

REA PRIVACY POLICY

Last Updated: November 10, 2023

This REA Privacy Policy explains how information about you is collected, used and disclosed by Research & Education Association (“REA”). This Privacy Policy applies to information we collect when you use our website and other online products and services that link to this Privacy Policy (collectively, the “Services”) or when you otherwise interact with us. REA is a subsidiary and affiliated brand of LSC Communications Inc. US, LLC. This Privacy Policy does not apply to LSC Communications or any of LSC’s other affiliated brands, which are governed by the LSC Communications Privacy Policy.

Certain states, including California, Colorado, Connecticut, and Virginia, require additional information regarding our privacy practices and your privacy rights. Depending on whether you are a resident of those states (“Consumer”), we provide you additional notices about our privacy practices and consumer rights relating to your personal information or personal data, as defined under those laws. If you are a California, Colorado, Connecticut, or Virginia resident, please see the “California and Other State Privacy Information” section.

We may change this Privacy Policy from time to time. We will not make material changes to this Privacy Policy without first providing prominent notice to the user (i.e., the student when the information is collected directly from the student with consent) and allowing them choices before data is used in a manner materially inconsistent with terms they were initially provided. We also will not make material changes to other policies or practices governing the use of Student Data that are inconsistent with contractual requirements.

We encourage you to review the Privacy Policy whenever you access the Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

I. Collection of Information

The types of information we have collected in the previous 12 months include identifiers, commercial information, and internet or electronic network activity data. Below, we provide examples of the precise data points we collect and the sources of such collection.

INFORMATION YOU PROVIDE TO US

We collect student personally identifiable information (“Student Data”) that you directly provide to us. For example, if you create an account with us, the Student Data that we may collect includes identifiers such as your name, email address, phone number, photo, and other contact information. You may also be required to provide educational information like your grade, the tests that you are preparing for, your responses to tests and overall test results, and other educational information. We only collect Student Data that you, or your parent on your behalf, authorize us to collect for the purpose of providing you the Services.

We collect other information that you may provide directly to us. For example, we collect information when you interact with us on social media, subscribe to our email alerts, fill out a form, make a purchase, apply for a job, interact or communicate with us via third party social media sites, request customer support or otherwise communicate with us. The types of information we may collect include identifiers, such as your name, email address, postal address, phone number, and any other information you choose to provide. In connection with some of our Services, you may be required to provide certain financial or payment information, such as credit card number, type, expiration date, or other financial information. Such information is collected and stored by third-party payment processors, and use and storage of that information is governed by any applicable terms and conditions and privacy policies of those third parties.

INFORMATION WE COLLECT AUTOMATICALLY WHEN YOU USE THE SERVICES

When you access or use our Services, we automatically collect commercial information and internet or electronic network activity data, including:

- **Log Information:** We collect log information about your use of the Services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Services.
- **Device Information:** We collect information about the device you use to access our Services, including the hardware model, operating system and version, and unique device identifiers.
- **Information Collected by Cookies and Other Tracking Technologies:** We use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that may be used in our Services or emails to help deliver cookies, count visits, and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see “Your Choices” below.

INFORMATION WE COLLECT FROM OTHER SOURCES

We may also obtain information from other sources and combine that with information we collect through our Services. For example, we may collect information about you from third parties, including but not limited to identity verification services, credit bureaus, mailing list providers and publicly available sources.

II. Use of Information

We use and maintain the Student Data that you provide to us only for the purposes for which you authorize us, namely to provide you with the Services. We will not use your Student Data to build a personal profile other than as authorized by you (i.e., to create your profile so that you can use the Services). We will not use Student Data for behavioral targeting of advertisements to

students. We will not knowingly retain Student Data beyond the time period as authorized by the student or as reasonably necessary to fulfill the purpose for which we collected it, unless otherwise required to in order to comply with applicable law.

We use all other categories of information listed above for business and commercial purposes, including to:

- Deliver the products and services you request;
- Provide, maintain, and improve our Services and the content of our website;
- Provide and deliver the products and services you request, process transactions, and send you related information, including confirmations and invoices,
- Send you technical notices, updates, security alerts, and support and administrative messages;
- Respond to your comments, questions and requests, and provide customer service and support;
- Communicate with you about products, services, offers, promotions, rewards, and events offered by REA and others, and provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage, and activities in connection with our Services;
- Detect, investigate, and help prevent fraudulent transactions and other illegal activities, and protect the rights and property of REA and others;
- Comply with our legal and financial obligations;
- Link or combine with information we get from others to help understand your needs and provide you with better service; and
- Carry out any other purpose described to you at the time the information was collected.

III. Disclosures of Information

We do not sell Student Data, and will only disclose Student Data for the purposes for which you authorize us and in the following circumstances:

- With vendors, consultants and other service providers who need access to such information to carry out work on our behalf, such as assisting with web hosting, fraud prevention, customer service, and marketing and advertising, and with whom we will require to follow the principles outlined in this Privacy Policy and/or the privacy principles set forth in the [Student Privacy Pledge](#) with respect to Student Data;

- In connection with, or during negotiations concerning, any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company, provided that any successor entity that acquires all or a portion of our business will treat your Student Data in accordance with the privacy principles outlined in this Privacy Policy and/or the privacy principles set forth in the [Student Privacy Pledge](#) with respect to Student Data, including by allowing you a choice to send personal information to the successor entity or have your personal information deleted; and
- With your consent or at your direction.

We may disclose all other categories of information listed above in the following circumstances or as otherwise described in this policy:

- With vendors, consultants and other service providers who need access to such information to carry out work on our behalf, such as assisting with web hosting, fraud prevention, customer service, and marketing and advertising;
- With third parties to offer or provide related services;
- If you request us to carry out specific transactions, for example refunds, promotions, etc., unless you opt out of this type of sharing. To opt out, please, send an email to info@rea.com with details of your request. We will contact you to acknowledge receipt and take any appropriate action;
- If we believe that disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- If we believe that your actions are inconsistent with our user agreements or policies, if we believe that you have violated the law, or if we believe it is necessary to protect the rights, property, and safety of REA, our users, the public, or others;
- With our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interest;
- In connection with, or during negotiations concerning, any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company;
- Between and among LSC Communications and our current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you. REA processes, maintains, and uses this information only in a de-identified fashion and will not attempt to re-identify such information, except as permitted by law.

IV. Advertising and Analytics Services Provided by Others

We will not disclose your Student Data collected through the Services for behavioral targeting of advertisements.

With regard to the non-Student Data you provide, we may allow others to provide analytics services, serve advertisements, and perform related services on our behalf across the Internet and in applications. These entities may use cookies, web beacons, SDKs, device identifiers, and other technologies to collect information about your use of the Services and other websites and applications, including your IP address and other identifiers, web browser, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used to deliver advertising and content targeted to your interests on other companies' sites or mobile apps and to analyze and track data, determine the popularity of certain content, and other websites and better understand your online activity. In addition, some of our advertising partners enable us to translate your email address or phone number into an identifier that can't be used to identify you personally. Our advertising partners then use that unique identifier to show ads that are more relevant to you across the web and in mobile apps.

For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes by companies that participate in the Digital Advertising Alliance, please visit www.aboutads.info/choices.

V. Security

We will maintain a comprehensive security program that is reasonably designed to protect the security, confidentiality, and integrity of Student Data against risks – such as unauthorized access or use, or unintended or inappropriate disclosure – through the use of administrative, technological, and physical safeguards appropriate to the sensitivity of the information.

VI. Transfer of Information to the U.S. and Other Countries

REA is based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services located in the United States or otherwise providing information to us in the United States, you consent to the processing, transfer and storage of information in and to the U.S. and other countries, where you may not have the same rights and protections as you do under local law.

To the extent REA processes personal data it receives from the EU in connection with services it offers in the EU (“EU Data”), REA leverages Standard Contractual Clauses with our customers to operate as a data processor and/or subprocessor. Please direct any inquiries or complaints regarding our data privacy compliance to the point of contact listed in the “Contact Us” section below.

VII. Your Choices

ACCOUNT INFORMATION

We support access to and correction of Student Data by the student or their authorized parent. You may update, correct, or delete information about you at any time by logging into your online account or emailing us at: info@rea.com.

If you wish to deactivate your account, please email us at info@rea.com. We may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

COOKIES

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

VIII. California and Other State Privacy Information

CALIFORNIA AND OTHER STATES NOTICE OF INFORMATION COLLECTED AND/OR DISCLOSED

The California Consumer Privacy Act or “CCPA” (Cal. Civ. Code § 1798.100 et seq.), as amended by the California Privacy Rights Act (“CPRA”) and privacy laws in Colorado, Connecticut, and Virginia, afford consumers residing in those states certain rights with respect to their personal information. If you are a resident of one of those states, this section applies to you as further described below.

If you are a California applicant or employee, employee applicant, or contractor, please refer to the LSC Privacy Notice for California Applicants/Employees for a description of LSC’s privacy practices in that context, and if you are a California business contact, please see our California Business Privacy Notice.

In the preceding 12 months, we have collected the following categories of personal information:

<i>Category of Personal Information</i>	<i>Examples of Personal Information Collected</i>
Identifiers	Name, mailing address, zip code, IP address
California customer records or similar personal information under applicable state laws	Name, address, telephone number
Internet or other electronic network activity	Browsing activity
Characteristics of Protected Classifications under State or Federal Law	Age
Commercial information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
Sensory data	Audio information (such as call recordings)

Student Data	Information relating to a student using K-12 services or relating to a student's education records under the Family Educational Rights and Privacy Act
Inferences	Approximate location based on IP address

We collect personal information for the business and commercial purposes described in the Use of Information section above. In the preceding 12 months, we have disclosed the following categories of personal information for business purposes to the following categories of recipients:

<i>Category of Personal Information</i>	<i>Categories of Recipients</i>
<ul style="list-style-type: none"> Identifiers 	<ul style="list-style-type: none"> Web hosting and cloud storage providers Customer support services providers Customer feedback services providers Data analytics providers Fraud prevention services providers Advertising partners
<ul style="list-style-type: none"> Characteristics of protected classifications under state or federal law 	<ul style="list-style-type: none"> Customer feedback services providers
<ul style="list-style-type: none"> Internet or other electronic network activity information 	<ul style="list-style-type: none"> Web hosting and cloud storage providers Data analytics providers Fraud prevention services providers Advertising partners
<ul style="list-style-type: none"> Student Data 	<ul style="list-style-type: none"> Web hosting and cloud storage providers Customer support services providers Customer feedback services providers Data analytics providers Fraud prevention services providers

<ul style="list-style-type: none"> • Inferences 	<ul style="list-style-type: none"> • Advertising partners
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We do not use or disclose sensitive personal information for the purpose of inferring characteristics about you. We retain personal information for as long as necessary to carry out the purposes for which we originally collected it and for other purposes described in this privacy policy.

SALES OF PERSONAL INFORMATION

California law requires that we provide transparency about personal information we “sell.” “Sale,” for the purposes of the CCPA, broadly means scenarios in which we have disclosed personal information with partners in exchange for valuable consideration. In the preceding twelve (12) months, LSC Communications has not sold personal information.

We do not knowingly sell or share personal information about consumers under the age of 16.

CALIFORNIA NOTICE OF FINANCIAL INCENTIVE

California’s privacy law requires that we notify you if we provide you a program, benefit, or other offering, related to the collection, deletion, or sale of personal information, which it defines as a “financial incentive.” We offer coupons to prospective and current REA consumers. Sometimes, consumers sign up or provide us their personal information (e.g., email address) in order to receive our coupons. As such, under the CCPA, our coupons and product incentives may be considered financial incentives provided in exchange for the collection and retention of personal information.

We offer these coupons to enhance our relationship with you or so you can enjoy or try our products at a lower price. There is no obligation to opt in and consumers may opt out at any time. The details of each program are contained in each such program offering.

The consumer data received in exchange for your participation is dependent on a number of factors, including, for example, whether and to what extent you take advantage of any offerings and whether and to what extent you opt out of any offerings but is roughly equivalent to the value of the coupon or product offered.

INFORMATION RELEVANT TO CALIFORNIA

The CPRA requires that we notify you if we “Share” your personal information with third parties. For purposes of the CPRA, “Sharing” means that we make available or otherwise disclose your information to third parties for cross-context behavioral advertising, such as

targeting of advertising to you based on your personal information obtained from your activity across businesses, websites, apps, and services other than our Services.

Accordingly, we “Share” your non-Student Data information for Targeted Advertising. Specifically, we disclose your identifiers and internet or other network activity with Service Providers and third parties with whom you direct us to disclose your personal information.

As stated above, any such third parties with whom REA shares Student Data must have privacy principles consistent with those outlined in this Privacy Policy and/or the privacy principles set forth in the [Student Privacy Pledge](#) with respect to Education information.

To opt out of targeted advertising, sharing, and sales of your personal information, please follow the prompts here.

YOUR STATE CONSUMER RIGHTS AND CHOICES

Subject to certain limitations, you have the right to (1) request to know more about the categories and specific pieces of personal information we collect, use, and disclose, (2) request correction of your personal information, (3) request deletion of your personal information, (4) opt out of any “sales” or “sharing” of your personal information that may be occurring, and (5) not be discriminated against for exercising these rights. You may make these requests by calling 833-591-2798 or sending an email to info@rea.com. We will verify your request by asking you to provide information related to your recent interactions with us.

If we receive your request from an authorized agent and they do not provide a valid power of attorney, we may ask the authorized agent to provide proof that you gave the agent signed permission to submit the request to exercise rights on your behalf. In the absence of a valid power of attorney, we may also require you to verify your own identity directly with us or confirm to us that you otherwise provided the authorized agent permission to submit the request. If you are an authorized agent seeking to make a request, please call 844-572-5720.

IX. Contact Us

If you have any questions about this Privacy Policy, please contact us at:

Research & Education Association
1325 Franklin Ave., Suite 250
Garden City, NY 11530
info@rea.com