# PRIVACY POLICY

The following privacy policy applies to the website administered by The College Investor, LLC ("The College Investor", "we", "our" or "us"), located at https://thecollegeinvestor.com/ ("Website").

Your use of the Website constitutes your acceptance of, and agreement to, the following Privacy Policy. The College Investor reserves the right to modify, alter, amend or update its Website, and Privacy Policy. This Privacy Policy is subject to change without notice. If you do not agree with or do not accept any part of this Privacy Policy, you must not use the Website.

**WHAT INFORMATION DO WE COLLECT AND HOW IS IT USED?**

- **Information You Voluntarily Submit to the Website:** The Website may collect personal information from you such as your name or email address. For example, you may voluntarily submit information to the Website by leaving a comment, subscribing to a newsletter, or submitting a contact form.
- **Information We Collect from Others:** The Website may receive information about you from other sources. For example, if you use a third-party software through the site, they may transfer information to us for order fulfillment.
- **Automatically-Collected Information:** The Website automatically collects certain information about you and the device with which you access the Website. For example, when you use the Website, The Website will log your IP address, operating system type, browser type, referring website, pages you viewed, and the dates/times when you accessed the Website. The Website may also collect information about actions you take when using the Website, such as links clicked.
- **Cookies:** The Website may log information using cookies, which are small data files stored on your browser by the Website. The Website may use both session cookies, which expire when you

close your browser, and persistent cookies, which stay on your browser until deleted, to provide you with a more personalized experience on the Website.

**HOW YOUR INFORMATION MAY BE USED**

The Website may use the information collected in the following ways:

- To operate and maintain the Website;
- To send you promotional information, such as newsletters. Each email promotion will provide information on how to opt-out of future mailings;
- To send you administrative communications, such as administrative emails, confirmation emails, technical notices, updates on policies, or security alerts;
- To respond to your comments or inquiries;
- To provide you with user support;
- To fulfill orders;
- To track and measure advertising on the Website; or,
- To protect, investigate, and deter against unauthorized or illegal activity.

**THIRD-PARTY USE OF PERSONAL INFORMATION**

The Website may share your information with third parties when you explicitly authorize us to share your information. Additionally, the Website may use third-party service providers to service various aspects of the Website. Each third-party service provider's use of your personal information is dictated by their respective privacy policies. The Website currently uses the following third-party service providers:

- Fathom Analytics – this service tracks Website usage and provides information such as referring websites and user actions on the Website. Fathom Analytics may capture some of your data, but as

a privacy-focused solution, it minimizes data requests. You may access Fathom Analytics' privacy policy here.

- Woopra – this service tracks Website usage and provides information such as user actions on the Website. Woopra may capture your IP address, location, and website actions. You may access Woopra's privacy policy here.
- Drip – this service is used for delivery of email updates and newsletters. Drip stores your name and email address for purposes of delivering such communications. You may access Drip's privacy policy here.
- MyFinance – these services are used to manage our display advertisements. To provide personalized advertising options, MyFinance may track your IP address or location. This information is not stored on the Website. MyFinance's privacy policy can be found here.
- Influencer Networks – from time to time, as described herein, the Website may post sponsored content that contains tracking pixels for networks. These tracking pixels may capture information such as your IP address to evaluate the effectiveness of the marketing campaigns. This information is not stored on the Website.
- Teachable – this service is used to host the courses available on the Website. The Website does not capture any data related to your purchase. Teachable's privacy policy can be accessed here.
- GumRoad – this service is used for the ebooks available on the Website. The Website does not capture any data related to your purchase. Gumroad's privacy policy may be accessed here.
- Rakuten Marketing- We partner with Rakuten Marketing, who may collect personal information when you interact with our Website. The collection and use of this information is subject to the privacy policy located here. https://rakutenmarketing.com/legal-notices/services-privacy-policy/
- OneSignal – We partner with OneSignal to provide push notifications. This website does not capture any data related to

your notifications. You can disable these notifications by following these instructions.

Social Media Networks: When an individual interacts with our Website through various social media networks, such as when someone logs in through a social network, “Likes” us on Facebook, or follows us or shares our content on Google, Facebook, Instagram, Twitter, or other social networks, we may receive some information from those social networks including your profile information and any other information you permit the social network to share with third parties. We may use this information to allow you to log into your account, to communicate or interact with individuals on the social network, to better understand the demographics of our visitors, and to personalize content and advertising. Individuals should always review and, if necessary, adjust their privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services.

At this time, your personal information is not shared with any other third-party applications. This list may be amended from time to time in the Website’s sole discretion.

Except when required by law, The College Investor will not sell, distribute, or reveal your email addresses or other personal information without your consent; however, The College Investor may disclose or transfer personal information collected through the Website to third parties who acquire all or a portion of our business, which may be the result of a merger, consolidation, or purchase of all or a portion of our assets, or in connection with any bankruptcy or reorganization proceeding brought by or against us.

**PUBLICLY AVAILABLE INFORMATION**

The Website may include interactive sections such as commenting areas and the forum where you can post comments. Please remember that any information that is disclosed in these areas becomes public information and

you should exercise caution when deciding to disclose your personal information. If you create a user profile on the forum or leave a comment, certain information may be publicly visible. To create a user profile, you must choose a username and password and input your email address for profile confirmation. Your email address will never be available publicly.

**ANONYMOUS DATA**

From time to time, The College Investor may use anonymous data, which does not identify you alone, or when combined with data from other parties. This type of anonymous data may be provided to other parties for marketing, advertising, or other uses. Examples of this anonymous data may include analytics or information collected from cookies.

**COOKIES**

The Website uses cookies to store visitors' preferences, record user-specific information on what pages users access or visit, ensure that visitors are not repeatedly sent the same banner ads, customize content based on visitors' browser type or other information that the visitor sends. Cookies may also be used by third-party services, such as Google Analytics, as described herein.

**What are cookies?**

A cookie is a small text file which is sent to your computer or mobile device (referred to in this policy as a "device") by the web server so that a website can remember some information about your browsing activity on the Website. The Cookie will collect information relating to your use of the Website, information about your device such as the device's IP address and browser type, demographic data and, if you arrived at the Website via a link from third-party site, the URL of the linking page.

In addition to Cookies, the Website may use web beacons. Web beacons allow us to count the number of users who have visited or accessed the

Website and to recognize users by accessing our cookies. We may employ web beacons to facilitate Website administration and navigation, to track the actions of users of the Website, to compile aggregate statistics about Website usage and response rates, and to provide an enhanced online experience for visitors to the Website. We may also include web beacons in HTML-formatted e-mail messages that we send to determine which e-mail messages were opened. A web beacon is often invisible because it is only 1 x 1 pixel in size with no color. A web beacon can also be known as a web bug, 1 by 1 GIF, invisible GIF and tracker GIF.

**What are the different types of cookies and how do we use them?**

Essential – These are Cookies that are essential for the running of the Website. Without these Cookies, parts of the Website would not function. These Cookies do not track where you have been on the internet and do not gather information about you that could be used for marketing purposes.

Examples of how we may use essential Cookies include:

- Setting unique identifiers for each unique visitor, so that website numbers can be analyzed.

Functional – These Cookies are used to remember your preferences on the Website and to provide enhanced, more personal features. The information collected by these Cookies is usually anonymized, so we cannot identify you personally. Functional Cookies do not track your internet usage or gather information which could be used for selling advertising.

Examples of how we may use functional Cookies include:

- Gathering data about visits to the Website, including numbers of visitors and visits, length of time spent on the site, pages clicked on or where visitors have come from

- Eliminating the need for returning users to re-enter their login details.

Analytical Performance – Analytical performance Cookies are used to monitor the performance of the Website, for example, to determine the number of page views and the number of unique users our the Website has. We use this information to improve user experience or identify areas of the Website which may require maintenance. The information is anonymous (i.e. it cannot be used to identify you and does not contain personal information such as your name and email address) and it is only used for statistical purposes.

Examples of how we may use analytical Cookies include:

- Measuring users' behavior
- Analyze which pages are viewed and how long for and which links are followed to better develop the Website

Advertising – Behavioral advertising Cookies, which may be placed on your device by us or our trusted third-party service providers, remember that you have visited a website and use that information to provide you with advertising which is tailored to your interests. This is often called online behavioral advertising and is done by grouping together shared interests based upon web browsing history. Your web browsing history can be used to infer things about you (e.g. your age, gender etc.), and this information may also be used to make advertising on websites more relevant to you. Although behavioral advertising Cookies can track your activity around the internet, these Cookies cannot identify you personally.

Examples of how we may use advertising Cookies include:

- Manage online advertising. The Website may use Cookies together with web beacons to provide advertising to you and to enable us to manage our relationship with those advertisers by, for example,

tracking how many unique users have seen a particular advertisement or followed a link in an advertisement.

Third Party Cookies – You may notice on some pages of the Website that Cookies have been set that are not related to us. When you visit a page with content embedded from, for example, YouTube or Facebook, these third party service providers may set their own Cookies on your device. We do not control the use of these third party Cookies and cannot access them due to the way that Cookies work, as Cookies can only be accessed by the party who originally set them. Please check the third party websites for more information about these Cookies.

We also may use DART cookies for ad serving through Google's DoubleClick, which places a cookie on your computer when you are browsing the web and visit a site using DoubleClick advertising (including some Google AdSense advertisements). This cookie is used to serve ads specific to you and your interests. The ads served will be targeted based on your previous browsing history. DART uses "non personally identifiable information". It does NOT track personal information about you, such as your name, email address, physical address, telephone number, social security numbers, bank account numbers or credit card numbers. You can opt-out of this ad serving on all sites using this advertising by visiting https://www.doubleclick.com/privacy/dart_adserving.aspx

Users may, at any time, prevent the setting of cookies, by the Website, by using a corresponding setting of your internet browser and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. However, if users deactivate the setting of cookies in your Internet browser, not all functions of our Website may be entirely usable.

**How can you manage or opt-out of cookies?**

Cookies, including those which have already been set, can be deleted from your hard drive. You can also change the preferences/settings in your web browser to control Cookies. In some cases, you can choose to accept Cookies from the primary site, but block them from third parties. In others, you can block Cookies from specific advertisers, or clear out all Cookies. Deleting or blocking Cookies may reduce functionality of the Website. To learn more about how to reject Cookies, visit www.allaboutcookies.org or go to the help menu within your internet browser. If you experience any problems having deleted Cookies, you should contact the supplier of your web browser.

Opting out of Analytical Performance Cookies

If you would like to opt out of Analytics Cookies, please do so by clicking on the links below:

Google Analytics: https://tools.google.com/dlpage/gaoptout

Opting out of Behavioral Advertising Cookies

If you would like more information about how to opt out of interest-based advertising in desktop and mobile browsers on a particular device, please visit https://optout.aboutads.info/#/ and https://optout.networkadvertising.org/#. You may download the AppChoices app at https://www.aboutads.info/appchoices to opt out in connection with mobile apps, or use the platform controls on your mobile device to opt out.

**ADVERTISING**

**Display Ads**

The Website uses Google Ads and MyFinance to manage all third-party advertising on the Website. Google Ads and MyFinance serve content and advertisements when you visit the Website, which may use cookies. Google Ads and MyFinance may collect IP addresses and location to serve personalized ads.  If you would like more information about this practice and

to know your choices to opt-in or opt-out of this data collection, please visit https://www.networkadvertising.org/managing/opt_out.asp.

**Retargeting Ads**
From time to time, the Website may engage in remarketing efforts with third-party companies, such as Google, Facebook, Reddit, Snapchat, Quora or Instagram, in order to market the Website. These companies use cookies to serve ads based on someone's past visits to the Website. You may opt-out of this data collection by visiting the provider's website and adjusting your privacy settings.

**Sponsored Content Tracking Pixels**
This Website may engage in sponsored campaigns with various influencer networks, brands, and agencies. All sponsored content is duly disclosed in accordance with the FTC's requirements. From time to time, these sponsored campaigns utilize tracking pixels (aka web beacons), which may contain cookies to collect data regarding usage and audience. This information is collected by the sponsoring company to track the results of the campaign. As stated above, these pixels may capture your IP address on behalf of the content sponsor. No personally identifiable information collected by the Website is used in conjunction with these tracking pixels.

**Affiliate Program Participation**
The Website may engage in affiliate marketing, which is done by embedding tracking links into the Website. If you click on a link for an affiliate partnership, a cookie will be placed on your browser to track any sales for purposes of commissions.

The College Investor, LLC is a participant in the Amazon Services LLC Associates Program, an affiliate advertising program designed to provide a means for sites to earn advertising fees by advertising and links to Amazon.com. As part of this Amazon Associates program, the Website will post customized links, provided by Amazon, to track the referrals to their

website. This program utilizes cookies to track visits for the purposes of assigning commission on these sales.

**Newsletters**
On the Website, you may subscribe to our newsletter, which may be used for advertising purposes. All newsletters sent may contain tracking pixels. The pixel is embedded in emails and allows an analysis of the success of online marketing campaigns. Because of these tracking pixels, The College Investor may see if and when you open an email and which links within the email you click. Also, this allows The College Investor to adapt the content of future newsletters to the interests of the user. This behavior will not be passed on to third parties.

**Push Notifications**
On the Website, you may subscribe to allow push notifications to your web browser, which may be used for advertising purposes. Push notifications are opt-in from your web browser, and we do not store any personal data that can identify a subscriber individually at the time of web push subscription. If you want you can disable it, here is a guide to disabling push notifications.

**NO LIABILITY THIRD-PARTY SERVICES AND THIRD-PARTY LINKS**

The third-party service providers affiliated with The College Investor have their own independent privacy policies governing the use of your Personal Information pursuant to the GDPR and CCPA and we encourage you to read those privacy policies carefully.  You understand that even if The College Investor deletes your Personal Information that it may still be available in a third-party service provider's database.  The College Investor has no responsibility or liability for the Personal Information collection, use, or storage activities of the third-party services providers used by The College Investor to provide you with the services associated with the Website.

The College Investor may outsource or subcontract some of our technical support, tracking and reporting functions, database management functions,

and other services to third parties. We may share information from or about you with them so that they can perform their services as long as they comply with this Privacy Policy, the GDPR, and the CCPA. You understand and agree that The College Investor will not be held responsible for any third-party communications sent by entities that The College Investor does not own or control. You are encouraged to review any third-party privacy policies before utilizing any such third-party service.

The College Investor may include or offer third-party products or services on the Website and provide third-party links to the same. These third-party websites have separate and independent privacy policies. The College Investor has no responsibility or liability for the content and activities of such third parties or their websites. We encourage you to read carefully the privacy policies of all such third-party websites. We seek to protect the integrity of the Website and therefore welcome any feedback about any such third-party websites.

**RIGHTS RELATED TO YOUR PERSONAL INFORMATION**

**Opt-out** – You may opt-out of future email communications by following the unsubscribe links in our emails. You may also notify via our Removal Page to be removed from our mailing list.

**Access** – You may access the personal information we have about you by submitting a request via our Removal Page.

**Amend** – You may contact us via our Removal Page to amend or update your personal information.

**Forget** – In certain situations, you may request that we erase or forget your personal data. To do so, please submit a request on our Removal Page.

Please note that we may need to retain certain information for recordkeeping purposes or to complete transactions, or when required by law.

**EU USERS' RIGHTS UNDER THE GDPR**

The GDPR provides users located in the EU under its protection certain rights with respect to their Personal Data collected by us on the Services. Accordingly, The College Investor recognizes and will comply with the GDPR and those rights, except as limited by applicable law. The rights under the GDPR include:

- **Right of Access**: This includes the right to obtain from us your Personal Data and whether it is being processed, along with the purposes of the processing; categories of Personal Data concerned; recipients to whom your Personal Data has been disclosed; the period for which your Personal Data is being stored; and the right to lodge a complaint.
- **Right of Rectification**: This includes the right to correct inaccurate Personal Data collected and/or stored by us.
- **Right of Erasure ("Right to be Forgotten")**: This includes the right to have your Personal Data deleted. However, if applicable law requires us to comply with your request to delete information, fulfillment of your request may prevent you from using our services and may result in closing your account.
- **Right to Restriction of Processing**: This includes the right to request restriction of how and why your Personal Data is used or processed by us.
- **Right to Data Portability**: This includes the right to receive your Personal Data in a structure, readable format and the right to have your Personal Data transferred.
- **Right to Object**: This includes the right to object to us processing your Personal Data for reasons such as direct marketing purposes and for scientific or historical research or statistical purposes.
- **Right to not be Subject to Automated Decision-Making**: This includes the right to not be subject to a decision based solely on automated processing, including profiling, that could have a legal,

or similarly significant, effect on you from being made solely based on automated processes.

**CALIFORNIA RESIDENTS**

California Residents: Pursuant to the California Consumer Privacy Act of 2019 ("CCPA"), you have certain rights with respect to your personal information. For the purposes of this section, personal information is used as defined in the CCPA. The College Investor reserves the right to verify all requests made pursuant to the CCPA.

**Access and Disclosure**

You may make a verifiable request that we disclose the categories of personal information we have collected about you, the categories of sources of the personal information we collected about you, the business or commercial purpose for collecting or selling the personal information, the categories of third parties with whom we share your personal information, our use of the personal information and if the personal information was disclosed or sold to third parties, including the categories of personal information sold or disclosed. You also have the right to make a verifiable request for a copy of the personal information collected about you for the twelve (12) months prior to the date of your request. To see any categories of personal information we have sold in the last twelve (12) months, please refer to the Do Not Sell My Personal Information Page.

**Deletion Request Rights**

You have the right to request that The College Investor delete any of your personal information that we collected from you and retained, subject to certain exceptions. We may deny your deletion request if retaining the personal information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

**Children Under 16**

We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age.

**No Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**Exercising Your Rights**

To exercise the access, disclosure and deletion rights described above, please submit a verifiable request to us by either (1) using our online Removal Form; (2) emailing support@thecollegeinvestor.com; (30 calling us at (858) 594-3194; or (4) sending us a written request to The College Investor LLC, Attn: CCPA, 2514 Jamacha Rd, Ste 502, PMB 75, El Cajon, CA 92019.

You may only make a verifiable request for access or disclosure twice within a 12-month period.  You may also make a verifiable consumer request on behalf of your minor child. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Note, completing the Removal Form is the best way to exercise your rights under the CCPA, given the nature of the data needed in order to fulfill your request. Failure to provide sufficient detail that allows us to respond will result in the request being deemed non-verifiable.

To respond to your request or provide you with personal information, The College Investor must verify your identity or your authority to make the request. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request. For instructions on exercising sale opt-out rights, please refer to the Do Not Sell My Personal Information Page.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by e-mailing us at support@thecollegeinvestor.com. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

**Timing**

We will respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at our option. Any disclosures we provide will only cover the 12-month period preceding the verifiable request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

**SENSITIVE PERSONAL INFORMATION**

At no time should you submit sensitive personal information to the Website. This includes your social security number, information regarding race or ethnic origin, political opinions, religious beliefs, health information, criminal background, or trade union memberships. If you elect to submit such information to us, it will be subject to this Privacy Policy.

**CHILDREN'S INFORMATION**

The Website does not knowingly collect any personally identifiable information from children under the age of 16. If a parent or guardian believes that the Website has personally identifiable information of a child under the age of 16 in its database, please contact us immediately at support@thecollegeinvestor.com and we will use our best efforts to promptly remove such information from our records.

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