



PRIVACY POLICY

Fall 2022 through Spring 2023

Last updated 5.3.22

1. PURPOSE OF POLICY

Verto is committed to protecting your privacy. We created this Privacy Policy (“Policy”) to give you confidence as you visit and use the Verto website and any other related services provided by us (collectively, the “Service”). This Policy covers how we collect, use, store, and share your information which on its own, or in combination with other information, may be used to identify you as an individual (“Personal Data”). This Policy complies with the requirements of the EU General Data Protection Regulation (“GDPR”). In addition, Verto’s Partner Colleges are subject to obligations concerning privacy of personally identifiable participant education records pursuant to the Family Educational Rights and Privacy Act (“FERPA”), and its regulations. Although not subject to FERPA per se, Verto abides by FERPA’s terms to the extent it receives or has access to your education records, and will not disclose such records to non-educational, non-Partner Colleges without your consent. Verto will work reasonably with Partner Colleges to protect the privacy and confidentiality of those records consistent with all legal obligations. The provisions of our [Terms of Service \(the “Terms”\)](#) apply to this Policy as well. All references to “we”, “us”, “our”, or “Verto” refer to Verto Education, Inc., a Delaware public benefit corporation. All references to “you”, “your”, or “user” refers to the end-user of the Service. Do not hesitate to contact us at privacy@vertoeducation.org if you have any questions or want to discuss this Policy. Capitalized terms used but not defined herein shall have the meanings given to them in the Terms.

This Policy also describes our practices related to information of individuals with whom we communicate for marketing or promotional purposes but who may not otherwise submit an Application through the Service (the “Marketing Recipients”). By using the Service and agreeing to this Policy, or by agreeing to this Policy as a Marketing Recipient, you consent to the privacy practices described in this Policy. And, additionally, you consent as necessary, to the use of your Personal Data by Partner Colleges and Academic Providers.

2. INFORMATION WE COLLECT AND HOW WE USE IT

Information You Voluntarily Provide Us.

When you submit an application (the “Application”) in the study abroad experience offered by Verto (the “Abroad Experience”) through the Service, you will be required to provide us with various Personal Data. Specifically, when you submit the Application, we collect from you:

- First and last name;
 - E-mail address;
 - Phone number;
 - Address;
 - Country of birth;
 - Year of high school graduation;
 - Gender and pronoun; and
 - Parent’s first and last name, e-mail address, and phone number.
3. In addition, as you use the Service, you may choose to provide additional Personal Data, including access to your address book/contacts. While the information described here is provided to us only with your permission, some aspects of the Service may not be available if you choose not to provide us with such information and Personal Data.

Personal Data We Collect From Marketing Recipients.

In addition to the Personal Data we collect from users submitting an Application through the Service, we collect Personal Data from Marketing Recipients who are interested in learning more about the Service. This Personal Data consists of basic contact information such as the Marketing Recipient’s

first and last name, email address, and phone number. This Personal Data is collected by us when Marketing Recipients sign up for commercial emails from us via online sign up forms. For Marketing Recipients who have not otherwise submitted an Application through the Service, we only use your Personal Data to send communications, including updates on promotions and events, relating to the Service offered by us and by third parties we work with that are related to the Service.

Special Information.

You may also choose to provide us with special categories of Personal Data, including, without limitation, Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data, or data concerning a natural person's sex life or sexual orientation (collectively, "Special Information"). You are not required to provide us with your Special Information when submitting an Application, but if you enroll in the Abroad Experience you will be required to provide certain Special Information, including health data. To the extent you choose to submit your Special Information, such information will only be used for the purposes of providing the Service. By agreeing to this policy and by your use of the Service, you explicitly consent to our collection and use of your Special Information.

Information We Automatically Collect As You Use The Service.

In addition to the information you voluntarily provide us, when you use the Service, we automatically collect your IP address and geo-location while the Service is running on your device. You may be able to limit such collection in the settings on your device. As with the voluntarily provided information described above, some aspects of the Service may not be available if you choose not to provide us with such information and Personal Data.

Additionally, if you participate in an online Abroad Experience, we may use video conferencing software to record live class discussions, as described in more detail in Section 7 below. As such, we may collect video recordings that capture your image and/or voice.

We use cookies to remember you as a user of the Service and to streamline the functionality of the Service. These are first party cookies, not third party cookies, meaning that the cookies are only used to track your activity on the Service, and not on third party sites or services.

Other Anonymous Data We Collect.

When you use and visit the Service, we may also use third-party services, such as Google Analytics and Hubspot, which use cookies to collect generic, anonymous information that does not identify you. We use this information to better understand how users interact with the Service and to improve your user experience while using the Service.

Do Not Track Signals.

We do not track you or collect your information across third party websites or online services. Thus, we do not receive Do-Not-Track signals, or other similar signals. To the extent that we do receive any such signals, we will not comply with them as it is not an aspect of the functionality of our Service.

4. PURPOSES OF COLLECTION AND LEGAL BASIS FOR USE

We use the Personal Data described above primarily for providing you with the core aspects of the Service. However, we also use the Personal Data to improve the Service over time and to send you information about Verto and the Service. By using the Service, you consent to us sending you a Verto newsletter or to otherwise contact you about promotions, updates, and features of the Service.

We also use your Personal Data, or aggregated and/or anonymized Personal Data (but not Personal Data that can be used to identify users), for our own purposes of understanding our users and how they use the Service, as well as improving the Service over time. By using the Service, you consent to these additional uses.

The legal grounds for our processing of your Personal Data for the purposes above are:

- first and foremost, you provided your consent by agreeing to this Policy, which you may withdraw at any time by emailing us at privacy@vertoeducation.org;
- it is necessary for our contractual relationship;
- the processing is necessary for us to comply with our legal or regulatory obligations; and/or
- the processing is in our legitimate interest as a provider of the Services (for example, to protect the security and integrity of our systems and to provide you with customer service and the core functionality of the Service).

5. HOW WE SHARE YOUR PERSONAL DATA

Information Shared By You Through The Service.

You may, now or in the future, be able to choose to voluntarily share Personal Data collected through the Service through email, or other means of communication.

In particular, you may also choose to voluntarily share photos or other similar materials through the Service. We may use, copy, modify, share, publish, or redistribute, such materials in order to promote Verto or for other similar purposes.

Our Personnel

To be able to effectively provide you with the Service, and to improve the functionality of the Service, we may disclose your Personal Data to our personnel, including our employees, contractors, and agents, only to the extent that such persons or entities have a need-to-know such information in

furtherance of the Service. All such personnel are trained to keep such Personal Data private and confidential.

Our Vendors

We work with third party service providers to provide website, hosting, maintenance, data processing, Abroad Experience services, and other services for us in furtherance of the Service. These third parties may have access to or process your Personal Data as part of providing those services for us. However, we limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions and receive commitments as to maintenance of privacy.

Partner Colleges & Credit Granting Institutions

A core aspect of the Service is to facilitate an application where users may apply to the Abroad Experience and independently apply to Partner Colleges. To that end, Verto will provide its Partner Colleges and Academic Providers with access to the Personal Data of users who submit an Application (as that term is defined in the Privacy Policy) for the purposes described in our Privacy Policy (namely, to aid the Partner Colleges in determining whether to extend admission to such users and to allow the Academic Provider to issue the academic credit). For users who are accepted to the Abroad Experience, Verto will provide its Partner Colleges and Academic Provider with access to such users' Personal Data to facilitate the provision of the services offered as part of the Abroad Experience. While their use of your Personal Data is beyond our control, all such Educational Institutions have privacy policies to protect your information; by agreeing to these Terms and our Privacy Policy, and by submitting your Application, you do consent to Verto sharing your Personal Data with the Partner Colleges you select on your Application, as well as the Academic Provider who will issue you the academic credits, and you consent to our Partner Colleges' and Academic Providers' use of your Personal Data as described above and in our Privacy Policy. Further, you understand that Partner Colleges and Credit Granting Institutions may not have appropriate technical and organizational safeguards in place for your Personal Data, including (1) being in a country that has adequate data privacy protections (as determined by the European Commission); (2) having in place Binding Corporate Rules;

and/or (3) having Data Processing Agreements that incorporate Standard Contractual Clauses approved by the European Commission. These Partner Colleges and the Academic Providers may be in countries that the European Commission has determined do not provide for an adequate level of data protection to meet the requirements under the GDPR. If Partner Colleges and/or Academic Provider do not have appropriate technical and organizational safeguards, you understand that there might be certain risks affecting your Personal Data, including but not limited to the fact there might not be a supervisory authority, data processing principles, and/or data subject rights in such countries that protect your Personal Data in the same way and to the same extent the principles and standards of the GDPR might. You agree that your consent to the above is our lawful basis under the GDPR for transferring your Personal Data to the Partner Colleges and the Academic Provider.

Non-Accredited Institutions

In addition to the foregoing, as part of the Application, you may choose to indicate interest in attending certain non-accredited institutions or programs (each, a “Non-Accredited Institution”) after completion of the Abroad Experience. To the extent that you indicate interest to Verto in such Non-Accredited Institutions through the application process or otherwise, you consent to Verto providing such Non-Accredited Institutions with your contact information and consent to such Non-Accredited Institutions contacting you about attending such Non-Accredited Institutions.

Sale Of Company Or Assets

In the event that we sell all or substantially all of our company or its assets, including the Personal Data collected through our Service, we may transfer your information to the acquiring company. However, we will notify you before we do so.

Other Third Parties

In addition to our practices described above, we may share your Personal Data if we have a good-faith belief that such action is necessary to (1) comply with the law (see the section below on “Government Requests”), (2) protect and

defend the rights or property of Verto, or (3) prevent an emergency involving danger of death or serious physical injury to any person. We will only share your Personal Data for the foregoing reasons to the extent permitted by GDPR.

6. **STORING YOUR PERSONAL DATA**

Duration Of Storage Of Your Personal Data

We will store your Personal Data for as long as it is needed to provide the Service, however, we may not know if you have stopped using the Service so we encourage you to contact us if you are no longer using the Service. However, if required by applicable law, we may retain your Personal Data for such period as may be required by such law. To continue to provide an effective service, we may store non-Personal Data perpetually and may anonymize your Personal Data and store that anonymized information perpetually.

Additionally, as described in this Policy, we use third parties to provide the Service and do not have full control over their practices related to storage and retention of your Personal Data. However, we will work with such third parties to delete or modify your Personal Data to the extent required by GDPR .

Security

We use reasonable efforts to secure your Personal Data and to attempt to prevent the loss, misuse, and alteration of the information that we obtain from you. For example, we require our personnel to sign confidentiality agreements that extend to your Personal Data; we restrict access to your Personal Data to individuals within and outside of Verto who need access to such information to provide the Service; and we review the privacy practices of new products and services that we integrate into our Service. In addition, we use reasonable technical safeguards such as encryption and secure hosting provided by industry leading third party vendors, to secure your Personal Data. However, loss, misuse, and alteration may occur despite our efforts to protect your Personal Data. We are not responsible to our users or to any third party due to any such loss, misuse, or alteration, except to the extent required by GDPR or other applicable law.

7. YOUR CHOICES

You can change some of your Personal Data through the account settings provided on the Service. In addition, if you wish to access, receive a copy of, change or delete the Personal Data we hold about you, you may contact us as described at the end of this Policy.

You may withdraw the consent granted in this Policy for us to use the Personal Data described in this Policy by contacting us as described at the end of this Policy. Please note that if you do so, it will not affect the lawfulness of the use of your Personal Data based on your prior consent.

In addition, you may contact us as described at the end of this Policy to request that we do not disclose your Personal Data to third parties (other than those that are acting as our agent to perform tasks on our behalf, such as data processors) or to request that your Personal Data not be used for a purpose that is materially different from the purposes for which it was originally collected or for purposes subsequently authorized by you.

If you receive commercial email from us, you may unsubscribe at any time by following the instructions contained within the email. You may also opt-out from receiving commercial email from us, and any other promotional communications that we may send to you from time to time, by contacting us as described at the end of this Policy. Please be aware that if you opt-out of receiving commercial email from us or otherwise modify the nature or frequency of promotional communications you receive from us, even after you opt-out from receiving commercial messages from us, you may continue to receive administrative messages from us regarding the Service.

Upon receipt of any of the above request(s), we will use reasonable efforts to reflect any changes you request in our databases to the full extent required by GDPR or other applicable law.

If you are not happy with how we have attempted to resolve your complaint, you may contact the relevant data protection authority.

8. RECORDING POLICY

If you are participating in an online Abroad Experience, we may use video

conferencing software to record live class discussions. This means that video and/or audio recordings of you may be captured and recorded through the video conferencing software. These recordings will be made available only to other individuals enrolled in the class and the class instructor(s). The purpose of recording the classes is to assist those who cannot attend the live session. All recordings will become unavailable to participants in the class when the Abroad Experience ends. Participants who prefer to participate via audio only will be allowed to disable their video camera so only audio will be captured. Participants should discuss this option with their instructors. Recordings of classes may be used solely for internal class purposes by Verto staff and participants registered for the class, and only for the duration of the Abroad Experience. If Verto wants to make subsequent use of recordings that include participant activity, it may do so only with informed written consent of the participants involved or if all participant activity is removed from the recording.

9. **PHONE CALLS AND TEXT MESSAGING POLICY**

Text messaging, also known as SMS, is one method that Verto uses to communicate with those users who submit their phone numbers, including its users' parents and Marketing Recipients. By submitting your phone number and agreeing to this Privacy Policy, you agree to receive Verto text messaging alerts ("Text Messaging Service"). Verto may send periodic texts that could include marketing and non-marketing information. Consent to receive non-marketing or marketing text messages is not required to purchase any products or services from Verto. Messaging and data rates may apply.

Phone Calls

By submitting your phone number and agreeing to this Privacy Policy, you agree to receive periodic calls and recurring business-related communications. Such communication includes informational calls at any of the contact information provided to us in connection with your account. We may place these calls for any purpose consistent with the Terms, this Policy, and any other agreements you may enter into with Verto. Standard rates and text charge may apply.

If you are a Florida resident please note: By agreeing to this Policy, you authorize Verto to deliver or cause to be delivered a telephonic sales call to you using an automated system for the selection or dialing of telephone numbers or the playing of a recorded message when a connection is completed to a number called. You are not required to directly or indirectly sign this Policy or to agree to enter into this Policy as a condition of purchasing any property, goods, or services.

You may revoke/withdraw your consent by writing to us at 3055 NW Yeon Ave # 8822, Portland, OR 97210, or by emailing us at privacy@vertoeducation.org. Your withdrawal will become effective only after we have had a reasonable time to process your withdrawal request.

Text Messaging

By submitting your phone number and agreeing to this Privacy Policy, you agree to receive Verto text messaging alerts (“Text Messaging Service”). Verto may send periodic texts that could include marketing and non-marketing information. Consent to receive non-marketing or marketing text messages is not required to purchase any products or services from Verto. Messaging and data rates may apply.

Authorization

You certify that you are authorized: (a) to enroll the designated mobile phone number in the Text Messaging Service and (b) to incur any mobile message or data charges that may be incurred by participating in the Text Messaging Service. Check your carrier's plan for details.

Subscribing To SMS Alerts

You may subscribe to the Text Messaging Service by entering and submitting your phone number in the provided submission forms available on our website or other digital forms, as well as on paper forms signed by you (collectively, the "Form"). By entering your phone number and completing the Form, and either checking a previously unchecked box on a web or digital form, or physically signing a paper form, you consent to receive text message communications from Verto as described herein. A text message will be delivered to the mobile number you provided confirming your enrollment once you have submitted your mobile number. You are responsible for managing the types of text messages (whether SMS or MMS) you receive.

By subscribing to the Text Messaging Service, you expressly consent and agree to accept and receive marketing and non-marketing communications via text message to your mobile device and to the mobile number(s) that you provided to us. Additionally, you consent to our use of an automatic telephone dialing system to generate the text messages to you.

Frequency Of Messages

The number and frequency of text messages sent to your device may vary depending on your relationship with Verto (for example, if you have enrolled in a Verto program), and whether you have asked for help or support via text messaging.

To Stop Messages

Text STOP to 971 257 8918 or reply STOP to any text message you receive, or contact Verto by writing to us at 3055 NW Yeon Ave # 8822, Portland, OR 97210, or by emailing us at privacy@vertoeducation.org. You consent that following such a request to unsubscribe, you will receive one (1) final message from Verto confirming that you have been inactivated in our system. Please allow up to three (3) business days to process your request.

For Help

Text HELP to 971 257 8918 for help, or reply HELP to any message, or visit vertoeducation.org.

No Guarantee

Verto is not responsible for incomplete, lost, late, or misdirected messages, including (but not limited to) undelivered messages resulting from any form of filtering by your mobile carrier or service provider or otherwise.

Carriers

Supported carriers include all major United States carriers including, AT&T, Verizon Wireless, T-Mobile®, Sprint, and others.

Termination

Verto reserves the right, in its sole discretion, to cancel or suspend any or all of the Text Messaging Service, in whole or in part, for any reason, with or without notice to you.

Changes To These Terms

Verto may revise, modify, or amend these terms at any time.

10. GOVERNMENT REQUESTS

From time to time, we may receive requests from government agencies to obtain information about our users. In handling such government requests, we greatly value the privacy of your Personal Data. While we may be required to

turn over user information at times, we will strive to require a search warrant or subpoena, to the extent that we can reasonably demand such warrant or subpoena, and will take reasonable steps to contact you to allow your participation in the process.

11. **THIRD PARTY SERVICES AND PRACTICES ARE BEYOND OUR CONTROL**

Our Service utilizes numerous third party services as part of the functionality of the Service. We may share your Personal Data with third parties as explained in this Policy. We have no control over such third parties, except to the extent required by GDPR. We encourage you to review the privacy practices of such third parties. We make no guarantees about, and assume no responsibility for, the information, services, or data/privacy practices of third parties, except to the extent required by GDPR. We encourage you to review the privacy practices of such third parties.

12. **CHANGES TO THIS POLICY**

Verto reserves the right to change this Policy from time to time, with or without notice to you, except to the extent required by GDPR. If you continue to use the Service, you consent to the new Policy. We will always have the latest Policy posted on the Service.

13. **PLEASE REACH OUT TO US WITH ANY QUESTIONS OR FEEDBACK**

If you have any questions or comments about this Policy or our Service, please feel free to contact us by email at privacy@vertoeducation.org, or by mailing to us your questions or comments to the following address:
Verto Education Inc.

3055 NW Yeon Ave # 8822
Portland, OR 97210

14. DATA PROTECTION OFFICER

Finally, we have appointed a Data Protection Officer (“DPO”). Our DPO can be contacted directly by email at privacy@vertoeducation.org, or by mail at:
Verto Education, Inc.

ATTN: Data Protection Officer
3055 NW Yeon Ave # 8822
Portland, OR 97210