



INTERNATIONAL STUDIES ABROAD

AFRICA ASIA EUROPE LATIN AMERICA PACIFIC

UK/EU PRIVACY POLICY

At ISA, we are committed to maintaining strong and meaningful privacy protections for our customers.

This privacy policy describes ISA's practices regarding personally identifiable information ("Personal Information") that we:

- collect from you, or that you provide or make available to us, when you make a booking with us, use our websites (including www.studiesbroad.com mobile applications or use our social media pages (our "Platforms");
- collect from third parties including our affiliated entities, advertising and business partners, data providers *etc*;
- collect automatically from your computer or mobile device, including IP address, browser type *etc* or through use of cookies or similar tracking technologies on the Platforms or third party platforms.

We will only collect and use your Personal Information where we have lawful grounds and legitimate business reasons to do so.

For the purposes of the EU General Data Protection Regulation ("GDPR"), we, ISA, are the "data controller".

Collection and Usage of Personal Information

In General.

We receive and store information about you when you:

- visit our Platforms;
- visit third party platforms;
- open or respond to our emails;
- contact customer service or use support tools;
- visit any page that displays our ads or content;
- purchase programs or services on our Platforms;
- connect or link to any Platform via social networking sites;
- post comments to online communities; and/or
- provide information to our suppliers, advertising and business partners.

Personal Information collected may include:

- first and last name;
- telephone number;
- postal address;
- email addresses;

- gender;
- data of birth;
- passport number;
- government identification number; and
- billing information (such as credit card number, cardholder name, and expiration date).

We may also request information regarding your insurance and medical coverage options, hotel room preferences, etc. You can choose not to provide Personal Information to us, but, in general some Personal Information about you is required in order for you to: register for our programs; book travel; complete a program profile; participate in a survey contest, or sweepstakes; ask us a question; or initiate other transactions on the Platforms.

You may also provide us with special categories of Personal Information, including information about any relevant medical conditions, diseases or disabilities you may have and which we need to enable us to meet your particular needs in relation to the booking. We will only collect and use these special categories of Personal Information with your explicit consent and for limited purposes which will be explained to you.

Information We Collect About You

Information from Other Sources. We also may periodically obtain both personal and non-personal information about you from affiliated entities, advertising and business partners, data providers and other third party sources and add it to our information. Examples of information we may receive include: name, educational institution, travel dates, flight info, email address, history of purchases, demographic information, unique individual or device identifiers, *etc.* In addition, if you sign up for our programs using social media accounts, or link your ISA account to your social media accounts, or use other social media features, we may access Personal Information about you via social media platforms (depending on your privacy settings on those third party social media platforms). This information may include your name, email address, profile picture, gender, location, list of friends, educational institution and other information.

Automatic Information. We automatically collect some information about your computer when you visit our, or other, Platforms. For example, we may collect information about your IP address, web browser, Internet Service Providers (ISPs), referring and exit pages, operating systems, date/time stamps, number of clicks to analyze trends, *etc.* This information is used to administer the Platforms, track user movements and gather information about referring websites. We also may collect information about your online activity, such as programs viewed and registrations completed. This automatic information is used

only on an aggregated, anonymous basis and is not used with, or linked to, any personally identifiable information.

How We Share Your Information

We share your information with or for:

Suppliers. We share your Personal Information, only when necessary, with hotel, airline, coach & bus, car rental, insurance, medical and activity providers, to fulfill your program requirements and reservations. By enrolling in our programs, through any Platform, you are authorizing us to disclose to our suppliers the information required to complete the program requested and fulfill related requirements such as insurance and medical coverage. We do not control the privacy practices of suppliers.

Third Party Vendors. We share your information with third party vendors who provide services or functions on our behalf. These third party vendors include credit card processing companies, business analytics platforms, customer service organizations, advertising and business partners, distributors of surveys or sweepstakes programs, and fraud prevention firms. We may also authorize third party vendors to collect information on our behalf as necessary to operate features of our Platforms or to facilitate online advertising tailored to your interests. We have appropriate privacy safeguards in place with third party vendors who are providing services or functions on our behalf.

Please note that third party vendors have access to, and may collect, your personal information to perform their own functions and deliver their own services. We do not control these additional practices of third party vendors - please refer to the third parties own privacy notices for information about how they treat your Personal Information.

Business Partners

We may jointly offer products or services with business partners. You can tell when a business partner is involved in a product or service you have requested because their name will appear, either alone or with ours. If you choose to access these optional services, we may share your Personal Information with our partners. We do not control the privacy practices of business partners.

Requesting Information and Referring Friends For Leadership Programs.

We may contact you to provide information on becoming a WorldStrides ISA Custom Programs Leader if you fill out a request form to lead a WorldStrides ISA Custom Program. Also, when you submit information about another educator for our "Refer a Friend" program, we may contact that individual regarding leading a WorldStrides ISA Custom Program. When you refer a friend using the Platforms,

Personal Information may be requested about that individual. You should obtain the consent of other individuals prior to providing us with their Personal Information.

Future Business Transactions. As our business is constantly changing, we may transfer your Personal Information as part of a merger, sale of assets, acquisition, *etc.*

Referring Platforms. If you are referred to our Platforms from another Platform, an advertising site, a blog, a social media site, *etc.*, we may collect information about you from the referring Platform or site. Also, we may share some information about you with the referring Platform or site. We do not control the privacy practices of referring websites. We encourage you to review the privacy policies of any referring Platform.

Surveys and Promotions. ISA may conduct surveys and promotions on our Platforms that collect your Personal Information. Our surveys and promotions are *voluntary* and any information you provide may be collected, used, shared, disclosed, stored, transferred and processed in accordance with this policy.

Using Our Platforms From Outside the United States

When visiting our Platforms from outside the United States, please be aware that we may process your Personal Information in, or transfer your Personal Information to, the United States. We may also transfer your Personal Information to third parties in the United States for processing. If you do not wish your Personal Information to be processed in, transferred to and stored in, the United States, please do not provide your Personal Information when using our Platforms in locations outside the United States.

We will only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is necessary for the delivery of your program or the fulfilment of our obligations to you, and where the recipient is compliant with data protection legislation or where the means of transfer provide adequate safeguards in relation to your data, for example:

- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
- by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or

- transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- where you have consented to the data transfer.

To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

Protecting Your Information

We want you to feel confident about using our Platforms to register in our programs and make travel arrangements. We are committed to protecting the Personal Information we collect. While no Platform can guarantee security, we use commercially reasonable physical, technical, and administrative safeguards to assist us in preventing unauthorized access, use and disclosure of your Personal Information.

Cookies and Tracking Technologies

ISA, and third parties, may use cookies and tracking technologies for the following purposes when you visit our Platforms

- To track new visitors to our Platforms;
- To operate, maintain and improve our Platforms;
- To facilitate and fulfill travel program requirements and services requests;
- To help us recognize your browser as a previous visitor. This includes saving and remembering any preferences that may have been set while your browser was visiting our Platforms, such as language preferences;
- To store your username and password if you are registered with us;
- To display interest-based or other ads and offers for products and services from us and our advertising and business partners. This targeting may be based on information you submit on our Platforms or third party platforms. This targeting may also be based on your activities or behaviors on our Platforms or those of third parties. We may also obtain information about your browsing history or other demographic information from our business and advertising partners.
- To perform analytics and conduct customer research. We may use Google Analytics and similar technologies to collect statistics about the behavior of visitors to our Platforms. These technologies

collect only anonymized information about you. We do not control the cookies or other tracking technologies used by third parties to collect and store your Personal Information. We encourage you to review the privacy policies of third parties for more information regarding the applicable privacy practices.

In addition, we and third parties may also collect and store your Personal Information via web beacons, remarketing pixel tags, and Flash cookies which are placed in the code of a web page or email or which access your browsing activity. Where cookie technologies may not be available (for example in mobile applications), ISA and third parties may use technologies that perform functions similar to cookies that link identifiers used for advertising on mobile applications to an advertising cookie to coordinate ads across your mobile apps and mobile browser.

Opting Out of Cookies

We provide you with choices regarding cookies and tracking technologies. The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

Please keep in mind that, without cookies, you may not have access to certain features on our Platforms, including access to your profile or account and certain personalized content. Removing all cookies from your computer could also affect your subsequent visits to certain Platforms by requiring that, for example, you enter your login name when you return.

If you would like to opt-out cookies, here are some options:

If you would like to opt-out of ad targeting cookies set by Google, Doubleclick and similar Platforms, please click here: Google opt-out:

<https://support.google.com/ads/answer/2662922?hl=en>

If you would like to generally opt-out of receiving personalized ads from third party advertisers and ad networks who are members of the Network Advertising Initiative (NAI) or who follow the Digital Advertising Alliance's (DAA) Self-Regulatory Principles for Online Behavioral Advertising please visit the opt-out pages on the NAI website and DAA website or click the following:

NAI's opt-out tool: <http://www.networkadvertising.org/choices/>

DAA's opt out tool: <http://www.aboutads.info/choices/>

Facebook opt-out: <https://www.facebook.com/business/help/1415256572060999>

Twitter opt-out: <https://support.twitter.com/articles/20170407?lang=en>

LinkedIn opt-out: https://www.linkedin.com/static?key=linkedin_ads_info

In order to control the collection of data for analytical purposes by Google Analytics, you may want to visit the following link: <https://tools.google.com/dlpage/gaoptout>.

Managing “Do Not Track” Signals

Some browsers have a Do Not Track (“DNT”) feature that lets you tell websites that you do not want to have your online activities tracked. When you choose to turn on the DNT setting in your browser, your browser sends a special signal to websites, analytics companies, ad networks, plug in providers, and other web services you encounter while browsing to stop tracking your activity via cookies or other tracking technologies. For information regarding DNT and how to enable this setting, if available, on your devices please see <https://allaboutdnt.com>. Our Platforms do not respond to DNT signals at this time.

Email Notifications

To respect the privacy of our users, we will only contact you with marketing information and offers relating to our products or services where you have told us that you are happy to receive such information. You will be given the opportunity to opt in to receiving certain types of communication when you register with us, book a trip with us or otherwise provide us with your Personal Information. If you have opted-in, you can still choose not to receive commercial emails from us by following the unsubscribe instructions contained in the commercial emails we send you. You may also email us directly at update@worldstrides.org at any time if you would like to unsubscribe from our email service. Please note that even if you do not opt in to receiving commercial email messages, or you opt in but subsequently choose to opt out, we may still email you regarding your account and your transactions.

We will only pass your Personal Information on to our business or advertising partners if you have informed us that you are happy for them to contact you with marketing information and offers.

Using Mobile and Other Devices

ISA, and/or third parties that we have engaged, may collect and store unique identifiers matched to your mobile device, in order to deliver customized ads or content while you use applications or surf the internet, or to identify you in a unique manner across devices or browsers. In order to customize these ads or content, we, or third parties, may collect your Personal Information, e.g., your email address, or data passively collected from you such as your device identifier or IP address.

You can manage how your mobile device and mobile browser share information with the Platforms, as well as how your mobile browser handles cookies, by adjusting the privacy and security settings on your device. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

Text Messaging and Alerts - Opting In and Out

Our mobile Platforms may give you the choice to opt-in to receiving text messages and alerts on the mobile phone number(s) you have shared with us. Once you have opted-in, we may send you text messages (i) regarding your account; (ii) to investigate or prevent fraud; and (iii) to alert you in the event of an emergency. We may send you text messages and alerts using autodialed technology. We will not contact you via text messages or alerts for marketing purposes without your prior express written consent. You do not have to opt-in to text messages and alerts to use and enjoy our Platforms and services. If you opt-in, standard text messaging charges may apply. For more information regarding our text messaging and alerts, please contact us at update@worldstrides.org.

You may choose to opt-out from our text messages and alerts at any time. Please follow the steps set out in the text message to opt-out and we will unsubscribe you from text communications. You may also email us directly at update@worldstrides.org at any time if you would like to unsubscribe. Once you opt-out, you will not receive any additional text messages via your mobile phone. Please keep in mind that if you opt-out of receiving text messages and alerts we may not be able to contact you with important messages regarding your account. However, if there is an emergency or account question, we will make every attempt to contact you in other ways such as by email or on a land line phone.

Storing Your Information and Security

We will use and store your Personal Information only for as long as necessary, bearing in mind the uses of your Personal Information as described in this privacy policy and otherwise communicated to you, and any mandatory legal requirements governing storage and reporting of information which we are subject to.

We review the Personal Information we hold at regular intervals and delete permanently or anonymise any Personal Information which is no longer necessary.

We have implemented appropriate technical and organizational measures to ensure that your Personal Information is kept in a secure environment and access to it is restricted to a 'need to know' basis.

Your Access To and Control Over Your Information

You can inquire as to your Personal Information, ask the following questions, or take the following actions by contacting us via email at update@worldstrides.org or via the address or phone number given on our Platforms to:

1. See what Personal Information we have about you (if any), including why we are holding it and who it could be disclosed to;
2. Ask us to change/correct any Personal Information we have about you;
3. Ask us to delete any Personal Information we have about you;
4. Ask us to restrict the processing of your Personal Information;
5. Express any concerns you have about our use of your Personal Information.

Information Submitted by Children

Outside the EU - we only collect Personal Information from children under 13 after verifiable parental consent has been obtained in accordance with the Children's Online Privacy Protection Act ("COPPA").

EU - we only collect Personal Information from children under 16 after verifiable parental consent has been obtained in accordance with the GDPR.

If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us. If we become aware that a child under 13 or 16 (as relevant, depending on where the child is located) has provided us with Personal Information without verifiable parental consent or if we receive Personal Information from other Platforms, we will delete such information from our Platforms.

Third Party Platform Links

We may collect your Personal Information from third parties. This includes when you log in using a third party platform, such as Facebook, Snapchat, Instagram, LinkedIn, Twitter, *etc.* We may also disclose information collected from third parties to customize ads and to manage and facilitate messaging on third party platforms. We do not control the privacy practices of third party platforms. We encourage you to review the privacy policies of third party Platforms for more information regarding the applicable privacy practices.

Your California Privacy Rights

As provided by California Civil Code Section 1798.83, a California resident who has provided Personal Information to a business with whom they have established a business relationship for personal, family, or household purposes (“California customer”) is entitled to request information about whether the business has disclosed Personal Information to any third parties for the third parties’ direct marketing purposes. In general, if the business has made such a disclosure of Information, upon receipt of a request by a California customer, the business is required to provide a list of all third parties to whom Information was disclosed in the preceding calendar year, as well as a list of the categories of Information that were collected and/or disclosed. To request such information, please submit your request by email to update@worldstrides.org, or in writing to WorldStrides, Attn: California Shine the Light Inquiry, 218 Water Street West # 400, Charlottesville, Virginia 22902. Please allow 30 days for a response. Please note that we are only required to respond to one request per customer each year and you will not be charged for this request.

If you are a California resident, who is a registered user of the Platforms and is a minor, you may remove, or request removal of, content or information that you posted on the Platforms, unless: (i) the content or information was posted by a 3rd party, (ii) any other provision of state or federal law requires ISA or a 3rd party to maintain the content or information, (iii) ISA anonymizes the content or information, or (iv) you received compensation from ISA for providing the content or information. To request removal of information or content that you posted, please e-mail update@worldstrides.org. Please note that the removal described does not ensure complete or comprehensive removal of the content or information that you post, as content or information may be cached in backup files or other storage. ISA will make all reasonable efforts to honor any removal request made as described in this paragraph.

If you would like to review and/or change your Personal Information retained by ISA please see the section above “Your Access to and Control over Information.” If you have questions regarding the process to review and/or change your Personal Information please email us at update@worldstrides.org.

California and other customers may request further information about our compliance with this law by emailing WorldStrides at update@worldstrides.org.

Changes to Privacy Policy

Any material changes to this policy will be posted on our webpage to keep you aware of what Personal Information is collected, how it is used, and under what circumstances it will be shared. It is your

responsibility to review ISA's Privacy Policy each time you provide Personal Information to us as the policy may have changed since the last time you used our Platforms.

How you can contact us

If you have questions about this Privacy Policy please email us at update@worldstrides.org

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