

# My California Privacy Rights

**Last updated: May 5, 2020**

This policy is specific and applies only to web visitors of MyDegree.com (the “Site”) who are California residents, under the meaning of Section 17014 of Title 18 of the Cal. Code of Regulations.

Under the “Shine the Light Law”, California residents have the right to receive, once a year, information about third parties with whom we have shared personal information about you or your family for direct marketing purposes during the previous calendar year, and a description of the categories of personal information shared. California residents may request further information about our compliance with this law by sending us an email at [info@MyDegree.com](mailto:info@MyDegree.com), or by mail addressed to: MyDegree, 322 NE 2nd St, 2nd Floor, Oklahoma City, OK 73104. Please note that we are only required to respond to one request per customer each year.

Under the California Consumer Privacy Act of 2018 (“CCPA”), up to twice in a twelve (12) month period, a consumer has the right to request that a business disclose what personal information it collects, uses, discloses, and sells. Information regarding our collection, disclosure, and sale practices are detailed below, in addition to instructions on how to exercise your rights regarding your personal information.

## **What Personal Information Do We Collect?**

We collect, and have collected personal information about our visitors within the preceding 12 months in the following categories:

<b>Categories of Personal Information</b>	<b>Categories of Sources from Which Personal Information is Collected</b>	<b>Business or Commercial Purpose for Which Each Category Will be Used</b>
<p>Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers), or information that identifies, relates to, describes, or is capable of being associated with, a particular individual</p>	<p>Consumer through the Site;            Advertising companies and networks;            Data analytics providers;            and            Public sources</p>	<p>Provide you with Site access and interaction, including the ability to leave a reply;</p> <p>Maintain your account;</p> <p>Track Site access and interaction;</p> <p>Fulfill requests submitted through the Site;</p> <p>Personalize and improve the Site;</p> <p>Connect you with the particular service(s) featured on the Site;</p> <p>Marketing;</p> <p>Internal database;</p>

		<p>Analyze the Site;</p> <p>Secure the Site;</p> <p>Customer service; and</p> <p>Legal compliance</p>
<p>Characteristics of protected classifications under California or federal law</p>	<p>Consumer through the Site;</p> <p>Advertising companies and networks;</p> <p>Data analytics providers; and</p> <p>Public sources</p>	<p>Provide you with Site access and interaction, including the ability to leave a reply;</p> <p>Maintain your account;</p> <p>Track Site access and interaction;</p> <p>Fulfill requests submitted through the Site;</p> <p>Personalize and improve the Site;</p> <p>Connect you with the particular service(s) featured on the Site;</p> <p>Marketing;</p> <p>Internal database;</p>

		<p>Analyze the Site;</p> <p>Secure the Site;</p> <p>Customer service; and</p> <p>Legal compliance</p>
<p>Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with a website, application, or advertisement)</p>	<p>Consumer through the Site;</p> <p>Advertising companies and networks;</p> <p>Data analytics providers; and</p> <p>Public sources</p>	<p>Provide you with Site access and interaction, including the ability to leave a reply;</p> <p>Maintain your account;</p> <p>Track Site access and interaction;</p> <p>Personalize and improve the Site;</p> <p>Connect you with the particular service(s) featured on the Site;</p> <p>Marketing;</p> <p>Internal database;</p> <p>Analyze the Site;</p> <p>Secure the Site;</p>

		Customer service; and Legal compliance
Geolocation data	<p>Consumer through the Site;</p> <p>Advertising companies and networks;</p> <p>Data analytics providers; and</p> <p>Public sources</p>	<p>Provide you with Site access and interaction, including the ability to leave a reply;</p> <p>Maintain your account;</p> <p>Track Site access and interaction;</p> <p>Personalize and improve the Site;</p> <p>Connect you with the particular service(s) featured on the Site;</p> <p>Marketing;</p> <p>Internal database;</p> <p>Analyze the Site;</p> <p>Secure the Site;</p> <p>Customer service; and</p> <p>Legal compliance</p>

<p>Professional or employment-related information</p>	<p>Consumer through the Site;  Advertising companies and networks;  Data analytics providers; and  Public sources</p>	<p>Provide you with Site access and interaction, including the ability to leave a reply;</p> <p>Maintain your account;</p> <p>Track Site access and interaction;</p> <p>Personalize and improve the Site;</p> <p>Connect you with the particular service(s) featured on the Site;</p> <p>Marketing;</p> <p>Internal database;</p> <p>Analyze the Site;</p> <p>Secure the Site;</p> <p>Customer service; and</p> <p>Legal compliance</p>
<p>Education information</p>	<p>Consumer through the Site;</p>	<p>Provide you with Site access and interaction, including</p>

	<p>Advertising companies and networks;</p> <p>Data analytics providers; and</p> <p>Public sources</p>	<p>the ability to leave a reply;</p> <p>Maintain your account;</p> <p>Track Site access and interaction;</p> <p>Personalize and improve the Site;</p> <p>Connect you with the particular service(s) featured on the Site;</p> <p>Marketing;</p> <p>Internal database;</p> <p>Analyze the Site;</p> <p>Secure the Site;</p> <p>Customer service; and</p> <p>Legal compliance</p>
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We collect the above personal information directly from you via the Site and from your interactions with the Site and the advertisements featured on the Site, including from cookies and tracking pixels (also known as web beacons, 1x1 pixels, or clear GIFs) on the Site. A cookie is a small data text file, which is stored on your computer's hard drive (if your web browser permits) that can later be

retrieved to identify you to us. Tracking pixels are code requiring a call back to a server to render, and which deliver information to us about your IP address and information from your browser. Cookies make your use of the Site easier, make the Site run more smoothly, and help us to maintain a secure Site. Cookies and tracking pixels may collect information about you, such as the referring website address, your IP address, your browser type and version, your Internet service provider, the area code and zip code associated with your server, the date and time of your visit, and the time spent on the Site. Cookies and tracking pixels are used to track your interaction with the Site, including clicks.

We also collect personal information from you through your clicks on the Site, including whether you indicated a need for a particular service or product featured on the Site, whether you responded to a particular advertisement featured on the Site, and which third party advertisements and links you click through the Site.

To the extent that you subscribe to receive electronic communications from us such as our email newsletters and/or email updates, we also collect information on whether you viewed the email communications, and clicked on any links within such communications.

To the extent that you create a post or reply to content featured on the Site, we also collect your personal information related to the post or reply.

### **What Personal Information Do We Disclose?**

We disclose personal information in all of the above categories to our third party service providers we utilize to assist us in providing you with the requested products or services, and to provide us with support for our internal and business operations, such as data processing, data storage, research, analytics, web hosting, marketing, and delivery of promotional or transactional materials.



We may also disclose personal information in all of the above categories to third party lead purchasers and advertisers when you engage in certain activities through the Site, including, but not limited to requesting or purchasing products or services offered by these third parties, electing to receive information or communications from them, or electing to participate in contests, sweepstakes, games, scholarships, or other programs sponsored or provided by these third parties, in whole or in part. We may also disclose personal information in all of the above categories to third party lead purchasers, advertisers, and marketing partners that are interested in contacting you or providing offers to you that may be related to our products or services or about other products or services you may find interesting, and for the purpose of tracking clicks/conversions.

We may also disclose personal information in all of the above categories to other third parties at your direction or request. For example, we may share your name and contact information with schools, to which you request information about, and may share your name and email address with any person to whom you request that we share such information. We may also disclose personal information in all of the above categories with any person who, in our reasonable judgment, is authorized to receive your information, such as your authorized agent.

We may also disclose your personal information in all of the above categories if legally required to do so, or at our discretion, when we believe disclosure is appropriate to comply with the law, to enforce or apply applicable terms and conditions and other agreements, or to protect the rights, property, or safety of our company, our affiliates, our other customers or users of the Site, or others.

Also, in the event that some or all of our business assets are sold or transferred, whether through a sale, acquisition, merger, consolidation, reorganization, bankruptcy, or other corporate change involving us and/or our affiliates, we may disclose your personal information in all of the above categories to third parties evaluating or facilitating the transaction, and such personal information may be included within the transferred assets. In the event we become the subject of an

insolvency proceeding, whether voluntary or involuntary, we or our liquidator, administrator, receiver or administrative receiver may sell, license or otherwise dispose of, such information in a transaction approved by the court.

### **What Personal Information Do We Sell?**

We disclose for a business purpose and sell personal information in all of the above categories our third party lead aggregators and purchasers and advertising partners so that they may contact you regarding your interest in enrollment opportunities. Also, in the event that we, or substantially all of our assets, are acquired, such personal information may be included within the transferred assets. In the event we become the subject of an insolvency proceeding, whether voluntary or involuntary, we or our liquidator, administrator, receiver or administrative receiver may sell, license or otherwise dispose of, such information in a transaction approved by the court.

We do not have actual knowledge regarding the sale of personal information of minors under 16 years of age. There are no financial incentives to disclose.

### **Your Right to Request to Know and How to Submit a Verified Request to Know**

A “request to know” is a request related to the personal information that a business has about such consumer. It may include a request for any or all of the following from us:

- specific pieces of personal information that we have collected about you;
- categories of personal information that we have collected about you;
- categories of sources from which the personal information was collected;

- categories of personal information that we have sold or disclosed for a business purpose about you;
- categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling personal information.

The CCPA permits requests to know from the same consumer up to twice in a twelve (12) month period.

To submit a request to know, please click here: </ccpa-form.php>, or email us at [CCPA@MyDegree.com](mailto:CCPA@MyDegree.com). To process your request, we may require that you submit the following information in conjunction with your request: your first name, last name, a California address, and email address. The information which you provide will be used to verify your request and to attempt to identify you within our data records. If you elect to use an authorized agent to exercise your right to submit a request for information, we may require the following before processing the request: 1) provide proof of your written and signed permission with the authorized agent to act on your behalf; 2) directly verify your own identity with us; and 3) directly confirm with us that you provided the authorized agent permission to submit the request on your behalf. The information which you submit in conjunction with your request to know will be used for the express purposes of verification and providing you with responsive information to your request, if required.

### **Your Right to Request Deletion and How to Submit a Verified Request to Delete**

You have the right to request the deletion of any personal information which we have collected about you, or which we maintain. To submit a verifiable request to delete, please click here: </ccpa-form.php>, or email us at [CCPA@MyDegree.com](mailto:CCPA@MyDegree.com).

To process your request, we may require that you submit the following information in conjunction with your request: your first name, last name, a California address, and email address. The information which you provide will be used to verify your request and to attempt to identify you within our data records. If you elect to use an authorized agent to exercise your right to submit a request for deletion, we may require the following before processing the request: 1) provide proof of your written and signed permission with the authorized agent to act on your behalf; 2) directly verify your own identity with us; and 3) directly confirm with us that you provided the authorized agent permission to submit the request on your behalf. The information which you submit in conjunction with your request to delete will be used for the express purposes of verification and providing you with responsive information to your request, if required.

We utilize a two-step process for online requests to delete, whereby you first submit your request to delete, and second, you separately confirm that you want your personal information deleted.

To the extent that your personal information is necessary for us to maintain for a reason delineated in Cal. Civ. Code § 1798.105(d), including but not limited to complete a transaction for which the personal information was collected, provide a good or service you have requested, detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, debug, etc., or to comply with a legal obligation, we are not required to comply with your request for deletion. For instance, we are not required to delete personal information which is necessary to maintain suppression files for those individuals who have opted out of receiving email marketing from us. If we are unable to verify your request, we will notify you as well.

**Your Right to Opt-Out of the Sale of Personal Information and How to Submit a Verified Request to Opt-Out**

You have the right to opt-out of the sale of your personal information. You have the right to direct a business that sells (or may in the future sell) your personal information to stop selling your personal information, and to refrain from doing so in the future.

Our homepage features a “Do Not Sell My Personal Information” link, which you can click to submit your request to opt-out of the sale of your personal information. You may also email us at [CCPA@MyDegree.com](mailto:CCPA@MyDegree.com) to submit your request to opt-out of the sale of your personal information. In conjunction with your request, we may request that you provide your first name, last name, a California address, and email address to verify and process your request. The information which you provide will be used to verify your request and to attempt to identify you within our data records. If you elect to use an authorized agent to exercise your right to submit a request for deletion, we may require the following before processing the request: 1) provide proof of your written and signed permission with the authorized agent to act on your behalf; 2) directly verify your own identity with us; and 3) directly confirm with us that you provided the authorized agent permission to submit the request on your behalf. The information which you submit in conjunction with your request to opt-out will be used for the express purposes of verification and complying with the opt-out request, if required.

### **Your Right to Non-Discrimination for the Exercise of Your Privacy Rights**

California affords consumers with the right not to receive discriminatory treatment by a business for the exercise of their privacy rights conferred by the CCPA. This means that you cannot be denied goods or services; be charged different prices or rates; be provided with a different level or quality of goods or services; or have it suggested that you will receive a different price or rate or different level or quality of goods or services. However, a business may offer a financial incentive

or price or service difference if it is reasonably related to the value of the consumer's data. A business shall notify consumers of any financial incentive or price or service difference.

## **Our General Privacy Policy**

Our general privacy policy is located here: </home/privacy-policy>

## **Updates**

We will revise this notice from time to time as implementing regulations further develop and come into effect and we are able to provide you with better information on your CCPA rights and how to exercise them.

## **Need More Information or Having Difficulty Accessing this Information?**

If you have any questions or concerns regarding your California privacy rights, our general privacy policy or practices, you may contact us via email at [CCPA@MyDegree.com](mailto:CCPA@MyDegree.com), or by mail at 322 NE 2<sup>nd</sup> St., 2<sup>nd</sup> Floor, Oklahoma City, OK 73104. Further, if you have a disability which interferes with your ability to access this policy, we can make accommodations to present the policy in an alternative format, to assist you. If you would like to receive this information in another format that is accessible to your needs (for example: audio, large print, etc.) please contact us.

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