

# CampusLogic Privacy and Cookie Policy

Last Updated: August 28, 2018

CampusLogic, Inc. ("**CampusLogic**," "**we**," and "**our**") is committed to protecting the privacy of individuals who visit and use this website [www.campuslogic.com](http://www.campuslogic.com) (the "**Site**") and/or the software applications (the "**Applications**") provided by CampusLogic, together the "**Services**." This Privacy and Cookie Policy (the "**Privacy Policy**") describes how CampusLogic collects, uses, and shares personal information. Please read the following information carefully to understand our views and practices regarding your personal information and how we will treat it.

## 1. COLLECTION OF INFORMATION

CampusLogic collects and retains personally identifiable information, like names, postal addresses, email addresses, etc., when voluntarily submitted by you to CampusLogic through the Site and/or Services. We will only process your personal information in accordance with applicable data protection and privacy laws.

If you registered to use the Services, you will have been asked to click to agree to provide this information in order to access our services or otherwise view our content. **If you do not agree to our use of your personal information in line with this Privacy Policy, please do not use our Services. By accessing and using our Site or by clicking "I accept" prior to your registration to the CampusLogic Services, you consent to the collection, use, and disclosure of your personal information by CampusLogic as described in this Privacy Policy.**

We collect information about you in the following ways:

**Information You Give Us.** This includes the personal information you provide when you register to use our Services, including your name, postal address, email address, and other personal and unique information provided to CampusLogic based on your submissions and responses to questions asked of you throughout the Services.

**Information We Get From Others.** We may also get information about you from other sources, for example, your academic institution's department of financial aid or the Department of Education. We may add this information to personal information we get from your use of the Services.

**Information Automatically Collected.** We automatically log information about you and your computer or mobile device when you access our Site and/or Services. Please refer to the sections on Cookies/ Tracking Technology below.

## 2. COOKIE/TRACKING TECHNOLOGY

### What are cookies?

We may collect information using "cookies." Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience in the Services.

### Cookies We Use.

Our Services use the following types of cookies for the purposes set out below:

Type of cookie	Purpose
----------------	---------

<i>Essential Cookies</i>	These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Services. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services. These cookies are only used for the duration of your session accessing the CampusLogic services and are removed following completion of the session.
<i>Functionality Cookies</i>	These cookies allow us to remember choices you make when you use our Services, such as remembering your login details. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Services.
<i>Analytics and Performance Cookies</i>	<p>These cookies are used to collect information about traffic to our Site and how users use our Services. The information gathered does not identify any individual visitor. The information is aggregated and anonymous. It includes the number of visitors to Site, the pages they visited on our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.</p> <p>[We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how [our Site/Application(s)/Services] works. You can find out more information about Google Analytics cookies by clicking <a href="#">here</a>.]</p> <p>[You can find out more about how Google protects your data by clicking <a href="#">here</a>.]</p> <p>[You can prevent the use of Google Analytics relating to your use of [our Site/Application(s)/Services] by downloading and installing the browser plugin available by clicking <a href="#">here</a>.]</p>

### **Disabling Cookies.**

You can typically remove or reject cookies via your browser settings. Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

If you do not accept our cookies, you may experience some inconvenience in your use of our Services.

### **Do Not Track Signals.**

Some browsers may be configured to send "Do Not Track" signals to the online services that you visit. We do not currently respond to do not track signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

### **3. USE OF YOUR INFORMATION.**

We may use your personal information as follows:

- To fulfill a specific request by you;
- To operate, maintain, and improve our Site and Services;
- To manage your account, including to communicate with you regarding your account with our Services;
- To respond to your comments and questions and to provide customer service;
- To send information including technical notices, updates, security alerts, and support administrative messages;
- With your consent, to send you e-mails about upcoming events, promotions, and other news if you have given us consent to be added to the CampusLogic mailing list; and
- As we believe necessary or appropriate (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities; (c) to enforce our Privacy Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

At any time after opting into to receiving e-mails on the CampusLogic mailing list, you may "opt-out" by sending us a request at [privacy@campuslogic.com](mailto:privacy@campuslogic.com). Please note that even if you opt out from receiving marketing emails, we may still send you non-marketing emails, which include emails about your account with us and in connection with your use of the Services.

CampusLogic does not share, sell, rent, or trade personally identifiable information collected through its Services with third parties for their sole promotional purposes.

### **Sensitive Personal Data.**

CampusLogic may receive sensitive personal information about you from you or your academic institution, which is used solely for performing the Services authorized by your or your academic institution. You and/or your academic institution consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such information through our Services.

## **4. SHARING YOUR INFORMATION.**

We may share your personal information as follows:

- **Third Parties Designated by You.** We may share your personal information with third parties where you have provided your consent to do so.
- **Our Third-Party Service Providers.** We may share your personal information with our third-party service providers who provide services such as information technology and related infrastructure, auditing, email delivery, and other similar services. These third parties are only permitted to use your personal information to the extent necessary to enable them to provide their services to CampusLogic.
- **Corporate Restructuring.** We may share personal information when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- **Other Disclosures.** We may share personal data as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

## **5. ANONYMOUS DATA**

We may create anonymous data from the personal information we receive about you and other individuals whose personal information we collect as set forth in this Privacy Policy. Anonymous data might include analytics information and information collected by us using cookies. We make personal information into anonymous data by excluding information (such as your name) that makes the data personally identifiable to you.

## 6. THIRD PARTY SITES

Our Site may contain links to third party websites and features. This Privacy Policy does not cover the privacy practices of such third parties. These third parties have their own privacy policies and we do not accept any responsibility or liability for their websites, features or policies. Please read their privacy policies before you submit any data to them.

## 7. FEEDBACK

You may share personal information with us when you submit user generated content through our Services. Please note that any information you post or feedback you disclose to CampusLogic through the Site or on our Services will not be private or confidential once it is published on Site or through our Services.

If you provide feedback to us, we may use and disclose such feedback in our Services or on our Site without any reference to you.

## 8. YOUR RIGHTS

- **Opt-out.** You can opt out of receiving communications by clicking on the unsubscribe link or contacting us at [privacy@campuslogic.com](mailto:privacy@campuslogic.com).
- **Access.** You may access the information we hold about you at any time via your account by contacting us at [privacy@campuslogic.com](mailto:privacy@campuslogic.com).
- **Amend.** You can also contact us at [privacy@campuslogic.com](mailto:privacy@campuslogic.com) to update or correct any inaccuracies in your personal information.
- **Move.** You can download your documents stored in the CampusLogic Services at any time.
- **Erase and forget.** You can request that we erase your data. If you request that we erase your information, please note that your information may continue to reside on our backup systems.

## 9. INTERNATIONAL DATA TRANSFER

CampusLogic is headquartered in the United States. Your personal information may be transferred, in accordance with this Privacy Policy, outside the country in which you reside, including to the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By using our Site and Services and agreeing to this Privacy Policy by clicking your acceptance, you consent to this transfer or processing of your personal information. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy.

## 10. SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect personal data within our organization. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us at [privacy@campuslogic.com](mailto:privacy@campuslogic.com).

## 11. RETENTION

We will only retain your personal data as long as reasonably required to provide you with the Services unless a longer retention period is required or permitted by applicable law.

## 12. CHILDREN

Neither our Site nor our Services are directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us directly at [privacy@campuslogic.com](mailto:privacy@campuslogic.com).

## 13. COMPLAINTS

We are committed to resolving any complaints about our collection or use of your personal information. If you would like to make a complaint regarding this Privacy Policy or our practices in relation to your personal data, please contact us at [privacy@campuslogic.com](mailto:privacy@campuslogic.com).

## 14. PRIVACY POLICY CHANGES

CampusLogic reserves the right to make changes to this Privacy Policy at any time, so we encourage you to review it frequently. If CampusLogic decides to change this Privacy Policy, we will post such changes to the Sites and other places in the Applications it deems appropriate. The "Last Updated" legend above indicates when this Privacy Policy was last changed. If we make any material changes to the Privacy Policy, we will post the updated Privacy Policy on our Site prior to such changes taking effect and may also notify you via email in connection with certain material changes.

## 15. CONTACT INFORMATION

You may contact us in writing at [privacy@campuslogic.com](mailto:privacy@campuslogic.com) or:

CampusLogic  
1340 S. Spectrum Blvd., Suite 200  
Chandler, AZ 85256  
Attn: Legal Department

### **Privacy Notice for California Residents**

**Effective Date:** January 1, 2020

This **Privacy Notice for California Residents** supplements the information contained in the Privacy Policy of CampusLogic Inc. ("**CampusLogic**") and applies solely to all visitors, users, and others who reside in the State of California ("**consumers**" or "**you**"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (**CCPA**) and any terms defined in the CCPA have the same meaning when used in this notice.

#### **1. INFORMATION WE COLLECT**

From Consumers Directly. Our Services (as defined in the Privacy Policy) may collect information directly from consumers, which identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("**personal information**"). This personal information may be collected directly from you on the Site (as defined in the Privacy Policy) or through the Services, or indirectly from you, for example by observing your actions in the Services or on the Site.

From Covered Businesses. Our Services may also collect such personal information from consumers indirectly from a for-profit educational institution, college, or university that may be a covered business

under the CCPA. In such event, CampusLogic is deemed a service provider that processes personal information on behalf of such covered business for the purpose of providing access to the CampusLogic Services as ordered and subscribed to by the covered business. Such processing activities are governed by the contract between CampusLogic and such covered business and the Privacy Policy of such covered business.

The CampusLogic Services have collected the following categories of personal information from its consumers within the last twelve (12) months:

<b>Category</b>	<b>Examples</b>	<b>Collected</b>
<i>A. Identifiers.</i>	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.	YES
<i>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</i>	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
<i>C. Protected classification characteristics under California or federal law.</i>	Age (40 years or older), 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).	YES
<i>D. Commercial information.</i>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
<i>E. Biometric information.</i>	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
<i>F. Internet or other similar network activity.</i>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
<i>G. Geolocation data.</i>	Physical location or movements.	NO
<i>H. Sensory data.</i>	Audio, electronic, visual, thermal, olfactory, or similar	NO

	information.	
<i>I. Professional or employment-related information.</i>	Current or past job history or performance evaluations.	NO
<i>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</i>	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.	YES
<i>K. Inferences drawn from other personal information.</i>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the scope of the CCPA, including: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

## **2. USE OF PERSONAL INFORMATION; BUSINESS PURPOSE**

We may use, or disclose the personal information we collect for one or more of the following business purposes, which includes without limitation to fulfill or meet the reason you provided the personal information to CampusLogic:

- To fulfill a specific request by you;
- To operate, maintain, and improve our Site and Services;
- To manage your account, including to communicate with you regarding your account with our Services;
- To respond to your comments and questions and to provide customer service;
- To send information including technical notices, updates, security alerts, and support and administrative messages;
- With your consent, to send you e-mails about upcoming events, promotions, and other news if you have given us consent to be added to the CampusLogic mailing list;
- As we believe necessary or appropriate (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities; (c) to enforce our Privacy Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others;
- as described to you when collecting your personal information or as otherwise set forth in the CCPA; or
- to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets.

CampusLogic will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice by updating this Privacy Notice or otherwise.

### **3. SHARING PERSONAL INFORMATION; CATEGORIES OF THIRD PARTIES**

CampusLogic may disclose your personal information to a third party for a business purpose. We take great care to ensure that your personally identifiable information is only shared with the following categories of third parties:

- Third Parties Designated by You. We may share your personal information with third parties where you have provided your consent to do so.
- Our Third-Party Service Providers. We may share your personal information with our third-party service providers who provide services such as information technology and related infrastructure, auditing, email delivery, and other similar services. These third parties are only permitted to use your personal information to the extent necessary to enable them to provide their services to CampusLogic.
- Corporate Restructuring. We may share personal information when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- Other Disclosures. We may share personal data as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Policy; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

### **4. DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE**

In the preceding twelve (12) months, Company may have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category J: Non-public education information.

CampusLogic may disclose your personal information for a business purpose to the following categories of third parties:

- Third Parties.
- Service providers.
- Corporate Restructuring.
- Other disclosures (legal purposes).

### **5. YOUR RIGHTS AND CHOICES**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

[Access to Specific Information and Data Portability Rights](#).



You have the right to request that CampusLogic disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### Deletion Request Rights.

You have the right to request that CampusLogic delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- 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 interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### Exercising Access, Data Portability, and Deletion Rights.

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 602.643.1300.
- Emailing [privacy@campuslogic.com](mailto:privacy@campuslogic.com).

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response electronically.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### Personal Information Sales Opt-Out and Opt-In Rights

CampusLogic does not sell personal information of consumers.

Under the CCPA, if you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

### Non-Discrimination.

We will not discriminate against you for exercising any of your CCPA rights.

### Other California Privacy Rights.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. CampusLogic does not disclose personal information

to third parties for their direct marketing purposes. For more information, please send an email to [privacy@campuslogic.com](mailto:privacy@campuslogic.com).

## **6. CHANGES TO OUR PRIVACY NOTICE**

CampusLogic reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of the Services following the posting of changes constitutes your acceptance of such changes.**

## **7. CONTACT INFORMATION**

If you have any questions or comments about this notice, the ways in which CampusLogic collects and uses your information described below and in the **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** 602.643.1300

**Website:** [www.campuslogic.com](http://www.campuslogic.com)

**Email:** [privacy@campuslogic.com](mailto:privacy@campuslogic.com)