



COUNCIL *for* OPPORTUNITY *in* EDUCATION

## **COUNCIL FOR OPPORTUNITY IN EDUCATION PRIVACY POLICY**

Last updated June 1, 2022

This Privacy Policy, together with other statements about our privacy practices, describes how the Council for Opportunity in Education and its affiliated entities (collectively “COE” or “we”) collects, shares, uses and protects information relating to individuals that are identified or are reasonably identifiable (“Personal Information”). This Privacy Policy does not address any Personal Information that constitutes an Education Record under the Family Educational Rights and Privacy Act (“FERPA”). Each individual to whom the Personal Information relates is called a Data Subject. We also may maintain a separate privacy policy to describe our information collection, sharing and use practices relating to specific context or service. To the extent of any discrepancy between this Privacy policy and other privacy policies, the more specific privacy policy will govern in that context. The Privacy Policy covers situations where we collect Personal Information in providing a product or service for personal, family, professional or household purposes. Please read through this Privacy Policy and contact us as described below if you have further questions.

### **How Personal Information is collected**

Most Personal Information we collect is from Data Subjects seeking to obtain or learn about our services or to collaborate with others to share knowledge or experiences. This Personal Information generally is collected online through websites or applications. We may also collect Personal Information through entities that perform services for us, such as vendors or business partners.

### **Types of Personal Information collected**

#### *Consumers*

Individuals seeking to obtain our services (Consumers) are asked to provide certain Personal Information. This Personal Information may include your name, address, email address, telephone number, and IP address.

#### *Site Visitors*

When you visit our online services, we and our third-party vendors automatically collect other information about your use of our website such as your IP address, web browser and device type (Device Information). We do not link IP addresses to the Personal Information. Your session and the pages you visit on our online services will also be tracked.

We use this Device Information for the primary purpose of conducting analyses to assist us with administering our online services. To the extent beneficial, we share this information with third-party vendors, such as Google Analytics, to improve our online services.

## Use and Sharing of Personal Information collected

We use Personal Information collected by us or on our behalf to provide requested services, improve our business, to meet legal and regulatory requirements and as otherwise permitted under applicable law. We collect and process this Personal Information in order to provide you resources (Resources). If you do not provide this personal information, we may be unable to provide you with the Resources.

Personal Information We collect or collected on our behalf may be shared with other entities. Our use and sharing of Personal Information will be for a lawful basis, which may be with your consent (as described below), as part of providing you with the Resources, as part of our normal business operations (such as to improve our services or let you know about products or services that may be of interest to you), to meet our contractual obligations with service providers or business partners, or to meet legal or regulatory obligations. We do not sell or rent Personal Information.

The chart below describes the categories of Personal Information we may collect or share and the purpose for collecting or sharing such Personal Information.

Category of Personal Information	Do We Collect	Sources of the Personal Information	Commercial or Business Purpose
<b>Identifiers.</b> This may include name, email address, internet protocol (IP) address, etc.	Yes	<ul style="list-style-type: none"> <li>You</li> <li>Our Service Providers or Business Partners</li> </ul>	<ul style="list-style-type: none"> <li>Provide the services you request</li> <li>Improving our services</li> <li>Inform you about our other products, services and offers that may be of interest to you</li> <li>Meet our contractual obligations with Service Providers or Business Partners</li> <li>Meet legal and regulatory requirements</li> <li>Provide customer service</li> <li>Detecting and protecting against security events and fraud</li> <li>Auditing consumer interaction &amp; transactions</li> </ul>
<b>Customer Records</b> (as defined in Cal. Civ.	Yes	<ul style="list-style-type: none"> <li>You</li> </ul>	<ul style="list-style-type: none"> <li>Provide the services you request</li> </ul>

<p>Code § 1798.80(e)). This may include a phone number, physical address, telephone number, etc.</p>		<ul style="list-style-type: none"> <li>• Our Service Providers or Business Partners</li> </ul>	<ul style="list-style-type: none"> <li>• Improving our services</li> <li>• Inform you about our other products, services and offers that may be of interest to you</li> <li>• Meet our contractual obligations with Service Providers or Business Partners</li> <li>• Meet legal and regulatory requirements</li> <li>• Provide customer service</li> <li>• Detecting and protecting against security events and fraud</li> <li>• Auditing consumer interaction &amp; transactions</li> </ul>
<p><b>Protected Classification Characteristics.</b> These could include age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information), etc.</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Demographic data voluntarily entered by authenticated visitors of our site into their user profile</li> </ul>
<p><b>Commercial Information.</b> This may include products or</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Provide the services you request</li> </ul>

<p>services purchased, order information, investment preferences, etc.</p>		<ul style="list-style-type: none"> <li>• Our Service Providers or Business Partners</li> </ul>	<ul style="list-style-type: none"> <li>• Improving our services</li> <li>• Inform you about our other products, services and offers that may be of interest to you</li> <li>• Meet our contractual obligations with Service Providers or Business Partners</li> <li>• Meet legal and regulatory requirements</li> <li>• Provide customer service</li> <li>• Detecting and protecting against security events and fraud</li> <li>• Auditing consumer interaction &amp; transactions</li> </ul>
<p><b>Internet/Network Information.</b> This may include username, password, website interaction, etc.</p>			
<p><b>Geolocation Data.</b> This may include device-shared location, and wi-fi connection location, personal location and movements, etc.</p>			
<p><b>Sensory Data.</b> This may include audio, electronic, visual, thermal, olfactory, or similar information.</p>			
<p><b>Professional or Employment-related Information.</b> This may include current or past job history or performance evaluations.</p>			

<p><b>Non-Public Education Information.</b> This may include education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• You</li> <li>Our Service Providers or Business Partners</li> </ul>	<ul style="list-style-type: none"> <li>• Provide the services you request</li> <li>• Improving our services</li> <li>• Inform you about our other products, services and offers that may be of interest to you</li> <li>• Meet our contractual obligations with Service Providers or Business Partners</li> <li>• Meet legal and regulatory requirements</li> <li>• Provide customer service</li> <li>• Detecting and protecting against security events and fraud</li> <li>• Auditing consumer interaction &amp; transactions</li> </ul>
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## Cookies

Cookies are small files that are stored on your computer. We use cookies to understand and save your preferences for future visits to our website and to offer you personalized information and products from our third-party business partners that may be of interest to you.

## Children’s privacy

Our website is intended for use only by individuals planning their post-baccalaureate or post-college education. Our website is not intended to be used by children under the age of 13. If you are under the age of 13, please do not use our online services.

## European Economic Area (EEA) data subjects

Our website is intended for use only by individuals located in the United States. Our website is not intended for individuals located outside the United States. If you are located outside the United States, please do not use our website.

## Retention of your personal information

We will retain your personal information for as long as is necessary to fulfill any of the uses and disclosures identified in this notice or to comply with applicable legal obligations.

### **Information protection**

We have implemented reasonable administrative, physical and technical safeguards to protect your personal information from unauthorized access, alteration, and disclosure.

### **Residents of certain US states (including California)**

Some US states provide additional privacy rights to individuals who are residents of the state.

California residents may have additional rights under the California Consumer Privacy Act (CCPA). For all individuals, including California residents, the sections above describe our Personal Information collection, sharing and use. Under CCPA, certain residents of California, in addition to other rights described in this Privacy Policy, have the following rights:

- To request that we disclose what personal information relating to you that we collect, share or sell.
- To request that we delete certain personal information relating to you that we maintain.
- To opt-out from the sale by a business of your personal information.
- To make such a request relating to these California rights, please send your request to Office of Information Technology c/o Council for Opportunity in Education, 1025 Vermont Avenue, N.W., Suite 400, Washington D.C. 20005, or call (202) 347-7430 We may need to obtain information about you or your specific request in order to verify and respond. If you have an authorized agent, that person also may submit requests relating to your California privacy rights. We will need to obtain verification of the agent's identity, their authority to act on your behalf, and verification that you are the individual about whom We possess the personal information requested.

A business may not discriminate against a California resident that exercises their privacy rights under state law.

### **Changes to this Privacy Policy**

We may revise this Privacy Policy based on changes to our business practices, the services we offer, changes in the law, or for other reasons. Please check back here periodically for any changes. We will indicate the effective/amendment date at the top of the Privacy Policy.

### **Contact us**

If you have questions about this notice, please contact:

Associate Vice President of Information Technology  
c/o Council for Opportunity in Education

1025 Vermont Avenue, N.W., Suite 400  
Washington, D.C. 20005  
Email at [webmaster@coenet.org](mailto:webmaster@coenet.org)

## **Notice about cookies and similar technology**

This Cookie Notice is effective June 1, 2022.

When you access our online services, We, or service providers we hire to track how our online services are used, may place small data files called “cookies” on your browser or other access device. Cookies are pieces of data stored on your device and are assigned by a web server to the browser on your device. When you return to a site you have visited before, your browser gives this data back to the server.

A “session cookie” may be sent to your computer or other access device when you access our online services. This type of cookie recognizes you if you visit multiple pages on a site during the same session, so that you do not need to be prompted for your password on each page. Once you log out or close your browser, this cookie expires and no longer has any effect.

“Persistent” or longer-lasting cookies can be used for other purposes, such as to record user experience preferences when you use our online services and to inform you about products and services during and after you visit our online services, a process known as remarketing. These cookies do not expire once you log out or close your browser. You are free to decline our cookies if your browser permits, but doing so may interfere with your use of our online services.

We use service providers to perform remarketing on our behalf. In the remarketing process, a unique ad-serving cookie is placed on your browser that uses information about your browser and your activity on our online services to serve ads on places such as the Google content network. As a result, you may notice ads about our products and services elsewhere online when browsing. [Please click here for more information about remarketing or to opt out of the Google remarketing cookie](#). To learn more about this type of advertising in general, and to opt out of seeing interest-based advertisements on participating sites, visit the [Network Advertising Initiative](#) home page. Please note that, even if you choose to remove your information, you will still see advertisements while you're browsing online. However, the advertisements you see may be less relevant to you and your interests.

You can control the use of certain cookies and similar technologies by:

- Opting out of targeted online advertising through advertising networks (please visit <http://www.aboutads.info/choices/>, <http://optout.networkadvertising.org/?c=1#!/> or <http://www.youronlinechoices.com> for more information);
- Setting or amending your web browser controls to accept or refuse cookies (please visit your browser’s help menu for more information).

If you choose to reject certain cookies and similar technologies, you may still visit our online services.

We and our service providers may also use technologies similar to cookies to track your interaction with our online services. Some of these technologies include web beacons, pixels, tags and Flash objects. As with cookies, you are free to decline such technologies if your browser permits. You should refer to your browser's instructions to remove cached history and images from your device. Deleting or disabling cookies will not remove Flash objects. You should refer to Adobe's website (<http://www.adobe.com>) for more information on how to disable these objects.

We and the service providers who assist in operating our online services do not respond differently or limit their practices under the terms of this policy when you access those online services with a browser that uses a do not track signal or similar mechanism.

### **Updates to this Cookie Notice**

We may update this Cookie Notice from time to time. Please check here for such updates. We will indicate the effective/amendment date at the beginning of this Cookie Notice.