# COGNIA PRIVACY NOTICE

Last Updated September 29, 2025

Cognia, Inc.® ("Cognia", "we", "us" or "our") respects the privacy of your information. This Privacy Notice (the "Notice") sets forth our privacy practices and policies and describes the type of information we collect about you, how and when we collect it, how we use it, with whom we may share your information, and your rights regarding our use of your information. This Notice applies to all information collected through your interaction or communication with us, whether electronic, written or oral; information collected on this website and through our mobile application (the "Site"); information collected through your interactions with us related to your use of our products and services (the "Services"); as well as any other information about you we may collect or receive from third parties and through your interactions with us through our online community, portals and networks which may connect users of Cognia's services to each other ("Learning Community").

From time to time, we may clarify, revise or update this Notice. This may include making changes to the way we collect, maintain and store information. If we make changes to this Notice, we will update the Effective Date at the top of this Notice. Changes to this Notice will be effective once they are posted.

This Policy does not apply to information collected or received through other means, to information collected by any third party, including websites or applications we may link to, or the collection, use and sharing of deidentified or anonymous data. Third-party websites and applications may be subject to their own privacy notices.


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## Information We Collect

We collect information from several sources. The information we collect depends on how you interact with our Site or Services.

### Information You Provide

We collect information that you provide to us when you interact with our Site or Services, through surveys, or through other communications. We may collect data from entities you have requested or authorized to provide information to us in connection with a Service. For example, we collect information when you:

- Purchase or request a Service;
- Register for, manage or update a Service;

- Manage your online account;
- Use the Site, Services or the associated resources and materials;
- Access other applications and services from the Site;
- Subscribe to newsletters or other communications from us;
- Provide feedback, request information, or otherwise contact us through the Site or Services;
- Participate in social media platforms where Cognia maintains a presence, such as Facebook, or when you make information available to us and others via social media or via forums, blogs, email lists, chat rooms or other similar technologies;
- Participate in our Learning Community, including by posting, responding to posts, participating in discussions or otherwise creating and uploading content to the Learning Community platform;
- Participate in surveys, studies or promotions;
- Act as an end-user of our Services as provided to a school, college, university, or other educational institution (the "Institution") with which you may be affiliated;
- Participate in Services that are powered by artificial intelligence technologies, including technologies provided by our vendors, which vary in how they use your submitted information.
- Conduct searches through the Site; and/or
- Otherwise share information about yourself with the Sites or through our Services, or authorize a third party to share such information about you with us.

We may collect the following information, including as reasonably required to complete a request, provide a Service, or complete a transaction on your behalf: first and last name, home or other physical address, telephone number, email address, other identifiers that permit an individual to be contacted physically or online, date of birth, data about transactions with us (such as Service purchase history), Institution name and address (if applicable), shipping options and instructions, employment and professional information, credit or debit card number and other financial information, race, disability status, voice recordings, or other information.

Information We Collect Automatically

We may collect information automatically using data collection technologies such as cookies, web beacons, pixel tags or other similar current and future technologies as they develop (the "Data Technologies"). We may have access to information automatically collected by Data Technologies across our Site, third-party websites and mobile applications, or as compiled by marketing and advertising partners.

When you download or use our mobile application or use mobile devices to access our Sites, we may receive information about your location and your mobile device by, for example, using satellite, cell phone tower or Wi-Fi- signals. This may include a unique identifier for your device, device settings, analytical information about how you use your mobile device and other information that may be stored on or accessed through your mobile device. In some cases, we may receive information from mobile applications not operated by us or from other devices connected to your mobile device.

Information collected automatically, including through Data Technologies, may include: your IP address and associated activity tracking; the type of computer or device you use; the type of browser and operating system you use; the date and time you access the Site; the address of

websites you visit prior to or after visiting our Sites; the number of times you access our Sites; the pages viewed and features you access during your visit to our Sites; how long you viewed each page; responses to advertisements and promotions on the Sites, other websites and mobile applications; Cognia emails you open and links you click within those emails; data regarding your internet service provider or mobile carrier geolocation data (to the extent provided by you or your device); and inferences which we may gather relating to your preferences, attitudes, characteristics or behaviors.

Information from Your Institution

We may collect information about you from your Institution in compliance with applicable laws, by fair means and, where appropriate, with your knowledge or consent including if you are a student, test-taker, employee, or contractor of such Institution. That information may include a student's name; parents' names; addresses of students or families; a student's ID number; a student's student number; a student's biometric record; your username and password, or credentials assigned to your Institution or to you by your Institution; other information, such as a student's date of birth, place of birth and mother's maiden name, other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates.

Information We Collect from Other Sources

We may collect information about you from other third-party sources, including from commercially available sources such as data brokers or other companies that collect or analyze information about consumers or users. Examples of information we receive from third-party sources include: (1) demographic information from data brokers and other sources to help anticipate consumer trends and needs; (2) information provided from sources you have authorized to share information with us, either on our Site or via third-party applications, devices, websites, or other digital interfaces; and (3) other similar types of information. We may also gather information from other third parties who maintain their own privacy practices and policies. We may combine information obtained from other sources with information we collect ourselves.

How We Use Information

We may use information we collect to operate our business, including the following:

- for our everyday business purposes, such as providing Services, information you request and customer support;
- to evaluate your or your Institution's eligibility for Services;
- for special events, programs, surveys, promotions, some of which may have additional rules or provisions addressing how your information is used or shared;
- to price and develop new and existing Services or technology and analyze the effectiveness of Services, marketing trends, mobile applications and websites;
- to maintain the quality or safety of Services or technology which we may own, control or provide;
- to conduct internal research;

- to conduct studies for or on behalf of Institutions, including for the purposes of developing, validating, or administering predictive tests, administering student aid programs, or improving instruction;
- to carry out an Institution's accrediting functions or process;
- to deliver content and marketing communications that we think may interest you, including ads or offers tailored to you based upon your browsing and usage history, both within this Site and on other websites and mobile applications;
- to comply with the law, regulations and other legal obligations;
- to properly verify your identity, prevent fraud and enhance security;
- to audit and provide reporting relating to particular transactions and interactions, including online interactions you may have with us or others on our behalf or through our Learning Community;
- to allow you to utilize features and personalized content within our Sites when you grant us access to information from your device (e.g., contact lists, geolocation, etc.), including location-based services;
- to contact you, including via telephone, text or chat;
- to connect you with other users of our Services and sites through our Learning Community;
- for short-term, transient use including contextual customization of ads;
- to protect our rights, interests or property and the rights, interests or property of others; and/or
- for other purposes, as permitted by law or to which you, your Institution, or a student's parents' consent.

Information Sharing and Disclosure

We may share the information that we collect about you to support our business. In some cases, and for some forms of information (e.g., regulated student information), our use will be limited as required by law. Generally, entities with which we share or disclose information may include the following:

Affiliates and Service Providers

We may share information with our affiliates and subsidiaries, service providers, data processors, third-party contractors, payment processors and others who perform services for us in connection with our Sites, Learning Community, or our businesses, to complete or confirm a transaction or series of transactions or to provide Services to you (e.g., your Institution or your employer, if you work at an Institution). In some cases, as permitted by law, we may share information with our affiliates to market their products and services to you.

Institutions

We provide Services to Institutions. In connection with that activity, we may exchange information about you, including with your Institution.

Other Entities

We may share information as part of an actual or proposed merger, acquisition or other sale or transfer of all or part of our assets or business. To the extent you register for or purchase a

Service online, we may share your information with all the entities you have authorized us to share information with or request information from.

Government Entities, Regulators, and Law Enforcement

We may disclose information about you to third parties under certain circumstances, such as in connection with illegal activity on the Sites, or to respond to a subpoena, court order or other legal process. We may release information that we collect to law enforcement, government officials, auditors, professional advisors, or third parties as required or permitted by law, to protect our rights and the rights of others, or in our discretion to prevent fraud, harm or loss to you, ourselves or others.

Social Media

We may include widgets, tool bars, or icons from social media providers on our Sites that allow you to interact or share information with them, and these social media networks may collect information about your browsing on the pages of our Sites. Such collection may occur even when you do not click on or otherwise activate the widget, tool bar, or icon. These and other entities may also collect information about your activities via Data Technologies, discussed above. The privacy policy of the relevant social media network controls the collection, use and disclosure of all information collected by that social media network.

Marketing, Analytics, and Advertising Partners

Third parties may collect personally identifiable information about your online activities over time and across different Web sites when you use our Services. We may share information with marketing providers, analytics providers and advertising networks which deliver targeted advertisements to consumers, including advertisements with links to Cognia websites, and which generate related statistics and metrics. These partners may utilize information collected through a variety of Data Technologies to provide advertising placement, customization, auditing, research and reporting for us and other advertisers.

Your Choices

You may make certain choices about how we communicate with you or the information we collect. For example, you may: elect not to provide your information; adjust your device or browsing settings to disable, prohibit or turn off Data Technologies or geolocation or location services features; and adjust your device's settings regarding the use of advertising identifiers. (Please note that when you adjust settings or delete Data Technologies in one device or browser, those same settings or deletions may not be effective on other devices or browsers.) As of the effective date above, we do not respond to Do Not Track signals or other mechanisms that provide consumers with the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer's online activities over time and across third-party websites. If you choose to limit collection of your information in these ways, certain Site or mobile application features may not function properly, or at all, and certain Services may not be available to you. If you do not want to receive marketing emails from us, you can follow the unsubscribe link provided in those emails.

## Your Privacy Rights

### Accessing Your Information

If you created an online account, you could log in to that account to access all or some of the information you previously provided.

### Correcting Your Information

If you believe that the information we maintain about you is inaccurate, you may request that we correct or amend the information by contacting us as indicated in the Contact Us section below. In many cases, you may also access your online account or contact your Institution to correct your information, as appropriate. We may limit our response to your requests as permitted by applicable law.

### For California Residents

If you are a resident of the State of California, pursuant to California Civil Code Section 1798.83 permits you to request certain information regarding our disclosure of your personal information to third parties for their direct marketing purposes during the preceding calendar year. Please contact us at the email provided in "Contact Us" below to make such a request. Additionally, if you are a resident of the State of California under the age of 18 and you interact with our Site, Services or Learning Community, through surveys, or through other communications, you may request that we remove content or information that you have posted to our Site or Learning Community. You may request removal by contacting us at the email provided in "Contact Us" below. PLEASE NOTE that such request or subsequent removal of content does not ensure complete or comprehensive removal of such content or information posted, as, for example, some of your content posted publicly may have been copied or reposted by another user. Your content or information my remain on our servers in some form, while no longer visible nor accessible to other users of our Site, Services or Learning Community.

## Children's Privacy Rights

If an Institution is providing us information relating to children of any age, we rely solely on those Institutions to collect appropriate parental consent, as required. Therefore, we do not knowingly collect any information of children under the age of 13 unlawfully or without parental consent. Additionally, Cognia does not direct marketing communications to students or individuals under the age of 18.

## Security

We use administrative, technical and physical security measures designed to safeguard your information against loss, theft, unauthorized use, disclosure or modification. Of course, despite these measures, no network or system is entirely secure, and we cannot guarantee the security of networks and systems we operate or that are operated on our behalf.

## Contact Us

If you have any questions or comments about this Notice, please contact us by email at legal@cognia.org. Cognia, Inc. 9115 Westside Parkway, Alpharetta GA 30009.