

## Privacy Policy

Last updated: February 14, 2024

This Privacy Policy ("Policy") is designed to help you understand how CollegeWell, Private College 529 Plan and their subsidiaries and affiliates (collectively, "the Plan," "we," "us," or "our"), the owner and operator of the Plan website located at [www.collegewell.com](http://www.collegewell.com) (the "Website") handles your personal information when you use the Website.

CollegeWell and Private College 529 Plan are established and maintained by Tuition Plan Consortium, LLC ("TPC"). Catalis Regulatory & Compliance, LLC ("Catalis") is the Plan Administrator.

The Plan is committed to protecting your privacy, and we only use, collect, and disclose your personal information as described in this Policy or when we have obtained your consent. Please read this Policy carefully to understand our policies and practices regarding your personal information and how we will treat it. If you do not agree with our Policy, your choice is not to use our Website. By accessing or using this Website, you agree to this Policy. This Policy may change from time to time.

### What This Policy Covers

This Policy describes how we collect, use and share personal information we collect if you use the Website. Personal information is information that can be used to identify you and does not include de-identified or anonymized information. We may use de-identified or anonymized information for any lawful purpose. This Policy only applies to the Website. It does not apply to any other Plan's or third party websites, services, applications, or offline activities.

### Types of Personal Information We Collect

• Information you give us. Personal information we may collect from you through the Website or related to your use of the Website includes:

- *Contact information.* We may collect your contact details, such as your first and last name, email address, and phone number.
- *Account information.* If you use features of the Website that require a user account, you will be required to provide first name and last name, an email address, create a password, and create security questions and answers. We will also collect your date of birth, address, phone number, Social Security Number ("SSN") or Taxpayer Identification Number ("TIN"), bank account and routing number if you enroll into our program and opened an account.
- *Beneficiary information.* We collect your designated beneficiary's information including first name, middle initial, last name, Social Security Number ("SSN"), date of birth, address, phone number, gender, projected enrollment year, and your relationship to the beneficiary.
- *Successor account owner information.* We collect your successor account owner information including first name, middle initial, last name, Social Security Number ("SSN"), date of birth, address, and phone number.

- *Educational information.* We collect your education level, and we may collect additional information from you, such as educational institutions you have attended.
- *User generated content.* We may collect content or other information that you may provide or create when you interact with the Website, such as your goals, interests or preferences, and information you may provide.
- *Communications with others.* We may collect or provide you access through the Website to systems that collect your communications with individuals through the Website, such as your communications with our representatives or other users.
- *Correspondence with us.* We may collect information about you that you provide when you use request information from us or otherwise correspond with us. If you choose to correspond with us this way, we will collect any additional personal information you choose share via these features.

**Information automatically collected.** Our servers and third party service providers may automatically record certain information about how you use the Website and devices you use to access the Website. This information may include your Internet Protocol (IP) address and information about the device, such as: device identifier, model and device type, name and version of the operating system, mobile carrier, settings and language of the device, Internet service provider, referring links, approximate geographic location, precise geographic location, the pages or features of the Website that you browse and the time you spend on those pages or features, the frequency with which you use the Website, and the actions you take in the Website. We collect this information in server logs, within the Website, and using third party service providers who operate their own privacy policies.

**Google reCAPTCHA.** In addition, our Website uses Google's reCAPTCHA to prevent spam and abuse. Google operates reCAPTCHA by tracking and analyzing your behavior on our Website. This includes looking at how you navigate through the Website or the time you take to complete various tasks to determine if the user is a human or a bot. Your use of reCAPTCHA v3 is subject to Google's Privacy Policy and Terms of Use. By accessing or using our Website, you agree to be bound by Google's Privacy Policy and Terms of Use.

**Cookies.** We use cookies, pixels, and other technologies and other identifiers (collectively, "Cookies"). Your browser may have settings to allow you to refuse certain Cookies. However, doing so may limit your access to certain sections of the Website. We use cookies to help us improve and manage the Website. For example, Cookies help us recognize new versus repeat visitors to the site, track the pages visited and enable some special features on our website. This data helps us provide a better service for the Website's visitors.

To learn more about cookies, visit <http://www.allaboutcookies.org>.

**Retargeting ads through social media.** We use online advertising to make you aware of and help you find our offering and services. You may see our banners and ads when you are on other websites and apps, including various social media platforms. We manage this through a variety of digital marketing networks and ad exchanges. We also use a range of advertising technologies. The banners and ads you see are based on information we hold about you or your previous use of the Website. You may disable these tracking technologies at the applicable website or platform directly.

## How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described in this Policy or at the time of collection:

**To operate the Website.** We use your personal information:

- to provide, operate and improve the Website;
- to process your Plan transactions, provide you with Plan materials; and issue you Plan Account statements;
- to communicate with you about the Website, including by sending you announcements, reminders, suggestions, updates, security alerts, and support and administrative messages;
- to manage your account, including to verify your identity and provide you with access to your account should you become locked out or forget your login and password;
- to provide you with requested services, namely to administer your enrollment;
- to understand your needs and interests, and personalize your experience with the Website; and
- to respond to your requests, questions and feedback related to the Website.

**Online Enrollment, Account Information Access and Online Transactions.** When you visit the Website, you can go to pages that are open to the general public or log on to protected pages to enroll in the Plan, access information about your account, or conduct certain transactions related to your account. Once you have opened an account in the Plan, access to the secure pages of the Website is permitted only after you have created a user ID and password by supplying your SSN or TIN and account number. The user ID and password must be supplied each time you want to access your account information online.

Please note that we use multi-factor authentication to verify your identity when logging in to your account and requesting certain online transactions. You will be asked to enter a security code that will be sent to you via email or text. If you have questions or need further assistance regarding your Private College 529 Plan account(s), please call us at 888.718.7878 or contact us at [support@pc529.com](mailto:support@pc529.com).

**For research and development.** We analyze use of the Website to study trends and users' movements related to the Website, gather demographic information about our user base, improve the Website and develop new products and services.

**To create anonymous data.** We may create aggregated and other anonymous data from our users' information. We make personal information into anonymous data by removing information that makes the data personally identifiable. We may use this anonymous data and share it with third parties to understand and improve the Website, promote our business and for other lawful business purposes. When in aggregate form, this information can no longer be used to personally identify you.

For compliance, fraud prevention and safety. We may use your personal information and share it with government officials, law enforcement or private parties, as we believe appropriate to:

- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity;
- comply with applicable laws; court orders, subpoenas and other legal process; and requests from government authorities; and
- where permitted by law in connection with a legal investigation.

**To send notifications.** Notifications may be delivered to you by email at the address you provided when you created your account or as later updated. We will not ask you for your personal information, account username, and password, or any of your credit or debit card information via email. We will have no responsibility for any misuse of such information if you provide such information via email.

### **How We Share Your Personal Information**

The Plan does not disclose your personal information to anyone for marketing purposes. The Plan does not sell personal information to anyone. We do not share your personal information with third parties without your consent, except in the following circumstances or as described in this Policy:

**Service providers.** We may share your personal information with third party companies and individuals as needed for them to help us provide the Website or support our business activities (such as Website analytics, email delivery, payment processing, marketing/advertising, IT providers, technical support, and legal and other professional advice).

**For compliance, fraud prevention and safety.** We may share your personal information for the compliance, fraud prevention and safety purposes.

**Business transfers.** We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

### **Your Rights and Choices**

#### **For California Residents: Your California Privacy Rights**

California residents can request and obtain from us once a year and free of charge a list of all third parties to which the Plan has disclosed certain information during the preceding calendar year for the third parties' direct marketing purposes. If you are a California resident and want such a list, please contact us [support@pc529.com](mailto:support@pc529.com). For all requests, you must put the statement "Your California Privacy Rights" in the message field of your request, as well as your name, street address, city, state, and zip code. Please note that we will not accept these requests by telephone, email or fax, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

## Residents of Other Jurisdictions

Residents of other jurisdictions may also have rights regarding their personal information. If applicable law provides you data subject rights, please contact us at [support@pc529.com](mailto:support@pc529.com). We will respond to your request consistent with applicable law.

## Other Important Privacy Information

**Third party sites and services.** The Website may contain links to other websites and services operated by third parties. In addition, features, widgets or portions of the Website may be integrated on other websites. These links and integrations are not an endorsement or representation that we are affiliated with any third party. We do not control third party websites, applications or services, and are not responsible for their actions. Other websites and services follow different rules regarding their processing of personal information. You should read their privacy policies to learn more.

**Security practices.** The security of your personal information is important to us. We employ a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information. If you have a user account for the Website, you are solely responsible for maintaining and protecting the confidentiality of your account username, password and other account information in your possession.

**Data retention.** We will retain your personal information collected through the Website for as long as necessary to fulfill the purposes we collected it for, including satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for your information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of your information, the purposes for which we process your information and whether we can achieve those purposes through other means, and the applicable legal requirements.

**Encryption.** In general, the email services provided by the Website are encrypted and provide a secure and private means of communication with us, but we cannot and do not guarantee that all email services provided by the Website will be encrypted every time. You should only communicate confidential and/or personal information to us via email when you are advised that you are using a secure website. As a security measure, we advise you not to send personal or account information to us in nonsecure emails. Instead, you should communicate with us using the email features of the Website using a browser that supports Secure Sockets Layer (SSL) protocol.

We do not guarantee or warrant that any part of the Website, including files available for download, is free of viruses or other harmful code. It is your responsibility to take appropriate precautions, such as use of an antivirus software package, to protect your computer hardware and software.

Encryption is achieved through an electronic scrambling technology that uses a “key” to code and then decode the data. Encryption acts like the cable converter box you may have

on your television set. It scrambles data with a secret code so that no one can make sense of it while it is being transmitted. When the data reaches its destination, the same software unscrambles the data.

You can exit the secure area by either closing your browser, or for added security, you can use the log out button before you close your browser.

**User Generated Content.** We may make available on the Website, or link to, features that allow you to share information online (for example, through messages or feedback). Please be aware that, whenever you voluntarily disclose personal information online or to others, the information may become public and can be collected and used by others. We have no control over, and take no responsibility for, the use, storage or dissemination of any such publicly-disclosed personal information.

**Use of Website by visitors outside of the United States.** The Website is intended for users in the United States and are not intended to be used by users in other countries. Any information we obtain about you in connection with your use of the Website may be processed and stored in, and subject to the laws of, the United States or other countries. If you use the Website from a location outside the United States, you: (a) acknowledge that the data protection laws of other countries, including the United States, may provide a less comprehensive or protective standard of protection than those in your country, and (b) consent to all actions taken by us with respect to your information in compliance with the Policy and applicable privacy laws.

**Children.** The Website are not directed at, and we do not knowingly collect personal information from, anyone under the age of 13. If parents or guardians believe that we have unintentionally collected their child's personal information, they should contact us for the deletion of the information using the contact information below.

**Changes to this Policy.** We reserve the right to modify this Policy at any time. If we make changes to this Policy, we will post them on the Website and indicate the effective date of the change. If we make material changes to this Policy, we will notify you by email or through the Website. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

## **How to Contact Us**

Please direct any questions or comments about this Policy to:

Catalis Regulatory & Compliance, LLC  
Private College 529 Plan and CollegeWell  
6735 Southpoint Drive South, Suite 300  
Jacksonville, FL 32216

888.718.7878  
support@pc529.com