

Privacy Policy

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The Pond is an online guidance platform used by students to navigate the college admissions process, including tools and information to help students build their roadmaps, school lists, and apply to colleges. This Privacy Policy applies to The Pond Sites operated by Letitu Corp., Ltd., dba The Pond (“The Pond,” “we,” “our,” or “us”), including www.diveintothepond.com, and all related websites, web-based services, and mobile apps (the “The Pond Sites”).

This Policy explains what personal information we collect from visitors to The Pond Sites, how we use and share that information, and the rights and choices you have in connection with that information, including how you can limit certain uses and sharing of your information. When we refer to “personal information,” we mean information about an identified individual or about an individual whom we could identify. Subject to applicable law, personal information generally does not include publicly available information or anonymized or de-identified data.

This Privacy Policy does not apply to third-party websites, products or services, even if they link to The Pond Sites. We recommend you review the privacy practices of those third parties before connecting or accessing third party websites and sharing any personal information. See the section titled Links to Other Sites for more information.

Without prejudice to your rights under applicable laws, this Policy is not contractual and does not form part of your contract with The Pond or its affiliates or subsidiaries.

1. Who you are

Depending upon how and why you interact with The Pond, the types of personal information we collect, receive, use, or disclose may vary. This Policy applies to one of the following types of individuals and our collection, receipt, use, or disclosure of these individual's personal information:

A Registered The Pond Site User: You visit a The Pond Site and you are a parent, student, or family member of a student that registered to use The Pond with a The Pond account, or are an independent education counselor, highschool counselor, tutor, mentor using The Pond Sites with a The Pond account. For example, you log in to the Sites to use The Pond to connect directly with admissions officers and current students or to engage an independent education counselor. We refer to you as a “Registered The Pond Site User.”

An Admissions User: You visit a The Pond Site and you represent a college or university and use The Pond Sites to recruit prospective students. For example, you log in to the Sites to use The Pond to connect directly with current students via a campaign or engage directly with current students. We refer to you as an “Admissions User”.

A The Pond Site Visitor: You visit and interact with The Pond Sites without a The Pond account, without logging into your The Pond account, or without otherwise disclosing that you have a The Pond Account. For example, you are not using The Pond Sites to connect directly with admissions officers or to engage or work with an independent education consultant. We refer to you as a “The Pond Site Visitor.”

An Advisor: You are an independent education counselor or high school counselor contracted by The Pond and who provides college advising to Users. We refer to you as “Advisors.”

A California Job Applicant or Employee: You are a The Pond employee or job applicant who is a resident of the State of California. We refer to you as a “California Job Applicant and Employee.”

You may be included in more than one of these categories. For example, you may have signed up to use The Pond Sites and also use The Pond without logging in. In that case, you can be a Registered The Pond Site User and a The Pond Site Visitor, depending upon our particular interaction with you.

We encourage you to read this Policy thoroughly. For more information, contact us using the information in the Contact Us

2. If You Are Site Visitor

As a The Pond Site Visitor, you visit and interact with The Pond Sites without a The Pond account, without logging into your The Pond account, or without otherwise disclosing that you have a The Pond Account. For example, you are not using The Pond Sites to connect directly with admissions officers or to engage or work with an independent education consultant. We refer to you as a “The Pond Site Visitor.”

A. Types of Personal Information We Collect About The Pond Site Visitors and Why

We may collect the following categories of personal information about The Pond Site Visitors, for the purposes stated in the chart. We may have done this in the past 12 months.

CATEGORY OF PERSONAL INFORMATION	EXAMPLES	PURPOSE OF COLLECTION AND USE
Identifiers	Device ID or IP address and user-generated content (including reviews and feedback)	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites - Detect and prevent fraud - Market or advertise to you - Comply with legal or regulatory obligations
Internet or other electronic activity information	Browsing history on The Pond Sites; clickstream data; browser and operating system type; navigation paths; data/time stamps; cookie identifiers; and other information about device characteristics and how you interact with The Pond Sites or our Services	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites - Detect and prevent fraud - Market or advertise to you - Comply with legal or regulatory obligations
Geolocation data	Geolocation data based on your IP address	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites - Detect and prevent fraud - Market or advertise to you - Comply with legal or regulatory obligations
Electronic information	Session replay	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites

B. How We Collect Information About The Pond Site Visitors and Why

We may collect personal information about The Pond Site Visitors from the following sources:

SOURCES OF PERSONAL INFORMATION	HOW	CATEGORIES OF PERSONAL INFORMATION WE COLLECT
Directly from you	We may collect personal information from you when you interact with The Pond Sites or our services, submit inquiries or request information from us, or otherwise contact or communicate with us.	<ul style="list-style-type: none"> - Identifiers - Internet or other electronic activity information - Geolocation data - Electronic information
Automatically	We may collect personal information from you automatically when, logged in, you visit The Pond Sites, as you load The Pond Sites, or as you interact with The Pond. See Section 7, Cookie, Pixel, and Session Replay Policy.	<ul style="list-style-type: none"> - Internet or other electronic activity information - Geolocation data
Our service providers and third-party vendors	The Pond Sites may use third party analytics services. These services may record mouse clicks, page views, mouse movements and scrolling activity and are used by The Pond to analyze trends and administer The Pond Sites.	<ul style="list-style-type: none"> - Identifiers - Internet or other electronic activity information - Electronic information
Third parties	We may collect personal information from third-party social media platforms and sites, such as when you engage with our social media pages, online communities and forums, and when you mention us on your own or other social media pages, online communities or forums. Please note that online forums may be publicly accessible and other individuals may view information you post in the forums. We may also provide the option for you to register for our services through linking your account at a third party, such as Facebook or Google. If you register for our services by linking your account at a third party, you are consenting to have the information in those accounts (“Third-Party Account Information”) transmitted into your account with us, and that Third-Party Account Information is covered by this Privacy Policy.	<ul style="list-style-type: none"> - Identifiers - Internet or other electronic activity information - Electronic information

C. Parties To Whom We May Disclose Information About The Pond Site Visitors

We disclose personal information about The Pond Site Visitors as follows, and we may have done so in the past 12 months:

We do not sell personal information about The Pond Site Visitors for money. For more information about whether we “sell” for purposes of California law, see Section 14, Notice to California Residents.

CATEGORIES OF THIRD PARTY RECIPIENT	PURPOSE FOR DISCLOSURE	CATEGORIES OF PERSONAL INFORMATION WE MAY SHARE
Our service providers and third-party vendors	The Pond uses third-party vendors to perform operational functions related to The Pond Sites. Some of these vendors (e.g., marketing automation vendors or hosting providers) may have access to your personal information, but only as necessary to provide services to The Pond. If the third-party vendor is The Pond's service provider, The Pond has agreements in place with the vendors requiring your information to be kept confidential and reasonable data security measures used to protect it. We also share your personal information with vendors (for example, marketing automation vendors or hosting providers) as needed to assist The Pond with business operations, but in such instances, these vendors are contractually required to keep your information confidential.	<ul style="list-style-type: none"> - Identifiers - Internet or other electronic activity information - Electronic information
Government entities	We may share personal information with government entities and agencies, regulators, law enforcement, and other third parties, including to comply with applicable laws and regulations, to respond to a subpoena, search warrant, or pursuant to legal process, and to establish or exercise our legal rights or for fraud or crime-prevention purposes or for the protection of the rights, property, or safety of our company or third parties.	<ul style="list-style-type: none"> - Identifiers - Internet or other electronic activity information - Electronic information
Business partners	We may engage third parties to perform certain functions on our behalf. To do so, we may disclose personal information to our third-party business partners and service providers in order to maintain and operate The Pond Sites and services and provide, improve, and personalize The Pond Sites and services, including to fulfill requests for the Services, and for other technical and processing functions, such as sending e-mails on our behalf and technical support.	<ul style="list-style-type: none"> - Identifiers - Internet or other electronic activity information - Electronic information
Successor organizations	Subject to applicable law, we reserve the right to transfer some or all personal information in our possession to a successor organization in the event of a merger, acquisition, bankruptcy, or other sale or transfer of all or a portion of our assets. If any such transaction occurs, the purchaser will be entitled to use and disclose the personal information collected by us in the same	<ul style="list-style-type: none"> - Identifiers - Internet or other electronic activity information - Electronic information

	manner that we are able to, and the purchaser will assume the rights and obligations regarding personal information as described in this Privacy Policy.	
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3. If you are a Registered The Pond Site User or want to be a Registered The Pond Site User

Registered The Pond Site Users are individuals who have signed up to use The Pond, and who are using The Pond Sites when logged into their account. For example, a Registered The Pond Site User is an individual who visits The Pond Sites when logged into their account or who otherwise discloses that they have a The Pond account to The Pond Sites.

A. Types of Information We Collect About Registered The Pond Site Users and Why

We may collect the following categories of personal information about Registered The Pond Site Users, for the purposes stated in the chart. We may have done this in the past 12 months.

CATEGORY OF PERSONAL INFORMATION	EXAMPLES	PURPOSE OF COLLECTION AND USE
Identifiers	First and last name; username and password; mailing address; email address; telephone number, date of birth; device ID; or IP address	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services - Connect you with Advisors, college admissions officers, or current students - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
California Consumer Records Act information	First and last name; home address; personal email address; telephone number; education and employment history; and physical characteristics or description	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services - Connect you with Advisors, college admissions officers, or current students - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
Characteristics of protected classifications under California or federal law	Age; date of birth or age range; gender or gender identity; marital status; military or veteran status; national origin; criminal history or records; income level; racial or ethnic origin; religious or philosophical beliefs; or sexual orientation	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services. - Connect you with independent education consultants, college admissions officers, or current

		<p>students</p> <ul style="list-style-type: none"> - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
Commercial information	Financial aid offers; transaction information; or products or services purchased	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services. - Connect you with independent education consultants, college admissions officers, or current students - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
Internet or other electronic activity information	Browsing history on The Pond Sites; clickstream data; browser and operating system type; navigation paths; data/time stamps; cookie identifiers; or other information about device characteristics and how you interact with The Pond Sites or our Services	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services. - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
Geolocation data	Geolocation data based on your IP address	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites and Services. - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Comply with legal or regulatory obligations

<p>Audio, electronic, visual, or similar information</p>	<p>Student-submitted photographs; or session replay</p>	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services. - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
<p>Professional or employment-related information</p>	<p>Employment information (including employer name), employment history, professional licenses or registrations, or employment identification number</p>	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites and Services. - Connect you with independent education consultants, college admissions officers, or current students - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
<p>Education information</p>	<p>School and related information, such as grades, performance, college applications, admissions results, or test results (SAT, ACT, AP, IB, MCAT, LSAT, GMAT, GRE, TOEFL, TOEIC, TEPS, DELF, DELE, DCAT, SSAT, GED, CLEP, PTE, IELTS, Cambridge Assessment International Education, GRE subject tests, ISEE, SHSAT, A-levels, O-levels, BMAT, UKCAT, LNAT, ACTFL, NAPLEX, Duolingo tests)</p>	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites and Services. - Connect you with independent education consultants, college admissions officers, or current students - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
<p>Inferences</p>	<p>Inferences drawn from any other personal information we may collect to create a profile about preferences; characteristics; psychological trends; predispositions; behavior; attitudes, intelligence, abilities; or aptitudes</p>	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites and Services. - Connect you with independent education consultants, college admissions officers, or current students

Please note that because of the overlapping nature of certain of the categories of personal information identified above, which are required by state law, some of the personal information we collect may be reasonably classified under multiple categories.

B. How We Collect Information About Registered The Pond Site Users and Why

We may collect or have collected personal information about Registered The Pond Site Users from the following sources:

SOURCES OF PERSONAL INFORMATION	HOW	CATEGORIES OF PERSONAL INFORMATION WE COLLECT
Directly from you	We may collect personal information from you when you register for our services or provide information about yourself or your family, when you interact with The Pond Sites or our services, submit inquiries or request information from us, or otherwise contact or communicate with us. We may also collect personal information when you interact with an independent education consultant through The Pond Sites.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial or financial Information - Internet or other electronic activity information - Geolocation data - Audio, electronic, visual, or similar information - Professional or employment information - Education information - Sensitive personal information - Inferences
Automatically	We may collect personal information from you automatically when, logged in, you visit The Pond Sites, as you load The Pond Sites, or as you interact with The Pond. See Section 7, Cookie, Pixel, and Session Replay Policy.	<ul style="list-style-type: none"> - Internet or other electronic activity information - Geolocation data
Our service providers and third-party vendors	The Pond Sites may use third party analytics services. These services may record mouse clicks, page views, mouse movements and scrolling activity and are used by The Pond to analyze trends and administer The Pond Sites.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act Information - Internet or other electronic network activity - Inferences - Audio, electronic, visual, or similar information
Third parties	We may collect personal information from third-party social media platforms and sites, such as when you engage with our social media pages, online communities and forums, and when you mention us on your own or other social media pages, online communities or forums. Please note that online forums may be publicly accessible and other individuals may view information you post in the forums. We may also provide the	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act Information - Internet or other electronic network activity - Education information - Inferences

	option for you to register for our services through linking your account at a third party, such as Facebook or Google. If you register for our services by linking your account at a third party, you are consenting to have the information in those accounts (“Third-Party Account Information”) transmitted into your account with us, and that Third-Party Account Information is covered by this Privacy Policy.	
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C. Parties To Whom We May Disclose Information About Registered The Pond Site Users

We disclose personal information about Registered The Pond Site Users as follows, and we may have done so in the past 12 months:

We do not sell personal information about Registered The Pond Site Users for money. For more information about whether we “sell” for purposes of California law, see Section 14, Notice to California Residents.

CATEGORIES OF THIRD PARTY RECIPIENT	PURPOSE FOR DISCLOSURE	CATEGORIES OF PERSONAL INFORMATION WE MAY SHARE
The Pond network	<p>The Pond Sites may also contain features that facilitate your connection and communication with selected colleges, universities, other educational institutions, and/or representatives from any of these institutions (“The Pond Network”). The Pond Network serves as an intermediary in order to facilitate these connections. When you opt to connect with an educational institution, you are agreeing to share your profile information with that educational institution.</p> <p>We also allow you to share your profile with colleges that are interested in connecting with you. We give you control over whether you want to make your profile public to colleges and what information you share in your public profile; however please be aware that if you make your profile public to a college, the college will be able to view all of the information in your public profile. Your Personal Information is only viewable to colleges when you choose to make your profile public and your profile is never visible to other users.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial or financial Information - Audio, electronic, visual, or similar information - Professional or employment information - Education information - Inferences
Independent education consultants	The Pond permits students and family members to connect with or engage independent education consultants for college counseling. By connecting with or engaging an independent education consultant, students and their family require	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial Information

	<p>us to share certain personal information with the independent education consultant. Any personal information you provide directly to the independent education consultant is not subject to this Policy.</p>	<ul style="list-style-type: none"> - Professional or employment-related information - Education information - Inferences
<p>Our service providers and third-party vendors</p>	<p>The Pond uses third-party vendors to perform operational functions related to The Pond Sites. Some of these vendors (e.g., marketing automation vendors, email vendors or hosting providers) may have access to your personal information, but only as necessary to provide services to The Pond. If the third-party vendor is The Pond's service provider, The Pond has agreements in place with the vendors requiring your information to be kept confidential and reasonable data security measures used to protect it. We also share your personal information with vendors (for example, marketing automation vendors or hosting providers) as needed to assist The Pond with business operations, but in such instances, these vendors are contractually required to keep your information confidential.</p> <p>We may share personal information with service providers or other third parties to detect, protect against, and respond to security incidents or other malicious, deceptive, illegal, or fraudulent activity or other threats and for legal compliance purposes or pursuant to legal process.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial Information - Internal or other electronic activity information - Audio, electronic, visual, or similar information - Professional or employment-related information - Education information - Inferences
<p>Government entities</p>	<p>We may share personal information with government entities and agencies, regulators, law enforcement, and other third parties, including to comply with applicable laws and regulations, to respond to a subpoena, search warrant, or pursuant to legal process, and to establish or exercise our legal rights or for fraud or crime-prevention purposes or for the protection of the rights, property, or safety of our company or third parties.</p> <p>We may also share personal information in relation to a known or suspected violation of our terms of use, fraud prevention or other unlawful use, including with entities assisting us with an investigation, or as may be required by applicable law.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial Information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Inferences
<p>Business partners</p>	<p>We may engage third parties to perform certain functions on our behalf. To do so, we may disclose personal information to our third-party business partners and service providers in order to maintain and operate The Pond Sites and services and provide, improve, and personalize The Pond Sites and services, including to fulfill requests for</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial Information

	the Services, and for other technical and processing functions, such as sending e-mails on our behalf and technical support.	<ul style="list-style-type: none"> - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Inferences
Successor organizations	Subject to applicable law, we reserve the right to transfer some or all personal information in our possession to a successor organization in the event of a merger, acquisition, bankruptcy, or other sale or transfer of all or a portion of our assets. If any such transaction occurs, the purchaser will be entitled to use and disclose the personal information collected by us in the same manner that we are able to, and the purchaser will assume the rights and obligations regarding personal information as described in this Privacy Policy.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial Information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Inferences

D. Additional Information For Registered The Pond Site Users

Registered The Pond Site User Content

The Pond Sites may permit you to submit, upload, publish, or otherwise make available to The Pond, your content, photographs, reviews, feedback, or other content, including personal information (collectively, "Registered The Pond Site User Content"). You should always keep in mind that public postings are not confidential, and that we do not control who will have access to the information you choose to make public and cannot guarantee that parties who have access to such publicly available information will respect your privacy or keep it secure.

Lookalike Audience

For advertising purposes, we occasionally use information about our customers to generate a "lookalike audience" or similar audience of prospective customers through Facebook, Google, and other online advertising platforms. This allows us to target advertisements on their networks to potential customers who appear to have shared interests or similar demographics to our existing customers, based on the platforms' own data. We typically do this by uploading a list of email addresses which are used to generate the lookalike audience. Email addresses that are sent to these platforms are used for no other purpose, other than to build the lookalike audience. We do not have access to the identity of anybody in the lookalike audience, unless they choose to click on the ads. Based on this, we believe that generating lookalike audiences poses little or no threat to the privacy of our customers.

For example, we may use aggregated, de-identified, or anonymized information about how you use The Pond Sites (e.g., the schools in which you are interested, schools to which you apply, the participants with whom you connect on The Pond Network), to improve the functionality of The Pond Sites and improve our service offerings, including using this data at an aggregate level to create data analytics offerings to analyze trends. Subject to applicable law, our use of such aggregated, de-identified, or

anonymized information is not personal information or subject to this Policy.

For more information, see Section 6.c, "Interest-Based Advertising".

4. If You Are An Admissions User Or Want To Be An Admissions User

Admissions Users are individuals who have signed up, either directly or through their educational institution, to use The Pond to recruit students, and who are using The Pond Sites when logged into their account. For example, an Admissions User is an individual who visits The Pond Sites when logged into their account or who otherwise discloses that they are an admissions professional with an admissions account on The Pond Sites.

A. Types of Information We Collect About Admissions Users and Why

We may collect the following categories of personal information about Admissions Users, for the purposes stated in the chart. We may have done this in the past 12 months.

CATEGORY OF PERSONAL INFORMATION	EXAMPLES	PURPOSE OF COLLECTION AND USE
Identifiers	First and last name; username and password; mailing address; email address; telephone number, date of birth; device ID; or IP address	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services - Connect you with Advisors, parents, current students, or other Registered The Pond Site Users - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
California Consumer Records Act information	First and last name; home address; personal email address; telephone number; education and employment history; and physical characteristics or description	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services - Connect you with Advisors, parents, current students, or other Registered The Pond Site Users - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
Characteristics of protected classifications under California or federal law	Age; date of birth or age range; gender or gender identity; marital status; military or veteran status; national origin; criminal history or records; income level; racial or ethnic origin; religious or philosophical	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services. - Connect you with Advisors,

	beliefs; or sexual orientation	<p>parents, current students, or other Registered The Pond Site Users</p> <ul style="list-style-type: none"> - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
Commercial information	Financial aid offers; transaction information; or products or services purchased	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services. - Connect you with Advisors, parents, current students, or other Registered The Pond Site Users - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
Internet or other electronic activity information	Browsing history on The Pond Sites; clickstream data; browser and operating system type; navigation paths; data/time stamps; cookie identifiers; or other information about device characteristics and how you interact with The Pond Sites or our Services	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services. - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
Geolocation data	Geolocation data based on your IP address	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites and Services. - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Comply with legal or regulatory obligations

<p>Audio, electronic, visual, or similar information</p>	<p>Student-submitted photographs; or session replay</p>	<ul style="list-style-type: none"> - Communicate with you - Provide and enhance The Pond Sites and Services. - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
<p>Professional or employment-related information</p>	<p>Employment information (including employer name), employment history, professional licenses or registrations, or employment identification number</p>	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites and Services. - Connect you with Advisors, parents, current students, or other Registered The Pond Site Users - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
<p>Education information</p>	<p>School and related information, such as grades, performance, college applications, admissions results, or test results (SAT, ACT, AP, IB, MCAT, LSAT, GMAT, GRE, TOEFL, TOEIC, TEPS, DELF, DELE, DCAT, SSAT, GED, CLEP, PTE, IELTS, Cambridge Assessment International Education, GRE subject tests, ISEE, SHSAT, A-levels, O-levels, BMAT, UKCAT, LNAT, ACTFL, NAPLEX, Duolingo tests)</p>	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites and Services. - Connect you with Advisors, parents, current students, or other Registered The Pond Site Users - Customize your experience - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Market or advertise to you - Comply with legal or regulatory obligations
<p>Inferences</p>	<p>Inferences drawn from any other personal information we may collect to create a profile about preferences; characteristics; psychological trends; predispositions; behavior; attitudes, intelligence, abilities; or aptitudes</p>	<ul style="list-style-type: none"> - Provide and enhance The Pond Sites and Services. - Connect you with independent education consultants, college admissions officers, or current students

Please note that because of the overlapping nature of certain of the categories of personal information identified above, which are required by state law, some of the personal information we collect may be reasonably classified under multiple categories.

B. How We Collect Information About Admissions Users and Why

We may collect or have collected personal information about Admissions Users from the following sources:

SOURCES OF PERSONAL INFORMATION	HOW	CATEGORIES OF PERSONAL INFORMATION WE COLLECT
Directly from you	We may collect personal information from you when you register for our services or provide information about yourself, when you interact with The Pond Sites or our services, submit inquiries or request information from us, or otherwise contact or communicate with us. We may also collect personal information when you interact with current students through The Pond Sites.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Internet or other electronic activity information - Geolocation data - Audio, electronic, visual, or similar information - Professional or employment information - Education information - Sensitive personal information
Automatically	We may collect personal information from you automatically when, logged in, you visit The Pond Sites, as you load The Pond Sites, or as you interact with The Pond. See Section 7, Cookie, Pixel, and Session Replay Policy.	<ul style="list-style-type: none"> - Internet or other electronic activity information - Geolocation data
Our service providers and third-party vendors	The Pond Sites may use third party analytics services. These services may record mouse clicks, page views, mouse movements and scrolling activity and are used by The Pond to analyze trends and administer The Pond Sites.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act Information - Internet or other electronic network activity - Inferences - Audio, electronic, visual, or similar information
Other third parties	We may collect personal information from third-party social media platforms and sites, such as when you engage with our social media pages, online communities and forums, and when you mention us on your own or other social media pages, online communities or forums. Please note that online forums may be publicly accessible and other individuals may view information you post in the forums. We may also provide the option for you to register for our services through linking your account at a third party, such as Facebook or Google. If you register for our services by linking your account at a	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act Information - Internet or other electronic network activity - Professional or employment information - Education information - Inferences

	third party, you are consenting to have the information in those accounts (“Third-Party Account Information”) transmitted into your account with us, and that Third-Party Account Information is covered by this Privacy Policy.	
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C. Parties To Whom We May Disclose Information About Admissions Users

We disclose personal information about Admissions Users as follows, and we may have done so in the past 12 months:

We do not sell personal information about Admissions Users for money.

CATEGORIES OF THIRD PARTY RECIPIENT	PURPOSE FOR DISCLOSURE	CATEGORIES OF PERSONAL INFORMATION WE MAY SHARE
The Pond network	The Pond Sites may also contain features that facilitate your connection and communication as a representative of a college or university with selected current students (“The Pond Network”). The Pond Network serves as an intermediary in order to facilitate these connections. When you opt to connect with a current student, you are agreeing to share your profile information with that student.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Audio, electronic, visual, or similar information - Professional or employment information - Education information - Inferences
Our service providers and third-party vendors	<p>The Pond uses third-party vendors to perform operational functions related to The Pond Sites. Some of these vendors (e.g., marketing automation vendors, email vendors or hosting providers) may have access to your personal information, but only as necessary to provide services to The Pond. If the third-party vendor is The Pond’s service provider, The Pond has agreements in place with the vendors requiring your information to be kept confidential and reasonable data security measures used to protect it. We also share your personal information with vendors (for example, marketing automation vendors or hosting providers) as needed to assist The Pond with business operations, but in such instances, these vendors are contractually required to keep your information confidential.</p> <p>We may share personal information with service providers or other third parties to detect, protect against, and respond to security incidents or other malicious, deceptive, illegal, or fraudulent activity or other threats and for legal compliance</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial Information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Inferences

	purposes or pursuant to legal process.	
Government entities	<p>We may share personal information with government entities and agencies, regulators, law enforcement, and other third parties, including to comply with applicable laws and regulations, to respond to a subpoena, search warrant, or pursuant to legal process, and to establish or exercise our legal rights or for fraud or crime-prevention purposes or for the protection of the rights, property, or safety of our company or third parties.</p> <p>We may also share personal information in relation to a known or suspected violation of our terms of use, fraud prevention or other unlawful use, including with entities assisting us with an investigation, or as may be required by applicable law.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial Information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Inferences
Business partners	<p>We may engage third parties to perform certain functions on our behalf. To do so, we may disclose personal information to our third-party business partners and service providers in order to maintain and operate The Pond Sites and services and provide, improve, and personalize The Pond Sites and services, including to fulfill requests for the Services, and for other technical and processing functions, such as sending e-mails on our behalf and technical support.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial Information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Inferences
Successor organizations	<p>Subject to applicable law, we reserve the right to transfer some or all personal information in our possession to a successor organization in the event of a merger, acquisition, bankruptcy, or other sale or transfer of all or a portion of our assets. If any such transaction occurs, the purchaser will be entitled to use and disclose the personal information collected by us in the same manner that we are able to, and the purchaser will assume the rights and obligations regarding personal information as described in this Privacy Policy.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial Information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Inferences

5. If You Are A Job Applicant or Employee In California

A. Types of Information We Collect About California Job Applicants and Employees and Why

Subject to applicable legal restrictions, unless otherwise stated herein or at the point of collection, we generally collect, use and disclose personal information about Job Applicants and Employees in California as reasonably necessary for purposes stated in the chart. This subsection does not contain information about how we may collect, use, and disclose personal information about California residents not related to any employment-related purpose, which is described in the remainder of this Privacy Policy. This subsection does not apply to non-California residents.

CATEGORY OF PERSONAL INFORMATION	EXAMPLES	PURPOSE OF COLLECTION AND USE
Identifiers	Name; username and password; mailing address; personal email address; telephone number; employee or personnel number; date of birth; device ID; IP address; Social Security number; and emergency contact details	<ul style="list-style-type: none"> - Communicate with you - Facilitate employment applications, including conducting screenings, interviews, and background checks - Make employment, payroll, and compensation decisions - Make workforce management decisions, including evaluations, internal investigations, and performance reviews - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Investigate, protect, enforce, or defend the legal rights, privacy, safety, or property of us or others - Comply with legal or regulatory obligations
California Consumer Records Act information	First and last name; Social Security number; home address; personal email address; telephone number; driver's license number; education and employment history; bank account numbers, credit or debit card numbers, and other financial information; insurance policy numbers; medical conditions; workplace accommodations and related documentation; FMLA calculations and related leave records; worker's compensation claim information; other medical and health insurance information; signature;	<ul style="list-style-type: none"> - Facilitate employment applications, including conducting screenings, interviews, and background checks - Make employment, payroll, and compensation decisions - Make workforce management decisions, including evaluations, internal investigations, and performance reviews - Provide employee benefits, accommodations, and compensation - Protect against unauthorized

		<p>access, security incidents, fraud, or other illegal or malicious activity</p> <ul style="list-style-type: none"> - Investigate, protect, enforce, or defend the legal rights, privacy, safety, or property of us or others - Comply with legal or regulatory obligations
<p>Characteristics of protected classifications under California or federal law</p>	<p>Age; date of birth or age range; gender or gender identity; marital status; military or veteran status; national origin; criminal history or records; income level; drug test records; pregnancy status; racial or ethnic origin; sexual orientation; trade union membership; disabilities; and similar information about your household members and dependents</p>	<ul style="list-style-type: none"> - Facilitate employment applications, including conducting screenings, interviews, and background checks - Make employment, payroll, and compensation decisions - Make workforce management decisions, including evaluations, internal investigations, and performance reviews - Provide employee benefits, accommodations, and compensation - Detect and prevent against unauthorized access, security incidents, fraud, or other illegal or malicious activity - Investigate, protect, enforce, or defend the legal rights, privacy, safety, or property of us or others - Comply with legal or regulatory obligations
<p>Financial information</p>	<p>Bank account number; credit card number, debit card number; or any other financial information</p>	<ul style="list-style-type: none"> - Make employment, payroll, and compensation decisions - Provide employee benefits, accommodations, and compensation
<p>Internet or other electronic activity information</p>	<p>Browsing history on The Pond Sites; clickstream data; browser and operating system type; navigation paths; data/time stamps; cookie identifiers; or other information about device characteristics and how you interact with The Pond Sites or our Services</p>	<ul style="list-style-type: none"> - Network activity; and device platform, version, and other device characteristics which may include settings such as Wi-Fi, Bluetooth, and Global Positioning System ("GPS") - Detect and prevent unauthorized access, security incidents, fraud, or other illegal or malicious activity - Ensure network and information security and compliance with our IT and data privacy and security policies

		<ul style="list-style-type: none"> - Comply with applicable laws and regulatory obligations
Geolocation data	Locational information based upon IP address; and other similar locational data which may be collected from various devices including company-issued mobile device(s)	<ul style="list-style-type: none"> - Recordkeeping for business records - Ensure safety and appropriately restrict physical access
Audio, electronic, visual, or similar information	Employee photos; call and video recordings	<ul style="list-style-type: none"> - Recordkeeping for business records - Ensure safety and appropriately restrict physical access
Professional or employment-related information	Job application details; current employment; employment history; salary, wages, and other compensation data; benefits and entitlement data; bonus payments and amounts; company or entity; business unit or division; employment contract information; employment start date; employment end date; hours of work; job title or role; manager/supervisor; travel booking details; travel history; performance ratings; professional memberships; background check references and related information; military service records and related documentation; employment visa and sponsorship status; past work samples, including artistic portfolios; fillable responses to job application content; and any disciplinary action and/or reason for termination	<ul style="list-style-type: none"> - Facilitate employment applications, including conducting screenings, interviews, and background checks - Make employment, payroll, and compensation decisions - Make workforce management decisions, including evaluations, internal investigations, and performance reviews - Protect against unauthorized access, security incidents, fraud, or other illegal or malicious activity - Investigate, protect, enforce, or defend the legal rights, privacy, safety, or property of us or others - Comply with legal or regulatory obligations
Education information	Academic transcripts; awards or honors; degrees earned; education and training history; grades; languages spoken; and other qualifications and certifications	<ul style="list-style-type: none"> - Facilitate employment applications, including conducting screenings, interviews, and background checks - Make employment, payroll, and compensation decisions - Make workforce management decisions, including evaluations, internal investigations, and performance reviews - Protect against unauthorized access, security incidents, fraud, or other illegal or malicious activity - Investigate, protect, enforce,

		<p>or defend the legal rights, privacy, safety, or property of us or others</p> <ul style="list-style-type: none"> - Comply with legal or regulatory obligations - Inferences
Inferences	Inferences about a job applicant's or employee's preferences; characteristics; psychological trends; predispositions; behavior; attitudes; intelligence; abilities; and aptitudes	<ul style="list-style-type: none"> - Make employment, payroll, and compensation decisions - Comply with legal or regulatory obligations
Sensitive personal information	Social security number; driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; racial or ethnic origin; religious or philosophical beliefs;	<ul style="list-style-type: none"> - Comply with legal or regulatory obligations

Please note that because of the overlapping nature of certain of the categories of personal information identified above, which are required by state law, some of the personal information we collect may be reasonably classified under multiple categories.

B. How We Collect Information About California Job Applicants and Employees

We may collect personal information about California Job Applicants or Employees from the following sources, and may have done so in the last 12 months:

SOURCES OF PERSONAL INFORMATION	HOW	CATEGORIES OF PERSONAL INFORMATION WE COLLECT
Directly from you	We may collect personal information from your employment application and/or over the course of your employment, such as in-person or via email, telephone, electronic messaging, postal mail, social media, or other means.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Financial information - Internet or other electronic activity information - Geolocation data - Audio, electronic, visual, or similar information - Professional or employment-related information - Education information - Sensitive personal information
Automatically	We may collect personal information from you automatically when, for example, you use our information and communication	<ul style="list-style-type: none"> - Internet or other electronic activity information - Geolocation data

	systems.	
Our service providers and third-party vendors	We may collect personal information about you through third party vendors, who may or may not be “service providers” as defined by the CCPA. We use these third-party suppliers to conduct background checks, source application information (such as when an individual applies for a position through LinkedIn), or to identify potential candidates who may be a good fit to work with us (such as outside recruitment agencies).	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act Information - Characteristics of protected classifications under California or federal law - Financial information - Internet or other electronic network activity - Professional or employment-related information - Education information - Sensitive personal information
Other third parties	We may collect personal information about you from recruiters and temporary job placement agencies, other employees, and former employers.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act Information - Characteristics of protected classifications under California or federal law - Financial information - Internet or other electronic network activity - Professional or employment-related information - Education information - Sensitive personal information
Government entities	We may collect personal information about you to assist in providing employee benefits and services to you.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act Information - Characteristics of protected classifications under California or federal law - Commercial or financial information - Professional or employment-related information - Education information - Sensitive personal information

C. Parties To whom We May Disclose Information About California Job Applicants and Employees

We disclose personal information of California Job Applicants and Employees as follows, and we may have done so in the past 12 months.

We do not sell personal information about Employees for money or other valuable consideration. For more information about whether we “sell” for purposes of California law, see the Notice to California Residents section.

The CCPA requires us to state that we do not use or disclose sensitive personal information about job applicants, prospective employees, or current or former employees for purposes other than to perform the services reasonably expected by an average job applicant or employee who applies for a job or is employed by us; to prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information; to resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those reasonable for those actions; or to collect or process sensitive personal information where such collection or processing is for the purpose of inferring characteristics about a job applicant.

CATEGORIES OF THIRD PARTY RECIPIENT	PURPOSE FOR DISCLOSURE	CATEGORIES OF PERSONAL INFORMATION WE MAY SHARE
Our service providers	We may disclose your personal information to our service providers to provide services on our behalf, such as providers of background and credit checks, HR and payroll processing, analytics, hosting, technical support, and other services. These third parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use the information for any other purpose. We put in place appropriate measures to make sure that our service providers keep the personal information confidential and secure.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Financial information - Internal or other electronic activity information - Geolocation data - Audio, electronic, visual, or similar information - Professional or employment-related information - Education information - Sensitive personal information
Benefits providers	We may also disclose personal information about you to our benefits providers, for example, to administer employee payroll, salary, and compensation, to administer employee pensions, IRAs and 401K, health insurance, medical plans, and other employee benefits administration (which may include the collection of personal information about others such as beneficiaries, where necessary to administer such benefits), and to monitor and manage vacation, holiday, sick leave, and other leaves of absences.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Financial Information - Sensitive personal information
Financial institutions	We may disclose personal information about you to financial institutions in order to provide employee compensation.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Financial Information

		<ul style="list-style-type: none"> - Sensitive personal information
Government entities	<p>We may share also personal information with government entities and agencies, regulators, law enforcement, and other third parties, including to comply with applicable laws and regulations, to confirm or verify a California resident's right to work in the United States; to respond to a subpoena, search warrant, or pursuant to other legal process; to establish or exercise our legal rights or for fraud or crime-prevention purposes; or for the protection of the rights, property, or safety of our company or third parties.</p> <p>We may also share personal information in relation to fraud prevention or other unlawful use, including with entities assisting us with an investigation, or as may be required by applicable law.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial or financial information - Geolocation data - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Sensitive personal information
Professional services firms	<p>We may disclose personal information about job applicants or employees to professional services firms that help us comply with our legal and regulatory obligations and establish, enforce, and otherwise exercise our rights and defend against claims, including, for example, auditors, law firms, and consultants.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial or financial information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Sensitive personal information
Successor organizations	<p>Subject to applicable law, we reserve the right to transfer some or all personal information in our possession to a successor organization in the event of a merger, acquisition, bankruptcy, or other sale or transfer of all or a portion of our assets. If any such transaction occurs, the purchaser will be entitled to use and disclose the personal information collected by us in the same manner that we are able to, and the purchaser will assume the rights and obligations regarding personal information as described in this Privacy Policy.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial or financial information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Sensitive personal information

6. If You Are An Advisor

A. Types of Information We Collect About Advisors and Why

We may collect the following categories of personal information about Advisors in California, for the purposes stated in the chart. We may have done this in the past 12 months. This subsection does not contain information about how we may collect, use, and disclose personal information about California residents not related to any employment-related purpose, which is described in the remainder of this Privacy Policy. This subsection does not apply to non-California residents.

CATEGORY OF PERSONAL INFORMATION	EXAMPLES	PURPOSE OF COLLECTION AND USE
Identifiers	First and last name; username and password; mailing address; personal email address; telephone number; employee or personnel number; date of birth; device ID; IP address; and Social Security number	<ul style="list-style-type: none"> - Facilitate applications, including conducting screenings, interviews, and background checks - Communicate with you - Connect you with Registered The Pond Site Users - Pay you - Protect against unauthorized access, security incidents, fraud, or other illegal or malicious activity - Investigate, protect, enforce, or defend the legal rights, privacy, safety, or property of us or others. - Comply with applicable laws and regulatory obligations
California Consumer Records Act information	First and last name; Social Security number; home address; personal email address; telephone number; driver's license number; education and employment history; or bank account numbers, credit or debit card numbers, and other financial information	<ul style="list-style-type: none"> - Facilitate applications, including conducting screenings, interviews, and background checks - Protect against unauthorized access, security incidents, fraud, or other illegal or malicious activity - Investigate, protect, enforce, or defend the legal rights, privacy, safety, or property of us or others. - Comply with applicable laws and regulatory obligations
Characteristics of protected classifications under California or federal law	Age; date of birth or age range; gender or gender identity; marital status; military or veteran status; national origin; criminal history or records; income level; racial or ethnic origin; religious or philosophical beliefs; or sexual orientation	<ul style="list-style-type: none"> - Facilitate applications, including conducting screenings, interviews, and background checks - Connect you with Registered The Pond Site Users - Pay you - Protect against unauthorized access, security incidents, fraud, or other illegal or malicious activity

		<ul style="list-style-type: none"> - Investigate, protect, enforce, or defend the legal rights, privacy, safety, or property of us or others. - Comply with applicable laws and regulatory obligations
Financial information	Bank account number; credit card number; debit card number; or any other financial information	<ul style="list-style-type: none"> - Pay you
Internet or other electronic activity information	Online tracking technology; network activity, clickstream data; and device platform, version, and other device characteristics which may include settings such as Wi-Fi, Bluetooth, and Global Positioning System (“GPS”)	<ul style="list-style-type: none"> - Detect and prevent fraud and malicious activity - Ensure network and information security and compliance with our IT and data privacy and security policies - Comply with applicable laws and regulatory obligations
Geolocation data	Geolocation data based on your IP address	<ul style="list-style-type: none"> - Detect and prevent fraud and malicious activity - Recordkeeping for business records - Comply with applicable laws and regulatory obligations
Audio, electronic, visual, or similar information	Advisor photos and call or video recordings	<ul style="list-style-type: none"> - Recordkeeping for business records - Connect you with Registered The Pond Site Users
Professional or employment-related information	Current employment; employment history; compensation data; company or entity; advising contract information; advising start date; advising end date; performance ratings; professional memberships; background check references and related information; and military service records and related documentation.	<ul style="list-style-type: none"> - Facilitate applications, including conducting screenings, interviews, and background checks - Connect you with Registered The Pond Site Users - Protect against unauthorized access, security incidents, fraud, or other illegal or malicious activity - Investigate, protect, enforce, or defend the legal rights, privacy, safety, or property of us or others - Comply with legal or regulatory obligations
Education information	Academic transcripts; awards or honors; degrees earned; education and training history; grades; languages spoken; and other qualifications and certifications	<ul style="list-style-type: none"> - Facilitate applications, including conducting screenings, interviews, and background checks - Connect you with Registered The Pond Site Users - Protect against unauthorized access, security incidents, fraud, or other illegal or

		malicious activity - Investigate, protect, enforce, or defend the legal rights, privacy, safety, or property of us or others - Comply with legal or regulatory obligations
Inferences	Inferences drawn from any other personal information we may collect to create a profile about preferences; characteristics; psychological trends; predispositions; behavior; attitudes, intelligence, abilities; or aptitudes	- Inferences about your preferences, characteristics, behavior, attitudes, abilities, and aptitudes - Connect you with Registered The Pond Site Users - Comply with legal or regulatory obligations
Sensitive personal information	Social security number; driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; racial or ethnic origin; religious or philosophical beliefs;	- Comply with legal or regulatory obligations

Please note that because of the overlapping nature of certain of the categories of personal information identified above, which are required by state law, some of the personal information we collect may be reasonably classified under multiple categories.

B. How We Collect Information About Advisors and Why

We may collect or have collected personal information about Advisors from the following sources:

SOURCES OF PERSONAL INFORMATION	HOW	CATEGORIES OF PERSONAL INFORMATION WE COLLECT
Directly from you	We may collect personal information from your application to be an Advisor, and/or over the course of your employment, such as in-person or via email, telephone, electronic messaging, postal mail, social media, or other means.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Financial information - Internet or other electronic activity information - Geolocation data - Audio, electronic, visual, or similar information - Professional or employment-related information - Education information - Inferences

		- Sensitive personal information
Automatically	We may collect personal information from you automatically when, logged in, you visit The Pond Sites, as you load The Pond Sites, or as you interact with The Pond, such as when you participate in advising sessions with Registered The Pond Site Users. See See Section 7, Cookie, Pixel, and Session Replay Policy.	- Internet or other electronic activity information - Geolocation data
Our service providers and third-party vendors	We may collect personal information about you from communications and analytics providers; internet service providers; operating systems and platforms; data brokers; and fraud solutions We may also collect personal information about you through third party suppliers, who may or may not be “service providers” as defined by the CCPA. We use these third-party suppliers to conduct background checks, source application information (such as when an individual applies to be an Advisor on LinkedIn), or to identify potential candidates who may be a good fit to work with us and our Registered The Pond Site Users (such as outside recruitment agencies).	- Identifiers - California Consumer Records Act Information - Characteristics of protected classifications under California or federal law - Financial information - Internet or other electronic network activity - Geolocation data - Professional or employment-related information - Education information - Inferences - Sensitive personal information
Other third parties	We may collect personal information about you from recruiters, other employees, and former employers.	- Identifiers - California Consumer Records Act Information - Characteristics of protected classifications under California or federal law - Financial information - Biometric information - Internet or other electronic network activity - Professional or employment-related information - Education information - Inferences - Sensitive personal information
Government entities	We may collect personal information about you to assist in providing employee benefits and services to you.	- Identifiers - California Consumer Records Act Information - Characteristics of protected classifications under California or federal law - Commercial or financial information - Professional or employment-

		related information - Education information - Sensitive personal information
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C. Parties To Whom We May Disclose Information About Advisors

We disclose personal information about Advisors as follows, and we may have done so in the past 12 months.

We do not sell personal information about Advisors for money. For more information about whether we "sell" for purposes of California law, see the Notice to California Residents section.

CATEGORIES OF THIRD PARTY RECIPIENT	PURPOSE FOR DISCLOSURE	CATEGORIES OF PERSONAL INFORMATION WE MAY SHARE
Registered The Pond Site Users	We allow you to share your profile with Registered The Pond Site Users that are interested in connecting with you.	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Financial information - Audio, electronic, visual, or similar information - Professional or employment-related information - Education information - Inferences - Sensitive personal information
Our service providers and third-party vendors	<p>The Pond uses third-party vendors to perform operational functions related to The Pond Sites. Some of these vendors (e.g., marketing automation vendors, email vendors or hosting providers) may have access to your personal information, but only as necessary to provide services to The Pond. If the third-party vendor is The Pond's service provider, The Pond has agreements in place with the vendors requiring your information to be kept confidential and reasonable data security measures used to protect it. We also share your personal information with vendors (for example, marketing automation vendors or hosting providers) as needed to assist The Pond with business operations, but in such instances, these vendors are contractually required to keep your information confidential.</p> <p>We may share personal information with service providers or other third parties to detect, protect against, and respond to security incidents or other malicious, deceptive, illegal, or fraudulent activity or other threats and for legal compliance</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial information - Internet or other electronic activity information - Audio, electronic, visual, or similar information - Professional or employment-related information - Education information - Inferences

	purposes or pursuant to legal process.	
Government entities	<p>We may share personal information with government entities and agencies, regulators, law enforcement, and other third parties, including to comply with applicable laws and regulations, to respond to a subpoena, search warrant, or pursuant to legal process, and to establish or exercise our legal rights or for fraud or crime-prevention purposes or for the protection of the rights, property, or safety of our company or third parties.</p> <p>We may also share personal information in relation to a known or suspected violation of our terms of use, fraud prevention or other unlawful use, including with entities assisting us with an investigation, or as may be required by applicable law.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Inferences
Business partners	<p>We may engage third parties to perform certain functions on our behalf. To do so, we may disclose personal information to our third-party business partners and service providers in order to maintain and operate The Pond Sites and services and provide, improve, and personalize The Pond Sites and services, including to fulfill requests for the Services, and for other technical and processing functions, such as sending e-mails on our behalf and technical support.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Inferences
Successor organizations	<p>Subject to applicable law, we reserve the right to transfer some or all personal information in our possession to a successor organization in the event of a merger, acquisition, bankruptcy, or other sale or transfer of all or a portion of our assets. If any such transaction occurs, the purchaser will be entitled to use and disclose the personal information collected by us in the same manner that we are able to, and the purchaser will assume the rights and obligations regarding personal information as described in this Privacy Policy.</p>	<ul style="list-style-type: none"> - Identifiers - California Consumer Records Act information - Characteristics of protected classifications under California or federal law - Commercial information - Internal or other electronic activity information - Audio, electronic, visual, thermal, olfactory, or similar information - Professional or employment-related information - Education information - Inferences

7. Cookie, Pixel, and Session Replay Policy

A. Usage Info and Cookies

When you access The Pond Sites, our servers automatically collect and record the Internet Protocol ("IP") address associated with your computer. We may also collect additional information such as a device ID, browser type and version, the operating system of your device and language, country, as well as the date and time of visits, your IP address, the pages viewed, time spent on The Pond Sites, and the websites visited just before and just after a The Pond Site. This information is used to help us administer The Pond Sites. This information may be appended to your profile information to remember your preferences, and diagnose technical problems.

To collect this information, we use cookies. Cookies are small data files sent by a website and stored on the computer or device at the request of that site. Cookies store information related to a user's browser to enable us to recognize your device on return visits to The Pond Sites and to remember your preferences.

Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. If you want to block the use and saving of cookies from The Pond Sites on to the computer's hard drive, you should take the necessary steps within your web browser's settings to block all cookies from the Services and external serving vendors. Please note that if you choose to erase or block your cookies, certain parts of our Services may not function correctly. For information on how to disable cookies, refer to your browser's documentation.

We may also use web beacons, pixels, or similar collection mechanisms, and in certain circumstances may collect IP address, screen resolution and browser software and operating system types, clickstream patterns, dates and times that our site is accessed, and other categories of data.

The Pond Sites currently use Google Analytics. Please read "How Google uses data when you use our partners' sites or apps," which you can find at www.google.com/policies/privacy/partners/, for information about how Google Analytics collects and processes data. If you wish to opt out of Google Analytics, please visit <https://tools.google.com/dlpage/gaoptout>.

B. Do-Not-Track

The Pond Sites do not support Do-Not-Track functionality. Do-Not-Track is a preference you can set on your web browser to inform websites that you do not want to be "tracked" by third parties. The Pond does not respond to Do-Not-Track Signals as it does not track you when you leave a The Pond Site. The Pond's third party service providers, who provide ad serving, retargeting services and web analytics services to The Pond, may not respond to Do-Not-Track signals. If an individual comes to a The Pond Site directly with a Do-Not-Track signal enabled on such individual's browser, The Pond does not look for the Do-Not-Track signal or respond to it.

C. Interest Based Advertising

We do not display advertisements on The Pond Sites but we do participate in interest-based advertising to place advertisements on unaffiliated sites using information you provide us when you interact with The Pond Sites. Interest-based ads, also known as personalized ads, are ads that are targeted to you based on your web browsing and app usage over time and across websites or apps. For example, The Pond Sites may use third-party ad servers, retargeting services, and web analytics systems, such as Google, to analyze aggregate web usage statistics and provide us the ability to display advertisements about our services to you when you have left our site.

You have the option to restrict the use of information for interest-based advertising and to opt-out of receiving interest-based ads. Some of these third parties may use cookies and other technologies to collect information about your online activities over time and across third party websites or online services to deliver advertising based on your interests and preferences, as inferred from your browsing history. Some of these ads may be personalized, meaning that they are intended to be relevant to you based on information that those third parties Providers collect about your visits to this site and elsewhere over time.

To learn more about this type of advertising and how to opt-out of this form of advertising, you may either visit optout.aboutads.info to opt-out of sites and services participating in the Digital Advertising Alliance (“DAA”) self-regulatory program, or visit optout.networkadvertising.org to opt-out of this form of advertising by members of the Network Advertising Initiative (“NAI”). Note that electing to opt-out will not stop advertising from appearing in your browser or applications, although it may make the ads you see less relevant to your interests. This opt-out works through cookies set on a particular browser, so if you delete cookies from a web browser, or use a different browser, you will need to opt out again.

Your choice to opt out on a particular browser or device will apply only to the collection and use of information from that particular browser or device. Opting out on a particular device will not opt you out of information collection on other devices, nor will it limit cross-device sharing on those other devices. If you use different browsers on a device or multiple devices, for each browser and device you wish to opt out, please opt out each device and browser separately at optout.aboutads.info and at optout.networkadvertising.org

D. Session Replay

The Pond Sites use session replay technology. Session replay is a reconstruction presentation of how an individual experiences a website or mobile application. It captures things like clicks, mouse movements, and page scrolls, and generates a walkthrough-style video of what the individual did while on a site enabled with it. We use session replay technology to understand how you and other individual’s experience our Sites and how to enhance or improve them, our products, and services. We do not use session replay technology to collect information that is inconsistent with your intent, and we do not use it to record sensitive information related to credit cards. We do not provide information gathers to third parties other than our service providers.

The Pond Sites use Hotjar. For information on how Hotjar may collect and use your personal information, please review [Hotjar’s Privacy Policy](#).

8. Aggregated, De-identified, or Anonymized Data

We may create aggregated, de-identified, or anonymous information from personal information by removing certain data components (such as your name, email address, or linkable tracking ID) that makes the data identifiable, or through aggregation, obfuscation or other means. For example, we may use aggregated, de-identified, or anonymized information to understand how to improve or enhance The Pond Sites. Subject to applicable law, our use of such aggregated, de-identified, or anonymized information is not personal information or subject to this Privacy Policy.

9. Your Privacy Choices

You have certain choices with respect to your personal information.

A. Access or Update Your Information

If you have registered for an online account with us, you may review and update certain account information from your account. You can update your account information by contacting us at customerservice@letitu.io.

You have the option to set your profile preference to either public or private. If your profile is public, the information you include in your profile will be viewable to colleges. If your profile is private, your profile will only be visible to you. Your profile will never be shared with other individuals. We also allow you to share your profile with colleges that are interested in connecting with you. We give you control over whether you want to make your profile public to colleges and what information you wish to include in your public profile. Your personal information is only viewable to colleges when you choose to make your profile public and your profile is never visible to other Registered The Pond Site User or The Pond Site Visitor.

You may close your account on a The Pond Site via the “Delete” button located on your Account page. You may also close your account by sending an email to customerservice@letitu.io and we will remove your personal information from our active database. Once your account is closed, we will discard your personally identifiable data, but we may retain certain data for internal business purposes, such as analysis of non-personally identifiable data, or as may be required by applicable law.

B. Update Your Communications Preferences

We may use your contact information to send you e-mail messages regarding updates to The Pond Site, such as the publication of new The Pond information and content, promotional offers, or to communicate with you about your use of The Pond Sites. The frequency of these messages will vary depending upon your profile. You may opt-out of receiving these emails at any time via the unsubscribe link contained in the email message.

We may invite you to participate in surveys, contests and other promotions relevant to the college search process. If you participate, your personal information may be shared with third party partners to process entries and send you promotional material. Please consult the official rules of any contest or sweepstakes you enter on a The Pond Site as specific data collection, usage, and information sharing practices may vary by contest and sweepstakes. Survey information will be used to monitor or improve The Pond Sites, but we will not share individual responses to a survey without your consent.

The Pond will communicate with you only according to your listed preferences. We may use your contact information to send you messages regarding updates to The Pond Site, such as the publication of new The Pond information and content, promotional offers, or to communicate with you about your use of The Pond Sites. The frequency of these messages will vary depending upon your profile. You may opt-out of receiving these messages by following the unsubscribe link contained in the message, or by contacting our customer support team at customerservice@letitu.io. Please be advised that you may not be able to opt-out of receiving certain messages from us, including legal notices.

C. Exercise Rights Based on Your State of Residency

Residents of certain states may have additional or different rights as described elsewhere in this Policy.

In order to opt-out of third-party communications, you will need to contact the applicable third party. If you have any questions relating to opting-out, please contact us at customerservice@letitu.io.

10. Localization of Data Storage and Processing

The Pond Sites are operated in the United States. If you are located outside of the United States, any information you provide to us will be transferred to, processed, and/or maintained in the United States. If you are located outside of the United States, the transfer of personal information may be necessary to provide you with the requested information and services and/or to perform any requested transaction.

11. Data Security

We have taken steps to secure and protect your personal information from loss, unauthorized access, unauthorized disclosure, misuse, destruction, or alteration. However, there is always some risk involved in transmitting information over the Internet, and we cannot fully eliminate security risks associated with the storage and transmission of personal information.

We will assume that anyone who has the required login/password information for your account is you, so please keep this information confidential. If you have an account with us and you suspect any unauthorized use of your account or password, or that the security of your account has otherwise been compromised, you should notify us immediately, in accordance with the "Contact Us" section below. If you have any questions about security issues, please e-mail us at customerservice@letitu.io.

12. Links to Other Websites and Artificial Intelligence Technologies

The Pond Sites contains links to other websites, including social networking websites, mobile applications, Internet locations, or generative artificial intelligence or similar technologies ("AI Technologies"; all, collectively "Third-Party Sites"). The fact that we link to a website or provide the ability to use an AI Technology through The Pond Sites is not an endorsement or representation of an affiliation with that website. We have no control over and are not responsible for Third-Party Sites, their privacy practices, their content, or any goods or services available through the Third-Party Sites. Our Privacy Statement does not apply to Third-Party Sites, including to any information you provide to an AI Technology offered through the CollegeView Sites; any information you provide to a Third-Party Site or AI Technology is subject to that Third-Party Site's privacy policy or privacy statement. You should carefully review the applicable privacy policies or privacy statements before using or engaging with any Third-Party Site or AI Technology on any of The Pond Sites. Please be aware that the AI Technology, and some other Third-Party Sites, may use the information you provide to it to improve its model, products, or services. Before providing any such information, you should consider whether the inclusion of that information could cause you or someone else embarrassment, distress, unease, guilt, or humiliation and whether you would be comfortable having that information used to improve the AI Technology's or Third-Party Site's models, productions, and services.

The Pond Sites may include social network sharing widgets that may provide information to their associated social networks or third-parties about your interactions with our web pages that you visit,

even if you do not click on or otherwise interact with the plug-in or widget. Information is transmitted from your browser and may include an identifier assigned by the social network or third party, information about your browser type, operating system, device type, IP address, and the URL of the web page where the widget appears. If you use social networking tools or visit social networking sites, we encourage you to read their privacy disclosures to learn what information they collect, use, and share.

13. Children's Policy

The Pond Sites and the services offered are not directed to or intended for use by children under 13 years of age. We do not knowingly collect or solicit personal information from anyone under the age of 13, or knowingly allow such persons to register for our services, without parental consent. No one under age 13 may provide any personal information to The Pond or on The Pond Sites. If you are under 13, please do not attempt to register for The Pond Sites or send any information about yourself to us, including your name, address, telephone number, or email address. If we learn that we have inadvertently collected personal information from an individual under age 13 without parental consent, we will take steps to delete the data as permitted by law. If you believe that we might have any information from or about an individual under age 13, please contact us at customerservice@letitu.io.

14. Notice to California Residents

Subject to certain exceptions and limitations (such as inapplicability to personal information about individuals in their capacity as an employee), if you are a California resident, you may have the following rights under applicable California law in relation to your personal information:

- Right to Know. You may have the right to, up to twice in a 12-month period, request what personal information we collect, use, share, disclose, and/or sell, as applicable.
- Right to Delete. You may have the right to request under certain circumstances the deletion of your personal information that is collected by us from you.
- Right to Correct. You may have the right to correct inaccurate information that we maintain about you.
- Right to Opt-Out of Sale or Sharing. You may have the right to opt-out of the sale or sharing of your personal information by a business.
- Right to Non-Discrimination. You have the right not to receive discriminatory treatment for the exercise of the privacy rights described above.

15. How to Submit a Request

Subject to various exclusions and exceptions under applicable laws, you may exercise any of the rights described in this section by contacting us by email at customerservice@letitu.io.

Any request you submit to us is subject to an identification and residency verification process ("Verifiable Consumer Request") as permitted by the CCPA. We cannot fulfill your request unless you have provided sufficient information, including your first and last name and email address, that allows enables us to reasonably verify that you are the consumer about whom we collected the personal information. You may only make a Verifiable Consumer Request twice within a 12-month period.

We will respond to your request within forty-five (45) days upon receipt of a Verifiable Consumer Request. We reserve the right to extend the response time by an additional forty-five (45) days when reasonably necessary, provided that consumer notification of the extension is made within the first forty-five (45) days.

If we cannot verify your identity to a degree of certainty as required by the CCPA through any reasonable method, we will state in writing that we are unable to verify you and provide a reason as to why there is no reasonable method by which we can verify your identity. We will evaluate our methods for verifying the identity of all consumers who request to know or delete personal information on a yearly basis.

A. Authorized Agents

You may also designate an authorized agent, in writing or through a power of attorney, to request to exercise the above rights on your behalf. If you should use an authorized agent to exercise your various rights under the CCPA, we may require that you provide your authorized agent with written permission to exercise your various rights and to verify your own identity with us. If your authorized agent does not submit proof that they have been authorized by you to submit verified requests for disclosure and deletion, we reserve the right to deny such a request that we have received and will explain to your authorized agent why we have denied such request. The authorized agent may submit a request to exercise these rights by emailing the letter of authorization or power of attorney to us, as described in How to submit a request. If the authorized agent does so by email, they should include proof of their authorization to submit the request on your behalf in their email.

B. Opting Out of the Sale or Sharing of Personal Information

The CCPA defines “sale” to include data transfers for monetary or other valuable consideration. We do not sell or share your personal information to third parties based on the CCPA definitions of “sell” and “share”.

As stated above in the data collection sections, we collect and transmit your data to third party service providers in order to deliver services to you.

C. California “Shine The Light” law

Under California’s “Shine The Light” law (California Civil Code § 1798.83), California residents are entitled to request, once a year and free of charge, certain information regarding what types of their personal information may be disclosed to third parties and, in some cases, affiliates, for those third parties’ and affiliates’ own direct marketing purposes. Under this law, a business is to either provide California customers certain information upon request or permit California customers to opt-out of this type of disclosure. You may request this information by contacting us at customerservice@letitu.io and indicate in the e-mail subject line, “California Shine The Light Request.” Please include your mailing address, state of residence and e-mail address with your request.

16. Updates to this Policy

We may update this policy from time to time. The “effective date” at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy on The Pond Sites. We encourage you to routinely review this Privacy Policy to learn

about updates to our privacy practices.

17. Contact Us

For more information or if you have questions or concerns about our privacy practices, please contact us by email at customerservice@letitu.io.