# PRIVACY POLICY

This Privacy Policy ("Policy") describes the privacy practices applicable to ACBS ("Association of Colleges and Business Schools" "we" or "our"), including the website at ACBS global and other sites or applications that are under our control if we post the Policy to the site or application (collectively, "Sites"). The Policy explains how personal information about you may be collected, used, and disclosed by us. The Policy also explains the choices you may have regarding your personal information that is subject to this Policy. This Policy does not apply, and any conflicting terms herein will be superseded if another policy or written agreement applies to you.

#### 1. INFORMATION WE COLLECT

Due to the nature of our organization, we collect and receive Personal Information and other information from a variety of sources and in a variety of ways, including those listed below. Personal Information means information relating to an identified or identifiable natural person. Personal Information does not include information that has been de-identified, pseudonymized or anonymized to the extent permitted by applicable law.

Interactions with the Sites and Us. When you visit the Sites, you may choose to provide Personal Information and other information, such as your name, your date of birth, postal address, email address, and telephone number. Although not required, you may also choose to provide personal demographic information, such as ethnicity, race, and gender. For example, you will provide Personal Information to fill out our online help form, sign up for our mailing list, and fill out surveys. You may provide Personal Information when you contact us by email or telephone or participate in events sponsored by us or our partners. In some cases, another party may provide your Personal Information on your behalf, such as when an employer registers a group of employees for an event.

We collect Personal Information and other information about a variety of individuals during our conferences. We may also collect Personal Information when filing a complaint report. For example, ACBS staff will request a name and email address from the individual who files a complaint. The type of Personal Information and other information depends on the nature of the matter and may include additional information such as a postal address, additional email addresses, telephone number, and other unique identifiers.

**Institutions.** We collect Personal Information and other information about individuals associated with Institutions that we engage, such as name, postal address, email address, and telephone number.

**Job Applications.** We collect Personal Information and other information when you apply for a job with us, including your name, postal address, email address, telephone number, and information on your resume.

**Transactions.** We may collect Personal Information when you enter into other transactions with us.

**Device and Browser Information.** When you visit our Sites, we may collect information, such as the type of browser and operating system you are using, the domain name of your Internet service provider, which pages you visit and how long you spend on each page, your geographic location, and the unique number (such as IP address) assigned to your server or Internet connection. Additional information is provided about this type of data collection in Section 2.

**Social Media Sites.** If any Sites are accessible through or link to third-party social networking sites and you use such features, or you interact with our social networking sites, we may have access to Personal Information you provide as well as other information associated with your social media account (such

as your name, email address, and photograph). If you are a member of the social networking site, the social networking site may connect your visit to the Sites with your Personal Information.

**Other Information.** We may obtain Personal Information about you from third parties, including entities that direct you to or are accessible via the Sites, and our affiliates and partners.

You can visit the Sites without disclosing any Personal Information about yourself. However, without your Personal Information, we may not be able to fulfill all the functions described above. For example, you will need to submit Personal Information to file a complaint, apply for a job, pay related fees via the Sites, and, in some cases, participate in other activities.

#### 2. COOKIES AND SIMILAR TECHNOLOGIES

#### A. Use of Cookies

When you visit the Sites, we may place, or authorize third parties to place a cookie on your computer or device. A "cookie" is a small text file that is stored on your computer or device. The use of cookies enables us to obtain information about your use of the Sites, such as whether you have visited the Sites more than once and how you found us. Cookies are also used to improve your experience on the Sites, such as recognizing you when you return. You may delete cookies from your device or set your browser to reject cookies. However, if you reject cookies by changing your browser setting, then be aware that this may disable some of the functionality on the Sites. In addition, blocking or deleting browser cookies may not block other types of cookies. We may also use other types of tracking technologies, such as web beacons, HTML5 and Flash Local Storage. The Sites do not respond to "Do Not Track" or other automated signals on browsers.

#### B. Analytics

### 3. THE WAY WE USE INFORMATION

We use Personal Information and other information for the purposes described below.

To provide help filing a complaint and other interactions.

- To respond to your online, email, telephone or in-person inquiries.
- To contact you regarding our services, fulfill your requests made on the Sites and through other interactions with us.
- To provide you with informational materials.
- To promote, administer and conduct events, such as webinars and in-person events.
- To improve the functionality, customization, personalization, security, design and/or content of the Sites.
- To conduct web analytics, including analyzing usage and patterns on the Sites.
- To aggregate and/or deidentify information from you and other users of the Sites.

- To develop new products and services.
- To administer, fulfill, and enforce contractual obligations.
- To evaluate job applicants.
- For compliance purposes and legal obligations, such as complying with legal and regulatory requirements, protecting and defending us and our affiliates against legal actions or claims, and preventing fraud.

In addition, if you provide your postal address, telephone number, or email address to us or through the Sites, you may receive any of the following periodic contacts from ACBS.

- Mail or telephone contact to invite you to support or volunteer for ACBS; to help ACBS achieve its mission; and to provide information about ACBS's programs and events.
- Email contact to respond to your questions, comments or suggestions; alert you to ACBS news
  updates and programs; invite you to ACBS events; invite you to help ACBS achieve its mission;
  and to support or volunteer for ACBS.

See Section 5 for opt-out options.

### 4. DISCLOSURE OF PERSONAL INFORMATION

Your Personal Information may be shared with third parties as follows:

With persons who are involved in our legal matters, such as opposing counsel, co-counsel, courts and government bodies and experts.

With select partners. For example, we may share your Personal Information with persons who volunteer with us and with partners that co-host events with us.

With third parties that we engage to provide services to us, such as processing payments, processing job applications, maintaining the Sites and analyzing the Sites.

We may share with third parties' information that has been de-identified or anonymized such that the third party cannot personally identify you from the information we share.

We may also share or transfer your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets, or in preparation for any of these events.

We may disclose your information if we believe that the Sites are being used to commit unlawful acts; if disclosure of your information is required to comply with applicable laws or regulations or with a court or administrative order or will help to enforce any applicable terms of use; to protect your safety or security, including the safety and security of property; or to protect the safety and security of the Sites or third parties.

We may share your Personal Information with other parties based on your consent.

### 5. YOUR OPTIONS

If you wish to opt out of receiving any solicitations from us, please contact us at the email or postal address listed in Section 12. Even if you opt-out, we may still use and share the information we collect for transactional purposes.

Certain emails we send may include an automated way for you to opt out (unsubscribe) from emails sent by us. To unsubscribe, please follow the instructions in the email you receive.

# 6. THIRD PARTY WEBSITES

The Sites may contain links (including social media widgets) that may direct you outside of the Sites to other Internet locations, such as third-party websites. You should be aware that such third parties may collect data from or about you, which is beyond ACBS's control. In some cases, a link on the Sites may direct you to a platform operated by our service provider. For example, if you apply for employment on the Sites, you will be directed to a form operated by (e.g., your HR Company), which has its own privacy policy. ACBS is not responsible for any use or misuse of personal information by third parties. We may also provide information at the Sites about programs and events that are sponsored by or co-sponsored by other firms or organizations. If you register for any of these events, we may have no control over the third-party sponsors' use of your information. You should always review the privacy policies of third parties before you provide any personal information or complete any transaction with such parties, whether you are linked to a new website, or a platform operated by a service provider from the Sites.

## 7. SECURITY OF PERSONAL DATA

Although we employ technical and organizational controls that we believe are reasonably appropriate to protect your information, we do not guarantee that our security precautions will protect against the loss or misuse of your information. Similarly, we cannot guarantee the privacy of information you transmit over the Internet or that may be collected in transit by others, including contractors that provide services to us.

#### 8. MINORS

You must be at least 18 years old or the age in your applicable jurisdiction to enter into a contract, whichever is older, to use the Sites. None of the content and information on the Sites is targeted towards children under 13 years of age. However, if you become aware that we have collected Personal Information from a minor through the Sites without your consent or other legal justification, and you are the minor's parent or guardian, please contact us at the email or postal address listed in Section 12.

## 9. UNITED STATES POLICY

ACBS is organized in the United States. Personal information provided in jurisdictions outside of the United States will be transferred to and processed in the United States and other locations. By providing us your Personal Information, you consent to the transfer to and processing of your Personal Information in the United States. We make no representation that the practices described in this Policy are compliant with laws outside of the United States that apply to the collection, security, use, and disclosure of information. If you are located outside the United States, please be advised that some jurisdictions, such as the European Economic Area and the United Kingdom, do not consider the privacy protections in the United States to be adequate. When information is transferred to the United States, it will be handled in accordance with the laws of the United States.

## 10. DATA RETENTION

We will retain your Personal Information for as long as necessary to provide any information you request; as necessary for the performance of legal agreements; to comply with legal obligations, including document preservation practices; to resolve disputes; during applicable statutes of limitations; in accordance with our internal document retention policy; and for other legitimate purposes.

# 11. PRIVACY POLICY REVISIONS

ACBS reserves the right to modify this Policy at any time. Changes to the Policy shall become effective as of the date they are posted to the Sites. Please review this Policy from time to time to ensure your familiarity with its terms. By continuing to access or use the Sites after changes become effective, you agree to be bound by the terms of the revised Policy.