

VIRGINIA529 PRIVACY POLICY FOR SOAR VIRGINIA

**This Privacy Policy applies only to information collected about SOAR VIRGINIA scholars with regard only to SOAR VIRGINIA accounts administered by the Virginia College Savings Plan.*

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, phone number, and educational information from the following sources:

- Information you or your college access provider discloses to us on applications, correspondence, forms and through other forms of communication;
- Information about your transactions with respect to your account(s), including account balances, account numbers, and disbursement information; and
- Information from your educational institutions as required to implement the SOAR Virginia program.

2. We do not disclose any nonpublic personal information about our SOAR Virginia scholars or former SOAR Virginia scholars to anyone, except as you and/or your parent/guardian agrees in writing or as permitted by law. We share nonpublic personal information with nonaffiliated entities, such as financial service providers and college access providers, for our everyday business purposes in order to process transactions, maintain accounts, respond to court orders and legal investigations and as otherwise permitted by law. You cannot opt out of this sharing. We require any entity with which we share your information to adhere to our privacy and security standards and to use the information for the limited purpose for which it was shared.

3. In compliance with the Family Educational Rights and Privacy Act of 1974 (FERPA) and other applicable state and federal law, you and/or your parent/guardian authorize Virginia529 and the higher education institution 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 collect information about you by soliciting your opinion via survey, speaking with the college or university you are attending, employing the use of social media, and using other 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. These measures include computer safeguards and secured files and buildings.

6. We reserve the right to modify or supplement this Privacy Policy for SOAR Virginia at any time. Before we ever decide to share your nonpublic personal information other than as described above, we will provide you with written notice informing of the change and, when required by applicable law, you will be able to opt out of such sharing.

California Residents only: Other than for our everyday business purposes or for marketing our products and services to you, we will not share your personal information with nonaffiliates without first giving you additional privacy choices.

Last updated: [January 31, 2019]