

# Privacy Policy

## 1. Introduction and scope

Porter and Chester Institute, Inc (“PCI,” “we,” “us,” or “our”) is committed to protecting your privacy. This Privacy Policy (“Policy”) describes how we collect, use, disclose, and protect personal information in connection with our educational services, including our websites, portals, and software applications, whether operated by us or on our behalf (collectively, the “Services”)

“You” or “your” refers to you as a user of our Services, including prospective students, applicants, enrolled students, graduates, website visitors, and other individuals who interact with.

You should read this Policy together with any other privacy notices we provide on specific occasions when we collect or process personal information, so you understand how and why we are using your data. This Policy supplements those notices and is not intended to override them.

This Policy describes:

- Personal Information We Collect
- How We Collect Your Personal Information
- How We Use Your Personal Information
- How We Share Your Personal Information with Third Parties
- Your Privacy Rights (including California rights, if applicable)
- Data Security
- Changes to this Policy
- Questions About this Policy
- Other Information (including FERPA and marketing preferences)

## 2. Personal information we collect

“Personal Information” means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual or household. It does not include anonymized or aggregated data that cannot reasonably be used to identify you.

Depending on how you interact with PCI, we may collect, use, store, and transfer the following types of Personal Information.

- **Identifiers** such as name, alias, postal address, email address, telephone number, PCI student ID, account name or username, online identifiers, Social Security number, driver’s license number, state identification card number, or other government identification numbers where required by law or for financial aid and enrollment processes.
- **Demographic and profile information** such as date of birth, gender, marital status, veteran or military status, limited disability-related information where needed for accommodations, and other demographic information you choose to provide, to the extent permitted by law.
- **Educational information** such as prior education history, high school completion information, enrollment status, program of study, attendance, grades, academic progress, credentials earned, and other records maintained by PCI or on its behalf.
- **Financial and billing information** such as tuition and fee information, financial aid data, scholarship or grant information, payment history, limited tax or income data required to process aid, and payment card or bank account details processed through secure third-party payment processors.
- **Employment and career information** such as your employment status, employer information, job title and duties, work history, certifications or licenses, and post-graduation employment and earnings information where collected for placement and accreditation reporting.
- **Technical and usage data** such as IP address, device identifiers, browser type and version, operating system, time zone and approximate location, referring/exit pages, and information about how you use our Services (pages viewed, time on page, clicks, and similar usage data).

- **Communications and marketing information** such as your communication preferences, consent to receive text messages, call recordings where permitted by law, email engagement (opens/clicks), and information about your interests in PCI programs.
- **Audio, electronic, and visual information** such as call recordings (where legally permitted and disclosed), voicemails, webinar recordings, and photos or video of on-campus events where used in accordance with PCI policies.

We may also create and use **Aggregated Data** such as statistical or demographic information derived from Personal Information. Aggregated Data is not considered Personal Information if it cannot reasonably be used to identify you. If we combine or link Aggregated Data with Personal Information so that it can identify you, we treat the combined data as Personal Information.

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### **3. How we collect your personal information**

We collect Personal Information from a variety of sources, including:

#### **Information you provide directly**

You may provide Personal Information to us when you:

- Submit an information request or contact form
- Call, email, or text PCI, or use chat features on our websites
- Apply for admission or enroll in a PCI program
- Create or access a student portal, learning management system (LMS), or other account
- Apply for financial aid, scholarships, or grants
- Register for classes, events, tours, or information sessions
- Use career services or other student resources
- Submit a review, testimonial, or survey response

#### **Information collected automatically**

When you use our Services, we and our service providers automatically collect certain information through cookies, pixels, and similar technologies, including:

- IP address, device identifiers, browser type, operating system, and other technical data
- Information about how you interact with our websites (pages viewed, referring URLs, time spent, clicks)
- Approximate location information derived from your IP address or device settings

We may use third-party analytics tools, such as Google Analytics, to help us understand website traffic and usage patterns. These tools collect information such as your IP address and usage data and provide reports to us so we can improve our Services.

You can manage cookies through your browser settings. If you disable cookies, some features of our Services may not function properly.

Some browsers offer “Do Not Track” (DNT) signals; because there is no uniform standard for responding to such signals, our websites do not currently respond to DNT, but you can use other tools (such as cookie controls) to manage tracking technologies.

### **Information from third parties**

We may receive Personal Information about you from:

- Education partners and lead generation services that host PCI information request forms or advertisements
- Financial aid and loan servicers, background check providers (where required), testing services, or credential evaluators
- Student information systems, LMS providers, and other vendors that support PCI operations
- Advertising and social media partners (such as Google or Meta properties) that provide information about your interactions with PCI ads or content, in accordance with their own privacy policies

When you visit third-party sites (for example, Facebook, Instagram, or other platforms) and choose to interact with PCI content or forms there, your information is governed by that third party’s privacy policy. We encourage you to review their policies before submitting information.

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#### **4. How we use your personal information**

Our primary purpose in collecting Personal Information is to provide and support the educational programs and services you request. We may use Personal Information for the following purposes:

- To respond to your inquiries and provide information about PCI programs, campuses, and services
- To evaluate your eligibility for admission and process your application
- To determine and verify your eligibility for financial aid, scholarships, and grants, and to administer those programs
- To enroll you in PCI programs, register you for classes, and maintain your academic records
- To provide and support access to student portals, LMS platforms, and other educational technologies
- To provide career services and track graduate employment outcomes as required by accreditors or regulators
- To operate, maintain, and improve our websites and Services, including monitoring performance and usage
- To personalize content and marketing communications, including email, SMS, phone calls, and digital advertising, consistent with your preferences and applicable law
- To conduct internal research, analytics, and reporting, including aggregated reporting for accreditation, regulatory, and institutional planning purposes
- To process payments and manage billing and collections
- To help secure our systems and prevent fraud, abuse, or other harmful activities
- To comply with legal, regulatory, and accreditation obligations, including those related to Title IV financial aid, FERPA, and state consumer protection laws
- To enforce our Enrollment Agreement, Code of Conduct, and other PCI policies
- For any other purpose disclosed at the time you provide your information or with your consent, where required by law

## 5. How we share personal information

We do not sell or rent your Personal Information to unrelated third parties for their own independent marketing purposes. We may share Personal Information with:

- **Service providers and vendors** that perform services on our behalf, such as student information systems, LMS providers, CRM and communications platforms, payment processors, background check providers, housing partners, analytics providers, and marketing/advertising partners. These parties are permitted to use Personal Information only to provide services to PCI and are required to protect it consistent with this Policy and applicable law.
- **Education, technology, or employer partners** that support specialized training programs, externships, or job placement activities, where sharing is necessary to operate those programs and permitted by law and applicable agreements.
- **Government agencies, accreditors, and regulators** where required to comply with applicable laws and regulations, financial aid program requirements, accreditation standards, audits, or reporting obligations.
- **Professional advisors** such as attorneys, auditors, or consultants, where sharing is necessary to protect PCI's legal rights or comply with legal obligations.
- **Other parties** when required by law, in response to valid legal process, to protect the rights, property, or safety of PCI, our students, or others, or in connection with a corporate transaction involving PCI, to the extent permitted by law.

PCI also maintains internal safeguards and requires that any external parties with access to personally identifiable information protect it in a manner consistent with this Policy and applicable state and federal privacy and information-security requirements.

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## 6. Children's privacy

Our Services are intended primarily for adults interested in PCI's programs and are not directed to children under 16. We do not knowingly request or collect Personal Information directly from children under 13. If we learn that we have collected Personal Information from a child under 13 without appropriate parental consent, we will take reasonable steps to delete it.

Parents or guardians who believe their child has provided Personal Information to PCI should contact us using the information in the “Questions About This Policy” section so we can review and, as appropriate, delete the information.

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## **7. Your privacy rights**

Depending on where you reside, you may have certain rights regarding your Personal Information under applicable privacy laws (for example, rights under the California Consumer Privacy Act (CCPA/CPRA) for California residents). These may include the right to:

- Request access to the categories and specific pieces of Personal Information we maintain about you
- Request that we delete certain Personal Information, subject to legal exceptions
- Request information about how we share Personal Information with third parties
- Opt out of certain types of “sales” or “sharing” of Personal Information as those terms are defined under applicable law
- Not be discriminated against for exercising your privacy rights

To submit a privacy request, please contact us using the information listed below. We may need to verify your identity (and authority, if you are an authorized representative) before fulfilling your request, which may require matching information you provide with existing records.

Some information may be exempt from these requests, for example where retention is necessary to comply with legal obligations, maintain educational records, resolve disputes, or enforce our agreements.

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## **8. Data security**

PCI uses administrative, technical, and physical safeguards designed to protect Personal Information from unauthorized access, use, or disclosure. For example, personally identifiable information is not stored on servers accessible by the public, and online applications and data collection systems are reviewed to ensure appropriate security controls are in place.

However, no method of data transmission or storage is completely secure, and we cannot guarantee absolute security. Any transmission of information to PCI is at your own risk.

## **9. Changes to this policy**

We may update this Policy from time to time to reflect changes in our practices, technology, or legal requirements. When we make material changes, we will update the “last updated” date at the top of the Policy and, where appropriate, provide additional notice (such as posting a notice on our website or sending an email).

Your continued use of the Services after any changes become effective signifies that you acknowledge the updated Policy.

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## **10. Questions about this policy**

If you have questions or comments about this Policy or our privacy practices, or if you wish to exercise applicable privacy rights, please contact us at:

- Email: [privacy@porterchester.edu](mailto:privacy@porterchester.edu)
  - Mailing address: 2080 Silas Deane Highway, Suite 302, Rocky Hill, CT 06067
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## **11. Other information (including FERPA and marketing preferences)**

If you become a PCI student, your educational records are also protected by the Family Educational Rights and Privacy Act (FERPA), applicable state laws, and PCI’s school policies. For more information about your FERPA rights and how to access or amend your education records, please refer to the applicable PCI catalog and policies.

You may opt out of receiving marketing emails by using the unsubscribe link in those messages or following the instructions provided in the communication. For text messages, you can typically reply STOP to opt out, consistent with the instructions provided at the time of enrollment in SMS communications.