



AstrumU Privacy Policy

Last Updated: September 24, 2018

Respect for your privacy and the security of your information are among our top priorities at AstrumU, Inc. (“AstrumU”). Stated simply: We’re here to help, but we proceed only with your permission. This privacy policy (“Privacy Policy”) describes AstrumU’s policies and procedures on the collection, use, sharing and disclosure of your information when you use any of AstrumU’s services (the “Services”). Whether you access the AstrumU.com website, our mobile application, or any future AstrumU platform, AstrumU will neither use nor share your information with anyone except as described in this Privacy Policy. Information you publish(ed) elsewhere is not governed by this Privacy Policy. Capitalized terms that are used but not defined in this Privacy Policy shall have the meanings given to them in our Terms of Service.

Information You Provide

We ask for certain information such as your full name, student ID number and email address when you register for an AstrumU account, or if you correspond with us. We may also retain any data you send through the Services, and may collect information you post to the Services. We use this information to operate, maintain, and provide to you the features and functionality of the Services.

Information We Receive About You from the University

Education records which AstrumU’s partner academic institutions share with AstrumU may include:

- Personal information: full name, ethnicity, gender, zip code, family educational background
- High school information (high school name, GPA and standardized test score)
- Post-secondary course history
- Grades
- Major/minor
- Extracurricular activities
- Other professional and academic experiences
- Financial aid-related information

What Do We Do with Your Data?

We use, process and store your personal data to personalize your experience and maximize opportunities to connect you with potential employers. This includes:

- Connecting you to job opportunities and communications from potential employers by email.
- Allowing your profile to be viewable by employers who are interested in finding candidates like you.
- Personalizing your experience of our application. For example, we may suggest employers, occupations and/or skill recommendations to you based on your profile information and the preferences you provide to us.

Analytics Data

We may directly collect analytics data, or use third-party analytics tools and services, to help us measure traffic and usage trends for the Services. These tools collect information sent by your browser or mobile device, including the pages you visit and other information that assists us in improving the Services. We collect and use this analytics information in aggregate form such that it cannot reasonably be manipulated to identify any particular individual user.

Communications and Marketing Data

We may contact you about additional Services you might be interested in, unless you opt-out by sending an email to unsubscribe@astrumu.com.

Non-Personally Identifiable Information

We may aggregate and/or anonymize information collected through the Services and/or our application so that such information cannot be linked back to you or any other individual. We may use aggregated, anonymized, and other non-personally identifiable information for any lawful purpose, including for marketing, insights and reporting, and research purposes, and our use and disclosure of such information is not subject to any restrictions under this Privacy Policy.

Other Protections

When student information shared by our partners includes records that are subject to the terms and conditions of the [Family Educational Rights and Privacy Act of 1974](#), as amended (FERPA), AstrumU is considered a “School Official” (as that term is used in FERPA regulations) and will comply with all applicable FERPA requirements.

Sharing Information

We will only share your personal data with members of our trusted network -- specifically, employers and our college/university and non-profit institution partners with which you are enrolled or registered as a beneficiary, with your consent.

Your profile information, including student-submitted information and university information, will be viewable through our application, only with your consent, by your college/university, by prospective employers, and by our non-profit institution partners.

You may choose to apply for a job and we will share more detailed information (such as your entire transcript and/or your resume/CV) you provide and authorize with the selected employers.

We may share your information with third-party service providers for the purpose of providing the Services to you. Third-party service providers will be given limited access to your information as is reasonably necessary for us to deliver the Services, and we will require that such third parties comply with this Privacy Policy, or operate under a similar privacy policy.

When We Are Required to Share Your Information

AstrumU will disclose your information where required to do so by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Service or to protect the security, quality or integrity of our Services; and/or (c) to exercise or protect the rights, property, or personal safety of AstrumU, our users, or others.

What Happens in the Event of a Change of Control

We may buy or sell/divest/transfer AstrumU (including any shares in AstrumU), or any combination of its products, services, assets and/or businesses. Your information collected through the Services and/or our application may be among the items sold or otherwise transferred in these types of transactions and you hereby consent to such transfer or assignment. We may also sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of the company.

How We Store and Protect Your Information

Storage and Processing

Your information collected through the Services will be stored and processed in the United States. AstrumU may transfer information that we collect about you, including personal information, to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If

you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which AstrumU or its parent, subsidiaries, affiliates, or service providers maintain facilities, and to the use and disclosure of information about you as described in this Privacy Policy.

Keeping Your Information Safe

AstrumU cares about the security of your information, and uses commercially reasonable safeguards to preserve the integrity and security of all information collected through the Services and/or our application. To protect your privacy and security, we take reasonable steps, such as requesting a unique password, university email, and student ID number, to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information. We take reasonable security measures to protect the security of all user data; however, despite AstrumU's efforts to protect such data, there is always some risk that an unauthorized third party may find a way around our security systems or that transmissions of your information over the Internet may be intercepted. Your privacy settings may also be affected by changes to the functionality of third-party websites and services that you add to the Services, such as social networks. AstrumU is not responsible for the functionality or security measures of any third party.

Compromise of Information

In the event that any information under our control is compromised as a result of a breach of security, AstrumU will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised, and then take other steps in accordance with any applicable laws and regulations.

CAL-COPPA Regulation

AstrumU does not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to register as users. The Services and their content are not directed at children under the age of 13. In the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at privacy@astrumu.com.

Links to Other Websites and Services

We are not responsible for the practices employed by websites or services linked to or from the Services, including the information or content contained therein. Please

remember that when you use a link to go from the Services to another website, our Privacy Policy does not apply to third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link or advertisement on our website, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible for, and we do not have any control over, any third parties that you authorize to access your personal data. If you are using a third-party website or service (like Facebook or Twitter) and you allow such a third party access to your personal data, you do so at your own risk. This Privacy Policy does not apply to information we collect by other means (including offline) or from other sources other than through the Services.

Account Closure

Students may opt-out of our application by emailing optout@astrumu.com to deactivate their accounts, upon which students will no longer be visible to employers or to our college/university or non-profit institution partners, and they will no longer receive any communication from AstrumU unless they reactivate their accounts.

Changes to This Privacy Policy

Whenever this Privacy Policy is changed in a material way, all users will receive an email with notification of the changes prior to the changes becoming effective. Your use of the Services after a modified Privacy Policy has been posted constitutes acceptance by you of any changes made to it.

Contact Information

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