

Privacy Policy

This Site is solely owned and operated by International Scholarship and Tuition Services, Inc. (f/k/a Scholarship Program Administrators, Inc.), a Tennessee corporation with its principal place of business at 1321 Murfreesboro Road, Suite 800, Nashville, TN 37217. We are dedicated to protecting your privacy and handling any personal information you provide to us with care and respect. Please read this policy carefully and make sure you understand it before you start using the Site and any of the services provided on or through the Site (“Services”).

International Scholarship and Tuition Services, Inc. (hereinafter referred to as the “Company”, “ISTS,” “we,” “us,” or “our”) complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. ISTS has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. This privacy policy outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it and the notice and choice affected individuals have regarding our use of and their ability to correct that information. This privacy policy applies to all personal information received by the Company whether in electronic, paper or verbal format. ISTS is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

In compliance with the EU-US Privacy Shield Principles and the General Data Protection Regulation (GDPR), ISTS commits to resolve complaints about your privacy and our collection or use of your personal information. European Union, as well as non-EU individuals with inquiries or complaints regarding this privacy policy should first contact ISTS at:

ContactUs@applyISTS.com or

ISTS Program Support
1321 Murfreesboro Road, Suite 800
Nashville, TN 37217
USA

ISTS has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacy-shield/for-eu-consumers/> for more information and to file a complaint.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

By accessing the Site or using the Services, you confirm that you have read and consent to this privacy policy. This policy may change, so please refer back to it periodically.



1. Collection and Use of Information

Information Collected As Part of the Application Process

In order to be considered for the scholarship, tuition assistance or award programs (“Programs”) administered on this Site and receive other related services from us, you are required to complete and submit an online application and provide us with certain information. This may include your full name, address, email address, phone number, school, grade level, parent name(s), parent phone number(s), parent email address(es) and, in some cases, your social security number and relevant tax information (collectively, “Personally Identifiable Information” or “PII”). You may also be required to provide other information such as your date of birth, gender, personal interests, academic performance data, extracurricular activities, or personal essays, etc. Actual types of information we collect may vary depending on each Program we administer. If you send us personal correspondence, such as emails or letters, we may collect such information into a file specific to you. You always have the option to not provide any information by choosing not to use our Services or apply for a Program through our Site.

We own all information collected from the users of the Site. Information will be collected by us when you complete the application and click the “Submit” button. However, our system automatically saves information that you have entered on each page during the application process for your convenience. Therefore, even if you decide to abandon the application or do not submit your application in the end, the information you provide on the Site may still be collected and is subject to this policy.

We may use your PII to contact you if we have any questions about your application, to respond to your inquiries, to send you confirmations regarding your application, to notify you of your account updates, application status or certain features on or changes to the Site, to send you service related announcements, or to send you other communications necessary for us to administer the Program or the Services.

We may also use your PII to send you our informational newsletters or promotional materials. However, if you do not wish to receive such materials, you may “opt-out” of receiving such materials (see Section 3 Choice/Opt-out).

Other Information Collected Through Technology

We collect certain information through technology to make our Site more interesting and useful to you and for purposes related to our business. Such information, standing alone, is not personally identifiable, unless linked with PII.

Log Files

As is true of most Web sites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

We use this information, which does not identify individual users, to analyze trends, to administer the Site, to track users’ movements around the Site and to gather demographic information about our user base as a whole.

We may also use a third-party tracking service that uses cookies or log files to track non-



Personally Identifiable Information about visitors to our Site in the aggregate.

Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on our Site. We do not link the information we store in cookies to any PII you submit while on our Site.

We may use both session ID cookies and persistent cookies. We use session ID cookies to make it easier for you to navigate our Site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file. If you reject cookies, you may still use our Site, but your ability to use some or all areas of our Site may be limited. We may set a persistent cookie to store your passwords, so you don't have to enter it more than once. Persistent cookies also enable us to track and target the interests of our users to enhance the experience on our Site.

Clear Gifs (Web Beacons/Web Bugs)

Certain scholarship program sponsors may employ a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), within their scholarship application pages. These clear gifs are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence.

We use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns.

2. Sharing and Disclosure of Information

Aggregate Information (non-personally identifiable)

We may share aggregated demographic information about our user base with our partners. This information does not identify individual users. We do not link aggregate user data with PII.

Personally Identifiable Information

Program Sponsors

By submitting an online application through the Site, you acknowledge and agree that we may disclose any and all of your personal information (identifiable or not) to the sponsors of the specific Program for which you are applying. We are not responsible for the use and security of the information once it is in the care or control of such third-party sponsors of the Program.

Certain program sponsors maintain an independent privacy policy with specific terms for applicants to their respective programs. In these cases, the terms contained within these independent policies supersede the terms of this privacy policy. If you are applying for a program sponsored by an organization listed below, please refer to the independent policy displayed on the first page of the application for information regarding the terms of the



governing policy.

- ADP, Inc. or its affiliates
- CollegeCounts Scholarship Program
- New York State Higher Education Services Corporation
- Sacramento Municipal Utility District (SMUD)
- The Vertex Foundation

Service Providers

We may use third parties to provide certain services on our Site (“Service Providers”) on our behalf. We will only share your PII as necessary for such Service Providers to provide those services. These Service Providers are prohibited from using your PII for any other purpose.

Third-Party Advertisers

We may share your PII with a third-party advertiser (other than the Program sponsors, our agent or Service Providers). Such third-party advertiser may use your PII to send you promotional materials. We are not responsible for such third party’s use of your information or the security of your information once it is in the care or control of such third party. We do not share your social security number or your personal tax information with such third-party advertisers. If you do not want us to share your PII with such third party, you may contact us directly (see Section 3 Choice/Opt-Out) to opt-out of having your PII shared with or disclosed to such third party.

Legal Requests

We reserve the right, without notice to you, to disclose your PII in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

Disclaimer

We cannot ensure that all of your private communications and other personal information will never be disclosed in ways not otherwise described in this policy. By way of example (without limiting the foregoing), we may be forced to disclose personal information to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or a third party may abuse or misuse your personal information that they collect from the Site.

In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, ISTS is potentially liable.

3. Choice/Opt-out

If we send you any informational newsletter or promotional material, and you no longer wish to receive such materials from us, you may opt-out of receiving them by following the relevant instructions provided to you on the material itself or by updating your preferences on your Profile at <https://aim.applyISTS.net>. If you no longer consent to our disclosure of your PII to third-party advertisers, you may contact us directly to opt-out (see Section 11 Contact Us) at any time.



Once you make the choices to “opt-out”, it may take up to 30 days for your choices to be fully effective, as our systems require time to update the relevant information and some promotional communications using your PII may have already been initiated or in process. Some third-party advertisers with whom we have shared your PII before you exercised your opt-out choices may continue using your PII for promotional purpose. We cannot control or stop such third party’s use of your PII. You may contact such third-party advertisers directly to stop their use of your PII.

4. Privacy Protection for Children under the Age of 13

We do not collect PII directly from children who are under 13 years old (“Child Applicant”). However, a Child Applicant may occasionally be eligible for certain Programs administered through our Site, in which case, a parent or legal guardian of such Child Applicant must provide permission for the child to provide PII to us. The parent or legal guardian must also provide his or her own contact information (e.g., email address, mailing address and phone numbers) to us, and we will send all of our communications directly to such parent or legal guardian. The personal information (identifiable or not) of such parent or legal guardian collected is subject to this privacy policy.

Unless otherwise stated herein, this privacy policy applies to a Child Applicant’s information that we collect from a parent or legal guardian, except that (1) we do not share PII of a Child Applicants with any third party advertisers (other than the Program sponsors, or our agent or Service Providers, for the purposes stated in this privacy policy), (2) we will only send our promotional communications or newsletters to the parent or the legal guardian who provided the Child Applicant’s information to us, and (3) we do not link or tie, and prohibit third party advertisers from tying or linking, any such Child Applicant’s PII to log files, cookies, clear gifs or other tracking mechanisms used on the Site.

For more information on online privacy protection for children under 13, please visit: <http://www.ftc.gov/privacy/privacyinitiatives/childrens.html/>.

5. Links to Other Sites

This privacy policy applies only to information collected by our Site. This Site contains links to other sites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our Site and to read the privacy statements of each and every Web site that collects PII.

6. Changes to Personally Identifiable Information

We acknowledge the right of individuals to access their personal data. If any of your information changes, or if you no longer desire some or all of our services, you may correct or update your information through the “My Profile” tab on your Home page. If you would like to delete your information and your account, contact us directly using the contact information provided in Section 11 Contact Us. If you wish to remove all of your information from our records and you have not won any award through us, you must provide us your full name, address, date of birth, email address, and any other information we require when you contact us for such purpose.

7. Security

The security of your personal information is important to us. We follow generally accepted



industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. If you have any questions about security on our Site, you can email us at ContactUs@applyISTS.com.

8. Business Transitions

In the event we go through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, your PII will likely be among the assets transferred.

9. Changes in this Privacy Policy

We reserve the right to modify this privacy policy at any time without notice to you, so please review it frequently. If we make changes to this policy, we will post them here, on our home page, and other places we deem appropriate. The revised policy will apply with respect to all of your information, including your PII, even if it was collected before the revised policy was instituted. You are bound by the revised policy unless and until we have deactivated your account and deleted all of your information we have collected upon your request.

10. Contact Us

If you have any questions or suggestions regarding our privacy policy and our information and data collection and use practices, please contact us at:

International Scholarship and Tuition Services, Inc. (ISTS)
1321 Murfreesboro Road
Suite 800
Nashville, TN 37217
Phone: 615-777-3750
Contact Us: <https://ISTSprogramsupport.com/contact-us/>
Fax: 615-627-9070

This policy is effective as of July 31, 2010
Updated September 14, 2020

