

Keypath Privacy Policy

Last updated: August 2022

This Privacy Policy (this “Privacy Policy”) applies to your access and use of the website located at www.keypathedu.com, which we refer to as the “Site.” Use of the term “Site” also includes any associated mobile application (“app”), and any content, functionality, and services offered on or through the Site or associated app.

YOU SHOULD CAREFULLY READ THIS PRIVACY POLICY. BY ACCESSING, BROWSING, OR OTHERWISE USING THE SITE, YOU ARE ACKNOWLEDGING THAT YOU HAVE READ, UNDERSTOOD, AND AGREED TO BE BOUND BY THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY AND WOULD PREFER THAT WE NOT COLLECT, USE, OR SHARE YOUR INFORMATION AS WE DESCRIBE, YOU SHOULD NOT USE THE SITE OR PROVIDE US WITH ANY INFORMATION.

WE MAY MAKE CHANGES TO THIS PRIVACY POLICY. ANY MODIFICATIONS WILL BE EFFECTIVE WHEN THE CHANGES ARE POSTED TO THE SITE. YOU CAN REVIEW THE MOST CURRENT VERSION OF THIS PRIVACY POLICY AT ANY TIME BY ACCESSING THE SECTION OF THE SITE LABELED PRIVACY POLICY, AND YOU CAN DETERMINE WHEN THIS PRIVACY POLICY WAS LAST REVISED BY REFERRING TO THE “LAST UPDATED” LEGEND AT THE TOP OF THIS PRIVACY POLICY. YOU ARE EXPECTED TO CHECK THIS PRIVACY POLICY FROM TIME TO TIME TO TAKE NOTICE OF ANY CHANGES. YOU UNDERSTAND AND AGREE THAT YOUR CONTINUED ACCESS TO OR USE OF THE SITE AFTER ANY POSTED MODIFICATION TO THIS PRIVACY POLICY INDICATES YOUR ACCEPTANCE OF THE MODIFICATION, EVEN IF YOU DID NOT TAKE THE TIME TO READ THE MODIFICATION. NOTWITHSTANDING THE FOREGOING, ANY MODIFICATION TO THIS PRIVACY POLICY SHALL NOT APPLY TO ANY DISPUTE BETWEEN US ARISING PRIOR TO THE DATE ON WHICH WE POST THE REVISED PRIVACY POLICY THAT CONTAINS SUCH MODIFICATION.

OUR COMMITMENT TO PRIVACY

The Site is owned and operated by Keypath Education International, Inc. (who we refer to, together with our affiliates, as “Keypath,” “us,” “we,” or “our,” depending in the context).

We take the privacy of users of this site seriously. References in this Privacy Policy to “you” and “your” refer to you as a visitor to and user of the Site.

This Privacy Policy explains:

- What information we collect, how we collect that information, and how we use that information,
- When and with whom we may share information we collect, and

- Your choices regarding your personal information.

This Privacy Policy applies only to information provided and collected through the Site. It does not apply to information that we or other parties may collect through other means, such as through any business relationship between us and your institution. This Privacy Policy also does not apply to information that you submit on other websites, even if we communicate with you on those sites, or provide a link to those sites through our Site. For example, if you post something on Facebook, LinkedIn, Twitter, or other social media or networking sites, that information is governed by the privacy policies of those sites, not by this Privacy Policy. In addition, if you are a prospective, former, or current student that has interacted with one of our partner schools in connection with any educational programs they may offer, the information you provide in that context will be governed by the privacy policy of that partner school as well as the terms of any specific privacy policy we have made available to you in the course of those interactions.

COLLECTION AND USE OF PERSONAL INFORMATION

How We Collect Personal Information

“Personal Information” refers to information that can be used to personally identify you, a specific individual. Different country, state and provincial laws define Personal Information (or similar terms, such as “personally identifiable information”) differently, but Personal Information generally includes information such as your name, mailing address, e-mail address, and phone number. It may also include the IP address of your computer or mobile device if that IP address can be associated with other information and used to identify a particular person, or geo-location information, again if that information can be used to pinpoint a specific party.

We will collect Personal Information from you only if you voluntarily provide it to us. For example, when you contact us, such as through the “Contact Us” or similar links on the Site, or when you subscribe our resources, we will have access to your name, email address, and any other information you choose to include in your correspondence. If you participate in any other interactive area of our Site, we will collect any Personal Information that you include as a part of your participation.

In addition, some mobile network providers (“Mobile Provider”) use technology that tracks the physical location of mobile devices that use their service. Depending on your Mobile Provider and mobile device, we may automatically receive this information, which, as noted above may be considered Personal Information. Most mobile devices provide users with the ability to disable location services. These controls are usually located in the mobile device’s settings menu. If you have questions about how to disable your mobile device’s location services, you should contact your Mobile Provider or your mobile device manufacturer.

How We Use Personal Information

We use the Personal Information we collect through the Site to respond to your inquiries, to provide you with the resources and services you request, and to contact you regarding other services we offer that may be of interest to you. We may also use Personal Information collected through the Site for research regarding the effectiveness of the Site and our business planning, research,

marketing, advertising, and sales efforts. In addition, if we begin to offer services that use location tracking (“pinpointing”) information, then if we have your “opt-in” consent to do so we may use and store that information to provide location-based services, including location-targeted advertising.

We may combine and enhance the Personal Information we receive with information we receive from third parties as long as we use the combined information as described in this Privacy Policy. In addition, we may use your Personal Information to generate non-personal information, such as demographic information that helps us understand the general characteristics of our users. When we do so, we will take reasonable measures to ensure that the information is no longer personally identifiable and cannot later be used to identify you.

You are in control over whether you provide us with any Personal Information. If you are not comfortable with our accessing and using the Personal Information as described, you should not provide it (and should take steps to disable any technology that automatically provides us with Personal Information). This may affect our ability to provide you with information and services through the Site; however, that is your choice.

COLLECTION AND USE OF NON-PERSONAL INFORMATION

How We Collect Non-Personal Information

Whenever you interact with the Site, we automatically receive and record information from your browser, such as your IP address, the type of browser or application you are using to access the Site, the identity of the Site page or feature you are requesting. None of this information, on its own, is considered Personal Information (unless and until it is actually combined with information in a way that would allow someone to identify a specific individual).

Our Site may use “cookies” or other tracking technologies to track how you use the Site. We also may send instructions to your computer or device using JavaScript or other computer languages to gather the sorts of information described above and other details about your interactions with the Site. A cookie is a file stored on your computer or device to uniquely identify your browser or to store information or settings on your computer or device. If applicable, our advertising partners may also transmit cookies to your browser, application, or mobile device when you click on ads that appear on the Site. Clicking on a link to a third party website from our Site may also allow that third party website to also transmit cookies to you.

We may also use “web beacons”, i.e. “web bugs” or “single-pixel” or “clear” GIFs, on the Site. Web beacons allow ad networks to provide anonymized, aggregated auditing, research, and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Because your web browser must request these advertisements and web beacons from the ad network’s servers, these companies can view, edit, or set their own cookies, just as if you had requested a web page from their website.

You may adjust your web browser software if you do not wish to receive cookies or web beacons, but this may prevent you from taking advantage of some of the Site's features. Please refer to your browser or email software instructions or help screen to learn more about these functions.

You may also request to opt-out of an advertiser's use of cookies by visiting the Network Advertising Initiative or the Digital Advertising Alliance. You may request to opt-out of Google's use of cookies by visiting www.google.com/ads/preferences. Please note that your request to opt out will be subject to all applicable terms on those third-party websites, in addition to this Privacy Policy.

How We Use Non-Personal Information

In addition to the uses described above for automatically-collected non-personal information, we may use this information to analyze trends, administer the Site, and gather broad demographic data for aggregate use.

We may also use non-personal information and other de-identified information (i.e. information that cannot be used to identify you) for any lawful business purpose without any obligation or accounting to you. For example, we can use nonpersonal information for developing products, services, and providing those offerings to other users and third parties.

HOW WE MAY SHARE INFORMATION

We may share information with third parties in the following circumstances:

- We may share your information, including Personal Information, so that we or others may provide you with periodic mailings, or may contact you regarding products, services, or events. If you do not wish for us to share your information in this manner, please let us know by contacting us at cst@keypathedu.com.
- We may employ other companies and people to perform tasks on our behalf and we may need to share Personal Information with them to provide services to you. For example, such parties may handle our data management and/or email distribution. Unless we tell you differently, they do not have any right to use your Personal Information beyond what is necessary to assist us.
- We may share information, including Personal Information, with our corporate affiliates for our and their legitimate business purposes.
- Some of our third party service providers and affiliates have servers located outside of the country in which you have provided the information. Countries where our service providers may have servers located include the United States, Australia, Canada, the United Kingdom, Singapore, Malaysia and Israel.
- We will share Personal Information with third parties for other purposes if we have your express "opt-in" consent to do so.
- We may disclose non-personal, aggregate, anonymous data in a de-identified format for any legitimate business purpose.

- We may disclose Personal Information at the request of law enforcement or government agencies or in response to subpoenas, court orders, or other legal process to establish, protect, or exercise our legal or other rights or to defend against a legal claim, or as otherwise required or allowed by law.
- We may disclose Personal Information if we believe that such action is appropriate to (a) protect the rights, property, or safety of a user of the Site or any other person, (b) investigate or prevent a violation by you of any contractual or other relationship with us, (c) investigate or prevent your actual or potential illegal, fraudulent, or harmful activity, or (d) detect, prevent, or otherwise address fraud, security, or technical issues.
- We may share information, including Personal Information, in connection with, during negotiations of, or as a part of the closing of any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

We do not sell, rent, or lease any Personal Information that we collect about you through the Site to anyone for any purpose, other than as disclosed.

HOW WE PROTECT YOUR INFORMATION

We use commercially reasonable security measures to prevent unauthorized persons from accessing our files or tampering with our technology and to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. These measures include internal staff dedicated to information technology infrastructure and security, and an ongoing program of works reviewing and enhancing our technical, physical and procedural security processes. However, we cannot and do not guarantee the security of any information. This is especially true for any information that is transmitted electronically and that is unprotected until it reaches our servers.

YOUR COMMUNICATION PREFERENCES

Correcting, Updating, Accessing, or Removing Personal Information; Making a Complaint

If you want to correct, update, or remove any Personal Information that you have provided to us, if you would like to raise a concern in regard to our treatment of personal information, or if you no longer want to receive information from us, you can contact us at cst@keypathedu.com. You may also request access to your Personal Information collected by us by sending a request to us at cst@keypathedu.com.

Please note that we may not be able to completely remove Personal Information from our systems in certain circumstances. For example, we may retain your Personal Information for legitimate business purposes or customer requirements, your health care provider's requirements, or if it may be necessary to prevent fraud or future abuse, for account recovery purposes, if required by law, or as retained in our data backup systems or cached or archived pages. All of your Personal Information that we keep will continue to be subject to the terms of the Privacy Policy to which you have previously agreed.

In addition, please note that notwithstanding your email preferences, we may need to contact you as required by law, or to complete any open inquiries.

If you have a concern or complaint you wish Keypath to address in relation to our privacy and data practices, our Confidentiality and Security Team (**CST**) (accessible at cst@keypath.com) will be able to direct your query to ensure that a prompt internal review commences, led by Keypath's CST, or direct you to the relevant regulator in your jurisdiction, if you wish to direct queries or concerns to them.

Your California Privacy Rights

If you are a California resident, please see the section below entitled "Additional Information for California Residents."

DO NOT TRACK REQUESTS; THIRD PARTY SERVICES

Do Not Track

Currently, certain browsers (including Google Chrome, Safari, Firefox, and Internet Explorer) offer a "no not track" ("DNT") option. The DNT option sends a signal to websites visited by the user about the user's DNT preference, if any, set on the browser. We do not currently commit to responding to browsers' DNT signals. We cannot make this commitment because no common industry standard for DNT has been adopted by industry groups, technology companies, or regulators.

Third Party Services

Some of our Site features may be served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies and/or web beacons and/or other tracking technology when you use our Site. These third parties may be able to associate the information they collect with your Personal Information, or they may collect information about your online activities over time and across other websites and online services. They may use this information to provide you with behavioral advertising or other targeted content. We cannot control third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Third-Party Privacy Policies

The Site may include or provide links to other websites on the Internet that we do not control. Even if an affiliation exists between Keypath and a third party website, each of these linked sites maintains its own independent privacy and data collection policies and procedures. While we expect our customers and affiliates to respect the privacy of our users, we cannot be responsible for the

actions of third parties. We encourage you to consult that website's privacy policy before providing your Personal Information to it and whenever interacting with any website.

Disclosure of Customer Information Through Business Transfers

We may buy, merge, or partner with other companies or businesses and in so doing, acquire or transfer information. Your Personal Information collected through the Site may be among the transferred business assets. In the event that a portion or substantially all of our assets are sold or transferred to a third party, Your Personal Information would likely be a transferred business asset, and you hereby agree to such a transfer.

USERS FROM OUTSIDE THE UNITED STATES

Our Site is hosted in the United States and is governed by United States law. If you are using the Site from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By using the Site, you consent to your information being transferred to our facilities and to the facilities of those third parties with whom we share it as described in this Privacy Policy.

A NOTE ABOUT CHILDREN

Our Site is not targeted to, and we have no interest in collecting information from, children, and we do not knowingly gather any Personal Information from children under the age of 13. If you are a parent or a legal guardian who believes that your minor child provided us with any Personal Information, please contact us at cst@keypathedu.com.

QUESTIONS ABOUT OUR PRIVACY POLICY

If you have any questions about this Privacy Policy, please contact us at cst@keypathedu.com. If you are a California resident, please also see the section below entitled "Additional Information for California Residents."

ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

This section of this Privacy Policy provides additional information that is required by the California Consumer Privacy Act (the "CCPA"). It describes our collection and use practices over the past 12 months, and also provides information about your rights as a California consumer. Terms used in this section, such as "personal information," "consumer," "service provider," "third party," and "sale," have the meanings given to them in the CCPA.

Note that in the CCPA, “consumer” refers to residents of California, so this section only applies to you if you are a California resident.

The Categories of Personal Information We Collect

The section of our Privacy Policy above titled “Collection and Use of Personal Information” generally describes the types of personal information we collect, and our business and commercial purposes for collecting that personal information.

For purposes of the CCPA, the personal information we have collected during the past 12 months falls into the categories listed below. For each of these categories, we also provide information about the source(s) of that personal information, and our business and/or commercial purpose for collecting that information.

<u>Category of Personal Information We Collect</u>	<u>Examples</u>	<u>Where Obtained (i.e., the Categories of Sources of the Information)</u>	<u>Business or Commercial Purpose of Collection</u>
Identifiers	Real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or other, similar, identifiers.	<ul style="list-style-type: none"> • Directly from the consumer 	<ul style="list-style-type: none"> • Communication with the consumer • Providing services consistent with our business purpose • Marketing efforts
Personal information categories listed in the California Consumer Records statute (Cal. Civ. Code §1798.80(e))	Name, address, telephone number, education, employment, employment history. Some personal information included in this category may overlap with other categories.	<ul style="list-style-type: none"> • Directly from the consumer 	<ul style="list-style-type: none"> • Communication with the consumer • Providing services consistent with our business purpose • Marketing efforts • Evaluation of and response to employment applications (subject to applicable laws)

<u>Category of Personal Information We Collect</u>	<u>Examples</u>	<u>Where Obtained (i.e., the Categories of Sources of the Information)</u>	<u>Business or Commercial Purpose of Collection</u>
			<ul style="list-style-type: none"> Human resources management activities relating to current and former employees
Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	<ul style="list-style-type: none"> Directly from the consumer, if voluntarily provided in connection with an application for a position with Keypath 	<ul style="list-style-type: none"> Evaluation of and response to employment applications (subject to applicable laws) Human resources management activities relating to current and former employees
Internet or other similar network activity	Browsing history, search history, information on interaction with a	<ul style="list-style-type: none"> Indirectly through Site activity (page views and form field entry) from consumer's IP address 	<ul style="list-style-type: none"> Evaluation of relevance of, interest in, and engagement with Site content

<u>Category of Personal Information We Collect</u>	<u>Examples</u>	<u>Where Obtained (i.e., the Categories of Sources of the Information)</u>	<u>Business or Commercial Purpose of Collection</u>
	website, application, or advertisement.		<ul style="list-style-type: none"> Maintaining and debugging our Site
Professional or employment-related information	Current or past job history or performance evaluations.	<ul style="list-style-type: none"> Directly from the consumer Indirectly through online job search platforms and document sharing tools 	<ul style="list-style-type: none"> Evaluation of and response to employment applications (subject to applicable laws) Human resources management activities relating to current and former employees

Third Parties to Whom We Disclose Information

The section of our Privacy Policy above entitled “How We May Share Information” generally describes how and why we share personal information. We primarily share information with our service providers and other businesses with whom we have contractual information, and that personal information is shared in the ordinary course of our business relationships with those parties.

We also share personal information with analytics providers, like Google Analytics, who may use tracking technologies to measure the effectiveness of our Site. In connection with their analytics services, they may receive information about your internet or other similar network activity. Also see the section above entitled “Third Party Services.”

We do not sell personal information to third parties.

Rights of California Consumers Under the CCPA

The CCPA provides California consumers with specific rights regarding their personal information. If you are a California resident, you have the rights described below. Please note that your rights are subject to limitations and exceptions described in the CCPA.

- **Right to Access Certain Information** – You have the right to ask us to provide you with information about our collection and use of your personal information over the past 12 months.
- **Right to Data Portability** – You have the right to ask us to provide you with copies of personal information that we have collected about you, in a portable and readily-usable format.
- **Right to Request Deletion of Certain Information** – You have right to ask us to delete personal information about you that we have collected and retained.
- **Right to Non-Discrimination** – You have the right not to be discriminated against for exercising any of your CCPA rights.

How to Exercise Your Rights Under the CCPA

To exercise any of the rights described above, you must submit a verifiable consumer request to us. You can do so by:

- Emailing us at cst@keypathedu.com; or
- Calling us toll-free at 1-844-348-5248

Only you, or a person registered with the California Secretary of State that you expressly authorize to act on your behalf, can make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within any 12-month period.

We cannot respond to your request or provide you with information if we cannot identify you or confirm your authority to make the request, so any request will require you to provide sufficient information to allow us to reasonably verify your identity. We will only use any personal information provided in a verifiable consumer request to verify the requesting party's identity or authority to make the request.

We will respond to any verifiable consumer request in the manner and within the timeframes required by the CCPA.

California's "Shine the Light" Law

In addition to the CCPA, California's "Shine the Light" law permits users that are residents of California to request the following information regarding our disclosure of your Personal Information to third parties for those third parties' direct marketing purposes (a) a list of certain categories of personal information that we have disclosed to certain third parties for their direct marketing purposes during the immediately preceding calendar year; (b) the identity of certain third parties that received personal information from us for

their direct marketing purposes during that calendar year; and (c) examples of the products or services marketed (if we have that information). If you are a California resident and would like to make such a request, please email us at cst@keypathedu.com.