# **Privacy Policy**

# **Uncommon College Guide, LLC**

## Effective: January, 2024

This privacy policy applies to uncommoncollegeguide.com, owned and operated by Uncommon College Guide, LLC. This privacy policy tells you how we collect, use, and protect your personal information. For the purpose of this policy "we" and "our" refers to the owner and any employees or volunteers associated with Uncommon College Guide, LLC.

By visiting the website <u>https://www.uncommoncollegeguide.com</u>, you accept and agree to the terms and conditions of this privacy policy. In particular, you consent to our collection and use of your personal information as described in this privacy policy.

### **MINORS (BELOW AGE 18)**

We do not sell products to minors, and only provide services related to the college admissions process to minors with the consent of a parent or legal guardian. If you are below the age of 18, you may use our website only with the permission and active involvement of a parent or legal guardian. If you are a minor under 13, please do not provide us or other website visitors with any personal information.

## THE TYPE OF INFORMATION WE COLLECT FROM YOU

Like most places on the Internet, simply by visiting our website you automatically tell us certain information. This includes basic information such as your IP address, when you visited, the website from where you came prior to visiting us, the website where you go when you leave our website, your computer's operating system, and the type of web browser that you are using. Our website automatically records this basic information about you and stores it in log files.

We combine this automatically collected log information with other information we collect about you. We do this to offer special discounts and to improve marketing, analytics, and site functionality.

Technologies such as: cookies and tags are used by Uncommon College Guide, LLC. We use cookies for our shopping cart, for user authentication and for user settings. Users can control

the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

We may also collect any data that you provide us by posting it at our website (through our contact us page) or by email (such as your name and email address). You can always choose not to provide us with information. However, if you do withhold information, we may deny you access to some or all of our website's services and features.

Any information provided on our website order form is collected by our payment processing service providers on their servers from Customers who access our site. That information is then shared with Uncommon College Guide, LLC. This information includes ordering information such as shipping and billing names and addresses, phone numbers, email address, and credit card information (See "Orders" below). We use this information primarily to fulfill customer orders and requests. **We do not share this information with any third parties.** However, we may disclose personal information collected if we have received your permission beforehand or in very special circumstances, such as when we believe that such disclosure is required by law or other special cases described below.

### ORDERS AND USE OF PERSONAL INFORMATION

If you purchase a product or service from us, we request certain personal information from you on our order form. You must provide contact information (such as name, email, and shipping address) and financial information (such as credit card information and expiration date). We use this information for billing purposes and to fill your orders. If we have trouble processing an order, we will use this information to contact you.

You may also provide personal information about other people, such as their name and email address. This information is only used for the sole purpose of completing your request or for whatever reason it may have been provided.

We may also make some content, products and services available through our Site or by emailing messages to you through cooperative relationships with third-party providers, often referred to as Affiliates. The brands of our provider partner may appear on the website in connection with such content, products and/or services. You may choose to establish a relationship and share information with that Affiliate, in which cases the privacy policy of our provider partner may apply to the provider partner's use of your information. The privacy policy of our provider partners may differ from ours. If you have any questions regarding the privacy policy of one of our provider partners, you should contact the provider partner directly for more information.

Be aware that we may occasionally release information about our visitors when release is appropriate to comply with law or to protect the rights, property or safety of users of the Site or the public.

## CONTACT US

We will communicate with you in response to your inquiries, to provide services you request, and to manage your account. We will communicate with you by email or telephone, in accordance with your wishes.

### WHAT WE DO WITH YOUR INFORMATION

We use your information to operate our website's business activities. For example, we may use this data to contact you about changes to our websites, new services, or special offers, resolve disputes, troubleshoot issues, bill you for goods, and enforce our website's terms and conditions.

As a general rule, we will not share, sell, rent or trade your data with third parties without your permission. However, there are some important exceptions to this rule that are described in the following paragraphs.

We may, in our sole discretion, provide information about you as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our Web site or other government officials for purposes of fraud investigations, alleged intellectual property infringement, or any other suspected illegal activity or matters that may expose us to legal liability.

Although we do not disclose individually identifiable information, we may disclose aggregate data about our website's visitors to advertisers or other third parties for marketing and promotional purposes.

From time to time, we may use third party suppliers to provide services on our website such as credit card processing to bill you for goods and shipping companies to fulfill orders. We restrict the way third party suppliers can use your information. They are not allowed to sell or give your information to others. We will share personal information as necessary for that third party to provide that service.

# ACCESS TO PERSONAL INFORMATION

If your personal information changes, or if you no longer desire our service, you may correct, amend, delete inaccuracies or deactivate it by contacting us at margie@uncommoncollegeguide.com. We will make every effort to respond to your access request within 14 days.

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at margie@uncommoncollegeguide.com. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### EU 2016/679 - GENERAL DATA PROTECTION REGULATION (GDPR) COMPLIANCE

Though we market primarily to residents of the United States, we strive to fully comply with the new regulations set forth in the GDPR established by the EU. By accessing this Site and our products, you hereby acknowledge that we may process personal data (information relating to an identified or identifiable natural person), including but not limited to: names, addresses, telephone numbers, email addresses, credit card details, financial information, posts on social media websites, and your and others' IP addresses. To the extent any personal data we process is governed by the GDPR, it will be treated in compliance with the GDPR.

Specifically, any personal data we process is collected for a legal and lawful reason, including, but not limited to, providing you with a tailored experience to our website, exposure and access to and our and our affiliates' products, and help you advance your own business. Further, we protect any personal data collected and limit the nature and scope of data collected to that which is adequate, relevant and limited to what is necessary in relation to the purposes for which it is being processed ('data minimisation'). For example, if you purchase one of our products, we will process the personal data necessary to execute your purchase of the product and allow you to subsequently access and use the product. Such personal data may include your name, mailing address, telephone number, email address, password, payment information (credit card number, bank account information), and/or IP address.

You have the absolute right to withdraw your consent, request erasure, and/or object to our processing of any of your personal data that we may process. Simply send an email to margie@uncommoncollegeguide.com with the subject line: "I hereby [withdraw my consent, and/or request reassure, and/or object] to my data being processed under the GDPR" and

include in the body of your email your name. Upon receipt of your email we will cease processing your personal data. Should you desire to exercise your right to erase or object to our processing of your personal data, please also include this request in the body of the email, and we will follow the procedures set forth in GDPR Art. 17, 18, and/or 21. Note, however, that notwithstanding your exercise of your right to withdraw, object and/or request erasure, we will not provide any refunds for products purchased beyond the deadline(s) established for the respective product(s) you purchased.

Upon request, pursuant to GDPR Art. 12 and 15, we agree to provide you with information regarding any of your personal data that we have processed, including the following:

- 1. the purposes of the processing;
- 2. the categories of personal data concerned;
- 3. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- 4. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- 5. the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- 6. the right to lodge a complaint with a supervisory authority;
- 7. where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

We will strive to provide you with this information within one (1) month of such request. We further reserve the right to charge a reasonable fee for such request and/or refuse such request pursuant to GDPR Art. 12 (5).

We take the protection of personal data seriously and not only strive to process and retain it in the safest manner possible, but we will notify you if we discover the unlikely event that any of your personal data is affected by any breach. Unless you have provided us explicit consent and/or you have volunteered without solicitation such personal data, we do not process any personal data that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric

data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

# AUTORESPONDERS

We may use autoresponders to communicate with you by email. To protect your privacy, we use a verified opt-in system for such communications and you can always opt-out of such communications using the links contained in each autoresponder message. If you have difficulties opting out, you may contact us by sending an email to margie@uncommoncollegeguide.com.

# **OPTING-OUT**

We provide you the opportunity to opt-out from any promotional or marketing emails that we may send you. You may do so by selecting the "Unsubscribe" link included in each communication or by emailing us at margie@uncommoncollegeguide.com.

## SECURITY

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

When you enter sensitive information (such as credit card number) on order forms that are hosted by our third party service providers, the transmission of that information is encrypted using secure socket layer technology (SSL).

# **Google Analytics**

We also use Google Analytics Advertiser Features to optimize our business. Advertiser features include:

- Remarketing with Google Analytics
- Google Display Network Impression Reporting
- DoubleClick Platform integrations
- Google Analytics Demographics and Interest Reporting

By enabling these Google Analytics Display features, we are required to notify our visitors by disclosing the use of these features and that we and third-party vendors use first-party cookies

(such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to gather data about your activities on our site. Among other uses, this allows us to contact you if you begin to fill out our check-out form but abandon it before completion with an email reminding you to complete your order. The "Remarketing" feature allows us to reach people who previously visited our site, and match the right audience with the right advertising message.

You can opt out of Google's use of cookies by visiting Google's ad settings and/or you may opt out of a third-party vendor's use of cookies by visiting the <u>Network Advertising Initiative opt-out</u> <u>page</u>.

# Facebook

As advertisers on Facebook and through our Facebook page, we, (not Facebook) may collect content or information from a Facebook user and such information may be used in the same manner specified in this Privacy Policy. You consent to our collection of such information.

We abide by Facebook's Data Use Restrictions.

- Any ad data collected, received or derived from our Facebook ad ("Facebook advertising data") is only shared with someone acting on our behalf, such as our service provider. We are responsible for ensuring that our service providers protect any Facebook advertising data or any other information obtained from us, limit our use of all of that information, and keep it confidential and secure.
- We do not use Facebook advertising data for any purpose (including retargeting, commingling data across multiple advertisers' campaigns, or allowing piggybacking or redirecting with tags), except on an aggregate and anonymous basis (unless authorized by Facebook) and only to assess the performance and effectiveness of our Facebook advertising campaigns.
- We do not use Facebook advertising data, including the targeting criteria for a Facebook ad, to build, append to, edit, influence, or augment user profiles, including profiles associated with any mobile device identifier or other unique identifier that identifies any particular user, browser, computer or device.
- We do not transfer any Facebook advertising data (including anonymous, aggregate, or derived data) to any ad network, ad exchange, data broker or other advertising or monetization related service.

## Links to Other Sites

Our website may contain links to other sites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other sites.

We encourage you to be aware when you leave our site and to read the privacy policies of each and every website that collects personal information.

This privacy policy applies only to information collected by our website.

### Testimonials

We may display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at margie@uncommoncollegeguide.com.

## **Children's Privacy Statement**

This children's privacy statement explains our practices with respect to the online collection and use of personal information from children under the age of thirteen, and provides important information regarding their rights under federal law with respect to such information.

- This site is not directed to children under the age of thirteen and we do NOT knowingly collect personally identifiable information from children under the age of thirteen as part of the site. If we become aware that we have inadvertently received personally identifiable information from a user under the age of thirteen as part of the site, we will delete such information from our records. If we change our practices in the future, we will obtain prior, verifiable parental consent before collecting any personally identifiable information from under the age of thirteen as part of the site.
- Because we do not collect any personally identifiable information from children under the age of thirteen as part of the site, we also do NOT knowingly distribute such information to third parties.
- We do NOT knowingly allow children under the age of thirteen to publicly post or otherwise distribute personally identifiable contact information through the site.
- Because we do not collect any personally identifiable information from children under the age of thirteen as part of the site, we do NOT condition the participation of a child under thirteen in the site's online activities on providing personally identifiable information.

## **POLICY CHANGES**

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Any questions or concerns about this policy should be brought to our attention by sending an email to margie@uncommoncollegeguide.com and providing us with information relating to your concern.