

UNIVERSITY OF PHOENIX PRIVACY POLICY

Updated: December 30, 2019

The University of Phoenix, Inc. and its affiliate Apollo Education Group, Inc. (“**University**,” “**us**” or “**we**”) recognizes the importance of privacy. In this Privacy Policy (the “**Privacy Policy**”), we disclose our practices with respect to the Personal Information (defined below) that we collect about individuals, as well as the choices and rights individuals have with respect to their Personal Information that we have collected.

OVERVIEW	
<p>This table provides a summary of the personal information we collect and how we use it, which is further explained in our Privacy Policy below. While the actual information we collect and our use of such personal information varies depending upon the nature of our relationship and interactions, the table below provides a general overview of the categories of personal information we collect and the purposes for which we use such information.</p>	
Categories of Personal Information Collected	Uses of Personal Information
<p>Name, contact information, and other identifiers: such as real name, alias, postal address, telephone number(s), unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.</p>	<p>Administering applications, enrollment, registration, and financial services</p> <p>Providing support and services</p>
<p>Customer records: including paper and electronic customer records containing Personal Information, such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, other financial information, medical information, or health insurance information.</p>	<p>Personalizing content and experiences</p> <p>Marketing and promotional purposes</p> <p>Analyzing and improving our services and operations</p> <p>Securing and protecting our assets and rights and preventing misconduct</p>
<p>Protected classifications: such as race, color, sex, age, religion, national origin, disability, and citizenship status.</p>	<p>Complying with legal obligations</p>
<p>Commercial information: including records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.</p>	<p>Supporting our general business operations</p>
<p>Biometric information: physiological, biological, or behavioral characteristics that can be used alone or in combination with each other to establish individual identity, including; imagery of fingerprint, face, and voice recordings—from which an identifier template can be extracted.</p>	
<p>Internet or other electronic network activity information: including, but not limited to, browsing history; search history; and information regarding a consumer’s interaction with an Internet website, application, or advertisement.</p>	
<p>Geolocation data: precise geographic location information about a particular individual or device.</p>	

<p>Audio, video and other electronic data: audio, visual, electronic, thermal, olfactory, or similar information, such as photos, call recordings, and CCTV footage.</p>	
<p>Employment history: professional or employment-related information.</p>	
<p>Education information: information regarding past and present education, including institutions attended, years of attendance, courses of study, attendance records, grades, awards earned, degree(s) obtained, discipline records, financial aid awards and payment history, as well as assignments and other student-generated work or contributions to online discussions. The information collected about a student or potential student may include both directory and non-directory information as those terms are defined in FERPA and the University's FERPA policy.</p>	
<p>Inferences drawn from any of above categories of Personal Information: inferences used to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	
<p>California residents. If you are a California resident, please be sure to review the Additional Information for California Residents section below for important information about the categories of personal information we collect and disclose and your rights under California privacy laws.</p>	

1. Scope

This Privacy Policy applies to Personal Information we collect about users of our Sites, Apps, Wi-Fi hotspots, and other online services, (collectively, our “**Services**”), as well the Personal Information we otherwise collect about individuals, including current and potential students, alumni, visitors to our campuses, prospective students, and others with whom we interact, whether online, via phone, or offline. If you are an employee, contractor or job applicant, then this Policy only applies to you when you are using our Services outside of those roles.

Certain Services may be subject to additional privacy policies or privacy disclosures relating to the services provided on the Site(s) (collectively, “**Additional Policies**”). In the event of any direct conflict between any Additional Policies and this Privacy Policy, the Additional Policies will take precedence.

Student Educational Records. If you become a student, your educational information that is part of your educational record with us is subject to the U.S. Federal Family Educational Rights and Privacy Act (FERPA), state laws and the University's policies (collectively “Student Educational Records Requirements”). In the event of any conflict between Student Educational Records Requirements and this Privacy Policy, the Student Educational Records Requirements will take precedence. Students have the right to limit access to their educational records and to request a copy of such records, as set forth in the University's [FERPA policy, click here](#). You may also contact us via one of the below methods:

Mail
 University of Phoenix
 Attn: Registrar's Office
 4025 S. Riverpoint Parkway

Mail Stop: CF-L201
Phoenix, AZ 85040

Phone

Admissions and Records Service Center: 800.866.3919.

The University may amend or otherwise modify this Privacy Policy at any time, so please revisit this page periodically to check for updates. The date of last revision is shown at the top of this document.

2. Definitions

As used in this Privacy Policy, the following terms have the following meanings:

“Aggregate and De-identified” means information that has been de-identified or aggregated so that it no longer reasonably identifies, relates to, describes, and is no longer reasonably capable of being associated with, or linked, directly or indirectly to an individual. Aggregate and De-identified information is no longer Personal Information.

“Apps” means software which may be utilized on our Sites and downloaded to or accessed through a computer or mobile device.

“Applicable Privacy Law(s)” means the consumer data protection and privacy laws or regulations to which the University is subject.

“CCPA” means the California Consumer Privacy Act of 2018, as amended, and any implementing regulations.

“Education Partners” means other companies or institutions who may participate in various University initiatives (e.g., companies making University programs available to their employees, potential employers, institutions conducting academic research or providing academic reporting, etc.).

“Other Third Parties” means third parties that are not Education Partners and who are not providing services as Service Providers.

“Publicly Available Sources” means information that is lawfully made available from federal, state, or local government records.

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household.

“Services” means our Sites and/or Apps that link to or display this Privacy Policy, as well as our Wi-Fi hotspots, and other online services we make available.

“Service Providers” means entities that the University contracts with to provide services on our behalf.

“Site” means any website owned or operated by the University, which links to or displays this Privacy Policy.

“Social Network” or **“Social Networking”** means various Internet communication technologies provided on the Services as well as on third party social networking sites such as LinkedIn, Facebook, Microsoft Teams, Yammer, etc., that facilitate conversation and interaction between people online and includes, but is not limited to, blogs, discussion forums, wikis, chat sessions, news groups, etc.

“Social Network Content” (or **“SNC”**) means user-generated content you consent to share via a Social Network and includes, but is not limited to, Personal Information, digital sounds, and pictures that you upload to a Social Network. It also includes your Personal Information that may be displayed on other users' Social Network pages.

3. Collection of Personal Information

We collect information about you directly from you, from third parties, and automatically through your use of our Services or interactions with us. We may combine the information we collect from these various sources.

Directly Collected Information. We collect Personal Information that you provide to us voluntarily (online or offline), including when you: respond to an advertisement; participate in a survey or a drawing; request information; apply for admission to the University; go to receive a photo ID for one of the University campuses; register for classes; apply for financial aid; order educational or other products and services; set up a Social Network or other Site profile; use one of our career resources, learning assessments, or other interactive tools; or otherwise interact with us online or offline. The exact nature of the Personal Information may vary depending on the type of response or service requested, but could include name, contact details, date of birth, education history, financial information, employment status, photos, interests, demographic information, and other information.

Automatically Collected Information. We and our Service Providers may use cookies, pixels, third party tags, scripts, log files, and other means to automatically collect information about the use of our Services and services, including (but not limited to): device information such as your hardware model, operating system, IP address, and unique device identifiers; collection date; publisher name; connection speed; day of week and time of day; language settings; country, state, city (relating to IP address, if available); domain (e.g., .com, .net, .mil, .org, .edu, etc.); web pages viewed; and email clicks or other actions taken. See the **Cookies and Similar Technologies** section below for more information. This information that we collect automatically may be linked with Personal Information to accomplish the purposes described in this Privacy Policy. In addition, we may use CCTV and other security monitoring to secure our premises, which may lead to the collection of Personal Information about visitors to our campuses. Further, when you call us, we may record calls for quality and training purposes.

Information Collected from Other Sources. We may also obtain Personal Information from Education Partners, Service Providers, Other Third Parties, and Publicly Available Sources, which may be combined with other Personal Information we have collected. For example, we may receive Personal Information about you from educational institutions which you have attended; financial institutions (e.g., related to student loans); government entities (e.g., related to education grants); employers (e.g. related to education or career initiatives); third party platforms or accounts that you connect to or integrate with one or more of our Services; providers that we work with to verify, update, or append data to the information that we have otherwise collected about you; third parties that we work with to identify prospective students or other individuals who may be interested in our services; and other third parties they support or that work with us to provide or make available our services.

Categories of Personal Information Collected

While the Personal Information we collect varies—as explained above—depending upon the nature of the services provided or used and our interactions with individuals, generally we may collect the following categories of Personal Information:

- **Name, contact information, and other identifiers:** such as real name, alias, postal address, telephone number(s), unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- **Customer records:** including paper and electronic customer records containing Personal Information, such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, other financial information, medical information, or health insurance information.
- **Protected classifications:** such as race, color, sex, age, religion, national origin, disability, and citizenship status.
- **Commercial information:** including records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.
- **Biometric information:** physiological, biological, or behavioral characteristics that can be used alone or in combination with each other to establish individual identity, including; imagery of fingerprint, face, and voice recordings—from which an identifier template can be extracted.
- **Internet or other electronic network activity information:** including, but not limited to, browsing history; search history; and information regarding a consumer's interaction with an Internet website, application, or advertisement.
- **Geolocation data:** precise geographic location information about a particular individual or device.
- **Audio, video and other electronic data:** audio, visual, electronic, thermal, olfactory, or similar information, such as photos, call recordings, and CCTV footage.
- **Employment history:** professional or employment-related information.
- **Education information:** information regarding past and present education, including institutions attended, years of attendance, courses of study, attendance records, grades, awards earned, degree(s) obtained, discipline records, financial aid awards and payment history, as well as assignments and other student-generated work or contributions to online discussions. The information collected about from a student or potential student may include both directory and non-directory information as those terms are defined in FERPA and the University's [FERPA policy](#).
- **Inferences drawn from any of above categories of Personal Information:** inferences used to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

4. Use of Personal Information

We may use the Personal Information we collect for the following purposes:

- **Administering applications, enrollment, registration, and financial services:** to review and process applications and registrations; to verify the information you provide us, determine your admissibility, register you for selected educational programs, and contact you relating to your University status; to provide financial services related to tuition payments and financial aid applications; to maintain student records; and for other related purposes.
- **Providing support and services:** to provide you with student services, including advice related to programs and degrees and connect you with relevant career and other resources; to provide

our Services, online services and other products and services; to communicate with you about your access to and use of such Services, online services, and other products and services; to respond to your inquiries; to provide troubleshooting, fulfill your orders and requests, process your payments, and provide technical support; and for other customer service and support purposes. To facilitate communications and collaboration with you and others in our University community, including through our Education Partners, and our social networking, community, and collaboration features.

- **Personalizing content and experiences:** to tailor content we send or display on the Services in order to offer location customization and personalized help and instructions and to otherwise personalize your experiences; to reach you with more relevant ads and to measure ad campaigns.
- **Marketing and promotional purposes:** to send you newsletters, offers, or other information we think may interest you; to contact you about our products or services or information we think may interest you; to administer promotions and contests; and to promote our University and the programs and other services we offer.
- **Analyzing and improving our services and operations:** to better understand how users access and use the Services and online services, as well as programs and other services we offer; and for other research and analytical purposes, such as to evaluate and improve our services and business operations and to develop additional programs, services, and features. To improve student retention, our Services, programs, services, and user experiences.
- **Securing and protecting our assets and rights and preventing misconduct:** to protect our business operations, secure our network and information technology assets and services; to prevent and detect fraud, unauthorized activities, cheating, plagiarism, unauthorized access, and other misconduct; and, where we believe necessary, to investigate, prevent, or take action regarding suspected violations of our Student Policies, Terms of Use, or this Privacy Policy, as well as fraud, illegal activities, cheating, plagiarism, misconduct, and other situations involving potential threats to the rights or safety of any person or third party.
- **Complying with legal obligations:** to comply with the law or legal proceedings. For example, we may disclose information in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement, including responding to national security or law enforcement disclosure requirements.
- **Supporting our general business operations:** to support the administration of our general business, accounting, record keeping, and legal functions; including to analyze operational and business results and risks, to collect outstanding amounts owed, and to maintain business and educational records.

Aggregate and De-identified information. We also may de-identify and/or aggregate information to create aggregate or de-identified data sets and reports in order to assess, improve, and develop our business, products, and services; prepare benchmarking reports; and for other research and analytics purposes.

5. Disclosure of Information

We may disclose the Personal Information we collect as follows:

- **Service Providers.** We may share your Personal Information with third party service providers (who use this information to perform services for us), including payment processors, content providers, hosting providers, auditors, advisors, consultants, account collection agencies, and customer service and support providers.
- **Education Partners.** We may share your Personal Information, including academic records such as transcripts and diplomas, with our Education Partners who we work with to make available certain education and career initiatives or who may be doing academic or other institutional research.

- **Other Third Parties.** We may share your Personal Information with Other Third Parties that provide advertising, campaign measurement, online and mobile analytics, and related services. These Other Third Parties may receive or access Usage Data in order to help us better reach individuals with relevant ads and measure our ad campaigns, or to better understand how individuals interact with our Services and online services over time and across devices.
- **Business Transfers.** We may disclose or transfer your Personal Information as part of any actual or contemplated merger, sale, transfer of our assets, acquisition, financing, or restructuring of all or part of our business, bankruptcy or similar event, including related to due diligence conducted prior to such event where permitted by law.
- **Legally Required.** We may disclose your Personal Information as required under applicable law or in response to legal process (e.g., in response to a subpoena or court order).
- **FERPA Permitted.** We may disclose your Personal Information as permitted under FERPA.
- **Protect our Rights.** We may disclose your Personal Information where we believe it necessary to respond to claims asserted against us or to comply with legal process (e.g., subpoenas or warrants); to enforce or administer our agreements and terms; for fraud prevention, risk assessment, investigation and protection of the rights, property or safety of the University, our clients and customers or others.

Aggregate and De-identified data. We may share aggregate or de-identified information with third parties for research, marketing, analytics, and other purposes, provided such information does not identify you.

Categories of Personal Information Disclosed

Certain Applicable Privacy Laws (such as the CCPA) require that we tell you about the categories of Personal Information that we have disclosed for a business purpose as well as the categories that we have “sold” (as that term is defined under the CCPA or other applicable laws). Please review the Categories of Personal Information Collected section above for further descriptions of each category of Personal Information.

Disclosed for a business purpose. In general, we may disclose the following categories of Personal Information to our Education Partners and Service Providers to support our educational and career initiatives and other business purposes:

- Name, contact information, and other identifiers
- Customer records
- Protected classifications
- Commercial information
- Biometric information
- Internet or other electronic network activity information
- Geolocation data
- Audio, video, and other electronic data
- Employment history
- Education information
- Inferences drawn from any of above

Sale of Personal Information. The CCPA defines “sale” or “sell” as disclosing or making available to a third party Personal Information in exchange for monetary or other valuable consideration. While we do not disclose Personal Information to third parties in exchange for monetary compensation, we do disclose or make available Personal Information to third parties in order to receive certain services or benefits from them, such as when we allow third party tags to collect information such as your browsing

history when using our Services, in order to improve and measure our ad campaigns. Pursuant to the CCPA, the categories of Personal Information that we may “sell” as defined under the CCPA include:

- Name, contact information, and other identifiers
- Customer records
- Protected classifications
- Internet or other electronic network activity information
- Geolocation data
- Education information
- Inferences drawn from any of above

6. International Data Transfers

We operate and may process information in multiple jurisdictions, and some Education Partners, Service Providers, and Other Third Parties may be located or process information outside of the jurisdiction in which you reside. In such cases, your Personal Information may be collected, used, disclosed, stored, and processed in these other jurisdictions for the purposes described in this policy. The data protection and other laws of the United States and other countries might differ from your jurisdiction. In addition, your Personal Information may be subject to the laws of those other jurisdictions, including lawful requirements to disclose Personal Information to government authorities.

7. Cookies and Similar Technologies

We use cookies, pixels, tags, local storage objects (also called Flash cookies), web beacons, and other technologies (which may be provided by third parties) on our Services to enable certain functionality on our Services and for security and fraud detection and prevention, as well as to collect usage information about our Services and the emails that we send and to personalize content and provide more relevant ads and information. We may combine the information we collect via these technologies with other information that we collect, including Personal Information.

Cookies. Cookies are alphanumeric identifiers that are transferred to your computer through your web browser for record-keeping purposes. Some cookies enable you to log in to our Services or save certain settings and preferences, while others allow us to track usage and activities on our Services, personalize content on our Services, or deliver more relevant ads on third party sites. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help tab on the toolbar of most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you disable cookies, however, certain features on our Services may not be available or function properly. For more information or to update your preferences for certain third party tags and cookies on our Sites, use our [Preference Center](#).

Pixel tags and embedded script (aka clear GIFs and web beacons). Pixel tags are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer’s hard drive, pixel tags are embedded invisibly on web pages. We may use these in connection with our Services to, among other things, track the activities of users of our services, improve ads, personalize and manage content, and gather usage information about our Services. We may also use these in HTML emails to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded. For more information or to update your preferences for certain third party tags and cookies on our Sites, use our [Preference Center](#).

Local Storage Objects (LSOs). LSOs are data files that are stored locally in your browser by the sites you visit. LSOs can be used in a similar manner as cookies for a variety of purposes, such as keeping track of information you provided and remembering your preferences. Our Services may include video and content that rely on Adobe Flash Player, which uses LSOs (also called Flash cookies). If you have Adobe Flash Player installed on your computer, it can be set to reject or delete LSOs. This option is in the System Preferences on Mac OS X, in the Flash Player Control Panel on Windows®, or with the Flash Player management tools available on the Adobe website. Other types of LSOs include HTML5 Local Storage and similar technologies.

Do-Not-Track Signals. Do-Not-Track (DNT) is a browser-based signal that, when set, signifies your desire not to be tracked online. (For more information about do-not-track signals, please click [here](#).) Our Services do not respond to web browser based DNT signals. You may, however, disable certain cookies and opt out of interest-based advertising as explained in the **Individual Rights and Choices** section below.

8. Interest-Based Advertising

We may work with Service Providers and Other Third Parties (including but not limited to Adobe, Google, LinkedIn, Facebook, Oath) to display advertising on our Services or to manage our advertising on other websites. These third party networks and platforms use cookies, pixel tags, and other technologies to collect information about your activities on our Services and other websites over time to provide you targeted advertising based upon your interests. Some ads are targeted to your interests and preferences, based on your browsing history and other information. Your browsing history may be tracked in these cookies even if ads are not being displayed.

Cross-device. We may also use device information, particularly in mobile advertising, to help deliver our advertising and measure ad campaign effectiveness. To assist us in using device information, we participate in the Adobe Experience Cloud Device Co-op which helps us better understand how users access and use our Services across multiple devices, so that we can better tailor advertising and personalize the experiences of a user across their devices. We do not collect or share your name, email, or other contact details with other Co-op participants, but we may collect your device information when you visit or use one of our Services. Using this information, we may be able to associate you with the other devices you use to access our Services. This information may be associated with your browsing history, identifiers, and demographic so that we can provide more relevant ads and personalized experiences to you across your devices. To learn more about Adobe's Experience Cloud Device Co-op please [click here](#).

Your Choices. For more information, or to exercise certain choices regarding interest-based advertising, please see the **Individual Rights and Choices** section below.

9. Individual Rights and Choices

In this section, we describe the choices and rights individuals have regarding our use and disclosure of their Personal Information.

Marketing Communications

You may opt out of receiving marketing communications as follows:

- **Email.** If you do not wish to receive marketing emails, follow the opt-out instructions in the footer of any marketing email we send or unsubscribe [here](#).

- **Postal Mail.** If you do not wish to receive marketing mailings, you may unsubscribe [here](#).
- **Phone.** If you do not wish to receive marketing telephone calls, you may express your choice during the call or unsubscribe [here](#).
- **Text.** If you do not wish to receive text messages, you may opt out by responding **STOP** to cancel future text messages. To get help, text **HELP**. You may also get additional support or help by sending an email to TextMsgSupport@phoenix.edu or by calling 866-766-0766.

Marketing opt-out requests will only remove you from our list and the list of any Service Provider performing services on our behalf, not from the list of any third party.

Student Educational Records

Students who desire to prevent release of their “**Educational Records**”, as that term is defined by FERPA, may place a “FERPA hold” on their records that will serve to prevent release of any such information absent a lawfully issued subpoena or judicial order. Click here to view the University’s [FERPA policy](#).

Social Networking Content

You may change various user settings related to sharing your Personal Information contained in any user profile you set up as part of Social Network activities furnished by us, subject to contractual, academic, legal, or technical restrictions and reasonable notice. Note that your withdrawal from Social Network activities might prevent us from providing you with certain products or services.

Cookies and Similar Technologies. Using our [Preference Center](#), you can opt out of or change your preferences for most third party cookies and tags on our Sites, except those that are “necessary” to the proper functioning of our Sites or particular features available to you on our Sites. In addition, you may block or disable cookies for the device and browser you are using, through your browser settings; however, certain features on our Sites may not be available or function properly if you block or disable cookies.

Interest-Based Advertising

As explained in the Interest-Based Advertising section above, you have certain choices about how we use your Personal Information for interest-based advertising purposes. You may also update your preferences for third party tags and cookies on our Sites, using our [Preference Center](#), to opt out of third party advertising cookies and tags on our Sites, turn off Targeting cookies.

Individual Rights Under California Privacy Law

The CCPA grants California residents certain rights and imposes restrictions on businesses as set forth below. If you are a California resident, you have the following rights:

Initial Notice: to be notified at or before the point of collection of the categories of Personal Information collected and the purposes for which such categories are used.

Do-Not-Sell: the right to opt out of our “sale” of their Personal Information. To exercise this right, you may submit your request [here](#). In addition, you may opt out of third party advertising—i.e., “Targeting”—cookies and tags on our Sites, using our [Preference Center](#).

Verifiable Requests to Delete and Requests to Know: subject to certain exceptions, California residents have the right to make the following requests, at no charge:

- **Request to Delete:** California residents have the right to request deletion of certain of their Personal Information that we have collected about them and to have such Personal Information deleted, except where an exemption applies.
- **Request to Know:** California residents have the right to request and, subject to certain exemptions, receive a copy of the specific pieces of Personal Information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance. California residents also have the right to request that we provide them certain information about how we have handled their Personal Information in the prior 12 months, including the:
 - Categories of Personal Information collected;
 - Categories of sources of Personal Information;
 - Business and/or commercial purposes for collecting and selling their Personal Information;
 - Categories of third parties/with whom we have disclosed or shared their Personal Information;
 - Categories of Personal Information that we have disclosed or shared with a third party for a business purpose;
 - Categories of Personal Information collected; and
 - Categories of third parties to whom the residents' Personal Information has been sold and the specific categories of Personal Information sold to each category of third party.

California residents may make Requests to Know up to twice every 12 months.

Submitting a Verifiable Request: To submit a verifiable request, submit your request [here](#). Alternatively, you may call 866-809-3444 (US Toll Free).

Discrimination and Incentives: The CCPA prohibits discrimination against those who exercise their rights under the CCPA and imposes requirements on any financial incentives offered to California residents related to their Personal Information. A business may offer financial incentives for the collection, sale or deletion of California residents' personal information, provided it is not unjust, unreasonable, coercive or usurious, and is made available in compliance with applicable transparency, informed consent, and opt-out requirements. California residents have the right to be notified of any financial incentives offers and their material terms, the right to opt-out of such incentives at any time and may not be included in such incentives without their prior informed opt-in consent.

10. Our Security Measures

We have implemented security measures to protect against the loss, misuse, and alteration of the Personal Information under our control. However, no data transmission over the Internet can be guaranteed to be completely secure. As a result, although we will utilize such measures, we do not guarantee you against the loss, misuse, or alteration of Information under our control, and you provide Personal Information to us at your own risk. You should always take care how you handle and disclose your Personal Information and should avoid sending Personal Information through insecure email, Social Networks, or other Internet channels.

11. Monitoring of Communications

We may monitor, record and retain all incoming and outgoing communications for training of our representatives and for quality assurance purposes. To the extent such communications are retained, they are retained in accordance with our records retention policy.

12. Third Party Sites and Links

Some of our Services may contain links to websites or access to services hosted by third parties operating websites or providing services on their own behalf or on behalf of multiple entities. These third parties may collect your Personal Information and may apply their own policies on how your Personal Information is used. **Please make sure to read the policies of any websites or services you visit on the Internet carefully.** We are not responsible for the privacy practices or the content of any websites or services that are not operated by or exclusively for us, and the collection, use, and disclosure of Information about you will be subject to the policies applicable on those websites.

13. Privacy Policy Changes

University of Phoenix may update this Privacy Policy or revise it from time to time. You should contact us as described in the next section or check back at this Site periodically to obtain a current copy of this Privacy Policy. We urge you to review this Privacy Policy frequently to obtain the current version. Your continued provision of Personal Information or use of our services following any changes to this Privacy Policy constitutes your acceptance of such changes. If we intend to use your Personal Information in a manner materially different from that stated at the time it was collected, we will attempt to notify you in advance of such change via a notice on our Site and/or, when appropriate, via email to you.

14. Contact Us

Should you have any questions about our privacy practices, please contact us at Office.ComplianceUOPX@phoenix.edu or by mail:

University of Phoenix
Ethics, Compliance, and Data Privacy
4025 S. Riverpoint Parkway
Phoenix, AZ 85040
CF-L102