

TalkingPoints Privacy Policy

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Welcome to TalkingPoints, the online and mobile service of [TalkingPoints Corporate Entity] (“TalkingPoints,” “we,” “our,” or “us”). TalkingPoints understands that privacy is important to our users. This Privacy Policy explains:

- How TalkingPoints collects, uses, and shares information about visitors to our website and mobile products (“TalkingPoints Sites”), and
- How TalkingPoints collects, uses and shares information provided to us by or on behalf of our Customer as part of the applicant-tracking and workflow management Service.

All capitalized terms that are not defined herein have the definitions given them in our Terms of Service. By using our Service, you agree to the terms of this Privacy Policy and our Terms of Service.

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1. WHAT INFORMATION DO WE COLLECT AND FOR WHAT PURPOSE?

Generally. We collect personal information from our users in order to provide you with a personalized, useful and efficient experience. The categories of information we collect can include:

- **Information you provide to TalkingPoints Sites.** Visitors can browse some areas of our website without providing any personal information. However, certain interactions with us require personal information. For example, we may collect personal information such as a username and password, first and last name, phone number, email address, home address and billing information when you register for a User Account, use our Service, or if you correspond with us. We may also collect additional information you provide to us about you or your child, which we will consider to be personal information if it is linked to your identifying information. We may combine this information with data we collect from you through other methods, such as telephone conversations.
- **Information that we collect through the TalkingPoints Service:** In providing our Service to you, we collect, store, process and disclose personal information belonging to you. Once you begin using the Service, we will keep records of activities related to the Service.

- **Information we may receive from third parties:** We may receive information about you from third parties. For example, if you access our websites or Service through a third-party connection or log-in, for example, through Facebook or Google, or by interacting with our brand on social media sites, that third party site will pass certain information about your use of its service to TalkingPoints. This information could include, but is not limited to, the user ID associated with your third party account (for example, your Facebook UID), an access token necessary to access that service, any information that you have permitted the third party to share with us, and any information you have made public in connection with that service. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to the Service. You may also unlink your third party account from the Service by adjusting your settings on the third party service.
- **Address Book Information.** With your permission, TalkingPoints may access your contact list available on your mobile device or in your email accounts in order to locate your friends and contacts on the Service and to invite your friends and contacts to connect with our Service. When we invite your friends to join the Service, we will include your name and photo to let them know that you are the person extending the invitation. After sending these invitations, we may also send reminder emails to your invitees on your behalf. We will store these contacts for purposes of alerting you when your contacts join TalkingPoints at a later time so that you may connect with them on the Service, and to suggest friends and connections to other members of TalkingPoints.
- **Student Data:** TalkingPoints may have access to personally identifiable information about students (“**Student Data**”) in the course of providing its Services. We consider Student Data to be confidential and do not use such data for any purpose other than to provide the Services. TalkingPoints has access to Student Data only as requested by the school or provided by the student’s parent or legal guardian and only for the purposes of performing Services. If a student contacts TalkingPoints with a question about our Service, we will collect personal information from that student only as necessary to respond to the student’s request and direct the student to contact his or her school, and we will then delete or anonymize the personal data of the student after providing our response.

We use this information to operate, maintain, and provide to you the features of the Service. We may use this information to communicate with you, such as to send you email messages, or text messages with your consent, or to permit other users of the Service to send you such messages, and to follow up with you to offer information about our Service and your account. We may also send you Service-related emails or messages (*e.g.*, account verification, transactional communications, change or updates to features of the Service, technical and security notices). For more information about your communication preferences, see “Your Choices Regarding Your Information” below.

We reserve the right, but have no obligation, to monitor any user-generated content you post on the Service. We reserve the right to remove any such information or material for any reason or no reason, including without limitation if in our sole opinion such information or material violates, or may violate, any applicable law or our Terms of Use Agreement, or to protect or defend our rights or property or those of any third party. We also reserve the right to remove information upon the request of any third party.

2. HOW WE USE COOKIES AND OTHER TRACKING TECHNOLOGY TO COLLECT INFORMATION

We and our third party partners may automatically collect certain types of usage information when you visit our website or use our Service. For instance, when you visit our websites, we may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets us help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Service (*e.g.*, the pages you view, the links you click, how frequently you access the Service, and other actions you take on the Service), and allow us to track your usage of the Service over time. We may collect log file information about your browser or mobile device each time you access the Service. Log file information may include anonymous information such as your web request, Internet Protocol (“IP”) address, browser type, information about your mobile device, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, and other such information. We may employ clear gifs (also known as web beacons) which are used to anonymously track the online usage patterns of our Users. In addition, we may also use clear gifs in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service. These tools collect information sent by your browser or mobile device, including the pages you visit, your use of third party applications, and other information that assists us in analyzing and improving the Service. Although we do our best to honor the privacy preferences of our Users, we are not able to respond to Do Not Track signals from your browser at this time.

When you access our Service by or through a mobile device, we may receive or collect and store a unique identification numbers associated with your device or our mobile application (including, for example, a UDID, Unique ID for Advertisers (“IDFA”), Google Ad ID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and, depending on your mobile device settings, your geographical location data, including GPS coordinates (*e.g.* latitude and/or longitude) or similar information regarding the location of your mobile device.

We may use the data collected through cookies, log file, device identifiers, location data and clear gifs information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including advertising; (c) provide and monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website and our Service; (e) diagnose or fix technology problems; and (f) otherwise to plan for and enhance our Service.

Third party tracking and online advertising. We may permit third party ad networks, social media companies, and other third party services to collect information about browsing behavior from visitors to our Service through cookies, social plug-ins, or other tracking technology. We may permit third party online advertising networks to collect information about your use of our websites over time so that they may play or display ads that may be relevant to your interests on our Service as well as on other websites or services. Typically, the information is collected through cookies or similar tracking technologies. The only way to completely “opt out” of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser or mobile device. Please refer to your browser’s or mobile device’s technical information for instructions on how to delete and disable cookies, and other tracking/recording tools. (To learn more about cookies, clear gifs/web beacons and related technologies and how you may opt-out of some of this tracking, you may wish to visit <http://www.allaboutcookies.org> and/or the Network Advertising Initiative’s online resources, at

<http://www.networkadvertising.org>). Depending on your mobile device, you may not be able to control tracking technologies through settings.

3. SHARING OF YOUR INFORMATION

We may share your personal information in the instances described below. For further information on your choices regarding your information, see the “Your Choices About Your Information” section below.

Remember, our Service allows you to connect and interact with others. Your profile information, including your name, photo, and other personal information, may be available publicly to other members of the Service by default. This information may be available to the public and may be searchable by search engines which may display certain parts of your personal information publicly.

We may share your personal information with:

- Other parties you chose to share data with through our Service. This includes your school and any other company or individual you engage with through our Service;
- Other companies owned by or under common ownership as TalkingPoints. These companies will use your personal information in the same way as we can under this policy;
- Third-party vendors and other service providers that perform services on our behalf, in order to carry out their work for us, which may include billing, payments, service fulfillment, web hosting or providing analytic services. We provide only as much information as is reasonably necessary to perform the Services on our behalf;
- Other parties in connection with a company transaction, such as a merger, sale of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party or in the event of a bankruptcy or related or similar proceedings; and
- Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Service or to protect the security or integrity of our Service; and/or (c) to exercise or protect the rights, property, or personal safety of TalkingPoints, our Users, or others.

To the extent that we provide forums, blogs or bulletins that allow you to post user-generated content, such content may become available to the public and to other members of the Service. If you remove information that you posted to the Service, copies may remain viewable in cached and archived pages of the Service, or if other users have copied or saved that information.

We may also aggregate or otherwise strip data of all personally identifying characteristics and may share that aggregated or anonymized data with third parties.

4. YOUR CHOICES ABOUT YOUR INFORMATION

How to control your communications preferences: You can stop receiving promotional email communications from us by clicking on the “unsubscribe link” provided in such communications. We make every effort to promptly process all unsubscribe requests. You may not opt out of Service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Service, technical and security notices). Please note that other users, such as your employer or potential employer, may contact you through or outside

of the Service and TalkingPoints may not be able to control your preferences for those types of communications.

Modifying or deleting your information. We will retain your information for as long as your account is active or as needed to provide you Services. You may view and modify your personal information through your account settings. We may not be able to modify or delete your information in all circumstances. For example, information we collect in the course of providing the Service is shared with another user and we do not control access to nor delete that information once it has been shared with the other User. If you have any questions about reviewing, modifying or deleting your account information, contact us at hello@talkingpts.org. In some cases, we may not be able to remove your personally identifiable information, in which case we will let you know if we are unable to do so and why.

5. HOW WE STORE AND PROTECT YOUR INFORMATION

Storage and processing: Your information collected through the Service may be stored and processed in the United States and in any other country in which TalkingPoints or its subsidiaries, affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we will transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which TalkingPoints or its parent, subsidiaries, affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

Keeping your information safe: TalkingPoints cares about the security of your information, and uses commercially reasonable physical, administrative, and technological safeguards to preserve the integrity and security of all information collected through the Service. However, no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, TalkingPoints will investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

6. CHILDREN'S PRIVACY

TalkingPoints does not knowingly collect any information from children under the age of 13 unless the school or we have obtained appropriate parental consent for such information or for the student to use the Service. Please contact us at hello@talkingpts.org if you believe we have inadvertently collected personal information of a child under 13 without proper parental consents so that we may delete such data as soon as possible.

7. LINKS TO OTHER WEB SITES AND SERVICES

Our Service may integrate with or contain links to other third party sites and services. We are not responsible for the practices employed by third party websites or services embedded in, linked to, linked from, or connected with the Service and your interactions with any third-party website or service are subject to that third party's own rules and policies.

8. HOW TO CONTACT US

If you have any questions about this Privacy Policy or the Service, please contact us at hello@talkingpts.org.

9. CHANGES TO OUR PRIVACY POLICY

TalkingPoints may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the policy we will update the 'last modified' date at the top of this page. Please do not use (or continue to use) the Service unless you agree to the modifications.