## CSUSA Privacy Policy on Marketing Data

CSUSA values your privacy - This policy sets forth how we protect marketing data information that we may collect from users in the course of business or that is provided to us through our relationship with students and their families.

We use the marketing contact data that users provide directly to us for the purpose for which it was collected: to send requested content or respond to questions. We also use that marketing contact data to send notices for direct marketing of our products and services.

We use automatic identifiers and tracking identifiers to administer, improve, analyze and personalize websites and to provide targeted advertisements.

We also use all marketing data to assess the effectiveness of various marketing initiatives and track the levels of sales and other engagement that result from marketing initiatives.

CSUSA (and/or one of its direct or indirect subsidiaries) is the controller of marketing data we collect. We collect marketing data when you visit our websites, when you provide it to us (by phone, in person, by webform), or when we collect it from public databases, partners, social media sites or other third parties.

Marketing data includes your contact details such as name, physical address, country, email, company name and telephone. It also includes automatic identifiers such as IP address, geographic location, browser type, operating system, screen size and company that we automatically collect when you visit our websites. These automatic identifiers are anonymous unless you provide additional information to us (such as by filling out a form on our website) that connects the automatic identifiers to you.

When you visit our websites we use cookies, web beacons or other online tracking identifiers. These tracking identifiers are anonymous unless you provide additional information to us (such as by filling out a form on our website) that connects the tracking identifiers to you. You can enable or disable cookies by modifying the settings in your browser.

Marketing data also includes data that shows the web pages you may view, marketing content you have requested and any transactions that may have resulted from your interaction with marketing content.

We process marketing data based on our legitimate interest in direct marketing our products and services. We also process marketing data based on consent given by individuals who opt in, where required, to our communications.

We share marketing data within our family of companies. We also share certain marketing data with third party service providers whose tools we use for marketing lead management, reporting, account matching, standardization, enhancement, deduplication, video engagement, targeted advertising and website behavior analysis. We make sure any third parties with whom we share personal data will use the data only for the purpose of providing their services to us, and in a manner consistent with our privacy practices.

We retain marketing data for as long as is reasonable for the original purpose for which it was collected and for furthering our legitimate interest for direct marketing. We also retain marketing data for prospects for a reasonable amount of time to determine if there is any interest or engagement.

In all cases, you are given the right to opt out of receiving further marketing communications. In that case, we will only retain the amount of information needed to be sure we do not contact you again for direct marketing purpose. You may opt-out of further communications from us at any time by visiting:

opt-out@charterschoolsusa.com

You have the right to contact us at:

Privacy Officer CSUSA 800 Corporate Dr Suite 700 Fort Lauderdale, FL 33334

to review, correct or delete any marketing data that you previously provided to us or that we collect about you. We will respond to your request within a reasonable amount of time.

You have the right to lodge a complaint with the appropriate data protection authority.

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