

# Privacy Policy

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This Privacy Policy describes how Kollegio AI Inc. (“**Kollegio**,” “**we**,” “**us**” or “**our**”) processes personal information that we collect through the digital properties that we own or control and that post or link to this Privacy Policy, including our website, <https://www.kollegio.ai>, and any associated services provided by Kollegio (collectively, the “**Service**”), as well as through social media pages, our marketing activities and other activities described in this Privacy Policy.

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## Personal information we collect

**Information you provide to us.** Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, email address, and phone number.
- **Account data**, such as the username and password that you may set to establish an online account with us; information that you may choose to add to your account profile, such as your date of birth, racial and ethnic origin, personal financial data, mailing address, parent income level, location (state, country), colleges applied to, and college essays; and information about your interests and preferences.
- **Education data**, such as your SAT/ACT scores, GPA, high school name and class rank.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, social media, or otherwise.
- **Research data**, such as your responses to surveys that we might ask you to complete for research purposes related to our business.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Payment data**, needed to complete transactions, including payment card information or bank account number.

- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third-party sources.** We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as social media platforms and other publicly available sources.
- **Private sources**, such as data providers and data licensors.
- **Third-party services**, such as Google, that you use to log into, or otherwise link to, your Service account. This data may include your username, profile picture and other information associated with your account on that third-party service that is made available to us based on your account settings on that service.

**Automatic data collection.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or general geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Communication interaction data** such as your interactions with our email or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

**Automatic data collection technologies.** Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users’ web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both “session cookies” that are deleted when a session ends, “persistent cookies” that remain longer, “first party” cookies that we place and “third party” cookies that our third-party business partners and service providers place.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

## How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery and operations.** We may use your personal information to:

- provide and operate the Service and our business;
- personalize the Service, including remembering the devices from which you have previously logged in and remembering your selections and preferences as you navigate the Service;
- establish and maintain your user account;
- communicate with you about the Service and our business, including by sending Service/business-related announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience on the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

**Research and development.** We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services. As part of these activities, we may create aggregated, de-identified and/or anonymized data from personal information we collect. We make personal information into de-identified or anonymized data by removing information that makes the data personally identifiable to you. We may use this aggregated, de-identified or otherwise anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

**Marketing.** We may send you direct marketing communications. You may opt-out of our marketing communications as described in the Opt-out of marketing communications section below.

**Automatic data collection technologies.** In addition to the other uses included in this section, we may use the automatic data collection technologies described above for the following purposes:

- **Technical operation.** To allow the technical operation of the Service.
- **Functionality.** To enhance the performance and functionality of the Service.
- **Analytics.** To help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails. For example, we use Google Analytics for this purpose. To provide this service, Google Analytics may collect certain information about you from your computer using cookies. You can learn more about Google Analytics and how it collects and processes data by visiting: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can opt-out of the use of Google Analytics here: <https://tools.google.com/dlpage/gaoptout?hl=en>. We also use Mixpanel for analytics purposes. You can learn more about Mixpanel and how it collects and processes data by visiting: <https://mixpanel.com/legal/privacy-policy/>.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);

- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**With your consent.** In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

## How we share your personal information

We may disclose your personal information to the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.

**Service providers.** Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, artificial intelligence and large language modeling including generative artificial intelligence, customer support, email delivery, marketing, research and analytics).

**Payment processors.** Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as Stripe. Stripe may use your payment data in accordance with its privacy policy, <https://stripe.com/privacy>.

**Business and marketing partners.** Third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

**Business transferees.** We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in Kollegio, financing of Kollegio, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Kollegio as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

## Your choices

In this section, we describe the rights and choices available to all users.

**Access or update your information.** If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

**Opt-out of marketing communications.** You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email. You may also opt-out of marketing-related emails or marketing-related mailings by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other

non-marketing emails.

**Mobile location data.** You can disable our access to your device’s precise geolocation in your mobile device settings.

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

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

## **Other sites and services**

The Service may contain links to third party websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions, nor are they subject to this Privacy Policy. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

## **Security**

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

## **International data transfer**

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

## **Children**

The Service is not intended for use by anyone under 13 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child’s parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

## **Changes to this Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

## **How to contact us**

To exercise your choices or if you have questions about this Privacy Policy or our privacy practices, please contact us at [support@kollegio.ai](mailto:support@kollegio.ai).