

## **VIRGINIA529 PRIVACY POLICY FOR SOAR VIRGINIA**

Protecting the privacy of your nonpublic personal information is important to us at the Virginia College Savings Plan (Virginia529). We respect your right to privacy and recognize your trust in us to keep information about you secure and confidential.

1. We collect nonpublic personal information about you, including but not limited to your name, social security number, address, and phone number from the following sources:

- Information we receive from you and your college access provider on applications, correspondence, forms and through other forms of communication
- Information about your transactions with respect to your account(s)

2. We do not disclose any nonpublic personal information about our SOAR Virginia scholars or former SOAR Virginia scholars to anyone, except as consented to by the scholars or their parent/guardian or as permitted by law. In addition, we may also disclose all of the information we collect, as described above, to companies that perform marketing and mailing services on our behalf, with agencies or non-profits performing college access, higher education coordination or scholarship services, and to other financial institutions with whom we have joint marketing agreements. These agencies, non-profits, and companies are required to adhere to our privacy and security standards and to use the information for the limited purpose for which it was shared, but they are prohibited from sharing the information with third parties.

3. In compliance with the Family Educational Rights and Privacy Act of 1974 (FERPA) and other applicable state and federal law, you or your parent/guardian authorize Virginia529 and the higher education institute you attend to disclose to each other nonpublic personally identifiable information about you and any other information necessary to administer the SOAR Virginia program and track your higher education progress.

4. We also reserve the right to locate and track your higher education progress to evaluate the effectiveness of the SOAR Virginia program and make improvements to the program. We may issue surveys, speak with the college or university you are attending, employ the use of social media, and online resources that we deem reasonable to track your higher education progress.

5. We restrict access to nonpublic personal information about you to those employees and persons who need to know the information in order to provide service to you. We maintain physical, electronic, and procedural safeguards in compliance with federal regulations to safeguard your nonpublic personal information.

6. We reserve the right to modify or supplement this Privacy Policy for SOAR Virginia at any time. If we ever decide to share your nonpublic personal information other than as described above, we will provide you with a notice informing you of the change and, when required by applicable law, we will allow time for you to choose whether you want the information shared.

Last updated: May 24, 2016

## **Virginia College Savings Plan Web Site Privacy Statement and Disclaimer**

It is the policy of the Commonwealth of Virginia that personal information about citizens will be collected only to the extent necessary to provide the service or benefit desired; that only appropriate information will be collected; that the citizen shall understand the reason the information is collected and be able to examine their personal record which is maintained by a public body.

Our web site does not automatically collect any personally identifiable information simply by your accessing the web site. Combined and anonymous data are collected automatically through the operation of the web site ("CA Data"). We may collect web site usage data (such as which web site pages you visit and in what sequence) through the use of various technologies. For example, we collect IP addresses from individuals who visit the web site. An IP address is a number that is automatically assigned to your computer whenever you're surfing the web. Web servers, the computers that "serve up" web pages, automatically identify your computer by its IP address, and when you request a page from a web site, its servers log your IP address. We do not link IP addresses to any personally identifiable information, so although your session will be logged, you will remain anonymous to us and the web site unless you log on to the account holder only portions of the web site. We may also collect password information from you when you log in, as well as computer and connection information such as browser type or version. During some visits, we may use software tools, such as Javascript, to measure and collect session information, including page response times, download errors, time spent on certain pages, page interaction information, and methods used to browse away from the page.

Like many web sites, we use "cookies" or other similar technologies to collect CA Data. A cookie is a small data file that writes to your hard drive for record keeping purposes when you visit the web site. Cookies allow the web site to measure traffic activity on the web site and to enhance your experience by, for example, remembering your passwords and viewing preferences, allowing you to log on to account holder only portions of the web site without having to re-enter authentication information. Most browsers are initially set to accept cookies. If you prefer, you can set your browser to refuse cookies or to alert you when cookies are being sent, but it is possible that some parts of the web site will not function properly if you do so.

In addition, we may use a service that collects data remotely by using so-called "pixel tags," "web beacons," "clear GIFs" or similar means (collectively, "Pixel Tags") embedded in the web site's content or on banner ads on third party web sites which you click on to be automatically linked to our web site. A Pixel Tag is an electronic image, often a single pixel (1x1), that is ordinarily not visible to web site visitors and may be associated with cookies on the visitors' hard drives. This information is anonymous data.

If you elect to provide us with your email address and/or mailing address, we store this information in an offline database in order to be able to send you the information you requested. The individual who is the subject of personal information maintained by the Virginia College Savings Plan may have access to that information upon written request. The Virginia Freedom of Information Act contains an exemption that protects individual personal information in the possession of the Virginia College Savings Plan from mandatory disclosure, except to the individual who is the subject of the information or as otherwise required by applicable law.

The Virginia College Savings Plan, an independent agency of the Commonwealth of Virginia, is established and governed by the provisions of sections 23-38.75 et seq. of the Code of Virginia (1950), as amended (after October 1, 2016 sections 23.1-100 of the Code of Virginia (1950), as amended). Changes to the law can only be made by the General Assembly. The Virginia College Savings Plan is also designed to meet the requirements of a "qualified state tuition program" under section 529 of the Internal Revenue Code (1986), as amended (26 U.S.C. Section 529) and the proposed regulations promulgated thereunder. These laws and regulations are subject to change at any time.

The Virginia College Savings Plan maintains our web site to enhance public access to Virginia College Savings Plan information. We strive to keep all information on our web site updated and accurate.

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. We may disclose all of the information we collect, as described in the Virginia529 Privacy Policy for SOAR Virginia.

In the event of any conflict between governing authorities and the information on our web site, the governing authorities shall have precedence. Information on our web site does not supersede the actual written contracts and agreements that establish Virginia College Savings Plan accounts. Our system and related software and equipment are intended solely for the communication, transmission, processing, and storage of Virginia College Savings Plan information.

Our web site includes downloadable documents and forms. Permission to copy or print a personal-use copy of this material is hereby granted and brief quotations for the purposes of news reporting and education are permitted. Otherwise, no part of this material may be used or reproduced without permission in writing from the Virginia College Savings Plan.

Unauthorized attempts to modify any information stored on this system, to defeat or circumvent security features, or to use our system for other than its intended purposes are prohibited and may result in criminal prosecution.