

The Capstone Institute Privacy Policy

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Privacy is important to everyone. At The Capstone Institute, (“The Capstone Institute”), we care about your privacy as well and want you to feel comfortable and secure in your use of our websites (including all related The Capstone Institute webpages, websites or other online services such as any mobile app we may offer, the “Sites”). The purpose of this Privacy Policy is to describe for you the types of information we collect from you on the Sites and how we store and use that information. Please note that The Capstone Institute uses automatic logic to ensure that prospective students meet any prerequisite enrollment requirements such as age and/or minimum educational attainment to make admissions decisions depending on the program that the prospective student would like to enroll in. This is the only instance that The Capstone Institute would engage in automated decision making. By viewing and using the Sites, you are, to the extent permitted by applicable law, accepting this Privacy Policy with respect to information collected by the Sites.

If you are under the age of 18, you have certain additional rights with respect to the removal of Content which you may provide to the Sites. These rights are set forth in Section 14 below.

Please Note: This Privacy Policy may be modified at any time so you should visit this page periodically to check for updates. The current version of this Privacy Policy can always be found under the Privacy Policy button on the Sites. You can tell if there have been changes to the Privacy Policy by checking the “Last Updated” and “Effective” dates at the top of this page.

The key items the privacy policy addresses include:

Categories of Personal Information We Collect

Personal Information in Publicly Accessible Areas

How We Collect Personally Identifying Information

How We Collect and Use Information About Your Use of the Sites

How We Collect and Use Personal Financial Information

How We Use Personal Information and Student Records

When We Share Personal Information with Third Parties Who May Offer Products or Services that May be of Value to You.

When We Share Personal Information with Partners in Education

When We Share Personal Information with Contractors and Service Providers

When We Share Personal Information with Licensing, Certifying and Accrediting Organizations

Disclosures of Personal Information in Litigation, Investigations or Enforcement Actions or for Security Reasons

Disclosures in Conjunction with a Change in Control or Similar Event.

Your Access Rights

Children's Privacy

Information Security and Storage

Rights to Opt Out

EU Residents

International Data Transfers

California Residents

1. Categories of Personal Information We Collect. There are five categories of personal information we may collect from you through the Sites:

Personally Identifying Information You Provide Us: this is information that is identifiable to you, as an individual, which you may provide to the Sites if you register on the Sites and engage in any Site activities, including personal details (e.g., name, age, gender, marital status, ethnicity, primary language, number of children in household, age of children, household income before taxes, housing type, transportation, hobbies, and employment), contact details (e.g., phone number, email address, postal address), account details (e.g., username and password);

Information we collect about your use of the sites: this is information commonly collected by many websites to track website usage and may include, for example, computer and server IP addresses, browser versions, pages most visited, duration and time of visit, and geographic location, as well as standard fields from our web log reporting software to include: date, time, client IP address, user name, service name and instance number, server name, server IP address, server port method, URI stem, URI query, HTTP status, Win32 status, bytes sent, bytes received, time taken, protocol version, host, user agent, cookie, referrer, and protocol sub-status;

Personal Financial Information: this is information, such as credit card or debit card information, that you provide if you are enrolling in a The Capstone Institute educational program or if you are purchasing any other The Capstone Institute products or services; and

Student Records: In addition, The Capstone Institute generates, collects and stores, through the Student Portal, additional information and materials personal to or provided by students enrolled in The Capstone Institute programs, such as course assignment work, exams, academic records, confidential enrollment information, and students' personal, program-related communications with The Capstone Institute. Note that we may be required by law to collect certain information about you or as a consequence of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfillment of these obligations.

Information from Third Parties: We may also collect Personal Information about you from third parties to perform certain functions such as collections activities or to customize our marketing efforts.

The information we collect depends upon what you do during your visit(s) to the Sites. To be clear, and without limiting any other provision in this Privacy Policy, by providing any personal information to The

Capstone Institute through the Sites (including your Student Records if applicable, “Personal Information”), to the extent permitted by applicable law, you are consenting to the collection, storing, processing and transfer of such information in and to the United States and other countries and territories, in accordance with this Privacy Policy and United States law. In certain jurisdictions, our legal basis for processing your personal information is not consent, but our legitimate interests in providing services to you.

2. Personal Information in Publicly Accessible Areas. Some interactive portions of the Sites are open and visible to the larger public and/or people and entities engaged in providing or supporting The Capstone Institute programs. If you include personally identifying information in materials you contribute to the Sites, via postings, chat rooms, or otherwise, that personal information will be available to members of the larger public. We therefore strongly encourage you not to include personally identifying information in your interactions in public forums made available through the Sites, such as in postings or in chat rooms, or in your User name.

3. How We Collect Personally Identifying Information. We collect Personally Identifying Information that you voluntarily provide to us. For example, when you register as a User on the Sites in order to participate in the Sites activities, we ask you for personally identifying information such as your name, email address, and telephone number. We may also collect this information if you contact us requesting information, participate in or provide feedback on the Sites or Site activities, or forward information from the Sites to internet addresses outside of the Sites. In addition, if you are a student, we collect and store your Student Records consistent with our business practices, requirements of our educational accrediting, certifying and licensing institutions, and applicable United States and state laws and regulations.

4. How We Collect and Use Information About Your Use of the Sites. We use common tracking tools such as cookies, clear GIFs (also referred to as web beacons or pixel tags), device identifiers or IP addresses to collect information about your use of the Sites. These tools, described in more detail below, are associated with standard internet protocols and are commonly implemented on web sites. The information collected through these tools is primarily used for aggregate, statistical reporting and stored in log files. Log files are simply transaction records that web servers maintain and record information, such as: service provider IP addresses, browser versions, referring websites, search terms used, average number of pages requested, average duration of visit, and/or total visitor traffic.

Cookies are small files web sites place on your hard drive that allow sites to identify you. For example, if you allow a site to remember your login name or password, the site places a cookie on your computer. Cookies cannot read any other information on your hard drive. If you do not wish to receive cookies, or want to be notified of when they are placed, your browser may permit you to do so.

GIFs can tell us whether you have visited a Web page or received or opened a message we send to you.

An IP address is a number that's automatically assigned to your computer by your Internet service provider whenever you're on the Internet. In addition to logging your IP Address, our server may also record the referring page that linked you to us (e.g., another web site or a search engine); the pages you visit and how long you stay on the Sites; and other Web usage activity and data. In some cases your IP address stays the same from browser session to browser session; but if you use a consumer internet access provider, your IP address probably varies from session to session.

The information we collect about your use of the Sites may be used to measure the Sites' traffic, help us to evaluate and improve the Sites, provide data points for marketing and business analysis, and better serve our Users. It is in our legitimate interests to evaluate and improve the Sites so that we may better serve our Users. We may share this information with third parties, but only in an aggregate statistical form that includes no personally identifying information. If we combine information about your use of the Sites with Personally Identifiable Information, through data mapping or otherwise, the combined information will be treated as Personally Identifiable Information.

5. How We Collect and Use Personal Financial Information. We collect Personal Financial Information you provide only when you are applying for or enrolling in a The Capstone Institute program, purchasing products or services from The Capstone Institute, or involved in other financial transactions with The Capstone Institute, and we use this information only in connection with your application, enrollment, purchases and other financial transactions. We collect this information so we can comply with our contractual obligations to you or interact with you in furtherance of initiating a contractual arrangement (e.g., if you are applying to enroll) and so that we can comply with our legal obligations. Personal Financial Information is retained by The Capstone Institute as required by law and its internal business practices. If you are not currently enrolled in a The Capstone Institute program and have no outstanding, pending, or contractual financial obligation to The Capstone Institute, you may ask that we delete your financial information and we will do so subject to legal, regulatory, licensing and accreditation obligations.

6. How We Use Personal Information and Student Records. We use your Personal Information in multiple ways:

Deliver products and perform services you purchase. This is so we can comply with our contractual obligations to you or engage in pre-contractual measures (e.g., if you apply to enroll in one of our programs).

Respond to your requests for information. It is in our legitimate interests to respond to your requests for information.

Contact you regarding products and services in which we believe you may be interested. It is in our legitimate interest to provide relevant and interesting advertising messages. Where necessary, we will obtain your consent before sending such marketing messages.

Notify you about community events and activities. It is in our legitimate interests to notify you about events and activities that may be of interest to you.

Ask you questions about your interests and your experience on the Sites. It is in our legitimate interests to learn more about your experience with the Sites.

To perform proactive outreach to encourage and engage you in your studies

To offer savings opportunities and/or promotional items only available to The Capstone Institute students

Additionally, if you are a Capstone Institute student, we may also use your Personal Information including Students Records to:

Support and monitor your progress through the academic program in which you are enrolled. We do this so we can comply with our contractual obligations to you.

Offer you various student support services. It is in our legitimate interests to offer support to our students.

Ask you questions regarding your satisfaction with the program. It is in our legitimate interests to learn more about your experience with the program.

Maintain your academic records. We do this so we can comply with our contractual obligations to you.

Complying with our obligations. We process your Personal Information to, for example, carry out fraud prevention checks or comply with other legal or regulatory requirements, where required by law or where in our legitimate interests to do so.

Maintain close communications with you in order to provide you with a rich, fulfilling and personalized academic experience. It is in our legitimate interests to communicate with our students and provide a personalized learning experience.

7. When We Share Personal Information with Third Parties Who May Offer Products or Services that May be of Value to You. We may provide your Personally Identifying Information (exclusive of Student Records) to third parties who offer products or services we believe may be of value to you; such third parties are only allowed to use your Personally Identifiable Information to contact you regarding those products or services and you are able to “opt out” from receiving such contacts at any time through the “opt out” procedures of those third parties. (See also Section 17 (“Rights to Opt Out”) below).

8. When We Share Personal Information with Partners in Education. The Capstone Institute often collaborates with school districts, individual schools, colleges and universities, vocational schools, organizations like the Job Corps, and other private educational or education-related programs (each an “Educational Partner”) to provide a broad range of educational programs responsive to different types of students’ requirements. We may share Personal Information, including Personally Identifying Information, Student Records and Personal Financial Information of students enrolled in these collaborative or partnership education programs with the associated Educational Partner.

9. When We Share Personal Information with Contractors and Service Providers. We may use third parties (including contractors, business partners and service providers) to help us with certain aspects of our operations and this may require disclosure of your Personal Information to them. For example, we use third party financial institutions to help us process payments and we may use third party agencies to help us with debt collection. We may also use third parties to help us to operate the Sites, deliver products and provide student services. We expect these third parties to use your Personal Information only as necessary to perform the services they are asked to perform.

10. When we Share Personal Information with Licensing, Certifying and Accrediting Organizations. The Capstone Institute is licensed by certain states. From time to time The Capstone Institute will seek additional certifications, accreditations and similar confirmations of quality and eligibility from third party institutions as part of the schools’ mission. The Capstone Institute may share Personal

Information with each of these accrediting, certifying and licensing bodies as reasonably required to maintain, renew or establish The Capstone Institute's accreditation, licenses, certifications and other institutional qualifications. All such bodies are committed to maintaining the confidentiality of student Personal Information.

11. Disclosures of Personal Information in Litigation, Investigations or Enforcement Actions or for Security Reasons. We may disclose your Personal Information when compelled or requested to do so by government or law enforcement authorities or when otherwise required or permitted by law, such as to respond to court orders and subpoenas or regulatory agency requests. We also may disclose Personal Information when we have reason to believe that someone is causing or threatening to cause injury to, or interfering or threatening to interfere with, the rights or property interests of The Capstone Institute or its affiliates (or their respective employees, agents, consultants, contractors or representatives), The Capstone Institute students or alumni, other Site Users, The Capstone Institute business partners (including Education Partners and service providers), accrediting/licensing/certifying bodies, or other persons or entities that could be harmed by such activities.

12. Disclosures in Conjunction with a Change in Control or Similar Event. If The Capstone Institute undergoes or contemplates undergoing a business transition, such as a merger or acquisition by another company, or a sale of all or a substantial portion of its assets, your Personal Information may be among the assets transferred or subject to new ownership. Changes in the terms governing the collection, storage or use of any third party successor in interest or transferee of your Personal Information will be communicated to you by The Capstone Institute or such third party via email, the applicable website, or a comparable means notification.

13. Your Access Rights. You may review and correct the Personally Identifying Information that is retained by The Capstone Institute in your account after you login. You may review and correct the Personal Financial Information that is retained by The Capstone Institute in your account by contacting The Capstone Institute at admin@thecapstoneinstitute.org. If you are a student, you may also review your Student Records through your Student Portal account or by contacting The Capstone Institute at admin@thecapstoneinstitute.org.

14. Children's Privacy. The Sites do not knowingly collect information from (a) children under the age of 13 and does not offer products, services or activities targeted at children under the age of 13, or (b) individuals older than 13 but under the age of legal majority in their state of residence whose registration or participation on the Sites has not been authorized by their parent or legal guardian.

15. Special Rule for Site Users under 18. If you are under the age of 18, you may at any time request The Capstone Institute to remove from the Sites any Content (as defined in the Site Terms of Use) you provide to or post on the Sites by sending your request to admin@thecapstoneinstitute.org. However, please understand that The Capstone Institute's removal of such Content may not be complete or comprehensive. Removal of Content may be limited to making Content no longer visible to the public or other Site Users. In addition, The Capstone Institute reserves the right not to remove Content you have provided if The Capstone Institute is required to maintain the Content pursuant to federal or state legal requirements, if the Content has been independently provided to the Site by a third party, if the Content is anonymized, or if you have been compensated for providing the Content to the Sites. Any Personal Information and Student Records retained by The Capstone Institute will continue to be governed by the terms of this Privacy Policy.

16. Third Party "Linked-To" Web Sites. The Sites may contain links to third party web sites which are neither operated nor controlled by The Capstone Institute. This Privacy Policy does not address the information practices of those third party web sites, and we encourage you to read the legal notices posted on such websites, including their Terms of Use and Privacy Policies. To be clear, The Capstone Institute has no responsibility or liability for your experience with, and the data collection and use practices of, such third party websites. All inquiries concerning the terms and policies of third party websites should be addressed to the third party hosting the respective website.

17. Information Security and Storage. The protection of your Personal Information is very important to us. To that end, we take reasonable steps to protect the Personal Information you share with us from unauthorized access or disclosure. However, you should know that no security measures are impenetrable and no company, including The Capstone Institute, can fully eliminate security risks to its telecommunications and computer systems. In addition, due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the Internet, will not be destroyed, hacked, hijacked, misdirected, stolen, modified or otherwise interfered with or misused. Accordingly, your transmission of information to or through the Sites is at your own risk.

We retain your Personally Identifying Information, Personal Financial Information, and Student Records for as long as we have a relationship with you. When deciding how long to keep this information after our relationship with you has ended, we take into account our legal obligations. We also retain records to investigate or defend against potential legal claims. If there is any information that we are unable to delete entirely from our systems for technical reasons, we will put in place appropriate measures to prevent any further processing or use of the data.

18. Rights to "Opt Out". If you are receiving emails, texts or similar on line communications from The Capstone Institute, it is because you consented or we understood from your participation on our Sites that you were interested in receiving ongoing information from us. If at any point you no longer wish to receive such communications, you may at any time "unsubscribe" from these communications by following the 'opt out' directions to be found at or near the end of the communication. Students can also "opt out" from certain communications on the Student Portal by editing their personal account preferences. If you have any questions about the opt-out process, you can contact us at admin@thecapstoneinstitute.org. Please note that if we have already shared your personal contact information with one of our business partners, unsubscribing from our communications list will not prevent these third parties from continuing to email or text you. You will have to send an opt-out request to those third parties directly. Opportunities to "opt out" from receiving emails and texts are usually found on these companies' websites or at the end of their emails or texts.

19. EU Residents. Under applicable local law, EU residents may have certain rights regarding the Personal Information we hold about them. These may include the rights to access, correct, delete, restrict or object to our use of, or receive a portable copy in a usable electronic format of your Personal Information. You also may have a right to lodge a complaint with your local data protection or privacy regulator. We encourage you to contact us at the contact information set forth below to update or correct your information if it changes or if the Personal Information we hold about you is inaccurate. Where you have provided your consent to any use of your Personal Information, and where applicable

under local law, you can withdraw this consent at any time. Please note that we may require additional information from you in order to honor your requests.

20. International Data Transfer. Your Personally Identifiable Information, Personal Financial Information, and Student Records may be transferred to, stored, and processed in a country (such as the United States) that is not regarded as ensuring an adequate level of protection for personal data under European Union law. We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your information is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

21. California Residents

Under applicable state law, we provide California residents the right to data access and deletion. To inquire about data access and deletion please contact The Capstone Institute at admin@thecapstoneinstitute.org or by phone at 1-888-585-7790.

22. Construction of Privacy Policy. This Privacy Policy supersedes any other representations, agreements, statements or understandings with respect to the terms pursuant to which The Capstone Institute collects, stores and uses information relating to you which is collected by the Sites. This Privacy Policy may not be modified, extended, limited, waived or terminated except with the written consent of The Capstone Institute. If any portion of this Privacy Policy is deemed void or unenforceable, then that provision shall be deemed severable from the Privacy Policy and the remaining terms shall remain in full force and effect. The word "including" shall be construed to mean "including but not limited to."

23. Modification to Privacy Policy. As noted above, The Capstone Institute reserves the right to modify this Privacy Policy at any time and will notify Users by posting the modified version of its Privacy Policy on this webpage. Under certain circumstances, we may also elect to notify registered Users of changes or updates to this Privacy Policy by additional means, such as posting a notice on the front page of the Sites or by sending you an e-mail but you should not rely on receiving such additional notice.

QUESTIONS or CONCERNS? The Capstone Institute is the controller responsible for the Personal Information it processes about you. If you have any questions or concerns about this Privacy Policy or its application, or for general questions about the Sites, please contact The Capstone Institute at admin@thecapstoneinstitute.org.