

# RELAY / GSE

## PRIVACY POLICY

We at Relay Graduate School of Education (“Relay,” “we,” “us,” or “our”) have created this privacy policy (this “Privacy Policy”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy applies to our information collection and use practices: (i) online when you visit one or more of our websites under the domain relay.edu (the “Websites”); and (ii) offline when you provide information to us.

### Acceptance of Terms

By visiting our Websites, you are agreeing to the terms of this Privacy Policy which governs your use of the Websites. By providing us information offline, you are also agreeing to the terms of this Privacy Policy.

### The Information We Collect

In the course of operating the Websites and/or interacting with you, we will collect (and/or receive) the following types of information.

#### 1. Personal Information

When you sign up to receive any of our newsletters, create an account through the Websites, or register for a class or a program, you may be required to provide us with personal information about yourself, such as your name, address, e-mail address, and phone number. We do not collect any personal information from Visitors when they use the Websites unless they provide such information voluntarily, such as by registering or sending us an e-mail or signing up for a newsletter. All information we collect and/or receive under this section is collectively called “Personal Information.”

#### 2. Other Information.

In addition to the information noted above, we may collect additional information (collectively, the “Other Information”). Such Other Information may include:

- a. From You. Additional information about yourself that you voluntarily provide to us (e.g., via a survey), such as gender; program, class, and service preferences; and other information that does not identify you personally.
- b. From Your Activity. Information that we automatically collect when you use the Website, including, without limitation:

- IP addresses, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device; browser type and language; referring and exit pages and URLs; date and time; amount of time spent on particular pages; what sections of the Websites you visit; and similar data; and
  - Information about your device, including the type of device; universally unique ID (“UUID”); advertising identifier (“IDFA”); MAC address; operating system and version (e.g., iOS, Android or Windows); carrier and country location; hardware and processor information (e.g., storage, chip speed, camera resolution, NFC enabled); network type (WiFi, 3G, 4G, LTE); and similar data.
- c. From Cookies. Information that we collect using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s or mobile device’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us collect Other Information and to enhance your experience using the Websites. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Websites may not function properly.
- d. Third-Party Analytics. We use third-party analytics services (such as Google Analytics) to better understand your use of the Websites, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Websites and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Websites, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Websites.

### **Information Collected by or Through Third-Parties**

We may share Other Information about your activity on the Website with third parties for the purpose of tailoring, analyzing, managing, reporting, and optimizing your experience on our Websites. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect such Other Information for such purposes. Pixel tags enable us, and these third parties, to recognize a browser’s cookie when a browser visits the site on which the pixel tag is located in order to better understand user interactions.

### **Accessing and Modifying Personal Information and Communication Preferences**

If you have registered for the Websites, you may access, review, and make changes to your Personal Information and certain Other Information by following the instructions found on the Website. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any Relay marketing email. Registered Students cannot opt out of receiving transactional e-mails related to their account or their registered classes. We will use commercially reasonable efforts to process such requests in a timely manner.

### **How We Use and Share the Information**

We use the Personal Information and the Other Information (collectively, the “Information”) to provide our services; to maintain and improve our Websites and services to you; to solicit your feedback; and to inform you about our programs, classes, and services and those of our third-party partners.

We may also use and/or share Information as described below.

- Relay will access, use, and share the Information as required to provide our services to you.
- We may, from time to time, share Information with other organizations, which may provide you information about the programs, classes, and services they or their partners offer. However, to the extent required by law, you will be given the opportunity to opt-out of such sharing.
- We may employ other companies and individuals to perform functions on our behalf. Examples may include providing technical assistance, order fulfillment, student services, and research. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.
- In an ongoing effort to better understand our Visitors, Registered Students, and our programs, classes and services, we may analyze the Other Information in aggregate form in order to operate, maintain, manage, and improve the Websites and/or our programs, classes, and services. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our programs, classes, and services to current and prospective partners and to other third parties for other lawful purposes.
- We may share some or all of your Information with organizations under common legal control with us.
- In the event of a merger, reorganization, dissolution, or similar event, the Information may be part of the transferred assets.
- To the extent permitted by law, we may also disclose the Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of Relay or others.

### **Information You Share**

Please keep in mind that whenever you voluntarily make your Personal Information available to third parties—for example on message boards or web logs; through email; during webinars, classes, or telephone conferences; or in comment or chat areas—that information can be seen, collected, heard, and/or used by others besides us. We are not responsible for any unauthorized third-party use of such information.

### **How We Protect the Information**

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the Information that you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from the Websites may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

### **Important Notice to Non-U.S. Residents**

For E.U. citizens, we take seriously your rights under the General Data Protection Regulation, and, as stated above, only collect your information when you provide it voluntarily, such as registering for a class or program or signing up for a newsletter. If you would like to further exercise your rights under the GDPR, please send an email to [info@relay.edu](mailto:info@relay.edu) with “GDPR” in the subject line.

It is important to note that the Website and its servers are operated in the United States. If you are located outside of the United States, please be aware that any Information you provide to us will be transferred to the United States. By using the Website and by providing us Information when using our services, you hereby irrevocably consent to this transfer and our use of the Information and data provided by you in accordance with this Privacy Policy.

### **Children**

We do not knowingly collect Personal Information from children under the age of 13 through the Websites. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children to never provide Personal Information through the Websites without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will endeavor to delete that information from our databases.

### **California Residents**

Under California Civil Code Section 1798.83, California residents who have an established business relationship with Relay may choose to opt out of our sharing your Personal Information with third parties for direct marketing purposes. If you are a California resident and (1) you wish to opt out; or (2) you wish to request certain information regarding our disclosure of your Personal Information to third parties for the direct marketing purposes, please send an e-mail to [info@relay.edu](mailto:info@relay.edu) with “Privacy Policy” in the subject line or write to us at:

Relay Graduation School of Education  
40 W. 20th St.  
Seventh Floor  
New York, NY 10011

In addition, Relay does not monitor, recognize, or honor any behavioral advertising opt-out or do-not-track mechanisms, including general web browser “Do Not Track” settings and/or signals.

### **External Websites**

The Website may contain links to third-party websites. We have no control over the privacy practices or the content of any of our partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

### **Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. By accessing the Websites and/or using our services after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

### **How to Contact Us**

If you have questions about this Privacy Policy, please contact us via e-mail at [info@relay.edu](mailto:info@relay.edu) with "Privacy Policy" in the subject line.

**Last Updated August 10, 2018**