

Privacy Policy

Effective date: December 15, 2022

We at ZeeMee, Inc. (“ZeeMee”, “Company,” “we”, and “us”) know you care about how your personal information is used and shared, and we take your privacy seriously. The terms “you,” “your,” and “yours” refer to the user/customer utilizing the Services. Please read the following to learn more about our Privacy Policy. By using or accessing the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

ZeeMee is based in the United States. By using or accessing the Services or otherwise providing information to us, you consent to the processing, transfer, and storage of such information, including your personally identifiable information, in and to the United States.

Remember that your use of ZeeMee’s Services is at all times subject to the [Terms of Use](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the [Terms of Use](#).

What does this privacy policy cover?

This Privacy Policy covers our treatment of personally identifiable information (“Personal Information”) that we gather when you are accessing or using our Services, or that is provided to us with your consent by participating institutions, schools, colleges, and/or universities (“Colleges”), but not to the practices of other companies or institutions we don’t own or control, or people that we don’t manage. We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information only in connection with our Services, including to: (i) personalize, provide, promote, and improve our services; (ii) to allow you to set up a user account and profile; (iii) for us to contact you; (iv) to allow other users to contact you in-app based on your privacy settings; (v) to fulfill your requests for certain products and services; (vi) and to analyze how you use the Services. In certain cases, we may also share some Personal Information with third parties, but only as described below.

As noted in the Terms of Use, we do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at privacy@zeemee.com.

What basis do we have for processing your Personal Information?

We will only process personal Information where we have a lawful reason for doing so. The lawful basis for processing Personal Information by us will be one of the following:

- the processing is necessary for the creation of an account by you and to provide Services at your request;
- we are acting as a data processor for a College who has represented to us that they have authorization to provide your Personal Information to us for processing under the terms of our contracts;

- the processing is necessary in order for us to comply with our legal obligations (such as lawful subpoena requests or responding to copyright disputes);
- for detecting, preventing, and responding to fraud, abuse, security risks, harmful or unlawful behavior, and technical issues that could harm ZeeMee, our users, or the public;
- the processing is necessary for the pursuit of our legitimate business interests (including that of the delivery and the promotion of our services);
- processing is necessary for the establishment, exercise or defense of legal claims; or
- you have given us consent to the processing of your personal information for one or more specific purpose.

Will ZeeMee ever change this privacy policy

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well, but if we do we will alert you to changes by placing a notice on ZeeMee.com, by sending you an email, by posting the revised Privacy Policy on our website and in our mobile app and revising the date at the top of the Privacy Policy, and/or by some other means.

Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them as they are made available in the Services. If you continue to use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

What information does ZeeMee collect?

Information You Provide to Us

We receive and store any information you knowingly provide to us. For example, through the registration process and/or through your account settings, we may collect Personal Information such as your name, email address, phone number, school, and third-party account credentials (for example, your log-in credentials for Facebook, Instagram, or other third-party sites). The types of information may also include photographs, videos, documents, postings, chats, messages, and other information you may include or other materials you create or transmit through the Services. If you provide your third-party account credentials to us or otherwise sign in to the Services through a third party site or service, you understand some content and/or information in those accounts ("Third Party Account Information") may be transmitted into your account with us, and that Third Party Account Information transmitted to our Services is covered by this Privacy Policy. Certain information may be required to register with us or to take advantage of some of our features.

Participating Colleges may, with your consent for the College to communicate with you, register prospective students, current students, and alumni, before they become a ZeeMee member and provide us various items, including, but not limited to, their name, email address, phone number, location, and if students or alumni, their degree program, and graduation year. If you sign up to become a member of ZeeMee, you can confirm or revise any such information and provide us other information about yourself such as your education history, intended major, career preferences, activities, passions,

interests, and job history. You may also close and delete the account if you wish. Any information provided to us at registration may be used by ZeeMee in relation to our Services as described in our Terms of Use and this Privacy Policy.

We may communicate with you if you've provided us the means to do so. For example, if you've given us your email address, we may send you promotional email offers on behalf of others (you may unsubscribe to such offers at any time), or email you about your use of the Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more relevant and improve our services.

We also may send messages to your mobile phone number if you have provided us or a College consent to do so; see "Will ZeeMee send messages to my phone?" below. If you have asked to follow a College using the ZeeMee app to obtain more information about the College or communicate with it, we will provide them with your account information, including the phone number listed for your account so they can contact you. We do not share your contact information with any College if you have not indicated your interest by opting-in to follow that College in the ZeeMee app.

Information Collected Automatically

Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, which may include your internet protocol ("IP") address, geolocation data, device identification, "cookie" information, the type of browser and/or device you're using to access our Services, and the page or feature you requested. "Cookies" are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device's acceptance of cookies, but this may prevent you from taking advantage of some of our features. For more information see our [Cookies Policy](#).

We may use third parties to provide analytics services. These entities may use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by ZeeMee and others to, among other things, analyze and track data, determine the popularity of certain content, customize the Services, deliver content targeted to your interests on our Services and other websites and better understand your online activity.

For example, we use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the Services and enhance your experience when you use the Services. For more information on how Google uses this data, go to www.google.com/policies/privacy/partners. Our partners may also transmit cookies to your browser or device, when you click on advertisements or items that appear on the Services. If you click on a link to a third party website or service, a third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren't responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honor "Do Not Track" requests you have set using your browser or device.

We may use this data to customize content for you that we think you might like, based on your usage patterns. We may also use it to improve the Services – for example, this data can tell us how often users use a particular feature of the Services, and we can use that knowledge to make the Services interesting to as many users as possible. We also use automated systems and algorithms to analyze messaging, images, and other content passing through our systems to help us detect abuse such as scams, fake accounts, spam, illegal content, and other harmful or unlawful behavior.

Information Related to Personal Data Provided by Institutions, Schools, Colleges, and Universities

If you are a prospective student or a current student, ZeeMee may receive some personal information about you under the direction of your institution, school, college or university, prior to any direct relationship established with you through signing up for our Services. ZeeMee works with institutions, schools, colleges, and universities to help them provide notice to their students concerning the purpose for which personal information is collected. This information is received and handled by ZeeMee consistent with the requirements of all applicable law, including without limitation the U.S. Family Educational Rights and Privacy Act (“FERPA”), 20 U.S.C. § 1232g, 34 CFR Part 99, and the EU General Data Protection Regulation 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016) on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data.

ZeeMee may not have a direct relationship with the individuals whose personal data it processes. If you are a prospective student or a current student at an institution, school, college, or university that works with ZeeMee, and prefer not to have your personal information shared on the Services, please contact us at privacy@zeemee.com and we will delete your personal information. You can also join ZeeMee and correct, amend, or delete inaccurate data, through the settings in your user profile. The privacy standards and practices at your institution, school, college, or university concerning the sharing of your personal information with third parties are not governed by this privacy policy. Contact the specific department at your institution, school, college, or university for information about their privacy policy regarding your personal information.

ZeeMee will retain personal information we process on behalf of participating institutions, schools, colleges, universities, and companies for as long as needed to provide services to them, after which all copies of such personal information will be deleted unless retention is required under applicable law, or you indicate to us through your account or otherwise that your personal information should be retained and not deleted. We will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. You may contact us at any time at privacy@zeemee.com if you wish to have your personal information deleted from our systems. (It may not be possible to delete or remove copies of Public User Submissions you have communicated and shared with others using the Services)

Information Collected from Other Websites and Do Not Track Policy

Through cookies we place on your browser or device, we may collect information about your online activity after you leave our Services. Just like any other usage information we collect, this information allows us to improve the Services and customize your online experience, and otherwise as described in this Privacy Policy. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that

you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time, which means that we collect information about your online activity while you are using the Services and after you leave our Services.

How does ZeeMee use information

We may use information about you for various purposes, including, but not limited to:

- provide, maintain and improve our Services;
- provide and deliver the products and services you request, process transactions and send you related information, including confirmations and invoices for any paid Services and deliver communications you have designated for others;
- send you technical notices, updates, security alerts, support and administrative messages;
- respond to your comments, questions and requests and provide customer service;
- communicate with you about products, services, offers, promotions, rewards, and events offered by ZeeMee and others, and provide news and information we think will be of interest to you (you may unsubscribe to such offers at any time);
- monitor and analyze trends, usage and activities in connection with our Services;
- personalize and improve the Services and provide advertisements, content or features that match user profiles or interests;
- process and deliver contest entries and rewards;
- link or combine with information we get from others to help understand your needs and provide you with better service;
- publish information and User Submissions you have provided based on your account settings in the Services;
- investigate suspicious activity;
- detect, prevent, and combat harmful or unlawful behavior, such as reviewing and in appropriate cases removing messages and other content, and/or terminating accounts;
- protect the rights, property, or safety of ZeeMee, our employees, our users, or others;
- report illegal or harmful activity to appropriate authorities; and
- carry out any other purpose for which the information was collected and you were informed.

How does ZeeMee integrate with other social networks?

One of the special features of the Services is that it allows you to enable or log in to the Services via various social networking services like Facebook or Instagram ("Social Networking Service(s)"). By directly integrating these services, we make your online experiences richer and more personalized. To take advantage of this feature, we will ask you to log into or grant us permission via the relevant Social Networking Service. When you add a Social Networking Services account to the Services or log into the

Services using your Social Networking Services account, we will collect relevant information necessary to enable the Services to access that Social Networking Service and your data contained within that Social Networking Service. As part of such integration, the Social Networking Service will provide us with access to certain information that you have provided to the Social Networking Service, and we will use, store and disclose such information in accordance with this Privacy Policy. However, please remember that the manner in which Social Networking Services use, store and disclose your information is governed by the policies of such third parties, and ZeeMee shall have no liability or responsibility for the privacy practices or other actions of any Social Networking Services that may be enabled within the Services.

You may also have the option of posting your Services activities to Social Networking Services when you access content through the Services (for example, you may post to Facebook that you performed an activity on the Services); you acknowledge that if you choose to use this feature, your friends, followers and subscribers on any Social Networking Services you have enabled will be able to view such activity.

Will ZeeMee send messages to my phone?

ZeeMee may seek to communicate with you at times by phone either through in-app notifications or by calls, including text messages, if we have been provided with your mobile phone number. You can turn off in-app messaging through your mobile phone settings for the ZeeMee mobile app.

If you register and submit your mobile phone number to us, you consent to receive text message alerts from ZeeMee containing product and service announcements and information that may be sent using automated dialing systems. Text messages may also include communications from Colleges you asked to follow and connect with while using ZeeMee Services. We may send approximately four (4) text messages each month but the number of messages you receive depends on the number of information requests. Your provider's standard message and data rates may apply. You may elect to stop receiving text messages at any time by replying with "STOP" or by contacting us at privacy@zeemee.com and it will not affect your ability to use any other ZeeMee Services or features.

We do not share your mobile phone number with any other parties for advertising or promotional purposes unless you specifically opt-in to share your information, such as when you request that we send your contact information to an identified third party as part of a contest or special promotion on the ZeeMee platform.

Will ZeeMee share any of the personal information it receives?

We do not rent or sell your Personal Information in personally identifiable form to anyone, except as expressly provided below. We may share or disclose your Personal Information with third parties as described in this section:

Sharing Information with Colleges and other Users: We do not provide private information from your account to Colleges that you have not chosen to follow. If you join ZeeMee by accepting an invitation from a College that is a ZeeMee partner, we will share the profile information you provide at that time with the College whose invitation you accepted, including your phone number and email address as applicable. If, after joining the ZeeMee platform, you choose to opt-in to join a College community so that you can communicate with the College, and the College can communicate with you, we will share your profile and contact information, including your phone number and email address as applicable with

the College partner. Note, ZeeMee will share this information with Colleges only when you opt-in to join a College community, and only with Colleges who are partners with ZeeMee and under contracts to ensure the privacy and lawful use of information they receive from us.

You understand that when you use the Services, your profile and other information you post and actions you take through the Services, including, but not limited to, direct messages, posts on public forums, emails, nudges, push notifications, and chat services, may be shared with other users and viewable on publicly available areas of the Services, depending on your applicable privacy settings. Any College or other user may send you direct messages, emails, nudges, push notifications, and chat services through the ZeeMee app unless you change your settings to turn off such notifications. For more information about how privacy settings work, please see the section titled “User Profiles and Submissions; Privacy Settings” below.

Information that’s been de-identified: We may de-identify your Personal Information so that you are not identified as an individual, and provide that information to our partners. We may also provide aggregate usage information to our partners (or allow partners to collect that information from you), who may use such information to understand how often and in what ways people use our Services, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage or de-identified information to a partner (or allow a partner to collect such information) in a manner that would identify you as an individual person.

Advertisers: We allow our advertisers and/or merchant partners (“Advertisers”) to choose the anonymous demographic information of users who will see their advertisements and/or promotional offers and you agree that we may provide any of the information we have collected from you in non-personally identifiable form to an Advertiser, in order for that Advertiser to select the appropriate audience for those advertisements and/or offers. For example, we might use the fact you are located in San Francisco to show you ads or offers for California Advertisers. Or, we might allow Advertisers to display their ads to users with similar usage patterns to yours. Note that if an advertiser asks us to show an ad to a certain audience or audience segment and you respond to that ad, the advertiser may conclude that you fit the description of the audience they were trying to reach. We do not share your contact information with other Advertisers unless you specifically opt-in to share your information with them.

We may deliver a file to you through the Services (known as a “web beacon”) from an ad network. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Because your web browser must request these advertisements and web beacons from the ad network’s servers, these companies can view, edit, or set their own cookies, just as if you had requested a web page from their site. You may be able to opt-out of web beacon tracking conducted by third parties through our Services by adjusting the Do Not Track settings on your browser; please note that we don’t control whether or how these third parties comply with Do Not Track requests.

Affiliated Businesses: In certain situations, businesses or third party websites we’re affiliated with may sell or provide products or services to you through or in connection with the Services (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that

it is related to such transaction or service you have requested. One such service may include the ability for you to automatically transmit Third Party Account Information to your Services profile or to automatically transmit information in your Services profile to your third-party account. We have no control over the policies and practices of third-party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies.

Agents: We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us based on our instructions.

User Profiles and Submissions; Privacy Settings: Certain user profile information, including your name, location, and any video or image content that such user has uploaded to the Services, may be displayed to other users to facilitate user interaction within the Services or address your request for our services. Your account privacy settings may allow you to limit the other users who can see the Personal Information in your user profile and/or what information in your user profile is visible to others.

Our Services are designed, among other things, to help you share information with the world and put your best digital foot forward. If your ZeeMee page's discovery mode is toggled on, most of the information you provide us through the Services is information you are asking us to make publicly accessible. If your ZeeMee page's discovery mode is toggled on, the information you provide through and on the Services is and will be public. If your ZeeMee page's discovery mode is private, the information you provide through and on the Services is not publicly accessible but may be accessed by Colleges. Admissions counselors will always have their ZeeMee pages' discovery modes be toggled on. When you share information or content like photos, videos, and documents via the Services, you should think carefully about what you are making public.

You may elect to restrict access to certain information, such as who can view your profile, by using the available privacy settings. It is important to note that regardless of the privacy settings you select for your own profile, information that you post and actions that you take on or in connection with other users' profiles or in other areas of the Services may be viewable by other users and may be publicly available, depending on the applicable privacy settings for that profile or area of the Services. If you do not activate any privacy settings, your profile will be publicly available.

Business Transfers: We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party. **We do not sell your information** in violation of the California Consumer Privacy Act.

As Required for the Protection of Company and Others: We reserve the right to access, read, preserve, and disclose any information that we believe is necessary to comply with law or court order; enforce or apply our Terms of Use and other agreements; or protect the rights, property, or safety of ZeeMee, our employees, our users, or others.

Is personal information about me secure?

Your account is protected via authentication for your privacy and security. If you access your account via a third party site or service, you may have additional or different sign-on protections via that third party site or service.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

It is your responsibility to protect the security of your login information. Please note that emails, push notifications, instant messaging, and similar means of communication are generally not encrypted, and we strongly advise you not to communicate any confidential information through these means. Although we allow you to set privacy options that limit access to your information, please be aware that no security measures are perfect or impenetrable. We cannot control the actions of other users with whom you share your information. We cannot guarantee that only authorized persons will view your information. We are not responsible for third party circumvention of any privacy settings or security measures on ZeeMee.

You should also report any security violation to us at privacy@zeemee.com or by postal mail at ZeeMee, Inc., 805 Veterans Boulevard, Suite 105, Redwood City, CA 94063.

You should also report any inappropriate content on ZeeMee to us by clicking “Report User” on ZeeMee’s platform.

What personal information can I access?

Through your account settings, you may access, and, in some cases, edit or delete the following information you’ve provided to us:

- name and password
- email address
- location
- school
- user profile information, including images and videos you have uploaded to the site

The information you can view, update, and delete may change as the Services change. If you have any questions about viewing or updating information we have on file about you, please contact us at privacy@zeemee.com.

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Information to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at privacy@zeemee.com.

What choices do I have

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

You may be able to add, update, or delete information and adjust your privacy settings as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by contacting us at privacy@zeemee.com, but note that we may retain certain information as required by law or for legitimate business purposes. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

Your rights in relation to Personal Information and how to exercise them

Under certain circumstances you may have the following rights:

- the right to ask us to provide you, or a third party, with copies of the Personal Information we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified according to the provisions of local law;
- the right to request erasure, anonymization or blocking of your Personal Information that is processed in breach of applicable law;
- the right to object on legitimate grounds to the processing of your Personal Information. In certain circumstances we may not be able to stop using your Personal Information, if that is the case, we'll let you know why; and
- withdrawal of consent – when Personal Information is processed on the basis of consent an individual may withdraw consent at any time (this may apply to processing of special categories of Personal Information where you have instructed us to act on your behalf and includes the following: racial/ethnic origin, political opinions, religious or philosophical beliefs and trade union membership). In the event that you no longer want to receive any marketing material from us, please use the unsubscribe option (which is in all of our marketing emails to you), or contact us at privacy@zeemee.com.

What if I have questions about this policy?

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to privacy@zeemee.com, and we will try to resolve your concerns.