# **Online Privacy Policy**

\*\*This Policy Has Been Modified\*\*

Last Revised: January 1, 2020

### **Scope of This Policy**

Strategic Education, Inc. is the parent company of Capella Education Company, Capella University, LLC, Strayer University, LLC, Hackbright Academy, Inc., Sophia Learning, LLC, Capella Learning Solutions, LLC, and Workforce Edge, LLC. Students and learners from each of these institutions shall be referred to collectively as "students."

Strategic Education, Inc. or one of its wholly owned subsidiaries (collectively, "SEI") owns and operates this website. This Policy governs how we process information—including Personal Information—collected through any SEI-owned website that displays a link to our Privacy Policy (collectively, "our Sites"). Except as otherwise specified within this Policy, this Policy does not apply to information collected offline, such as in person, on paper, or by phone. It also does not apply to any website that does not contain a link to our Privacy Policy, even if SEI owns that site.

If you are a student (or are applying to become a student) at an educational institution that is wholly owned by SEI and your education records are protected under the Family Educational Rights and Privacy Act ("FERPA"), then provisions of FERPA and the institution's FERPA policy supersede and govern over any contrary provisions in this Privacy Policy. To learn more about FERPA, <u>click here</u> for the Capella University FERPA policy, or click here for the Strayer University FERPA policy.

# **Your Consent to This Policy**

By using our Sites, you are consenting to the collection, use, and transfer of your information, including Personal Information, as described in this Privacy Policy (and any relevant Privacy Notice or Country-Specific Notice). If you do not consent to the collection, use and transfer of your information as described in this Privacy Policy (and any relevant Privacy Notice or Country-Specific Notice), you may not use our Sites.

#### **Definitions**

The terms "SEI," "we," "us," and "our" refer collectively to Strategic Education, Inc. and its wholly owned subsidiaries.

The term "Personal Information" refers to information that identifies you personally, alone or in combination with other information available to us.

The term "*Policy*" refers to this Online Privacy Policy.

The term "our Sites" refers collectively to the websites owned by SEI that display a link to this Privacy Policy.

The terms "User Generated Content" and "UGC" refer all of the text, photographs, images, illustrations, graphics, sounds, video and audio-video clips, and other content you and others post on or through our Sites and that does not constitute "Feedback" (as that term is defined in our Terms of Use).

#### **Privacy Notices**

Where additional information is needed to explain our privacy practices on a certain Site, we may post a supplemental privacy notice. Particular pages of a Site may also contain supplemental privacy notices providing more details about the information we collect on those pages. These additional notices are collectively referred to as "Privacy Notices" and are part of this Privacy Policy. Privacy Notices may advise you that different policies and practices apply to the information collected through those pages, in which case those different policies and practices will supersede this Privacy Policy.

#### **Country-Specific Notices**

Privacy requirements vary from country to country. To meet these requirements, we may include certain "Country-Specific Notices" as part of this Privacy Policy. If any of the terms of a Country-Specific Notice are different than the general terms of this Privacy Policy, the terms of the Country-Specific Notice will supplement or amend this Privacy Policy, but only to the extent that the laws of that country apply to the collection of information through our Sites.

#### This Privacy Policy is Part of Our Terms of Use

This Privacy Policy is referenced in and is an integral part of the <u>Terms of Use</u> governing your use of our Sites. Please take a few minutes to review our Terms of Use, if you have not already done so.

### **This Privacy Policy May Change**

We reserve the right to update or modify this Privacy Policy and any Privacy Notice or Country-Specific Notice, at any time and without prior notice, by posting the revised version at our Privacy Policy. If we modify this Privacy Policy or any Privacy Notice or Country-Specific Notice, the modifications will only apply to the information we collect after we have posted the revised version.

Your use of our Sites following any such change constitutes your agreement that all information collected from or about you after the revised version is posted will be subject to the terms of the revised version. You may access the current version of this Privacy Policy at any time by clicking on the "Privacy" link at the bottom of each page of the Sites governed by this Privacy Policy.

From time to time, for example, because of changes in the law or technology or the way we operate our business, we may ask your permission to use the information we have collected from you in the past in new or different ways. We will do this by sending you a notice by e-mail or postal mail at the last e-mail or postal address you provided to us, asking you to agree to the change. If you do not agree to the change in the manner prescribed by applicable law, we may, at our discretion, delete all or some of your information from our databases to avoid using it in ways to which you have not consented.

# **Your Choices**

We respect your right to make choices about the ways we collect, use, and share your information. We generally ask you to indicate your choices at the time and on the page where you provide your information. Depending on the nature of your choices and applicable law, we may also give you ways to change your privacy preferences.

If we provide a means for you to change your privacy preferences, you must give us enough information and a reasonable amount of time to process your request. Your new preferences will only apply prospectively. For example, if you give us permission to share your information with our affiliates and later withdraw your permission, you may still receive e-mail from one of our affiliates, if we shared your information before you withdrew your permission.

In addition, you have choices about the types of email communications you receive and the manner in which your online activities are tracked:

*Email preferences*: You cannot opt out of transactional emails related, for example, to your enrollment or tuition. However, you can opt out of promotional emails we send to you. If you wish to stop receiving promotional emails, simply click on the unsubscribe link located at the bottom of each communication.

Online tracking and third-party cookies: California law requires this Policy to address how we respond to any "Do-Not-Track signal" delivered by your browser. Because of the changing state of technology and indecision within the industry regarding the meaning of Do-Not-Track signals, we currently do not make any guarantee that we will honor them. However, as described below, you can opt out of cookies delivered to your computer by SEI or third parties.

#### Information We Collect and How We Use It

The categories of information we collect through our Sites are listed below. We generally use the information we collect for the following purposes:

- To provide educational services;
- To provide the information, products and services you request;
- To provide you with effective customer service;
- To provide you with a personalized experience when you use our Sites;
- To contact you with information and notices related to your use of our Sites;

- To contact you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us);
- To invite you to participate in surveys and provide Feedback to us (in accordance with any privacy preferences you have expressed to us);
- To improve the content, functionality and usability of our Sites;
- To better understand your needs and interests;
- To improve our products and services;
- To improve our marketing and promotional efforts;
- For security, credit or fraud prevention purposes; and
- For any other purpose identified in an applicable Privacy Notice, click-through agreement or other agreement between you and us.

Information You Manually Provide. SEI collects the information you manually provide (using your mouse, keyboard, or touchscreen) when you use one of our Sites. The information we collect depends on how you use our Sites, but, in many cases, it will be Personal Information. For example, if you submit an application, we collect the information you provide as part of the online application process. Likewise, we collect the information you provide when you create an account, post User-Generated Content, or contact us with questions or comments.

*Information Others Provide*. Others may also post information about you, primarily (but not exclusively) as User-Generated Content. For example, if you attend a graduation ceremony, someone may post photographs of you and others that he/she took at the ceremony. All postings must comply with the requirements for User-Generated Content as set forth in our <u>Terms of Use</u>.

Information From Third-Party Social Media Platforms. You may be able to register with, log on to, or enhance your profile on our Sites by choosing to automatically populate the requested data fields with information you previously provided to a third-party social media platform (such as Facebook or Twitter). By doing this, you are asking the third-party platform to send us information, including Personal Information, from your profile on that platform. We treat that information as we do any other information you give to us when you register, log on, or enhance your profile.

Information Sent to Us by Your Web Browser. We collect information that is sent to us automatically by your Web browser or mobile device. This information typically includes your IP address, the name and version of your operating system, the name and version of your browser, the date and time of your visit, the website you were visiting before you visited one of our Sites, and the pages on our Sites you visit. Please check your browser if you want to learn what information your browser sends or how to change your settings. This information does not identify you personally. However, we may link information sent by your browser to information that identifies you personally. For example, if you have created a user identity by signing up to use a password-protected area of our Sites, we may link your IP address to information that identifies you personally.

Cookies and Other Technologies. We use "cookies" and other Web technologies to collect information and support certain features of our Sites. For example, we may use cookies to:

- Collect information about the ways visitors use our Sites—which pages they visit, which links they use, and how long they stay on each page;
- Support the features and functionality of our Sites—for example, to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits;
- Personalize your experience when you use our Sites; and
- Improve our marketing efforts, including through use of targeted advertising.

Information collected by cookies does not identify you personally. However, we may link information collected by cookies to information that identifies you personally. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit our Sites, you may be unable to use all of the functionality of our Sites if your browser rejects our cookies. In fact, if you are a SEI student, you may not be able to fulfill course requirements if you set your browser to reject cookies.

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

With Third-Party Service Providers. We may share information collected through our Sites with third parties that perform certain functions on our behalf. For example, we may share information with companies that provide support services to us or that help us improve and/or market our products and services (such as third-party advertising companies). These service providers are permitted to use any Personal Information we provide to them only to perform services on our behalf and must treat it as strictly confidential.

With Other Users of Our Sites. Information contained in certain user-generated content you post on this Site—such as UGC you post for social networking purposes—can be read, collected, or used by others. In addition, unless prohibited by FERPA or other applicable law, we may use UGC you submit for advertising campaigns and other promotions. We may or may not use your name in connection with such use, and we may or may not seek your further consent before using the content for such purposes. Therefore, you should have no expectation of privacy with respect to UGC you submit on or through our Sites.

If, at any time, you wish us to remove UGC that you posted, please Contact Us at the information below. Although we do not promise to remove UGC simply because we receive a request to do so, we will consider reasonable requests and will remove UGC when applicable law requires us to do so. Please be aware, however, that if the UGC has already been distributed to other websites or published in other media, we will not be able to recapture and delete it.

Within the SEI Family of Businesses. When you upload information to one of our Sites, the owner of that Site may share your information with other members of the SEI Family of Businesses. Before doing so, however, the owner of the Site may offer you the opportunity to "opt out" or "opt in," as required by applicable law. Every member of the SEI Family of Businesses is required to handle information collected through our Sites in accordance with this Policy and the privacy preferences you have expressed to us.

With Third-Party Social Media Platforms. We may provide functionality on our Sites that allows you to automatically post information to a third-party social media platform (such as Facebook, Twitter, or Pinterest). If you choose to take advantage of this functionality, people with access to your profile on the third-party platform will be able to see your post. Thus, you should have no expectation of privacy in those actions. Further, if you choose to link your profile on our Sites with an account on a third-party social media platform, we may share the information in your profile with that third-party platform. We may also use third-party social media platforms to offer you interest-based ads. To offer such ads, we may convert your email address into a unique value which can be matched by our partner company with a user on their platform. Although we do not provide any personal information to these platform vendors, they may gain insights about individuals who respond to the ads we serve.

With Other, Carefully Selected Business Partners. From time to time, we may share your information with selected third parties for their own marketing purposes. For example, we may partner with third parties to sponsor contests or other promotions, and we may share with these third parties the information you submit to us to participate in the contest or take advantage of the promotion. Before doing so, however, we may offer you the opportunity to "opt out" or "opt in," as required by applicable law.

In Aggregate or De-Identified form. We use information collected through our Sites to create a compiled, aggregate view of usage patterns. We may share aggregate information with third parties so they can better understand our user base. We may also share with third parties information about how particular individuals use our Sites, but only on a de-identified basis ("Individualized Data"). Individualized Data is not personally identifiable, but it does reflect the usage patterns of a particular individual, as opposed to site users collectively. We may provide basic demographic information (gender and age) in conjunction with providing Individualized Data. Third parties typically use this information for analytical purposes and to market their own products and services. It is possible that third parties will attempt to "re-identify" de-identified data, and you should know that this is possible using external points of reference.

As Part of a Business Transfer. Your information may be transferred in connection with a corporate sale, purchase, merger, reorganization, liquidation, dissolution, or similar event. If such a transfer occurs, the successor organization's use of your information will still be subject to this Policy and the privacy preferences you have expressed to us.

To Comply with Laws and Protect Our Rights and the Rights of Others. We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the reporting requirements of accrediting bodies or the U.S. Department of Education or to comply with the law, a court order or a subpoena. We may also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of our Sites; to enforce or apply our online Terms of Use or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

As Described in a Privacy Notice or Country-Specific Notice. We reserve the right to disclose your information as described in any Privacy Notice or Country-Specific Notice posted on a page

of our Sites where you provide that information. By providing your information on that page you will be consenting to the disclosure of your information as described in the notice. We also reserve the right to disclose your information as described in any click-through agreement to which you have agreed.

# **How We Protect Your Information**

We maintain reasonable administrative, physical and technological measures to protect the confidentiality and security of Personal Information you submit on or through our Sites. Unfortunately, no website, server or database is completely secure or "hacker proof." We therefore cannot guarantee that your personal information will not be disclosed, misused or lost by accident or by the unauthorized acts of others. Further, we cannot control dissemination of personal information you post on or through our Sites using any social networking tools we may provide, and you should have no expectation of privacy in such information.

### **Online Courseroom**

Content You Submit to Courseroom. As a SEI online student, you will be expected to generate original content and submit that content for evaluation by your instructor through an online courseroom. The assignments you submit may be accessible to your classmates. For example, a particular course may require you to interact with your classmates through a discussion board in the courseroom, and your instructor may grade you on your participation. You should understand that if you post content in the courseroom in a manner accessible to your classmates, it may be more widely disseminated. For example, one of your classmates could re-post that content to another Web site.

As on any of our Sites, the content you submit to the courseroom must comply with our <u>Terms of Use</u> and with any other applicable policies, such as the student code of conduct.

SEI's Use of Content You Submit to Courseroom. SEI uses the content you submit to the courseroom primarily to evaluate your performance in a particular course and to assign you a grade. In addition, feedback you submit during the course and the instructor evaluation you submit at the end of a course may be used to improve the course and other SEI products, programs and services. SEI may also use information available through the courseroom for academic advising purposes and may contact you about services and products that may be of interest to you. For example, if you perform poorly in a particular course, SEI may use information available through the courseroom to identify a remediation course that may improve your performance, and it may contact you about enrolling in that course. However, SEI will not use in any public advertising or promotional campaign content you post to the courseroom solely for purposes of fulfilling a course requirement.

# A Note On Children's Privacy

SEI does not knowingly collect Personal Information from children under the age of thirteen through our Sites. If you are under thirteen, please do not give us any information that identifies you personally. If you have reason to believe that your child has provided Personal Information

to us through our Sites, please contact us, and we will use reasonable efforts to delete that information from our databases.

# **Your California Privacy Rights**

Last Updated: January 1, 2020

#### Introduction

If you are a California user, you have certain rights with respect to the collection, use, transfer, and processing of your "personal information," as defined by the California Consumer Privacy Act ("CCPA"). The rights set forth in this section also apply to any information collected offline. We reserve the right to limit these rights where permitted under applicable law, including where your identity cannot be reasonably verified or to the extent your rights adversely affect the rights and freedoms of others. To exercise any of the rights below, please contact us via the contact information below. 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.

#### What Information Do We Collect?

In the previous 12 months, SEI has collected the following categories of Personal Information:

- A. Identifiers
- B. Personal Information (Categories of Personal Information are as defined in Cal. Civ. Code. § 1798.140(o))
- C. Protected Classification Characteristics Under California or Federal Law
- **D.** Commercial Information
- E. Internet or Other Similar Network Activity
- F. Geolocation Data
- G. Sensory Data
- H. Professional or Employment-Related Information
- I. Non-Public Education Information
- J. Inferences Drawn of the Consumer

# **Sources From Which Personal Information Is Collected**

We collect your personal information in categories A (identifiers), B (personal), C (protected classifications), G (sensory data), H (employment), and I (educational) directly from you. We collect the personal information in category D (commercial) by keeping a log of your transactions. We collect the personal information in categories E (internet and other electronic network activity), F (geolocation), I (educational) and J (inferences) based on your interactions with our website and mobile apps. We collect the personal information in categories B (personal), E (internet and other electronic network activity), and I (educational) from third party vendors or public sources.

# **Business or Commercial Purposes for Which Personal Information Is Collected**

Your Personal Information is used for the following purposes:

- To provide educational services;
- To provide the information, products and services you request;
- To provide you with effective customer service;
- To provide you with a personalized experience when you use our Sites;
- To contact you with information and notices related to your use of our Sites;
- To contact you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us);
- To invite you to participate in surveys and provide Feedback to us (in accordance with any privacy preferences you have expressed to us);
- To improve the content, functionality and usability of our Sites;
- To better understand your needs and interests;
- To improve our products and services;
- To improve our marketing and promotional efforts:
- For security, credit or fraud prevention purposes; and
- For any other purpose identified in an applicable Privacy Notice, click-through agreement or other agreement between you and us.

#### Third Parties With Whom Personal Information Is Shared

SEI shares your Personal Information with analytics and service providers, benefits providers, transaction processors, and law enforcement (if necessary). In certain circumstances, we may also share our Personal Information with other users of our sites, within the SEI family of businesses, with third-party social media platforms, with other carefully selected business partners, in aggregate or de-identified form, or as part of a business transfer.

In the preceding 12 months, we have disclosed the following Personal Information about consumers for business purposes, including:

- We share information collected through our Sites with third parties that perform certain functions on our behalf.
- We share content posted on our social media platforms (e.g., if a consumer "comments" on a story) with other consumers.

- We allow certain companies to use cookies, web beacons, or other online tracking devices to enhance online experiences and customize advertising. For more information, please see the "Information Collected Automatically" and "Your Ad Choices" sections.
- We share information collected through our Sites with third parties that perform certain functions on our behalf. For example, we may share information with companies that provide support services to us or that help us improve and/or market our products and services (such as third-party advertising companies).
- We share information contained in certain user-generated content you post on this Site—such as UGC you post for social networking purposes—which can be read, collected, or used by others. In addition, we use UGC you submit for advertising campaigns and other promotions.
- We share information with other members of the SEI Family of Businesses, subject to this Policy and the privacy preferences you have expressed to us.
- We share information you elect to share to third-party social media platforms, as well as information contained in your social media profile on our Sites and use third-party social media platforms to offer you interest-based ads.
- We use information collected through our Sites to create a compiled, aggregate view of usage patterns. We share aggregate information with third parties so they can better understand our user base.
- We disclose your information when we, in good faith, believe disclosure is appropriate to comply with the reporting requirements of accrediting bodies or the U.S. Department of Education or to comply with the law, a court order or a subpoena. We also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of our Sites; to enforce or apply our online Terms of Use or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

In the preceding 12 months, we have not sold Personal Information about minors.

In the preceding 12 months, we have not sold Personal Information about consumers.

### **Individual Rights**

a. Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that SEI disclose the Personal Information it collects, uses, and discloses about you to third parties. There are two types of Rights to Know requests that you can make:

- **1. Right to Know (Abbreviated Request)**: If you make a Right to Know (Abbreviated Request), you will receive the following information about you:
  - a. Categories of Personal Information collected;
  - b. Categories of sources from which Personal Information is collected;
  - c. Business purpose for collecting or selling; and
  - d. Categories of third parties with whom sold.

- **2. Right to Know (Specific Pieces of Information Request)**: If you make a Right to Know (Specific Pieces of Information Request), you will receive the following information about you:
  - a. Specific pieces of Personal Information collected about you.

This information will be provided to you free of charge, unless SEI determines that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period.

There are certain exceptions to a consumer's Right to Know. SEI will state in its response if an exception applies.

# b. Right of Deletion

You have the right to request that SEI and our service providers delete any Personal Information about yourself which SEI has collected from you upon receipt of a verifiable request. This right is subject to certain exceptions. SEI will state in its response if an exception applies.

# c. Right to Opt-Out of the Sale of Personal Information

You have the right to opt-out of the sale of your Personal Information by a business subject to certain laws and regulations.

SEI does not, and will not, sell any Personal information of California consumers. SEI will update this Privacy Policy and comply with applicable laws and regulations in the event that it sells Personal Information of California consumers in the future.

# d. Right to Non-Discrimination

You have the right not to receive discriminatory treatment for exercising the privacy rights conferred by California law. SEI will not discriminate against you because you exercised any of your privacy rights by, including, but not limited to: denying goods or services to you; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level of quality of goods or services to you; or suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

#### e. Submitting Requests

You can submit your request by calling us at 1-844-925-1256 or visiting our request website <u>here</u>. You may also submit a request via email at Legal@StrategicEd.com.

# f. Verifying Requests

SEI provides California consumers with an online webform to submit requests. The webform is accessible <u>here</u>. As stated in the webform, SEI must verify that the person requesting information or deletion is the California consumer about whom the request relates in order to

process the request. To verify a California consumer's identity, we may request up to three pieces of Personal Information about you when you make a request to compare against our records. We may also request that you sign a declaration under the penalty of perjury from the consumer whose personal information is the subject of the request.

Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in your request to verify your identity and will delete any information you provide after processing the request. SEI reserves the right to take additional steps as necessary to verify the identity of California consumers where we have reason to believe a request is fraudulent.

#### g. Authorized Agents

You may choose a person registered with the California Secretary of State that you authorize to act on your behalf to submit your requests ("Authorized Agent"). If you choose to use an Authorized Agent, SEI requires that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with SEI. Failure to do so may result in SEI denying your request.

#### **Contact for More Information**

If you have any questions or concerns regarding your California Privacy Rights under this Privacy Policy, you may contact us in the following ways:

By e-mail at: Legal@StrategicEd.com

By letter mailed to:

Strategic Education, Inc.
Office of the General Counsel
2303 Dulles Station Blvd.
Mail Stop 6C
Herndon, VA 20171

#### **Links to Third-Party Sites**

Some of our Sites link to each other. Our Sites also contain links to websites that are owned and operated by unrelated third parties. For example, our Sites may link to government websites where you can apply for financial aid, as well as to third-party social networking sites such as Facebook, Twitter, and YouTube. In addition, our Sites contain links to websites operated by third parties who provide services to SEI. For example, SEI uses a third-party service provider to process credit card transactions. This Privacy Policy applies only to information that we collect through SEI-owned Sites that display a link to our Privacy Policy. It does not apply to information collected on any SEI-owned site that does not display a link to our Privacy Policy. It does not apply to information collected on the websites of our service providers or other third parties.

When you access a website to which this Privacy Policy does not apply, please take a few minutes to review the terms of use and privacy statement posted on that site.

# **Accessing and Correcting Your Personal Information**

We strive to maintain the accuracy and integrity of the information in our databases. We provide ways for you to access your Personal Information as required by applicable law, so that you can correct inaccuracies or update your Personal Information. For example, if you create an account through one of our Sites, you may log on at any time and update your profile.

If you cannot access or correct your Personal Information online, please contact us.

We will respond to reasonable requests within the time limits established by applicable law or within a reasonable time if no time limit is established by applicable law. For your protection, we may ask you for additional information to verify your identity. In most cases, we will provide the access you request and correct or delete any inaccurate Personal Information you discover. In some cases, however, we may limit or deny your request if applicable law permits or requires us to do so. We generally do not charge for this service, however, we reserve the right to charge a fee as permitted by applicable law.

# **Retention of Personal Information**

SEI retains the Personal Information collected on our Sites as long as necessary to provide the services, products, and information you request or as permitted by applicable law.

# **Information for Visitors Accessing Our Sites from Outside the United States**

SEI is a U.S. corporation headquartered in the United States. Our Sites are currently hosted on servers located in the United States, although we reserve the right to relocate our Sites to other servers elsewhere in the world. Your Personal Information may be stored on servers located within the United States or in another country. In addition, we may transfer your Personal Information to our service providers and others located in the United States or another country for the purposes described in this Privacy Policy. Different countries have different privacy laws and requirements, and some provide less legal protection for your Personal Information than others. Please know, however, that no matter where your Personal Information is collected, used, transferred or stored, if it was collected through this Privacy Policy, it will be protected by the terms of this Privacy Policy and any Privacy Notices or other agreements that apply to you.

BY USING OUR SITES, YOU ARE CONSENTING TO THE COLLECTION, USE, AND TRANSFER OF YOUR PERSONAL INFORMATION IN OR TO THE UNITED STATES OR TO ANY OTHER COUNTRY IN THE WORLD SUBJECT TO THE TERMS OF THIS PRIVACY POLICY.

## **Governing Law**

This Privacy Policy shall be governed under the laws of the Commonwealth of Virginia, United States of America, without regard to its conflicts of law provisions.

# **Contact Us**

If you have questions or concerns about this Privacy Policy, please e-mail us at legal@StrategicEd.com or send a letter to:

Strategic Education, Inc. Office of the General Counsel 2303 Dulles Station Blvd. Mail Stop 6C Herndon, VA 20171