Website Privacy and Security Policy

Date of Last Revision: April 15, 2024

Your privacy is important to us. Brazos Higher Education is a nonprofit corporation that manages, by contract, the group of nonprofit companies listed below ("Brazos Managed Companies")(together referred to as "We" or "Us" or "Our"). This Privacy Policy ("Policy") describes how We collect, use, share, and protect your Personal Information. This Policy applies to any individual from whom We collect Personal Information when you interact with Us online through studentloans.com (the "Site").

The Brazos Managed Companies include Brazos Education Lending Corporation, Brazos Higher Education Authority, Inc., Brazos Education Loan Authority, the Brazos Education Foundation, and Brazos Education Funding 2015.

The term "Personal Information" means information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual.

While the scope of this Policy is limited to Personal Information obtained or collected when you interact with Us through the Site, as a general matter, We follow the following privacy principles in all of Our interactions with a particular individual, either online through the Site or through other avenues We may use to conduct business:

- We do not sell your Personal Information.
- We do not allow those who are doing business on Our behalf (i.e., our service providers) to use your
 Personal Information for their own marketing purposes.
- We contractually require any person or organization providing products or services on Our behalf to protect your Personal Information.
- We may share your Personal Information and permit others to use your Personal Information only if you
 consent, it is necessary to originate a service or a transaction you request, or as otherwise permitted or
 required by law.
- We handle Personal Information about former and prospective customers and noncustomers the same as existing customers.

If We change our privacy practices set forth in this Policy, We will make updates to this Policy and will provide additional notification to you, where required by law.

1. HOW AND WHAT PERSONAL INFORMATION WE COLLECT

We collect your Personal Information in different ways depending on how you interact with Us. For example, we collect your Personal Information from:

- Interactions with Our corporate and social media websites and mobile environments through the use of cookies, pixels, web beacons and other similar technologies;
- Interactions with Our online advertisements; and
- Forms related to Our products and services that you choose to complete on Our Site.

Depending on your relationship with Us, the categories of your Personal Information We collect may vary but include:

- Identifiers and contact information (Examples: name, phone number, address, email address, mobile phone number, IP address, cookie ID);
- Personal Records (Examples: Signature, education, employment);
- Personal Characteristics and Traits (Examples: Age, marital status, sex, racial or ethnic origin);
- Transaction and/or Commercial Information (Examples: Products or services used or considered);

- Internet Usage History (Examples: Search, browsing history, and other interactions)
- Social Media Usage (Examples: Interactions you have with Our social media platforms, comments you make, posts you share, other interactions);
- Location Data (Examples: Where you enable location-based features on your device or a rough location);
- Device Information (Examples: Apple IDA, Android Advertising ID, or other unique identifier assigned to your mobile device); and/or
- Non-public Education Records (Examples: School Transcripts you may upload, or other information you may include in an essay or questionnaire).

2. HOW WE USE YOUR PERSONAL INFORMATION

We use your Personal Information for reasons such as:

- With your consent, to facilitate the processing and servicing of your requested transactions;
- Marketing Our products and services to you;
- Measuring and analyzing traffic and browsing activity on our Site;
- Measuring and analyzing the performance of our advertising campaigns;
- Showing advertisements for our products and/or services to you on third-party site;
- Improving Our products and services and ways to better service your requests and/or inquiries;
- Responding to your feedback and inquiries;
- Monitoring website or mobile usage and/or performance;
- Remembering personal settings and preferences to enhance your customer experience;
- Developing and offering you additional options or enhancing your online experience;
- Providing you personalized insights into the usage and management of your accounts;
- Ensuring technological compatibility with your computer and mobile devices; and
- Performing other activities as required by law.

We and Our service providers may also use anonymized or de-identified information for analysis to understand more about Our customers and Our industry, or for commercial purposes permitted by law. This information is not Personal Information.

3. HOW WE SHARE YOUR PERSONAL INFORMATION

We share your Personal Information with Our contracted service providers for the uses described in the "HOW WE USE YOUR PERSONAL INFORMATION" section above. The categories of third parties with which We share your Personal Information include:

- Loan and transaction servicers;
- Marketing service providers;
- Marketing partners; and
- Technology service providers; and/or
- As otherwise allowed or required by applicable law.

We do not sell or otherwise share your Personal Information with third parties.

4. HOW WE PROTECT YOUR PERSONAL INFORMATION

We take Our responsibility to protect your information very seriously. We use, and ensure Our service providers use, reasonable physical, technical, and procedural safeguards to secure your information from unauthorized use, access, alteration or disclosure. Please see the Security section below for additional information.

5. CHILDREN'S ONLINE PRIVACY

Our online services are not intended for the use of children under the age of 13. We do not knowingly collect or

retain any Personal Information from individuals under the age of 13 online. If you believe We have collected any Personal Information from a child under 13, please contact Us using the information below.

6. OTHER IMPORTANT INFORMATION RELATED TO THE USE AND CONTROL OF YOUR INFORMATION

a. Links to Third-Party Websites

Our Site may contain links to third-party sites or provide tips and tools related to student loans and finances or links to governance regulator websites for additional information. These links, pointers, and information are not part of Our Site. We do not make any representations or warranties regarding these third-party websites. The third-party websites may contain privacy policies, statements, promises, or provisions that differ from the studentloans.com Website Privacy and Security Policy. We are not responsible for any losses or damages in connection with the information, security, privacy practices, availability, content, or accuracy of materials of such third-party websites or applications. We encourage you to review the Terms of Use and Privacy Policy of all third-party websites before you share any personally identifiable information with them.

b. Third-Party Widgets

Please also be aware that We allow certain widgets (e.g., social share buttons) on our Sites that enable users to easily share information on another platform, such as a social media platform. The third parties that own these widgets may have access to information about your browsing on pages of Our Site where these widgets are placed.

c. Cookies

Cookies are small text files that are placed on your computer to distinguish you from other visitors to Our Site. The use of cookies helps Us to improve your experience on Our Site by providing data on which features and services are popular. The use of cookies is standard practice. We or Our third-party advertising service providers may place cookies or similar files on your hard drive. Certain web browsers can inform you every time a cookie is being sent to you and certain web browsers allow you to choose not to accept cookies. You can also delete cookies from your computer at any time. If you refuse cookies, the functionality of our website may be impacted or become non-functional. Since every browser and computer is different, you will need to follow your browser's instructions for disabling or deleting cookies.

d. Pixels, Web Beacons, and Other Technologies

We or Our third-party advertising service providers may also use technologies to track users' interactions with Our Site. Some of these technologies include web beacons (transparent graphical images placed on a website), pixels, tags, and Flash objects (also referred to as "Local Shared Objects"). Please refer to your browser's instructions to remove cached Sites, history, and images from your computer.

7. HOW TO OPT OUT OF CERTAIN TECHNOLOGIES

You may be able to decline to have your Personal Information collected via third-party tracking technologies as described above by navigating to the settings feature on your browser and declining all third-party cookies or declining all third-party cookies from specific sites. On your mobile device, you may limit ad tracking or reset your advertiser identifier via the privacy settings on your mobile device. If you use these functions, you will still have full use of the site.

Some of our partners may use non-cookie technologies (such as pixels) that may not be impacted by your browser settings, or your browser may not permit you to block such technologies. For this reason, you can use the following third-party tools to decline the collection and use of information for the purpose of serving you interest-based advertising:

- The NAI's opt-out platform
- The EDAA's opt-out platform
- The DAA's opt-out platform

<u>Do Not Track</u>: Some browsers have a "do not track" feature that is intended to allow you to notify websites that you do not want to have your online activities tracked. If you have your "do not track" signals turned on to disable the collection of information about your activities, you will still have full use and functionality of the Site.

8. SECURE SUBMISSION OF PERSONAL INFORMATION

Please only submit Personal Information to Us through secure channels such as online application or forms, over the phone, or as otherwise directed Us. Please be advised, sending Personal Information by email or text is not considered a secure channel through which to send Personal Information. Do not provide sensitive Personal Information, such as your social security number or account number, in public forums, such as social media websites. Please carefully review the Terms of Use and Privacy Policies on these social media and other sites as they may be different than Our own policies.

9. WEBSITE SECURITY

We use Secure Sockets Layer (SSL) protocol to establish an encryption link between Our web server and your browser. This link ensures that all data passed between the web servers and browsers remain private and integral. SSL is an industry standard. We have a zero-tolerance policy for misuse, misappropriation, unauthorized access, tampering, damage, destruction, or unlawful utilization of Our Site and computer systems and will seek the maximum enforcement of state, federal and international criminal and civil laws against any individual engaging in such activity.

10. CHANGING OR UPDATING YOUR INFORMATION

If you wish to change any information that you believe was collected through your interaction with studentloans.com or that you provided on the Site, please contact Us as indicated below.

If you have taken out a loan with Us, or have applied for a loan, you can access and update most of your personal information through Our servicer providers, which includes a student loan servicer, originator or collection agency, that is handling your account on Our behalf.

11. CHANGES TO THIS POLICY

This Policy may be modified when necessary to conform to federal, state, local and international laws and regulations, and at other times to conform to technological changes, court decisions and changes in policy. It is recommended that you check the Website Privacy and Security Policy every time you visit studentloans.com

QUESTIONS/CONTACT US

Should you have any questions, concerns, or desire additional information concerning this Policy, please contact Brazos Higher Education:

By email at: CustomerRelations@brazos.us.com

By mail at: Brazos Higher Education

Attn: Customer Relations 5609 Crosslake Parkway Waco, Texas 76712