

COGNOMOS PRIVACY POLICY

Last Updated: June 23, 2017

This Privacy Policy explains how information about you is collected, used and disclosed by Cognomos, Inc. ("Cognomos"). This Privacy Policy applies to information we collect when you use our website(s) and other online products and services (collectively, the "Services") or when you otherwise interact with us.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to review the Privacy Policy whenever you access the Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

Collection of Information

Information You Provide to Us. We collect information you provide directly to us. For example, we collect information when you create an account, participate in any interactive features of the Services, fill out a form, rank a class, communicate with us via third party social media sites, request customer support or otherwise communicate with us. The types of information we may collect include your name, email address, ranking of a class, desired classes, student group memberships, and any other information you or your university administrators choose to provide.

Information We Collect Automatically When You Use the Services. When you access or use our Services, we automatically collect information about you, including:

- **Log Information:** We collect log information about your use of the Services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Services.
- **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.
- **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular and count visits. Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see "Your Choices" below.

Use of Information

We may use information about you for various purposes, including to:

- Provide, maintain and improve our Services;
- Provide and deliver the products and services you request, process transactions and send you related information, including confirmations and invoices;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Respond to your comments, questions and requests and provide customer service;
- Communicate with you about products, services, offers, promotions, and events offered by Cognomos, and provide news and information we think will be of interest to you (you may opt out of this at any time by notifying us at privacy@cognomos.com);
- Monitor and analyze trends, usage and activities in connection with our Services, and provide analytics to your school's administrators;

- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of Cognomos and others;
- Personalize and improve the Services and provide advertisements, content or features that match user profiles or interests;
- Link or combine with information we get from others to help understand your needs and provide you with better service; and
- Carry out any other purpose for which the information was collected.

Sharing of Information

We may share information about you as follows or as otherwise described in this Privacy Policy:

- With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of Cognomos or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among Cognomos and its current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

Certain organizations using Cognomos are schools that are subject to FERPA – a federal law that protects the privacy of a student’s education records. FERPA does not allow schools to disclose personally identifiable information from student education records as defined under FERPA (“Educational Records”) without a student’s (or his parent’s, if the student is under 18) written consent, unless the disclosure meets the requirements of an exception.

All use and maintenance of any Educational Records subject to FERPA (and not otherwise subject to an applicable exception) is under the direct control of the applicable organization, and such Educational Records will only be used for authorized purposes and may not be re-disclosed to other parties unless we have specific authorization from the organization to do so and it is otherwise permitted by FERPA.

Analytics Services Provided by Others

We may allow others to provide analytics services on our behalf across the Internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used by Cognomos and others to, among other things, analyze and track data and better understand your online activity.

Security

Cognomos takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

Transfer of Information to the U.S. and Other Countries

Cognomos is based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing, transfer and storage of information in and to the U.S. and other countries, where you may not have the same rights and protections as you do under local law.

Your Choices

Account Information. You may update, correct or delete information about you at any time by logging into your online account. If you wish to delete your account, please email us at account@cognomos.com, but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

Cookies. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

Promotional Communications. You may opt out of receiving promotional emails from Cognomos by following the instructions in those emails. If you opt out, we may still send you non-promotional communications, such as those about your account or our ongoing business relations.

Contact Us

If you have any questions about this Privacy Policy, please contact us at: privacy@cognomos.com.