PRIVACY POLICY LAST UPDATED MARCH 2024



GENERAL PRIVACY PRINCIPLES

INFORMATION SECURITY

NAF takes reasonable steps to help protect your personal information in an effort to prevent unauthorized access, use, or disclosure. We employ a variety of physical, administrative, and technological safeguards designed to protect personal information against loss, misuse, and unauthorized access or disclosure.

Despite these measures, NAF cannot fully eliminate security risks associated with personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. Any information you submit is at your own risk.

If you have any questions data security, you can contact us at the contact information set forth below.

INFORMATION COLLECTION

We collect information about you to provide you with access to the NAF Website, the NAF Web-based Services, and/or the support you request. The type of information we collect can vary depending on how you access and use our services (see "Policies Specific to NAF Offerings"). Additionally, you can choose to voluntarily provide information to us.

Cookies

We, or our service providers, may use "cookies" and "web beacons" to track and gather certain information when you use the NAF Website and/or the NAF Web-based Services. A cookie is a small text file that contains information and is either stored temporarily in your browser (a session cookie) or placed on your computer's hard drive for a longer, predetermined length of time (a persistent cookie). The cookie is then sent back to the website on your subsequent visits. A web beacon is a small graphic file linked to our servers that allows us to track your use of the site(s). The information gathered by cookies and web beacons is typically non-personally identifiable information like your IP address, operating system, browser type, pages viewed, how much time you spend on a page or at NAF overall, links you clicked, activity information (for example, course assignments you have completed), and suspected geographic location. Cookies and web beacons allow NAF to personalize your experience. We believe the use of cookies and web beacons will improve your experience.

By using the Website and/or the NAF Web-based Services, you are giving your consent to our and our service providers' use of cookies to track and gather information. If you do not consent, you must discontinue your use of the Website and/or the NAF Web-based Services or configure your browser to reject cookies (see next paragraph). Web beacons are generally used in conjunction with cookies, so if your browser is set to reject cookies, or if you delete cookies, web beacons will not be able to track your activity as you navigate between websites.

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You may have activated your Web browser's "do not track" signal or another mechanism through which you exercised your preference regarding the collection of personally identifiable information about your online activities over time and across third-party websites or online services. We will honor your preferences and prevent storage of tracking data on your computer while you are on the Website. However, as certain NAF Web-based Services (ASH and NAFTrack require users to log into registered accounts, cookies must be enabled for users to benefit from the full services of these platforms.

Children

We do not knowingly collect information from children under the age of 13 unless and until NAF has received consent and authorization to collect information from or on behalf of such students. Please contact us at support@naf.org if you believe we have inadvertently collected personal information from a child under 13 without proper consent. This will allow us to delete such information as soon as possible.

USE OF INFORMATION

We process the data we collect about you to provide, maintain, secure and improve the NAF Website and the NAF Web-based Services, develop new services, improve programming, and protecting NAF and our users.

We also process the data we collect about you to provide you with relevant information about the NAF Website and NAF Web-based Services, and to assist you in using the service if required.

We use de-identified information to perform research for the purposes of improving secondary education and career preparation and analyzing trends. We also use such de-identified information to promote NAF, the NAF Web-based Services, and to develop new NAF Academies.

We use the data we collect to maintain NAF as a safe and secure platform for all our users, including appropriate enforcement of NAF policies, as well as compliance with the law and applicable regulations.

NAF and its third-party service providers use technologies discussed <u>above</u>, such as cookies and web beacons, to collect information. This information can be used by NAF and third-party service providers on behalf of NAF to analyze and track usage of the service, determine the popularity of certain content, and better understand how you use the service.

SHARING OF INFORMATION

NAF does not share your information unless one of the following conditions applies:

- With your consent.
- Publicity or research purposes.
 - We may disclose aggregate or de-identified information that is not associated with an identifiable individual for research or to enhance and promote our products and services. For example, we may share aggregated or de-identified information with a research firm or individual academic researchers to explore how our services are being used and how such data can be used to enhance our functionalities and further help our clients, students, and improve secondary education and career preparation generally. We also may share such aggregated or de-identified information with potential clients to demonstrate the benefits of NAF services.

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- For external handling and processing.
 - o NAF provides personal and non-personal information to our partners, trusted organizations, vendors, and other affiliated organizations so that they may assist us with administering the NAF Website, providing NAF Web-based Services, or facilitating donations. Some of these contractors and affiliated organizations may be located outside the United States. Our providers handle and process data in accordance with our instructions, this Privacy Policy, and any other appropriate confidentiality, security or other requirements we deem necessary in order to comply with NAF's obligations. By using NAF, you agree to allow these companies to process your data on our behalf, regardless of where they are located. We regularly update a list of our partners, service providers, and sub-processors, and this list is available upon request.
- To respond to legal requests.
- To prevent harm to the rights, property, or safety of NAF, School Clients, End Users, or the public.
- In accordance with the provisions below regarding the NAF Website, donors, and NAF Webbased Services.

We are not responsible for the privacy practices of any third party. We encourage you to be aware when you leave the NAF Website and/or the NAF Web-based Service platforms, and to read the privacy statements of each entity and website that collects personal information.

YOUR RIGHTS AND CHOICES

If you would like to access, modify, correct, or delete your personal information, please <u>contact</u> us. When you contact us, you may be required to provide us details to verify your identity.

We may not accommodate a request to change or delete information if we believe the change would violate any law or legal requirement, cause the information to be incorrect, or if we are unable to verify your identity. Also, if you are an End User (i.e., student or teacher) of a School Client and the data at issue is controlled by the School Client (i.e., your school), we may not be at liberty to accommodate a request to change or delete information; however, you may contact your school to discuss your options. [NAF Web-based Services, subsection School Client Policies]

NAF is a not for profit 501(c)(3) organization. If NAF engages in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

CONTACT US

NAF welcomes your comments or questions regarding this Privacy Policy. Please e-mail us at support@naf.org or contact us at the following address or phone number:

169 Madison Ave., Suite 2797 New York, NY 10016 (212) 635-2400