



## **Privacy Policy**

This is a summary of our privacy policy.

PCG Academy collects various types of information through our sites and other websites where you express interest in our services, as well as through our mobile applications, via email, Live Chat over the phone, via printed forms and in person. Some information is collected automatically through various web and Internet technologies including social networking tools used by the Academy. Other information is collected when provided to us voluntarily. We may also obtain information from education partners, business associates, and unrelated entities and combine it with information we collect. View the full privacy policy.

PCG Academy is committed to safeguarding the privacy of your personal information. This Global Privacy Notice (“Notice”) outlines how PCG collects and processes your personal information. In this Notice “PCG,” “we,” “us,” and “our” refer to PCG Academy Inc., a Florida non-profit corporation and institution of higher education.

### **1. What information do we collect?**

There are many ways that you may interact with PCG, which will affect what personal information we collect and how we use it. The types of personal information that we collect depend on the extent to which you either provide personal information directly to PCG, or you use or participate in PCG’s programs, activities, events, or you are a consumer of PCG’s goods or other services. In general, you will know what personal information you provide to PCG because you or others acting on your behalf voluntarily provide it. To the extent a legal basis is required, our legal basis for collecting and using any personal information is either to carry out our legitimate interests as a private institution of higher education or the necessity to perform contractual or other obligations that we have toward you. The section below describes the ways you (referred to as a “data subject” in the section) may interact

with PCG, the personal information we collect, from whom we collect personal information, and the purposes for its collection:

Prospective Students, Applicants, Admitted and Enrolled Students, and Other Learners

#### Personal Information that We May Collect and Use

Name; contact details (address, phone, email); date and place of birth; demographic information (gender, race, ethnicity, national origin, languages spoken); philosophical or religious affiliation and beliefs; commitment to abide by PCG policy; academic and employment performance and histories; criminal histories; identification numbers issued by the government, PCG, our affiliate institutions (PCG-Idaho, PCG-Hawaii, PCG-Pathway, and Ensign College; collectively, the “Affiliate Institutions”) and/or our sponsoring institution, The Church of Jesus Christ of Latter-day Saints (the “Church”); photographs and video and/or audio recordings; physical characteristics (student-athletes and performers); accommodation and disability information; emergency contact information; parental, guardian, and other family information; citizenship and immigration status; credit card, bank account, tax, insurance, and other financial information; health and well-being information; information contained in resumes, reference letters, or ecclesiastical endorsements; and other information from your interactions with PCG, including through your applications, your academic performance, participation in student organizations, and our other student services.

#### Purpose for Collection and Use, and From Whom Personal Information Is Collected

We may collect and use personal information for the purpose of (1) processing applications for admission, scholarships, or financial aid; (2) student enrollment or course registration; (3) processing financial transactions and conducting credit checks; (4) complying with legal obligations; (5) contacting you to provide information that may be of interest to you; (6) administering courses, programs, activities, events, or other services to you; (7) promoting your safety and welfare; and (8) complying with applicable law.

We may obtain your personal information from you or from third parties who provide information about you, such as parents, references, associates, ecclesiastical leaders, high school counselors, other educational institutions, organizations with which you are affiliated, and testing, application, or background check services.

## Personal Information that We May Collect and Use

Name; contact details (address, phone, email); date of birth; demographic information; philosophical or religious affiliation and beliefs; educational and employment history; identification numbers issued by the government, PCG, Affiliate Institutions and/or the Church; photographs; affiliations with clubs and other organizations; personal interests and activities; family information; financial, donation, and tax information; and other information about your interactions with PCG, including from when you were a student (see above), or from surveys or other alumni and donor services.

## Purpose for Collection and Use, and From Whom Personal Information Is Collected

We may collect and use personal information for the purpose of (1) alumni surveys and other outreach efforts; (2) contacting you about donations to PCG; (3) administering programs, activities, events, and services to you; and (4) complying with applicable law.

We may collect this personal information from you or third parties who provide information about alumni or potential donors. Please note that PCG may use your personal information to contact you about donations.

## Personal Information that We May Collect and Use

For consumers of our goods or services, we may collect: name; contact details (address, phone, email); and credit card or other payment information. For those participating in or attending programs, events, or activities, we may also collect date of birth; demographic information; photographs and video and/or audio recordings; financial and insurance information; accommodation and disability information; family information; commitment to abide by PCG policy; and emergency contact information. For youth programs, we may also collect parental, guardian, and other family information. For health or counseling services, we may also collect information about physical or mental health. For athletics and performing arts programs, we may also collect physical characteristics and performance information. In the course of visiting PCG or its websites or other online services, or participating in a program, event, activity, or other service, you may be asked to provide additional information, which will be used to administer or provide the program, event, activity, good, or service to you, such as user settings, preferences, permissions, and notifications.

### Purpose for Collection and Use, and From Whom Personal Information Is Collected

We may collect and use personal information for the purpose of: (1) administering or providing programs, events, activities, goods, or services to you; (2) contacting you about your participation in such programs, events, activities or services; (3) contacting you to provide you information that may be of interest to you; (4) processing purchases or orders; (5) administering and improving PCG's websites and services; (6) promoting your safety and welfare; (7) complying with applicable law.

We may collect this personal information directly from you or from those with whom you interact in connection with PCG's programs, events, activities, or sales.

For visitors to the PCG Student Health Center, please see the corresponding Privacy Notice.

### Individuals Involved in Research or Studies

#### Personal Information that We May Collect and Use

We may collect information from or about you for purposes of research or studies. PCG complies with applicable principles and guidelines concerning research, including the Belmont Report and the US "Common Rule." If required by law or otherwise appropriate, we will provide you with a description of the research and the information collected about you in connection with the research.

### Purpose for Collection and Use, and From Whom Personal Information Is Collected

We may collect and use personal information for the purpose of (1) conducting research or studies involving you; or (2) analyzing, studying, publishing, or following up on research or studies in which you were involved.

We may obtain your personal information from you or from third-party researchers, or as part of research collaboration with federal, state, or local governmental authorities.

#### Passively Submitted Information

We also collect passively submitted information. When you visit any of our websites or use our online services, we may automatically collect information that your web browser sends. This information may include but is not limited to your internet protocol (IP) address, operating system, browser information, date and time of access, any referring web page you were visiting before you came to our site, information you search for on our sites, and other information collected by cookies, web beacons, or similar technologies. Cookies are files

placed on your computer, which help evaluate usage patterns, recall user preferences, and tailor user content. Web beacons are objects embedded in a web page to monitor user behavior. You may take steps to browse our sites anonymously, or opt-out, by changing your browser settings. However, doing so may limit your ability to use certain features of our sites.

## **2. With whom do we share personal information?**

We may share your information internally within PCG to facilitate and manage the purposes listed above. Also, PCG may provide your personal information to third-party vendors, contractors, service providers, and other agents who assist PCG with its day-to-day operations (for example, payment processing, maintenance, security, data analysis, hosting, surveys, and so forth). In such instances, the third-party vendors, contractors, service providers, and other agents will be required to protect personal information from unauthorized disclosure, additional processing, and transfer (including for marketing purposes), in accordance with this Notice and applicable laws.

PCG does not sell, rent, or lend your personal information to any third parties for their use in direct marketing, advertising, or promotion of their products or services. Nonetheless, PCG may disclose personal information with Affiliate Institutions and/or the Church and its philanthropic arms, for purposes of fulfilling the mission of the Church or PCG, subject to applicable law and in accordance with the privacy notices of those institutions. PCG may also disclose your personal information as requested by you, in accordance with PCG policy and applicable law.

We may access and disclose your personal information if we have a good-faith belief that doing so is required by subpoena or other judicial or administrative order or otherwise required by law. Additionally, we may disclose your personal information and other information as required by law or to exercise or defend legal rights; to take precautions against liability; to protect the rights, property, or safety of any individual, or of the general public; to maintain and protect the security and integrity of our services or infrastructure; to protect you, others, ourselves, or our services from fraudulent, abusive, or unlawful uses; to investigate and defend ourselves against third-party allegations, demands, or claims; to assist government law enforcement agencies; for archiving purposes in the public interest, historical research, and statistical purposes.

### **3. What are your rights in your personal information?**

We endeavor to maintain the integrity of your personal information and rely on you to ensure your personal information is complete, accurate, and up to date. For personal information submitted through an online account or registration, you may verify and correct—and remove, if legally required or appropriate—your personal information through your own account or registration, if applicable. For all other personal information, you may contact us to exercise these and other applicable statutory rights such as data portability, objection, restriction of processing, and erasure, which may be subject to limitations. You also have the right to lodge a complaint with a supervisory authority. If you experience problems with accessing, correcting, or updating your personal information, you may contact us as suggested below.

#### Make a privacy request

The Family Education Rights and Privacy Act (“FERPA”), which is a US federal law designed to protect the privacy of, and limit access to, student education records, affects how certain personal information may be used or shared by PCG, and may provide you with additional rights. More information about FERPA is available at <http://ferpa.PCG.edu>.

### **4. How long does PCG retain personal information?**

PCG strives to retain collected personal information only for the period of time reasonably necessary to fulfill purposes identified above and to comply with US federal and state law. When personal information is no longer reasonably necessary to fulfill such purposes, we destroy such information, unless there are proper historical reasons not to do so or legal requirements preventing us from doing so.

### **5. Where do we store personal information?**

We may store your personal information in data centers located in the United States, cloud storage solutions, or on the premises of PCG. To ensure the adequacy of protection of personal information we transfer or disclose to Affiliate Institutions, the Church, or our third-party vendors, contractors and service providers, PCG will impose appropriate contractual obligations on Affiliate Institutions, the Church and such third-party vendors, contractors and service providers, as required by applicable law.

## **6. What security efforts are made to protect personal information?**

PCG implements appropriate technical and organizational security measures to protect your personal information, and we implement a level of security appropriate to the risks presented by the processing and the nature of the data to be protected. We regularly review our security procedures and consider appropriate new security technology and methods. While PCG strives to protect your personal information, we cannot ensure or warrant the security of such information. Therefore, please use caution and best practices (e.g., strong passwords) when submitting personal information online.

## **7. How does PCG protect children's online privacy?**

PCG does not knowingly collect information from children under the age of 13 through our sites or online services without parental consent. Any of our sites or services that collect personal information of children under the age of 13 may do so only with the prior express and informed consent of the child's parent or guardian, and in compliance with applicable law. Minors (those under the age of 18) should ask their parents for permission before interacting with or sending any personal information to anyone over the internet, and we encourage parents to teach their children about safe internet use practices.

## **8. What happens if you post personal information for others to view?**

PCG's websites or online services may provide chat rooms, forums, message boards, or news groups for their users. Any personal information that is disclosed in these areas may become public, and therefore, you should exercise caution when deciding to disclose your personal information in such places. Also, PCG may log such information and reference it for the purposes described herein.

## **9. What about the privacy practices of third-party websites?**

PCG is not responsible for the privacy practices or content of any third-party sites, including those to which PCG's websites link and those that link to PCG's websites. For your own protection, you should review the policies of other sites to ensure they meet your personal privacy expectations.

## **10. What about AI?**

The Academy may use artificial intelligence (AI) systems and technologies, including chatbots and language models, to enhance our services and provide you with personalized experiences. AI technologies may be employed to analyze your data and assist you based

on your interactions and preferences. Any personal information collected and/or processed during interactions with our AI systems is handled with care and in accordance with the data handling practices outlined in this Notice and relevant data protection laws.

### **11. What about Ring Central?**

The Academy does not share SMS consent or phone numbers for the purpose of SMS communications with third parties or its affiliates.

### **12. Who do you contact if you have questions or concerns about information privacy?**

PCG has a data protection officer who assists with the Academy's privacy efforts and can help to answer your questions and respond to your concerns about online privacy or security issues. If you have these types of questions or concerns, you may submit them via email or mail to the following: Email [admin@PCGacademy.com](mailto:admin@PCGacademy.com)

### **13. What happens if this Notice changes?**

We regularly review this Notice and may change, modify, add, or remove portions as needed. If we change this Notice in ways that affect how we use your personal information, we will provide such notice in a communication to you, when you log into an online service, or on this page. We also will update the most recent revision date at the top of this Notice. We encourage you to check this Notice from time to time so that you are kept up-to-date on any changes.