

# Privacy Policy

Last Updated: May 1, 2021

## Contents

- Overview of Ardeo Education Solutions’ Privacy Policy ..... 2
- The Information We Collect ..... 2
  - Information We Collect Automatically ..... 2
  - Information You Provide To Us ..... 3
  - Information We Collect From Our Clients ..... 3
- How We Use Your Information ..... 3
- How We Share Your Information ..... 4
- Your Rights And Choices Regarding Your Data ..... 4
  - All Users including California Residents ..... 4
  - Right to Know ..... 4
  - Right to Delete ..... 5
  - Right to Opt-Out ..... 5
  - Other Rights ..... 5
  - Exercising Your California Privacy Rights ..... 5
- FERPA ..... 6
- GDPR ..... 6
- Security of your Personal Information ..... 7
- Age Restrictions ..... 7
- Links ..... 7
- Changes to This Privacy Policy ..... 7
- General Usage Questions ..... 8

## Overview of Ardeo Education Solutions' Privacy Policy

Ardeo Education Solutions, LLC is committed to protecting your privacy. As an education company that provides services and support to colleges and universities, and to college students and graduates, we are aware of the sensitive nature of student data, and have worked to ensure compliance, including with FERPA and other applicable regulations.

This website, **mylrp.org** (the "Site"), is operated by Ardeo Education Solutions, LLC ("we" or "us").

This privacy notice (the "Policy") explains our collection, use, storage, and any potential disclosure of information you may provide via the Site or any of the various subdomains, features, applications, emails, content, uploads, or products now or subsequently available through the Site (collectively, the "Platform"). If you notice any oversights in this Policy, or have any questions, please send an email to [info@mylrp.org](mailto:info@mylrp.org).

By using the Platform or by otherwise providing any personally identifiable information to us, you are consenting to the collection, use, disclosure, processing, and storage of your personally identifiable information as set forth in this Policy.

## The Information We Collect

This Policy explains how we handle personal information provided by you, and choices you may have about the ways we use that information. "Personal Information" refers to any information relating to an identified or identifiable individual who is the subject of the information.

By using Ardeo Education Solutions products, some information is collected about you, the individual, to be able to create a user account and fulfill the necessary functions of the purpose of the Ardeo Education Solutions Platform. The term "individual" includes organizations for purposes of this Policy.

Please be sure to read this entire Policy before submitting any information to the Platform. We may update this Policy from time to time. We will also revise the "last updated" date at the top of this Policy. We encourage you to periodically review the Policy for updates.

By either registering for your own account on the Platform, or by accepting an account created for your behalf, you consent to us collecting and storing the required information to create and administer your account.

## Information We Collect Automatically

When visiting the site, certain kinds of non-personal information, such as the website that referred you to us, your IP address, browser type, operating system, and access times are collected automatically as a part of the site's operation. This information is collected to help troubleshoot any software issues or "bugs" you may encounter by providing our team with appropriate system data.

We also may collect navigational information, including information about the pages you view, the links you click, and other actions taken in connection with the Platform for the purpose of product development, customer service, and support.

We may use cookies and other technologies, such as pixel tags, to keep track of and store information, so the user does not have to supply the information multiple times. We treat information collected by

cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered Personal Information by local law, we also treat these identifiers as Personal Information.

Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Policy. You can configure your web browser to refuse cookies or to notify you when a web site attempts to send you a cookie. You can also check your hard drive for cookie files and delete them from your computer. Please note, however, that if you do turn off cookies, the Platform may not work as intended and may lose some functionality.

We may gather some information automatically and store it in log files. This information can include Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit pages, operating system, date/time stamp, and clickstream data.

For marketing purposes, we may collect information supplied by tracking pixels and by use of tools such as Google Analytics, for Remarketing, Google Display Network Impression Reporting, and Google Analytics Demographics and Interest Reporting. To review policies from Google about advertising or to opt out, [visit this page from Google](#). To review policies for Facebook, [visit this page from Facebook](#). To review policies from Twitter including those around custom audiences, [visit this page from Twitter](#). You can also visit the Digital Advertising Alliance's consumer choice tool at <http://optout.aboutads.info/>.

### Information You Provide To Us

When you create an account with us, we collect the information you provide us, such as your name, email address, phone number, birth date, address, and school information. In order to receive repayment assistance additional information will be requested such as your outstanding loan information and employment information.

If you sign up to use any special feature of the Platform, you may be asked to separately and expressly consent to specific terms, for example, by affirmatively checking a box or clicking on a button marked, "I agree." This separate agreement will supplement or amend this Policy, but only with respect to the matters governed by such separate agreement.

### Information We Collect From Our Clients

In order for our clients to offer students the opportunity to participate in their Loan Repayment Assistance Program (LRAP) they may send us any combination of the following: Institution Name, Institution Student ID, Name including first and last, Address, e-mail address(es), Phone number(s), Date of Birth, and/or Gender.

If you have been awarded an LRAP and are enrolled your institution will send us enrollment and borrowing information during your periods of enrollment.

### How We Use Your Information

We use the Personal Information we collect from you, including with the help of automated systems and clients, for business purposes. We use your Personal Information to market to you, provide the Platform, maintain the security of the Platform and its users, provide customer support, improve the Platform; and respond to legal proceedings and obligations.

## How We Share Your Information

We do not sell your Personal Information. To make the Platform work, we may need to share your Personal Information with our clients.

It may be necessary by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence for us to disclose your Personal Information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations, subscribers, sponsors, or users.

Additionally, in the event of a company re-organization, sale or merger, we may transfer any and all Personal Information we collect to the relevant third party or third parties as applicable.

We disclose some information to third-party service providers who perform necessary services on our behalf to provide you with the best and most secure experience possible. We utilize other companies to provide data storage, to host websites, to fulfill orders and shipments, to assist in marketing, to conduct audits, and to render other support.

Those third-party service providers will be permitted to obtain only the Personal Information they need to provide the service, must protect Personal Information to the same extent we do, and are prohibited from using it for any other purpose.

We believe that the Service Providers we use are reliable and dedicated to best practices for compliance, security and reputability, including but not limited to Microsoft Azure (Hosting), and DocuSign (Signature Processing).

## Your Rights And Choices Regarding Your Data

### All Users including California Residents

The California Consumer Privacy Act provides some California residents with the additional rights listed below. Ardeo has elected to make these rights available to all users, and not just those located in California.

### Right to Know

You have the right to know and see what data we have collected about you over the past 12 months, including:

- The categories of Personal Information we have collected about you;
- The categories of sources from which the Personal Information is collected;
- The business or commercial purpose for collecting your Personal Information;
- The categories of third parties with whom we have shared your Personal Information; and
- The specific pieces of Personal Information we have collected about you.

We respect your right to make choices about the use and disclosure of your Personal Information. If at any time you have questions or concerns about the collection, storage or usage of your Personal Information please contact us. If you choose not to receive marketing communications, you may request

to be unsubscribed at any time. Please be advised that you may not receive transactional, password reset, or account communications (e.g., confirmation emails and account balance statements). You can request to be re-subscribed at any time.

### Right to Delete

You have the right to request that we delete the Personal Information about you that we have collected from you and our clients. There are several exceptions, however, that include, but are not limited to, when the information is necessary for us or a third party to do any of the following:

- Complete your transaction;
- Provide you service;
- Perform a contract between us and you;
- Protect your security and prosecute those responsible for breaching it;
- Fix our system in the case of a bug;
- Protect the free speech rights of you or other users;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interests that adheres to all other applicable ethics and privacy laws;
- Comply with a legal obligation; or
- Make other internal and lawful uses of the information that are compatible with the context in which you provided it.

### Right to Opt-Out

We do not sell any Personal Information about you to any third parties. Therefore, there are no sales from which to opt-out.

### Other Rights

You have the right not to be discriminated against for exercising any of the rights listed above.

### Exercising Your California Privacy Rights

To request access to or deletion of your Personal Information, or to exercise any other data rights under California law, please contact us using one of the following methods:

#### In Writing

You may write to us to exercise rights. Please mail your request to the following address:

Ardeo Education Solutions, LLC  
P.O. Box 1476  
Bloomington, IN 47402

Please include your full name, email address, and phone number associated with your use of our Platform, along with why you are writing, so that we can process your request in an efficient manner.

### Via Phone

You may call us to exercise your rights. Please call (877) 577-5727 and select option 2 for “Students and Parents”. Please include your full name, email address, and phone number associated with account, along with why you are calling, so that we can process your request in an efficient manner.

### Via Email

You may email us to exercise your rights. Please send an email to [info@mylrap.org](mailto:info@mylrap.org). In the email please include your full name, email address, and phone number associated with your account and why you are writing, so that we can process your request in an efficient manner.

### Response Timing and Format

We aim to respond to a consumer request for access or deletion within 45 days of receiving that request. If we require more time, we will inform you of the reason and extension period in writing.

## FERPA

FERPA stands for the Family Educational Rights and Privacy Act (20U.S.C. 1232g, 34CFR§99) and is designed to ensure that students’ personally identifiable education information is protected.

We are committed to FERPA compliance, and we have designed our Platform to provide options to accommodate each school’s definition of Directory Information and/or Personally Identifiable Information (PII).

We acknowledge that, in the course of use of the Platform, PII about students ("Sensitive Student Data") may be disclosed to us through account creation and usage of the services of the Platform. We acknowledge that we will be considered a "School Official" (as outlined in FERPA) and will comply with the requirements in FERPA concerning the confidentiality and release of Sensitive Student Data.

We agree that officers, employees, and any of our agents who access Sensitive Student Data may use such data only for the purposes for which such data has been made available to us and ways outlined within this Privacy Policy.

Our definition of “Sensitive Student Data” entails student name, email address, any major/course title/information, and matriculation/graduation details.

## GDPR

We comply with the [EU GDPR framework](#) as set forth by the European Union regarding the collection, use, and retention of personal data from European Union member countries. The Platform adheres to the requirements of notice, choice, onward transfer, security, data integrity, access and enforcement.

If you are located outside of the United States, please note that any personal information collected through the Platform may be transferred to the United States and other countries that might not provide an equivalent level of protection as the data protection laws in your home country.

Your use of the Platform or submission of any Personal Information will therefore constitute your express consent to the collection, use, disclosure, processing, and storage of your Personal Information outside of your home country. We employ the use of cloud-based storage with distributed physical servers through Microsoft Azure, all of which are currently located in the United States.

If you have questions about the data we collect as a data controller, you can send an email to [info@mylrap.org](mailto:info@mylrap.org) at any time to request access to that information, request that it be changed, or request that it be deleted.

## Security of your Personal Information

The security of your Personal Information is important to us. We follow generally accepted industry standards to help protect your Personal Information, including without limitation:

- Limiting access to your Personal Information to those of our employees who require it to provide services to you;
- Requiring employees to sign confidentiality agreements to protect customer and other confidential information;
- Ensuring that third-party service providers sign confidentiality agreements to maintain the confidentiality of your Personal Information and not to use it for any unauthorized purposes;
- Use of HTTPS protocol for secure communication over computer networks;
- Rigorous evaluation of all third-party service providers before implementation;
- Annual Security Reviews internally to reevaluate all service providers and our system, to continue to ensure the highest level of security;
- Storing your Personal Information in secure systems which protect it from unauthorized access or use.

No method of transmission over the Internet, or method of electronic storage, is ever 100% secure. Therefore, while we strive to protect your Personal Information, we cannot guarantee its absolute security. If a password is used to protect your account and Personal Information, it is your responsibility to keep your password confidential.

## Age Restrictions

We do not intend to solicit or collect Personal Information from anyone under the age of 13 without parental consent. By creating an account or using this Platform, you verify that you are at least 13 years of age. If we find out that a child under 13 has given us Personal Information, we will take steps to delete that information. If you believe that a child under the age of 13 has given us Personal Information, please contact us.

## Links

We may share “links” to websites, including those of our subsidiaries and third-party content providers, that have different privacy policies and practices from those disclosed here. We can assume no responsibility for the policies or practices of such linked sites, and encourage you to become acquainted with them prior to following links.

## Changes to This Privacy Policy

While we reserve the right to change the terms of this Policy at any time, we will make every best effort to only make material changes between academic terms, to avoid any potential disruption.

When we make changes, we will revise the "last updated" date at the top of the Policy. If there are material changes to this statement or in how we collect or use your Personal Information, we will notify you by prominently posting a notice of such changes here or on our Platform, or by sending an email. We encourage you to review this Policy whenever you visit one of our sites.

## General Usage Questions

If you are a school administrator and you would like more information about how we protect student privacy, autonomy, and control over their data, please send an email to [info@mylrap.org](mailto:info@mylrap.org) or reach out by phone to (877) 577-5727. We will always work with each institution to clarify or tailor our services to ensure that our privacy standards meet your needs and expectations.