service providers we utilize to obtain personal information.

MC4L may share your information if we believe it is required by applicable law, regulation, operating agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns. MC4L may disclose your personal information: in response to legal process (for example, a court order, search warrant or subpoena) or requests from law enforcement or regulatory authorities; in other circumstances in which MC4L believes the Services are being or have been used in violation of our policies, applicable law or otherwise in the commission of a crime; when we have a good faith belief that there is an emergency that poses a threat to the safety of you or another person; or when necessary to protect the rights or property of MC4L or third parties.

We may disclose or transfer your personal information in connection with a corporate transaction, proceeding, or reorganization involving the business activities for which the information is maintained. In the event that ownership of MC4L or its business was to change as a result of a merger, acquisition, asset sale or transfer to another company, your personal information may be shared or transferred.

MC4L may share your information other than as described in this Policy if we notify you and you consent to the sharing.

**6. How We Safeguard Your Information.** We maintain reasonable and adequate technical, administrative, and physical security and confidentiality measures designed to help protect your personal information from unauthorized access or acquisition. We also require by contract (other than in an emergency situations) that third party services providers acting on our behalf or with whom we share your information also undertake to provide such security and confidentiality measures in accordance with industry standards.

**7. Information Retention and Deletion.** You may request deletion of your Account at any time by contacting us at [privacy@tuitionfit.org](mailto:privacy@tuitionfit.org). Following such request, MC4L deletes any information that we are not required to retain. In certain circumstances, MC4L may be unable to delete your Account or information, such as if there is an outstanding credit on your Account or an unresolved claim or dispute. MC4L may also retain certain information if necessary for its legitimate business interests, such as information which has already been shared with students and others, information which is not personally-identifiable data which we will use internally or in aggregate reports (as described in this Policy), as well as fraud prevention and enhancing users' safety and security. For example, if MC4L shuts down your Account because of unsafe behavior or security incidents, MC4L may retain certain information about that Account to prevent you from opening a new MC4L Account in the future.

## 8. Choices

You may request that MC4L:

- Provide a detailed explanation regarding the information MC4L has collected about you and how we use that information.
- Receive a copy of the information MC4L has collected about you.
- Request correction of any inaccurate information that MC4L has about you.

You can make these requests by contacting MC4L at [support@tuitionfit.org](mailto:support@tuitionfit.org). You can also update the name, phone number, and email address associated with your Account by contacting MC4L at [support@tuitionfit.org](mailto:support@tuitionfit.org).

Marketing Opt-Outs: You may opt out of receiving promotional emails from MC4L by contacting MC4L at [support@tuitionfit.org](mailto:support@tuitionfit.org). You may also opt out of receiving emails and other messages from MC4L by following the instructions in those messages. Please note that if you opt out, we may still send you non-promotional messages, such as information about your Account. We may also provide methods of opting out through Account controls.

**9. Cookies.** MC4L uses cookies, content, and other technologies that are placed in the browser on your computer or mobile device, and can be used to help recognize you on our Services and improve the user experience. We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. We use session cookies to maintain session state and user identity. A persistent cookie remains on your hard drive for an extended period of time. We use persistent cookies and content to help remember user preferences and improve the user experience. You may be able to remove persistent cookies by following directions provided in your browser's "help" file. You can control browser cookies through your browser's settings. The use of cookies, web beacons, or similar technologies by content and ad network providers is subject to their own privacy policies, not ours.

**10. Protection of children.** While the Services may be viewed by children, we do not wish to receive data from or about children. We encourage parents and guardians to monitor and supervise all Internet usage by children. No information should be submitted to, or posted at, the Services by visitors under 18 years of age without the consent of a parent or guardian.

**11. Your California Privacy Rights.** If you are a California resident you have the right to receive specific information about how MC4L discloses personal information to others for their marketing purposes, and what choices they have. MC4L's policy is not to share your personal information with other parties for direct marketing use unless you agree that MC4L can do so or as provided for in this Policy. If you wish to opt-out from any sharing without cost, please see "Choices" above. Further, MC4L is required to alert you how our websites react to Do Not Track signals. Some browsers support

a "Do Not Track" feature, which is intended to be a signal to websites that you do not wish to be tracked across different websites you visit. Sites operated by MC4L do not currently change the way they operate based upon detection of a Do Not Track or similar signal.

**12. Contact information.** If you have questions or complaints regarding our Policy or practices, please contact us at [privacy@tuitionfit.org](mailto:privacy@tuitionfit.org).