



Privacy Notice

Last Updated March 1, 2024

Weave Education, LLC, an Arizona limited liability company (“**Weave**” or “**we**”) is a software platform that provides data management solutions in the higher education sector. Weave respects your privacy, and this Privacy Notice applies to the Weave products, software and services (the “**Weave Platform**”) available at www.weaveeducation.com (the “**Site**”), as well as your interactions with Weave, the Weave Platform, and the Site.

This Privacy Notice describes the types of personal data we collect in connection with the Weave Platform, the purposes for which we collect such personal data, the other parties with whom we may disclose personal data, the measures we take to protect the security of personal data, and our direct marketing practices. It also tells you about your rights with respect to your personal data, and how you can reach us to exercise your rights, update your information, or get answers to questions you may have about our privacy practices.

Information We Collect

In connection with the Weave Platform, we collect certain personal data from and about subscribers (“**Subscriber**”) participating in the Weave Platform and their respective users and/or admins (collectively, “**Users**”). We collect information when an account is created on behalf of a Subscriber or User as part of the subscription process to the Weave Platform. We primarily collect information from our subscribers, rather than directly from the individual the data relates to. This information includes personal data, which is information that identifies, relates to, describes, or is reasonably capable of being associated with a particular individual or household. We also collect information automatically when you visit, access or use the Site or Weave Platform by automated means such as cookies, pixels, and web beacons in order to provide more seamless service to you. The information collected automatically may include personal data. The Use of Cookies section below describes these practices in more detail. Finally, we also collect personal data from third parties and publicly available sources.

We collect, or in the past twelve months have collected, the following categories of personal data from or about individuals:

| Category | Examples | Collected |
|-----------------|--|-----------|
| A. Identifiers. | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers. | Yes. |

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| <p>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p> | <p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> | <p>Yes.</p> |
| <p>C. Protected classification characteristics under California, Virginia or federal law.</p> | <p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p> | <p>No.</p> |
| <p>D. Commercial information.</p> | <p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p> | <p>Yes.</p> |
| <p>E. Biometric information.</p> | <p>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</p> | <p>No.</p> |
| <p>F. Internet or other similar network activity.</p> | <p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p> | <p>Yes.</p> |
| <p>G. Geolocation data.</p> | <p>Physical location or movements.</p> | <p>No.</p> |
| <p>H. Sensory data.</p> | <p>Audio, electronic, visual, thermal, olfactory, or similar information.</p> | <p>No.</p> |
| <p>I. Professional or employment-related information.</p> | <p>Current or past job history or performance evaluations.</p> | <p>Yes.</p> |
| <p>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section</p> | <p>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p> | <p>Yes.</p> |



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| 1232g, 34 C.F.R. Part 99)). | | |
| K. Inferences drawn from other personal information. | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | No. |

We may not collect all of the above categories of personal data from each individual we collect personal data from or about.

In addition to the above categories, we may also collect nonpersonal information, including encoded information, anonymized information, de-identified information, aggregate information, publicly available information, or other information that does not identify you.

Finally, as part of our information processing, we may collect or handle information related to students as part of administering our services. Student information will only be collected and used to administer the services, and is subject to all safeguards and rights in this policy including the provisions regarding access, sharing and security. To the extent we handle any information that constitutes an “education record”, as defined by the Family Educational Rights at Privacy Act (FERPA) located at 20 U.S.C. § 1232g, we support institutions in complying with their FERPA obligations.

How We Use Information We Collect

We will only use the information, including personal data, that we obtain from or about you for our legitimate business purposes and in order to provide service to you. These uses include:

- Providing the Weave Platform and Site to you by creating and managing your account, and responding to your inquiries;
- Validating payment information and performing accounting, auditing, billing, reconciliation and collection activities;
- Communicating with you about promotions and new products or services, if you opt-in to receive these marketing communications;
- Assisting third parties you direct or request to provide products or services in connection with the Weave Platform;
- Monitoring the use of the Weave Platform and our Site to enforce our terms, prevent fraud and comply with our regulatory, contractual and legal obligations;
- Performing audits, research or analyses in order to maintain, enhance, protect and improve our products and services;



- Understanding which Weave products or services are most commonly deployed and preferred by customers and how customers interact with Weave products or services;
- Creating and assembling datasets and/or statistics to inform machine learning. We only use accreditation, institution and faculty data for machine learning; we do not use identifiable student data to inform machine learning; and
- Compiling anonymous, aggregated datasets and/or statistics for the purposes of benchmarking, development of best practices, and other research, statistical, marketing and commercial purposes, including without limitation, the creation and maintenance of a shared resources library, provided that such aggregated datasets and statistics will not enable users to be individually identified.

Your Rights and Choices

We offer you choices about what personal data we collect from you, how we use that data, and how we communicate with you.

You may refrain from submitting information to us. However, if you choose not to provide us with personal data, you will not be able to register with the Weave Platform and we may not be able to provide you with information about Weave products and services.

We support the right to request access to and receive information about the personal data we maintain about you, and update and correct inaccuracies in your personal data. If you have any questions about these rights or if you wish to exercise these rights, please contact your educational institution, accrediting body, or the organization with whom your data is associated. If you are an educational institution, accrediting body, client of Weave, or otherwise believe that Weave has collected personal information directly from you, please contact us using the information below.

We strive to provide you with portability of your data, where it is technically feasible. If you have an account with us, the Weave Platform allows you to download and extract all of your data in a readily usable format through your account dashboard. We recommend that you regularly download and extract your data from the Weave Platform to ensure that you always have access to the most up-to-date data maintained in the Weave Platform.

You may opt-out of receiving marketing communications from us at any time by using the “unsubscribe” link or opt-out mechanism noted in the communication.

If you have additional questions about your rights and choices, please contact us using the information listed below.

Information Disclosure and Third Parties

We do not sell for monetary value the personal data we collect about you.

We disclose personal data to perform the services requested through the Weave Platform, including with our service providers and affiliates. We require our service providers to only use personal data shared with them to perform services on our behalf, consistent with their legal obligations. These service providers are required to appropriately safeguard the privacy and security of personal data they process on our behalf, and must treat information in accordance with this Privacy Notice.



We may share aggregated and de-identified information with participating financial institutions and their customers. For example, we may share data to show trends about the general use of the Weave Platform. Weave also shares data with payment processors who process payments on our behalf.

We also may disclose personal data about you (i) if we are required to do so by law or legal process, (ii) if we are requested by law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

In the event that we sell or transfer all or a portion of our business or assets and this Privacy Notice no longer applies to your information, we will endeavor to ensure the successor entity uses information consistent with this Privacy Notice, unless you consent otherwise. Following such a sale or transfer, you may contact the entity to which we transferred your personal data with any inquiries concerning the processing of that information.

Marketing Communications

If you opt-in to receiving communications about Weave products or services, we may send you communications that we believe may be useful to you in your business. You can at any time tell us not to send you marketing communications by clicking on the unsubscribe link within the marketing e-mails you receive from us or by changing the settings on your account.

How We Protect Personal Information

We strive to maintain appropriate administrative, technical and physical safeguards to protect the personal data we collect and maintain about you against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing. The types of measures we take vary with the type of information, and how it is collected and stored. We restrict access to personal data about you to those employees who need to know that information to provide products or services to you.

Data Retention

We will only retain data for the time necessary to provide services to you. We will delete, de-identify, or aggregate any personal information about you if it is no longer necessary to provide the Weave Platform, the Site or Weave's additional products and services, subject to our legal obligations to retain data.

Data Transfers and EU Residents

We may transfer personal information to countries other than the country in which the data was originally collected. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your personal data to other countries, we will protect that information as described in this Privacy Notice. To offer our services, we may need to transfer your personal data among several countries, including the United States, where we are headquartered. We endeavor to comply with applicable legal requirements providing adequate safeguards for the transfer of personal data to countries outside of the United States.

If you are an EU Resident and wish to exercise your rights to access, delete, or amend your data, if you would like us to stop processing your data, or if you would like to exercise any other rights conferred



under the General Data Protection Regulation (Regulation (EU) 2016/679) please contact us at the address below. Please note that we will take reasonable steps to verify your identity before implementing your rights request, including asking you to provide identification, if necessary.

State Consumer Privacy Law Rights (California, Virginia, Colorado, Connecticut, and Utah Residents)

If you reside in California, Virginia, Colorado, Connecticut, or Utah, you may have certain rights regarding your personal data under the state consumer privacy laws passed in these states. As mentioned in the Your Rights and Choices section above, you have rights to access, amend, review, and know the personal data we collect about you, and the right to have your personal data provided to you in a readily usable format, where technically feasible. You also have the right to request which third parties we have shared your personal information with over the last 12 months. You can designate an agent to exercise your rights for you. Please note that we will take reasonable steps to verify your identity before implementing your rights request, including asking you to provide identification, if necessary. Because Weave is a service provider or processor of information, if you wish to exercise these rights or if you have questions concerning your rights, please contact your educational institution, accrediting body, or the organization with whom your data is associated so that we can process your request. If you are an educational institution, accrediting body, client of Weave, or otherwise believe that Weave has collected personal information directly from you, please contact us using the information below.

We do not sell personal data for monetary consideration.

Use of Cookies

Our website uses cookies to automatically collect certain information from you, which may include personal data. A cookie is a text file containing a small amount of information which is downloaded to your device and can subsequently be accessed by our web servers. A web beacon is an object embedded in and downloaded together with a webpage which accordingly provides information as to the viewing of that webpage. We refer to both of these technologies collectively as “cookies” throughout this privacy notice and section. Our site uses the following types of cookies:

Strictly necessary or essential cookies

Strictly necessary and/or essential cookies enable you to use the Weave Platform and to securely access the Site and its functionalities.

The following information is placed in/collected through these cookies: session ID (to remember your credentials in the course of your session); and server affinity and authentication data (to establish and maintain communication with the most appropriate servers). Session cookies are deleted when you log out of the Site.

Persistent Cookies and Web Beacons

Third-party persistent cookies are used for web analytics purposes for Weave’s exclusive use, e.g., for managing and improving the performance and design of the Weave Platform. These may be provided by Omniture, Google Analytics, or such other similar companies. The following information is placed in/collected through the third-party cookies and web beacons: unique identification number assigned to your device; IP address; browser type; operating system; referring URLs; information on actions taken;



dates and times of Site visits. All data collected by via these third-party cookies and web beacons on behalf of Weave is aggregated and of a statistical nature.

You may reject cookies by altering the cookie function of your browser. The “help” portion of the toolbar on most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. However, if you reject these cookies, you will not be able to use the Weave Platform or the Site, as these cookies are strictly necessary for the Weave Platform and Site to operate.

Updates to Our Privacy Notice

This Privacy Notice may be updated periodically to reflect changes in our personal data practices. If we make material changes to our Privacy Notice, we will endeavor to provide notice. Your continued use of the Weave Platform, the Site and/or Weave’s products and services constitutes consent to these changes. The top of this Privacy Notice indicates when it was most recently updated. Please check this Privacy Notice and the Site periodically to ensure that you are aware of any changes or updates.

How to Contact Us

If you have any questions or comments about this Privacy Notice or if you would like us to update the personal data we have collected and maintain about you, or update your preferences, please contact us via email at help@weaveeducation.com, or by writing to:

Weave Education, LLC
Attn: Privacy Manager
6166 N. Scottsdale Road, C-4003
Scottsdale, AZ 85253