

Website Privacy Policy

Last updated: September 18, 2024

This Privacy Policy (the “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.pc529international.com and access.pc529international.com (collectively, 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 f/k/a Intuition College Savings Solutions, LLC (“Catalis”) is the Plan Administrator. When you purchase an International Tuition Certificate (“ITC”) through the Plan, Alta Trust Company (“Alta”) serves as the prospective trustee of a special purpose revocable trust (the “Trust”), and will apply your contributed funds towards the purchase of ITC(s) to be held by the Trust on your behalf. The Plan, TPC, Catalis, and Alta may share personal information with one another as described in this Policy.

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.

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 or our partners, affiliate companies, employees, contractors, or service providers, including Catalis and Alta. 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 may also collect your date of birth, address, phone number, government-issued identification number(s), 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, government-issued identification number(s), individual Taxpayer Identification Number (ITIN), 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, government-issued identification number(s), 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 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>.

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 provide you with Plan materials, process your plan transactions, and issue you Plan statements;
- to manage your account, including to verify your identity and provide you with access to your account;
- to provide you with requested services, including to administer your Plan enrollment;
- to communicate with you about the Website, including by sending you announcements, reminders, suggestions, updates, security alerts, and support and administrative messages;
- 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. The user ID and password must be supplied each time you want to access your account information online.

Please note that Alta may use multi-factor authentication to verify your identity when logging in to your account and requesting certain online transactions. If you have questions or need further assistance regarding your Private College 529 Plan account(s), please email us at questions@pc529international.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.

How We Share Your Personal Information

The Plan does not disclose your personal information to third parties for their own 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:

Affiliates, Employees, Contractors, and Partners. We may share your personal information with our affiliate companies, employees, contractors, and partners that assist us in providing the Website and/or support our business activities, including Catalis and Alta.

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

Residents of Panama, Ecuador, Costa Rica, and the Dominican Republic may exercise the following options with respect to their personal information collected by us through the website:

- **Know** – the right to request that we disclose the categories and/or specific elements of personal information collected.
- **Access/Portability** – the right to receive a copy of the categories and specific elements of personal information collected.
- **Correct/Delete** – under certain circumstances, the right to request such personal information collected be deleted or corrected.
- **Opt-Out** – the right to direct a business to not to sell personal information. To third parties We do not sell personal information or provide it to third parties for marketing purposes.
- **Exercise** – To exercise the above rights, please contact us at questions@pc529international.com. In order to process your request, we may ask for additional personal information to verify your identity.

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 questions@pc529international.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.

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.

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.

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:
questions@pc529international.com