

Veterans Higher Education Corporation Privacy Policy

Veterans Higher Education Corporation (“VHEC”) is committed to protecting the privacy of users of our services, including our online website (the “Site”). This Privacy Policy describes our practices concerning the personally identifiable information that we collect, such as your name, email address, telephone number, postal address, or credit card number (“personal information”). This Policy also describes our privacy practices with respect to other information that we collect through our Site, such as your IP address and how you use the Site.

The personal and other information that we collect about you is controlled by Veterans Higher Education Corporation, which is headquartered in the United States. Our mailing address is P.O. Box 170049, Boston, MA 02117. By using the Site or our other services, you agree with and consent to the terms of this Policy.

What personal and other information we collect about you

Personal information. You may use many of the Site’s features without disclosing any information that we can use to identify you personally. However, to donate on the Site, or to receive newsletters, updates, or other communications from us, you will need to provide personal information. This information could include, for example, your name, email address, telephone number, and/or postal address. And if you make a donation, our third-party vendor also will need to collect financial information from you. We collect this information through a variety of means, including our “contact” and “donate” pages on the Site, your communications and dealings with us (e.g., emails and telephone calls), and other contexts where your information is shared with us. Furthermore, if you apply for financial support through VHEC, we will collect a variety of other information about you, including your student ID number, social security number, financial aid letter, and enrollment status. Some of this information may be collected directly from your educational institution.

Web log data. When you use the Site, we automatically receive and record certain information from your computer (or other device) and your browser. This may include such data as your IP address and domain name, the pages you visit on the Site, the date and time of your visit, the files that you download, a referring URL from the website you visited before navigating to the Site, your software and hardware attributes, and your general geographic location (e.g., your city, state, or metropolitan region). To obtain such information, we may use web logs or applications that recognize your computer and gather information about its online activity.

Cookies. We also use cookies on the Site. Cookies are small files that are stored on your computer by your web browser. A cookie allows the Site to recognize whether you have visited before and may store user preferences and other information. For example, cookies can be used to collect information about your use of the Site during your current session and over time (including the pages you view and the files you download), your computer’s operating system and browser type, your Internet service provider, your domain name and IP address, your general geographic location, the website that you visited before the Site, and the link you used to leave the Site. If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to

accept it. You can also delete cookies from your computer. However, if you choose to block or delete cookies, certain features of the Site may not operate correctly.

Web beacons. The Site or the emails that you receive from VHEC may use an application known as a “web beacon” (also known as a “clear gif” or “web bug”). A web beacon is an electronic file that usually consists of a single-pixel image. It can be embedded in a web page or in an email to transmit information, which could include personal information. For example, it allows an email sender to determine whether a user has opened a particular email.

Third-party online tracking and behavioral advertising. We also may partner with certain third parties to collect, analyze, and use some of the personal and non-personal information described in this section. For example, we may allow third parties to set cookies or use web beacons on the Site or in email communications from VHEC. This information may be used for a variety of purposes, including online behavioral advertising, as discussed below (see the section entitled “How we share personal and non-personal information with third parties”).

How we use the personal and other information that we collect

VHEC uses the information that we collect for a variety of purposes. If we have personal information about you, we may use it, for example: to contact you about how you can get involved with our efforts; to respond to your questions or requests concerning the Site or other services offered by VHEC or our partners; to evaluate and respond to your application for financial support through VHEC; to fulfill the terms of any agreement you have with us; to accept a donation or complete another transaction that you initiate; to send you information about our services and other topics that are likely to be of interest to you, including newsletters, updates, or other communications; to improve your user experience and the quality of our services; to comply with legal and/or regulatory requirements; and to manage our business.

We use the other information that we collect for such purposes as: counting and recognizing visitors to the Site; analyzing how visitors use the Site and various Site features; improving the Site and enhancing users’ experiences with the Site; creating new services or improving our existing services; enabling additional website analytics and research concerning the Site; enabling online advertising; and managing our business.

We also may use the personal and other information that we collect to solicit a donation or send you promotional communications, including emails or postal mail about the services offered by VHEC or our partners. Although we hope you will find our promotional emails of interest, you may opt out of receiving them by sending an email to charles.king@vheccorp.org with “optout” in the subject line. Promotional emails will also have instructions for opting out of that type of communication in the future.

How we share personal and other information with third parties

We share your personal information and non-personal information with other parties for a variety of purposes, as described below.

Analytics and online behavioral advertising. We partner with certain third parties to collect the non-personal information discussed above and to engage in analysis, auditing, research, and reporting. These third parties may use web logs or web beacons, and they may set and access cookies on your computer or other device. In particular, the Site uses [Google Analytics](#) to help collect and analyze certain information for the purposes discussed above. You may opt out of the use of cookies by Google Analytics [here](#).

The Site also enables third-party tracking mechanisms to collect your non-personal information for use in online behavioral advertising. For example, third parties may use the fact that you visited the Site to target online ads for VHEC services to you on non-VHEC websites. In addition, our third-party advertising networks might use information about your use of the Site to help target non-VHEC advertisements based on your online behavior in general. For information about behavioral advertising practices, including privacy and confidentiality, visit the [Network Advertising Initiative website](#) or the [Digital Advertising Alliance website](#).

The use of online tracking mechanisms by third parties is subject to those third parties' own privacy policies, and not this Policy. If you prefer to prevent third parties from setting and accessing cookies on your computer, you may set your browser to block cookies. Additionally, you may remove yourself from the targeted advertising of companies within the Network Advertising Initiative by [opting out here](#), or of companies participating in the Digital Advertising Alliance program by [opting out here](#). Although our website currently does not respond to "do not track" browser headers, you can limit tracking through these third-party programs and by taking the other steps discussed above.

Third-party service providers and business partners. We also use other third-party service providers to help us manage and improve the Site and other VHEC services. These service providers may collect and/or use your personal or other information to assist us in achieving the purposes discussed above in the section entitled "How we use the personal and other information that we collect." For example, we use third parties to process donations on our behalf, and these parties must collect financial and other personal information from you in order to do so. We also use third parties to host our website and to implement our email communications and direct mailings.

We may share your personal or other information with other third parties when necessary to fulfill your requests for services; to complete a transaction that you initiate; to meet the terms of any agreement that you have with us or our partners; or to manage our business.

Sharing with educational institutions. If you apply for financial support from VHEC, we may disclose your personal or other information to your educational institution. Such information could include, for example, your contact information, student ID number, and amount of VHEC funding.

Legal purposes. Finally, we also may use or share your information with third parties when we believe doing so is necessary:

- to comply with applicable law or a court order, subpoena, or other legal process;

- to investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of our terms and conditions, or situations involving threats to our property or the physical safety of any person;
- to establish, protect, or exercise our legal rights or defend against legal claims; or
- to facilitate the financing, securitization, insuring, sale, assignment, or other disposal of all or part of our business or assets.

Aggregated information. From time to time, VHEC may also share anonymized and aggregated information about Site users, such as by publishing a report on trends in the usage of the Site or disclosing the amount collected in donations.

Security

We use commercially reasonable physical, electronic, and procedural safeguards to protect your personal information against loss or unauthorized access, use, modification, or deletion. However, no security program is foolproof, and thus we cannot guarantee the absolute security of your personal or other information.

Reviewing and updating your information

If you want to learn more about the personal information that VHEC has about you, or you would like to update or change that information, please contact us by email at charles.king@vheccorp.org.

Information for Site users from outside the United States

The personal and other information that we collect through the Site or in connection with our other services is transferred to and processed in the United States for the purposes described above. VHEC also may subcontract the processing of your data to, or otherwise share your data with, affiliates or third parties in the United States or countries other than your country of residence. The data-protection laws in these countries may be different from, and less stringent than, those in your country of residence. By using the Site or our other services, you expressly consent to such transfer and processing.

Changes to this Policy

VHEC may update this Privacy Policy from time to time. We will post all such changes on the Site, so you should review this Privacy Policy periodically. If we make a material change to the Policy, you will be provided with appropriate notice.

Effective date: December 18, 2014.