

MY JOURNEY TERMS OF SERVICE AND PRIVACY STATEMENT

Last Updated: March 30, 2022

PAIRIN Inc. (hereafter “Service Provider”) host and operate My Action Path on behalf of Lakeland Tours d/b/a Worldstrides (referred to hereafter as “Customer” or “WorldStrides”). The Service Provider and Customer have adopted the following Privacy Statement for the information collected on the My Action Path.

When you use My Action Path, both the Service Provider and Customer have access to your information and may use your information to operate and maintain My Action Path and in accordance with the terms of this Privacy Statement (“Privacy Statement” or “Statement”).

As My Action Path evolves, we (meaning both the Service Provider and the Customer) 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.

If you are a parent or legal guardian of a child under the age of 13, please see the section below titled “Children” for important information about our privacy practices.

WHAT THIS PRIVACY STATEMENT COVERS:

- Your agreement to this Privacy Statement
- Types of information collected
- 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
- Children
- Links
- Modifying your information
- Retention and Storage
- Amending this Privacy Statement
- Unenforceability
- Questions

YOUR AGREEMENT TO THIS PRIVACY STATEMENT When you use My Action Path, 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, Service Provider, and Customer. You agree that this Statement is supported by reasonable and valuable consideration (which includes your use of app.worldstrides.MyJourney.com (the "Site")), 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 My Action Path.

TYPES OF INFORMATION COLLECTED

This Statement covers information you expressly enter into My Action Path and information that we automatically collect as you use My Action Path.

THE PERSONALLY IDENTIFYING INFORMATION WE COLLECT To use certain features of My Action Path, 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 My Action Path. 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 My Action Path may collect from you include your name, date of birth, email address, 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 My Action Path 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 My Action Path. Further, the Customer 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), and student number. If the Customer provides us this information about you, we will automatically include that information in your profile on the Site.

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 My Action Path, we automatically track, collect, and store the following types of information (referred to as "Automatically-Collected Information"): 1) Date and time you access My Action Path; 2) pages visited and features used, and the order of use; 3) type of computer or other operating device accessing My Action Path and type of browser used to access My Action Path; 4) referring source (meaning the website you visit prior to visiting My Action Path); and 5) other similar information about the interaction between your browser and My Action Path and

activities in which you engage while using My Action Path. Unless otherwise stated in this Statement, Automatically Collected Information may be combined with your PII.

My Action Path 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 reporting requirements and requests. We will not sell or share this user data outside of the policies agreed to in that trust.

REASONS WE COLLECT PERSONALLY IDENTIFYING INFORMATION

My Action Path collects PII from you primarily for three reasons. The first reason is to perform a task on My Action Path requested by you, such as personalizing the recommendations for outcomes, goals and steps for your Journey. The second reason is to share information with partners and professionals who support you. The third reason is to enable Service Provider to respond to your questions or contact you when necessary in connection with the functioning of My Action Path or to provide required notices. When the effective functioning of a My Action Path 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

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 My Action Path server and to administer My Action Path.
- We may use your PII and Automatically-Collected Information to customize and tailor your experience using My Action Path, displaying content on My Action Path 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 My Action Path users may be collected by Service Provider and/or Customer, used by Service Provider and/or Customer for product improvement and development and/or research, and provided to various entities including colleges and other educational or workforce institutions represented on My Action Path. NO PII IS MADE AVAILABLE AS PART OF THESE SUMMARY REPORTS. One example of summary data is the number of monthly visitors to My Action Path.

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

Except as set forth below, PII you enter on My Action Path is not made available or distributed to third parties, except with your express consent or at your express direction. In particular, neither Service Provider nor Customer 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 My Action Path. We may share your PII as follows:

a. Customer and Service Provider Administration and Staff. Your account is meant to help you set goals and plan for the future. Professional staff at WorldStrides have access to the My Action Path Professional Center will have access to view (i) your My Action Path profile, including your PII that is part of your portfolio, (ii) email communications to and from you through My Action Path, and (iii) all other PII and other content that you add to My Action Path 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 My Action Path.

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 My Action Path as you use My Action Path). 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. Customer. As the sponsors of My Action Path, Customer may also have access to the PII associated with your My Action Path account in order to help you set goals and plan for the future and to otherwise operate My Action Path.

d. Service Provider. Service Provider operates and hosts My Action Path on Customer's behalf, and will receive PII about you. Service Provider and Customer 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 My Action Path 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 the Customer.

f. Replacement Vendor. In the event that Customer decides to internally operate or hire a new party (other than the Service Provider) to operate a site similar to My Action Path or that otherwise replaces My Action Path, you acknowledge and agree that the Customer will have access to and may obtain a copy of all PII contained in the Service Provider databases, and you acknowledge and agree that this includes PII that you provided from the date you first opened your account on My Action Path. All such PII will be used by the Customer in connection with such replacement site and may be given to a new third-party hired by the Customer 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 the Customer decide to internally operate or hire a new party (other than Service Provider) to operate a site similar to My Action Path or that otherwise replaces My Action Path, Service Provider will retain your PII in their databases as well. My Action Path allows you to use PII that you entered through your My Action Path account on other similar Service Provider-operated systems. Therefore, you will still be able to use your account for other Service Provider systems, and Service Provider will retain your PII to allow you to do so. Unless you

expressly direct otherwise, the Service Provider 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, the Service Provider and/or the Customer may supply PII contained in your My Action Path account as the Service Provider and/or Customer reasonably determine, based on the advice of counsel, they are legally required to supply. The Service Provider and/or the Customer may also disclose PII in emergency situations, to protect your safety or the safety of others, to defend against legal claims, to enforce the Service Provider and/or the Customer contractual or other rights, or to take actions regarding illegal activities or suspected fraud.

h. Merger, Acquisition, or Sale of the Service Provider or Customer. The Service Provider or Customer may transfer your PII and Automatically Collected Information to another entity if the Service Provider or Customer 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 My Action Path and other similar Service Provider-operated systems). Unless you consent otherwise, the Service Provider or Customer 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 My Action Path. 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 My Action Path (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 My Action Path 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 My Action Path 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 the information confidential.

SECURITY MEASURES TO PROTECT INFORMATION; DISCLAIMER

The Service Provider and the Customer 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, My Action Path encrypts the PII you enter when it is in route from your browser to the My Action Path 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. My Action Path 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-ofamerica/#monthly-201804-201904>).

PII residing on the My Action Path 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 the Service Provider and the Customer who require such access to administer and maintain the My Action Path system or to provide requested customer support to users of My Action Path. Each Service Provider employee who has access to the PII residing on the My Action Path server has agreed in writing to respect the privacy of all such PII. The Service Provider trains employees to protect customer information and only authorize access for employees who the Service Provider believe have a business need for that information. The Service Provider holds 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.

My Action Path uses cookies to remember you and personalize your web-viewing experience by keeping track of your session when using My Action Path. Cookies enable you to maintain continuity as you move from page to page on My Action Path 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 My Action Path features used and activities conducted while using My Action Path. We may use cookies to aggregate data about user traffic on and user interaction with My Action Path so we can offer better experiences and tools in the future.

Third-Party Cookies

We use third-party services provided by Google Analytics to track and analyze your Site activity. To gather this Automatically Collected Information, we use a Google Analytics cookie on the Site. 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 the Site, 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 My Action Path services and features might not function properly when cookies are not utilized. CHILDREN

The Children's Online Privacy Protection Act ("COPPA") requires us to explain to parents and legal guardians (as used in this section, "Parents") how we collect, use and disclose PII of children under the age of 13 ("Child" or "Children") who use My Action Path. Parents or legal guardians of users who tell us that they are under the age of 13 will be required to obtain parental consent before they can access certain features of My Action Path that involve the collection of their PII. We collect, use, and share the PII of all users of My Action Path, including Children, as described in this Privacy Statement. We will not condition a Child's participation in an activity within My Action Path on the Child disclosing more PII than is reasonably necessary for that activity. Parents of Children who use My Action Path can email us at support@pairin.com if they wish to:

- review their Child's PII, request that it be deleted, or refuse to allow any further collection or use of their Child's PII;
- agree to our collection and use of their Child's PII without allowing disclosure to third parties unless the disclosure is part of My Action Path; or
- ask any other questions about this Privacy Policy or how we handle their Children's information.

To protect your and your Children's privacy and security, we may require you to provide additional information to verify your identity before we provide any information or respond to your request. The operators that may collect or maintain PII from Children through the Service are Customer, Service Provider, and the companies identified [here](#). Questions about any operator's privacy practices and the use of Children's information may be directed to Service Provider the using the contact information listed at the bottom of this Privacy Statement.

LINKS

My Action Path 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 My Action Path, 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 the Service Provider nor the Customer are

responsible for the privacy practices or the content of any websites to which My Action Path links or for the conduct of persons operating those websites. Neither the Service Provider nor the Customer has control over such external sites and resources. Neither the Service Provider nor Customer shall be liable for any content, advertising, products, or other materials on or available from such sites or resources. In addition, neither the Service Provider nor Customer 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 My Action Path any PII you previously provided. To modify PII: (i) Sign in to My Action Path, (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 and request that your account be inactivated. Please recognize that if you delete information, it will no longer be available on My Action Path so that, for example, if a college to which you previously submitted an application were to attempt to retrieve that application from My Action Path after you made the deletion, the deleted information would no longer be accessible. Similarly, when accessed over My Action Path, 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 My Action Path. We retain all other PII and Automatically Collected Information in our databases to fulfill the purpose for which the information was collected. Because My Action Path is intended to help you set goals and plan for your future education and career path, the PII you put into My Action Path 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 My Action Path users even after you request that we remove your information from our databases, for use in the aggregate and to analyze and improve My Action Path. 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, the Service Provider will not retain PII for longer than is allowed under applicable law.

AMENDING THIS PRIVACY STATEMENT

The Service Provider 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 the Site by referring to the "last updated" date at the top of this Statement. If the Service Provider make any substantial changes to this Privacy Statement, the Service Provider may also notify you (i) by posting a message on the Site 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 the Site. Once posted to the Site, the new Privacy Statement will apply to all data previously submitted and subsequently submitted to My Action Path, 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 or support@pairin.com