

## PRIVACY POLICY

### MY COLORADO JOURNEY PRIVACY STATEMENT

Last Updated: April 2020

BrightHive Inc and PAIRIN Inc. are the two companies (hereafter “OPERATORS”) that host and operate MyColoradoJourney.com on behalf of the State of Colorado Departments of Higher Education, Labor and Employment, Human Services, Education and Workforce Development Council (referred to hereafter as “STATE PARTNERS”). The OPERATORS and STATE PARTNERS have adopted the following Privacy Statement for the information collected on the MyColoradoJourney.com Web Service.

When you use MyColoradoJourney.com, both the OPERATORS and STATE PARTNERS have access to your information and may use your information to operate and maintain MyColoradoJourney.com and in accordance with the terms of this Privacy Statement.

As MyColoradoJourney.com evolves, we (meaning both the OPERATORS and the STATE PARTNERS) may update this Privacy Statement to reflect changes in the way in which we deal with personal information, whether to comply with then-applicable regulations and self-regulatory standards or otherwise. The Privacy Statement posted here will always be current. We encourage you to review this Statement regularly. Please see additional information regarding amending this Statement in the Section entitled "Amending this Privacy Statement" below.

IMPORTANT NOTICE: Please see the information in the Section entitled "With whom personally identifying information and automatically collected information may be shared" regarding the parties who may access your information.

#### WHAT THIS PRIVACY STATEMENT COVERS:

- Your agreement to this Privacy Statement
- Types of information collected
- Creating an account when you are under the age of 18
- Reasons we collect personally identifying information
- Ways in which personally identifying information and automatically collected information may be used
- With whom personally identifying information and automatically collected information may be shared
- Security measures to protect information; Disclaimer
- Cookies
- Links
- Modifying your information
- Retention and Storage

- Amending this Privacy Statement
- Unenforceability
- Questions

## YOUR AGREEMENT TO THIS PRIVACY STATEMENT

When you use MyColoradoJourney.com, you signify and affirm that you have read, understand, and agree to the terms of this Statement; that you are competent and capable of understanding, agreeing to, and complying with this Statement; and that this Statement forms a legally-binding agreement between you, OPERATORS, and STATE PARTNERS. You agree that this Statement is supported by reasonable and valuable consideration (which includes your use of MyColoradoJourney.com), and you acknowledge your receipt of and the sufficiency of such consideration. If you do not agree with all of the provisions of this Statement, you may not use MyColoradoJourney.com.

## TYPES OF INFORMATION COLLECTED

This Statement covers information you expressly enter into MyColoradoJourney.com and information that we automatically collect as you use MyColoradoJourney.com.

## THE PERSONALLY IDENTIFYING INFORMATION WE COLLECT

To use certain features of MyColoradoJourney.com, you will need to provide us with information that personally-identifies you ("Personally Identifying Information" or "PII"). If you choose not to provide us your Personally Identifying Information, you will not be able to use certain features of MyColoradoJourney.com. When you do provide us your PII, you are authorizing us to use that PII in accordance with this Statement and to store your PII on our servers in the United States. The categories of PII that MyColoradoJourney.com may collect from you include your name, date of birth, address, email address, phone number, grade level, username and password, demographic data (such as your gender, ethnicity, and zip code), parent's or guardian's names, parent's or guardian's address and phone number and other contact information, financial information (such as credit card information), user preferences, and such additional information as you choose to actively enter into MyColoradoJourney.com and include in your profile or are required to provide by the college and/or financial aid applications that you choose to complete or other actions you choose to take through MyColoradoJourney.com. Further, some Colorado schools or STATE PARTNERS may provide students' information to us, including the following student PII: Name, address, date of birth, gender, ethnicity, graduation year, email address, grade point average (GPA), local student number, and State Student ID. If a Colorado school or STATE PARTNER provides us this information about you, we will automatically include that information in your profile on MyColoradoJourney.com.

You may apply to educational institutions located both within and outside the State of Colorado via MyColoradoJourney.com. To do so, you may be required to or have the opportunity to provide financial information (such as credit card information) to pay the application processing fee to the applicable institution. If you do provide your financial information, we encrypt your data during the payment process. We only use and retain your financial information to complete payments you initiate. We do not retain your financial information after the transaction is complete. We use a third-party intermediary to manage payment processing. Our third-party processor follows Payment Card Industry ("PCI") standards and is PCI-Compliant.

Our third-party payment processor is not authorized to use your financial information in any way other than to process payments you initiate and is required to keep the information confidential. We only share your financial information with our third-party payment processor, your credit card provider, and financial institutions to process payments.

#### AUTOMATICALLY COLLECTED INFORMATION

When you use MyColoradoJourney.com, we automatically track, collect, and store the following types of information (referred to as "Automatically-Collected Information"): 1) Date and time you access MyColoradoJourney.com; 2) pages visited and features used, and the order of use; 3) type of computer or other operating device accessing MyColoradoJourney.com and type of browser used to access MyColoradoJourney.com; 4) referring source (meaning the website you visit prior to visiting MyColoradoJourney.com); and 5) other similar information about the interaction between your browser and MyColoradoJourney.com and activities in which you engage while using MyColoradoJourney.com. Unless otherwise stated in this Statement, Automatically Collected Information may be combined with your PII.

My Colorado Journey currently uses Google Analytics to collect and store certain user information including IP Address, pages visited, access timestamp, time on page, and actions completed. We match IP addresses to Google's database to estimate information such as user location and potential demographics. We use Google Analytics User-id to link usage information of different sessions.

We use this information for product and support improvements, as well as to fulfill state reporting requirements and requests. If required, this data may be made available in the data trust, subject to all regulations on that data trust. We will not sell or share this user data outside of the policies agreed to in that trust.

#### CREATING AN ACCOUNT WHEN YOU ARE UNDER THE AGE OF 18

##### Between Age 13 and 17

If you are between the ages of 13 and 17, by using MyColoradoJourney.com, you represent and warrant that you possess parental or guardian consent to use MyColoradoJourney.com and provide PII and Automatically Collected Information through MyColoradoJourney.com.

## Under Age 13

If you are under the age of 13 and you indicate to us that you are under age 13 when you enter your birthdate into MyColoradoJourney.com, you can only create an anonymous account that does not require you to enter your name or other Personally Identifying Information. When there are open fields required in order to create such an anonymous account, you may not use any of these open fields to enter Personally Identifying Information, and your account portfolio will not include your Personally Identifying Information. Further, you will be restricted from using any areas of MyColoradoJourney.com that require you to enter Personally Identifying Information. You will only be able to use MyColoradoJourney.com features or modules that do not require you to enter Personally Identifying Information.

## REASONS WE COLLECT PERSONALLY IDENTIFYING INFORMATION

MyColoradoJourney.com collects PII from you primarily for three reasons. The first reason is to perform a task on MyColoradoJourney.com requested by you, such as filling out a financial aid application, and to personalize the recommendations for outcomes, goals and steps for your Journey. The second reason is to enable you to submit, in a convenient and efficient manner, information that is likely to be needed when you complete college admission, financial aid, and other applications and forms made available through MyColoradoJourney.com or undertake a scholarship search on MyColoradoJourney.com. The third reason is to enable the OPERATORS to respond to your questions or contact you when necessary in connection with the functioning of MyColoradoJourney.com or to provide required notices. When the effective functioning of a MyColoradoJourney.com module does not require PII, none is collected, and any such module can be accessed without providing any PII.

## WAYS IN WHICH PERSONALLY IDENTIFYING INFORMATION AND AUTOMATICALLY COLLECTED INFORMATION MAY BE USED

Upon your instructions to do so, MyColoradoJourney.com module will use your PII to complete the following forms and surveys, to obtain information for you, and to effect transactions on your behalf:

- Complete applications for admission
- Complete financial aid application
- Complete financial aid calculators
- Complete a scholarship search
- Complete Your Plan of Study, which can assist you in selecting courses and otherwise planning to meet admission requirements
- Communicate your requests for information or material to colleges or other institutions you have specified

Your PII and Automatically Collected Information may also be used for the following purposes:

- We may use your PII and Automatically Collected Information to help diagnose problems with the MyColoradoJourney.com server and to administer MyColoradoJourney.com.
- We may use your PII and Automatically-Collected Information to customize and tailor your experience using MyColoradoJourney.com, displaying content on MyColoradoJourney.com that we think you might be interested in and according to your preferences (but we do not track your activity across multiple websites for the purpose of serving targeted advertising to you).

Summary data consisting of a compilation of de-identified and aggregate data representing MyColoradoJourney.com users may be collected by OPERATORS and/or STATE PARTNERS, used by OPERATORS and/or STATE PARTNERS for product improvement and development and/or research, and provided to various entities including colleges and other educational or workforce institutions represented on MyColoradoJourney.com. NO PII IS MADE AVAILABLE AS PART OF THESE SUMMARY REPORTS. Some examples of summary data are the number of monthly visitors to MyColoradoJourney.com, the number of admission applications submitted over MyColoradoJourney.com, and the MyColoradoJourney.com functions utilized by students in specified age or grade ranges.

#### WITH WHOM PERSONALLY IDENTIFYING INFORMATION AND AUTOMATICALLY COLLECTED INFORMATION MAY BE SHARED

Except as set forth below, PII you enter on MyColoradoJourney.com is not made available or distributed to third parties, except with your express consent or at your express direction. In particular, neither OPERATORS nor STATE PARTNERS will give, sell, rent, trade, transfer, otherwise provide or provide access to your PII to any company, individual, or organization for its use in marketing or commercial solicitation or for any other purpose, except with your express consent and at your direction, unless it is pursuant to one of the exceptions listed below or necessary for operation of MyColoradoJourney.com.

We may share your PII as follows:

- a. State Partner Administration and Staff. Your account is meant to help you set goals and plan for the future. If you connect your account to a school, workforce center or other STATE PARTNER using MyColoradoJourney.com as part of a career, job and education planning program, then professional staff at that school or site designated by the administration of the school or site to have access to the MyColoradoJourney.com User Management System will have access to view (i) your MyColoradoJourney.com profile, including your PII that is part of your portfolio, (ii) email communications to and from you through MyColoradoJourney.com, and (iii) all other PII and other content that you add to MyColoradoJourney.com as part of your portfolio. This access is granted to these professional users so that they may assist you in a guidance capacity with your career and education planning. You have the option of not connecting your account to a school or site, though you will then not be able to make full use of MyColoradoJourney.com.

b. Parents and Guardians. You may request that your parent or legal guardian be given permission to view your profile (including all PII and other content that you add to MyColoradoJourney.com as you use MyColoradoJourney.com ). And if you do make this request, your parent or legal guardian will be granted access to your profile and may view all of your PII associated with your portfolio.

c. STATE PARTNERS. As the sponsors of MyColoradoJourney.com, STATE PARTNERS may also have access to the PII associated with your MyColoradoJourney.com account in order to help you set goals and plan for the future and to otherwise operate MyColoradoJourney.com.

d. OPERATORS reserve the right to share PII with one another (regardless of which entity first collected the information) in connection with the maintenance and operation of MyColoradoJourney.com and for use in accordance with this Statement.

e. As Directed by You. Any time you request that we perform a task that involves a transfer of PII, the PII related to the performance of that task will be made available to a recipient you designate. For example:

- If you submit an application for admission to a college or other educational/training institution, the PII required to complete that application and any other PII you entered onto the application will be provided on your behalf to the admissions office of the institution to which you are applying.
- If you request that a college or other educational institution send you material, your contact information will be provided to that institution, so the institution can send you material and contact you.

If you request that a company receive specific information you have directed to be sent to them for a job application.

- You wish to receive information or assistance from a STATE PARTNER.

f. Replacement Vendor. In the event that STATE PARTNERS decide to internally operate or hire a new party (other than OPERATORS) to operate a site similar to MyColoradoJourney.com or that otherwise replaces MyColoradoJourney.com, you acknowledge and agree that STATE PARTNERS will have access to and may obtain a copy of all PII contained in OPERATORS' databases, and you acknowledge and agree that this includes PII that you provided from the date you first opened your account on MyColoradoJourney.com. All such PII will be used by STATE PARTNERS in connection with such replacement site and may be given to a new third-party hired by STATE PARTNERS to operate such replacement site. Unless you expressly consent otherwise, all such PII will continue to be treated in accordance with the terms of this Statement. You also acknowledge and agree that in the event that STATE PARTNERS decide to internally operate or hire a new party (other than OPERATORS) to operate a site similar to MyColoradoJourney.com or that otherwise replaces MyColoradoJourney.com, OPERATORS will retain your PII in their databases as well. MyColoradoJourney.com allows you to use PII that you entered through your MyColoradoJourney.com account on other similar OPERATOR-operated systems. Therefore, you

will still be able to use your account for other OPERATORS systems, and OPERATORS will retain your PII to allow you to do so. Unless you expressly direct otherwise, OPERATORS will continue to treat your PII in accordance with the provisions of this Statement.

g. Required by Law. When required by law to comply with any valid legal process such as a statute, regulation, search warrant, subpoena, or court order, OPERATORS and/or STATE PARTNERS may supply PII contained in your MyColoradoJourney.com account as OPERATORS and/or STATE PARTNERS reasonably determine, based on the advice of counsel, they are legally required to supply. OPERATORS and/or STATE PARTNERS may also disclose PII in emergency situations, to protect your safety or the safety of others, to defend against legal claims, to enforce OPERATORS' and/or STATE PARTNERS' contractual or other rights, or to take actions regarding illegal activities or suspected fraud.

h. Merger, Acquisition, or Sale of OPERATORS. OPERATORS may transfer your PII and Automatically Collected Information to another entity if OPERATORS is involved in a merger, acquisition, reorganization, restructuring, or other sale or transfer of all or any portion of its assets or business. In this event, we will, if allowed, use reasonable efforts to notify you when your information is transferred to a third party (this notification may be made via email to you or by posting a prominent notice on MyColoradoJourney.com and other similar OPERATORS-operated systems). Unless you consent otherwise, OPERATORS will contractually require any successor to treat your PII in accordance with the promises made in this Statement, even after the transfer. But any information you provide after the transfer will likely be subject to a new privacy statement, and you should review that statement.

i. Third-Party Payment Processor. We use a third-party intermediary to manage payment processing when you submit payment to apply to an educational institution through MyColoradoJourney.com. This intermediary is not permitted to store, retain, or use your financial information or other PII, except for the sole purpose of processing payments you initiate. For more information regarding third parties who will have access to your financial information, see the subsection above entitled "The Personally Identifying Information We Collect."

j. Third-Party Service Providers. We may share Automatically Collected Information with our third-party service providers who assist us by performing services related to our operation of MyColoradoJourney.com (such as hosting, data storage, and security). Such third-party service providers are not authorized to use your information in any way other than as described here and are required to keep the information confidential.

k. Third-Party Analytics Services. We may use third-party analytics services to assist us in better understanding our MyColoradoJourney.com users. For example, we use these services to track and analyze certain Automatically Collected Information, such as feature usage. We only ever provide these service providers with (or allow these service providers to collect on our behalf) Automatically Collected Information. We use the information collected from these service providers to make MyColoradoJourney.com better and easier to use. The information we receive from these third parties may be re-associated with your PII after we receive it back from these third parties. These third parties are not authorized to use the information in any other way and are required to keep it the information confidential.

## SECURITY MEASURES TO PROTECT INFORMATION; DISCLAIMER

OPERATORS and STATE PARTNERS use industry standard physical, electronic, and procedural security measures to protect against the loss, misuse, and unauthorized access, disclosure, alteration, and destruction of PII and Automatically Collected Information we collect and store. For example, MyColoradoJourney.com encrypts the PII you enter when it is in route from your browser to the MyColoradoJourney.com web servers, and again when your PII is in route from the web servers to the back-end database servers using TLS 1.2. This practice helps prevent unauthorized third parties from intercepting and gaining access to your PII during transmission over the Internet. MyColoradoJourney.com is WC3 compliant and performs properly on all major operating system platforms as well as all internet browsers that maintain greater than or equal to 5% market share according to Global Stats Stat Counter (<http://gs.statcounter.com/browser-market-share/all/united-states-of-america/#monthly-201804-201904>) .

PII residing on the MyColoradoJourney.com server is password protected, and account access is provided only to the account holder who created the password, anyone to whom that account holder entrusted the password, designated school administrators and staff, and those employees of OPERATORS and STATE PARTNERS who require such access to administer and maintain the MyColoradoJourney.com system or to provide requested customer support to users of MyColoradoJourney.com. Each OPERATORS employee who has access to the PII residing on the MyColoradoJourney.com server has agreed in writing to respect the privacy of all such PII. OPERATORS trains employees to protect customer information and only authorize access for employees who OPERATORS believe have a business need for that information. OPERATORS hold employees accountable to a Code of Conduct and Ethics to protect user information.

The safety and security of your PII also depends on you. You should not send us sensitive PII via email, as this is not secure. You are also responsible for keeping your account username and password confidential. Please notify us if you become aware that your PII is lost, stolen, or used without permission; we may disable access to your account in order to prevent an unauthorized third party from accessing your account.

While we take industry-standard security measures to protect the privacy of your PII, we cannot guarantee that your PII will never be compromised. No Internet or wireless network transmission is ever 100% secure, and no security system can prevent all security breaches. We do not and cannot guarantee that there will be no unintended disclosures of your PII or that unauthorized third parties will not defeat our security measures or use nonpublic information for improper purposes.

## COOKIES

We collect and store Automatically Collected Information through a standard feature found in browser software called a "cookie." A cookie is a small file that a website transfers to a user's computer or other operating device, which may then be stored on the computer's or operating device's hard drive.



MyColoradoJourney.com uses cookies to remember you and personalize your web-viewing experience by keeping track of your session when using MyColoradoJourney.com. Cookies enable you to maintain continuity as you move from page to page on MyColoradoJourney.com and to avoid the nuisance of being asked to provide the same information repeatedly. Cookies also allow us to make sure that only your browser can exchange information regarding your account with our servers. Cookies also provide us Automatically Collected Information about MyColoradoJourney.com features used and activities conducted while using MyColoradoJourney.com. We may use cookies to aggregate data about user traffic on and user interaction with MyColoradoJourney.com so we can offer better experiences and tools in the future. The cookies we use are called session cookies, meaning they are set when you use MyColoradoJourney.com and are erased when you end your session on MyColoradoJourney.com or completely close your browser. The OPERATORS cookies we use do not remain on your hard drive after you end your session on MyColoradoJourney.com or completely close your browser.

### Third-Party Cookies

We use third-party services provided by Google Analytics to track and analyze your MyColoradoJourney.com activity. To gather this Automatically Collected Information, we use a Google Analytics cookie on MyColoradoJourney.com. If you don't want your Automatically Collected Information used by Google Analytics, Google recommends installing the Google Analytics Opt-out Browser Ad-on, located here: <https://tools.google.com/dlpage/gaoptout/>

We also have third-party widgets on MyColoradoJourney.com, such as widgets provided by YouTube, PollDaddy and Screencast. When you use these third-party widgets by using features of our site, the widgets may place cookies associated with these widgets on your computer or other operating device

Don't want cookies? Most browsers are initially set to accept cookies. If you don't want cookies, you can set your browser to disable or refuse cookies or to alert you when cookies are being used. Please refer to your browser for information on how to disable and control cookies. You should note, however, that various MyColoradoJourney.com services and features might not function properly when cookies are not utilized.

### LINKS

MyColoradoJourney.com hosts links to other sites or resources, and you may link to one of those sites or resources for a variety of purposes, such as but not limited to visiting an official college website or employer website. These sites and resources have privacy statements that may differ from that of MyColoradoJourney.com, and for your protection, we recommend that you read and understand the privacy policy at any website prior to providing personal information on that website or otherwise continuing to use that website. Neither OPERATORS nor STATE PARTNERS are responsible for the privacy practices or the content of any websites to which MyColoradoJourney.com links or for the conduct of persons operating those websites. Neither OPERATORS nor STATE PARTNERS has control over such external sites and resources. Neither

OPERATORS nor STATE PARTNERS shall be liable for any content, advertising, products, or other materials on or available from such sites or resources. In addition, neither OPERATORS nor STATE PARTNERS shall be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, advertising, products, or materials on or available through any such site or resource.

## MODIFYING YOUR INFORMATION

You may update on MyColoradoJourney.com any PII you previously provided. To modify PII: (i) Sign in to MyColoradoJourney.com, (ii) access either your portfolio or an application containing the information you want to change, (iii) modify that information using standard word-processing techniques, and (iv) save the change. If you want to remove PII that is in a required field (and not replace it with other data), you will need to contact [support@pairin.com](mailto:support@pairin.com) and request that your account be inactivated.

Please recognize that if you delete information, it will no longer be available on MyColoradoJourney.com so that, for example, if a college to which you previously submitted an application were to attempt to retrieve that application from MyColoradoJourney.com after you made the deletion, the deleted information would no longer be accessible. Similarly, when accessed over MyColoradoJourney.com, PII that has been updated or otherwise modified will appear in its then-current form, rather than in the form in which it may have been submitted at some earlier time. Please note that if you modify or delete any PII, we may retain the earlier- submitted PII, as described in the section below entitled "Retention and Storage."

## RETENTION AND STORAGE

We only retain financial information to complete your payment if you apply to an educational institution through MyColoradoJourney.com. We retain all other PII and Automatically Collected Information in our databases to fulfill the purpose for which the information was collected. Because MyColoradoJourney.com is intended to help you set goals and plan for your future education and career path, the PII you put into

MyColoradoJourney.com will be retained until you ask us to remove your information. Note that even after you ask that we remove your information from our databases, it may be impossible to remove some information, such as information tracked in our web server log files and information that may reside in backup files. We may also retain Automatically Collected Information and information contained in compilations of de- identified and aggregate data representing MyColoradoJourney.com users even after you request that we remove your information from our databases, for use in the aggregate and to analyze and improve MyColoradoJourney.com. Further, even after you request that we remove your information from our databases, we may retain PII and Automatically-Collected Information to comply with applicable laws, rules, regulations, or guidelines; to prevent fraudulent activity; to protect ourselves against liability; to resolve disputes;

and to enforce our contractual or other rights. Notwithstanding the foregoing, OPERATORS will not retain PII for longer than is allowed under applicable law.

#### AMENDING THIS PRIVACY STATEMENT

OPERATORS may amend this Privacy Statement from time to time. We will post any new Statement here, and you should review this Statement regularly to make sure you are aware of its terms. You can determine if this Statement has been revised since your last visit to MyColoradoJourney.com by referring to the "last updated" date at the top of this Statement. If OPERATORS make any substantial changes to this Privacy Statement, OPERATORS may also notify you (i) by posting a message on the MyColoradoJourney.com homepage for at least thirty (30) days; or (ii) by providing direct notice to you via your contact information or by requiring that you agree to the revised Statement to next time you log into your account on MyColoradoJourney.com. Once posted to MyColoradoJourney.com, the new Privacy Statement will apply to all data previously submitted and subsequently submitted to MyColoradoJourney.com, unless such use is prohibited by law.

#### UNENFORCEABILITY

If any part of this Statement is determined to be invalid, illegal, or unenforceable under applicable law, then the invalid, illegal, or unenforceable provision will be deemed to be superseded by a valid, legal, and enforceable provision that most closely matches the intent of the original provision, and the remainder of this Statement will continue in full force and effect.

#### QUESTIONS?

If you have any questions about this Privacy Statement and the privacy practices on this site, you may contact us at [privacy@pairin.com](mailto:privacy@pairin.com) or [support@pairin.com](mailto:support@pairin.com)