

USDLA Online Privacy Notice

Last updated February 27, 2024

Your privacy is important to us. We conduct regular assessment reviews and abide by privacy standards to ensure personal information we collect, use and share is protected. This U.S. Online Privacy Notice ("Notice") describes how USDLA and our affiliates manage personal information about you when you interact with us online through our websites, event registration sites, mobile applications, and social sites ("Sites and Mobile Apps") through your computer, smartphone, tablet or other mobile devices ("computer or mobile devices").

This Notice explains

- How we collect personal information when you visit, use, or interact with us online, and through our ads displayed through online services operated by us or non-affiliated third parties.
- How we may use or share personal information collected to deliver products and services to you and for advertising or event management purposes.

The term "United States Distance Learning Association (USDLA)" or "we", "us" or "our" in this Notice refers to distance learning affiliates or subsidiaries.

By using our Sites and Mobile Apps, you agree to the terms and conditions of this Notice. Our U.S. online services covered by this Notice are intended for a U.S. audience. If you visit or use one of our online services, your information may be transferred or processed in the U.S.

USDLA works with third-party providers who are contractually obligated to comply with our policies to protect information. However, if you visit or access one of these third-party provider sites or mobile apps, please review the online privacy practices of that site or mobile app to understand the specifics of how your online personal information may be collected, used, and shared.

Updates to this Notice

This Notice is subject to change. We update this Notice periodically to comply with the most recent federal and local laws. Please review it whenever you have questions. If we make changes to this Notice, we will revise the **Last updated** date on this page.

Our Online Privacy Practices

We are committed to the transparency of your personal information. We ask for your consent when required, otherwise by using our Site and Mobile Apps, you consent to the collection, use and sharing of your personal information subject to and consistent with applicable laws, regulations, and other notices you may have received based on your relationship with us.

Linking to other sites

We may provide links to non-affiliated third-party sites, such as partners, service providers or merchants. If you follow links to sites not affiliated with, or controlled by USDLA, you should review their privacy and security policies and other terms and conditions, as they may be different from those of our Sites and Mobile Apps. USDLA does not guarantee and is not responsible for the privacy or security of these sites, including the accuracy, completeness, or reliability of their information.

Protecting your personal information

To protect personal information from unauthorized access and use, we use security measures that comply with applicable federal and state laws. These measures may include device safeguards and secured files and buildings as well as oversight of our third-party providers to ensure personal information remains confidential and secure. In the event of a data breach, we provide timely notification, in accordance with applicable laws and regulations.

We also recognize the importance of protecting privacy where children are involved. Our Sites and Mobile Apps are not marketed to minors, and we request that these individuals do not provide personal information through our Sites and Mobile Apps. We do not knowingly collect personal information from minors.



Making sure personal information is accurate

Keeping your personal information accurate and up to date is very important. If your personal information is incomplete, inaccurate or not current, please use the **Contact Us** option on our Sites and Mobile Apps, or call or write to us at the telephone numbers or appropriate address for changes listed on your account statements, records, online or other account materials. You can also speak to a customer representative at our main number.

Personal Information We Collect Online

How do we collect personal information online?

We collect personal information about you through your computer or mobile devices by the use of cookies and similar tracking technologies as well as personal information you provide when you visit or use our Sites and Mobile Apps, for example when you:

- · Apply for or open a new membership
- Register for a conference or webinar event
- Inquire about a product or service
- Register as a participant in one of our events
- Complete a survey, contest or sweepstakes or other promotion

We may use third-party providers to process personal information for business purposes on our behalf. Third-party providers are contractually obligated to comply with our policies to protect information we share with them, or they collect on our behalf.

The personal information we collect is limited to what is required to provide our products or services and to support legal and risk requirements. For additional information, please review the **How do we use your personal information** section of this Notice.

Types of personal information we collect online

The type of personal information we collect from and about you online will depend on how you interact with us and may include:

- Contact information such as name, mailing address, email address, telephone, and mobile number(s).
- Access authorization such as user ID, alias, PIN and password and security questions and answers.
- **Documents or images** submitted via our Site or Mobile Apps to support account opening or during a USDLA sponsored event.
- Debit/Credit Card Information such as card number, expiration date, CVV2, billing address.
- Information from your computer and mobile devices where allowed by individual browsers and/or operating systems, such as:
 - o Unique device identifiers (for example Media Access Control (MAC) and Internet Protocol (IP) addresses) o Browser type, version, language, and display/screen settings
 - o Information about how you use and interact with our Sites and Mobile Apps (for example, activities on pages visited, links clicked or unique and measurable patterns such as keystrokes, mouse clicks and movements, swipes and gestures)
 - o Communications data, such as your communication preferences and details or the content of your communications with us (e.g., text messages, chat messages)
 - o Responses to advertisements on sites and mobile apps where we advertise
 - o Log information such as your search and voice to text queries in the mobile app
 - o Search engine referrals
 - o Social media preference
- Information to facilitate virtual or in-person event management (for example, attendee names, dietary requirements, special assistance needs, and travel details for participants).



How We Use and Share Personal Information

How do we use your personal information?

Personal information collected from and about you online described in this Notice may be used for many purposes:

- **Delivering products and services to you** by verifying your identity (for example when you access your account information); processing applications for products or services.
- **Personalizing your digital and mobile experience** by enhancing our Sites and Mobile Apps organization and design and analyze data to create relevant alerts, products or services.
- **Performing analytics** concerning your use of our services, including your responses to our emails and the pages and advertisements you view.
- Complying with and enforcing applicable legal requirements, industry standards, contractual obligations and our policies.
- Providing notifications concerning events for which you've registered, providing analysis to improve our events and develop new events, determining event overall effectiveness, enhancing products and services, operating and expanding our business activities.

We retain personal information for a period of time as required by laws and regulations and for the necessary business purpose. We securely delete personal information as soon as legally permitted.

California residents covered by the California Consumer Privacy Act may have additional rights. To learn more, California residents can reference the <u>California Consumer Privacy Act Notice</u> for additional information.

With whom do we share your personal information?

We may share the personal information we collect from and about you online described in this Notice (and subject to other legal restrictions and notices you may have received depending on your relationship with us) with:

- Affiliates and subsidiaries of USDLA, such as State Chapters.
- Third-party providers who have contracts with USDLA.
- Government agencies as required by laws and regulations.

Aggregated/de-identified information

Collected personal information may be aggregated and/or de-identified (we remove any details that identify you personally). We may share this aggregated and/or de-identified information with third-party providers to help deliver products, services, and content that are better tailored to the users of our online services and for our own business purposes where permissible under applicable laws and regulations.

How to limit sharing

You have choices regarding the sharing of some personal information. If you do not wish to have your information shared please contact us at membership@usdla.org to limit sharing of your personal information based on your marketing and information sharing choices.

Online Behavioral Advertising

Personal information collected from and about you online, as described in this Notice, is used and shared to deliver advertising and marketing, including prescreened offers of credit, which may be of interest to you.

We present tailored ads to you:

- On our Sites and Mobile Apps through ads that appear as you sign on or off of your online accounts.
- In off-line channels such as financial centers, call centers, and through direct marketing (for example email, mail, phone).
- On third-party sites and mobile apps not affiliated with USDLA.



How we tailor ads to you

- Advertising on our sites, mobile apps and off-line channels such as USDLA partners through direct
 marketing (for example email, mail, phone): We may use personal information about your activities on
 our Sites and Mobile Apps, such as pages visited and key words entered, to help determine which of our ads or
 offers may be of interest to you.
- Advertising on non-affiliated third-party sites and mobile apps: USDLA occasionally contracts with advertising companies to advertise our products and services on sites and mobile apps not affiliated with us. We may use personal information we have collected or that you have provided to assist our non-affiliated third-party sites and mobile apps to select offers that may appeal to you, display them to you and monitor your responses. Non-affiliated third-party sites and mobile apps are not subject to USDLA Privacy Notices.

Industry standards continue to evolve around web browser "do not track" signals or configurations set in your internet browser. In addition to the advertising opt-out options above, USDLA captures opt out preference signals, and to the extent users have rights under applicable law, treats them as valid requests to opt out of sale/sharing at the browser level.

Reminder

Please note that if you opt out of USDLA advertising:

- You may still receive general advertising from USDLA.
- When accessing online account servicing areas (i.e. after member login), you may receive tailored content and advertising based on your account relationships.
- In order for online behavioral advertising opt outs from our Sites and Mobile Apps and on other sites to work on your device, your browser must be set to accept cookies.
- If you delete cookies, buy a new device, access our Sites and Mobile Apps or other sites from a different device, login under a different screen name, or change web browsers, you will need to opt out again.

Social media

USDLA engages with customers on social media platforms such as Facebook®, Twitter®, YouTube® and LinkedIn®.

- Any content you post on official USDLA managed social media pages, such as pictures, information, opinions or any personal information that you make available to other participants on these social platforms, is subject to the Terms of Use and Privacy Policies of those respective platforms.
- When interacting with official USDLA social media pages, our guidelines apply:
 - o Use common courtesy and be respectful of others.
 - Create your own original content and avoid content that you know to be fraudulent.
 - Never repost someone else's copyrighted work unless you have permission.
 - Never post personal, identifying, or confidential information.

We reserve the right to delete comments or posts we deem to be:

- o Profane, obscene, inappropriate, disruptive, or unrelated.
- Indecent or sexually explicit material of any kind—including masked profanity where symbols, initials, intentional misspellings, or other characters are used to suggest profane language.



- Threats; personal attacks; abusive, defamatory, derogatory, or inflammatory language; or stalking or harassment of any individual, entity or organization.
- Discriminatory or that contain hateful speech of any kind regarding age, gender, race, religion, nationality, sexual orientation, gender identity or disability.
- o False, inaccurate, libelous, or otherwise misleading in any way.

We may allow social share buttons on our sites that enable users to easily share information on social media platforms. The non-affiliated third parties that own these widgets may have access to information about your browsing on pages of our Sites and Mobile Apps where these widgets are placed.