

Online Privacy Statement

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This website is provided by Iowa Student Loan Liquidity Corporation ("Iowa Student Loan"), its subsidiary Aspire Resources Inc. d/b/a Aspire Servicing Center ("Aspire Servicing Center"), or their affiliates (collectively, "we," "us," and "our" in this Online Privacy Statement). If you are a California resident, please review this Online Privacy Statement for important California privacy information. We provide access to and use of certain websites and subdomains that we own and control that offer products and functionality. Those websites include, without limitation, iowastudentloan.org, aspireservicingcenter.com, aspireresourcesinc.com, studentloan.org, ilinksupport.org, resetrefinance.com, resetrefinance.org, partnershiploan.org, and sp3.org. This Online Privacy Statement and our applicable Terms of Use apply to all of the websites that we own and control.

We understand that you are concerned about the privacy and security of your Personal Information (as defined below). This Online Privacy Statement ("Privacy Statement") applies to the information we collect from you online when you visit a website that we own and control. The amount, type and use of the information we receive depends on how you use this website and the kinds of products or services you receive.

If you obtain a financial product or service from Iowa Student Loan, your activities on this website are also governed by our [Customer Financial Privacy Notice](#) that describes how Iowa Student Loan collects, uses, and discloses nonpublic personal information of consumers (which may be you). If Aspire Servicing Center is the loan servicer to the financial institution (lender) from which you obtained financial products and/or services, in addition to this Privacy Statement your activities on this website are governed by the financial institution's [Customer Financial Privacy Notice](#) and how it collects, uses, and discloses nonpublic personal information and personally identifiable financial institution of consumers/customers. By using this website, you accept this Privacy Statement and consent to its terms. If you don't agree to the terms contained in this Privacy Statement, you must immediately exit this website.

Collecting and Using Your Personal Information

- **Information we collect from you.** We collect Personal Information (defined below) that you provide to us directly through electronic mail; electronic website forms, including inquiries about credit products and credit applications; and other electronic means. **"Personal Information"** means information that can specifically identify you, such as your name, phone number, address, email

address, date of birth, account number, the college or university you attend, your course of study, your planned year of graduation, employment history, income information and other financial information about you, Social Security number, driver's license number or information from other identification documents. If you are applying for employment, Personal Information may also include resumes, cover letters and other employment information that you provide us. We collect this information when you register and/or set up an account/profile to access, visit and/or use certain portions of the website.

- **Information that we collect from third parties.** We may collect information about you from third parties (for example, schools, other financial institutions, and consumer reporting agencies) when you apply for loans. We may also collect information about you from third parties when you apply for employment. This information may include credit reports, background checks and reference checks from national consumer reporting agencies, background check service providers and your references.
- **Information that we collect automatically.** In addition to the information that you or third parties provide us, we may automatically collect information about you when you use this website. We collect information related to your use of our websites using cookies, web beacons and log information. We use the information gathered from cookies, web beacons, logs and similar tools to monitor website performance; improve website design, functionality, and security; assemble web analytics and activity trends; and to measure, improve and customize our products and services. We may use cookies, web beacons and other technologies from third-party service providers to satisfy these functions. The information we may collect includes, without limitation, the make, model, settings, specifications (e.g., CPU speed, connection speed, browser type, operating system, device identifier) and geographic location of you and/or your computer, mobile or other device, as well as date/time stamp, IP address, pages visited, time of visits, content viewed, ads viewed, the website(s), application(s), destination(s) and/or service(s) you arrived from, and other clickstream data.
- **Google Analytics** is a tool we use to collect information about use of this website. Google Analytics collects information such as how often users visit this website, what pages they visit when they do so, what other sites they used prior to coming to this website and an anonymous IP address not exactly matching the IP address of the device used to connect to our site. We use some of the

information we get from Google Analytics to improve this website and provide information regarding our products to you. We do not combine the information collected from Google Analytics with any of your Personal Information. Although Google Analytics plants a permanent cookie on your device's web browser to identify you as a unique user the next time you visit this website using that same device, the cookie cannot be used by anyone but Google. You can read [Google's Privacy Policy](#) to learn how Google uses the data gathered by Google Analytics.

Users can opt out of Google Analytics tracking; to learn more visit Google's site: <https://tools.google.com/dlpage/gaoptout>.

Cookies and other browser-related items are explained further in this Privacy Statement.

We may use or disclose the Personal Information that we collect from you or third parties to:

- Register you with this website and to create an online account.
- Provide you with products or services.
- Process your loan applications and administer your online account.
- Process your employment application and to satisfy our legal obligations arising from the recruitment and hiring processes.
- Provide you with customer service, dispute resolution, or other troubleshooting.
- Communicate with you.
- Provide you with service updates.
- Provide you with marketing and surveys.
- Provide you with information you requested regarding our products or services or other questions.
- Verify your identity and reduce credit risk.
- Detect and prevent fraud, violations of our legal agreements, and illegal activity.
- Comply with legal or regulatory requirements.
- Make business decisions.
- Recover debt and collections.
- Fulfill other technical, logistical, financial, tax, legal, compliance, administrative or back-office functions.

Remarketing

This website uses third-party remarketing services, such as Google or Microsoft Ads, to

advertise our products and services on other websites to previous visitors of our website. Third-party remarketing services including Google will use cookies and pixel tags (action tags) on your web browser to collect non-identifiable information about your visits and interaction with our website—including button clicks and page visits—and display advertisements based on these past visits. The advertisements could be in the form of an advertisement on a Google or Bing search results page, a site in the Google Display Network, a banner or link. These advertisements on third-party websites allow us to track responses to our ads.

- Google Ads. You can set preferences for how Google advertises to you using the [Google Ad Settings](#) page.
- Microsoft Ads. We use certain services from Microsoft related to our websites and online ads, following their contracts and terms. Because of this, Microsoft may receive or collect some of your Personal Information. Please review the [Microsoft Privacy Statement](#) for more information.

If you want, you can opt out of interest-based advertising entirely by changing your cookie settings, permanently using a browser plugin or opting out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

Cookies are small files containing strings of text stored on your computer, mobile or other device. We use cookies to authenticate you as a user when you log in, to track your session, to deliver content specific to your preferences and interests, and to provide other functions.

We may use session cookies or persistent cookies. Session cookies are temporary and are deleted after you close your web browser. Session cookies do not collect personal information from your computer, mobile or other device. Among other uses, session cookies allow us to deliver content specific to your interests and to improve website navigation. We use persistent cookies for customer protection, as part of our authentication technology. Persistent cookies assist in verifying the identity of a customer who is attempting to log in to an account.

Web beacons are objects embedded into web pages that allow a website to count users and determine how long users view web pages. We use web beacons for website traffic reporting, unique visitor counts, auditing and reporting, personalization, and other functions.

A web beacon embeds a small transparent gif image in a web page or email used to track when the web page or email has been viewed. A similar device may be used where a product, service or functionality sends data to a server when a set of user-initiated events occur, such as clicking a button on the website or in an email. This is similar to a cookie—it tracks your visit, and the data is only read by the server that receives the data. However, it differs because it is not browser-based, may not function as an ID card and doesn't store any data on your computer.

Log file information is automatically reported by your browser each time you access this website. When you access this website, our servers may automatically record certain log file information. These server logs may include Personal Information such as your web request, Internet Protocol ("IP") address, browser type, browser language, operating system, platform type, the state or country from which you accessed the website, software and hardware attributes (including Device ID), referring/exit pages and URLs, number of clicks and how you interact with links on the website, domain names, landing pages, pages viewed and the order of those pages, the date and time you visited the website and uploaded or posted content, error logs, files you downloaded, and other such information. We use this information to enhance the functionality of this website and to make your access more convenient, secure and efficient. We may also use this information to develop group profiles of website visitors, to assist with systems administration, to resolve problems and to prevent fraud.

Location information is general location information (e.g., IP address, city/state and or ZIP code associated with an IP address) that we automatically collect from your computer or mobile device. We use this information to enhance your experience of using this website.

Most internet browsers are set up to accept cookies automatically. You may stop your browser from accepting cookies or web beacons or providing location information. The Help portion of your browser should explain how to configure your browser's settings. Your browser may have add-ons that may help you block web beacons. You may have limited functionality if you block cookies or web beacons set by this website. Please note that if you disable such features, you may not be able to access or receive some or all of the services, content, features and/or products made available via this website.

If you do disable such features, please note that we are unable to respond to Do Not Track signals or similar tools and settings at this time due to the limits of current internet technology, standards and solutions.

Updating Your Personal Information

Keeping your Personal Information up to date is important. You may review or update certain account information by logging in to our customer portal Account Access page. If you encounter information that cannot be changed online or if you prefer to request changes offline, you may contact our office by calling or writing to us using the contact information listed on the Contact Us section of our website or by using the contact information listed on your billing statements or other documents we send to you.

Disclosure and Sharing of Personal Information

We disclose Personal Information to accomplish the uses, purposes and sharing outlined in this Privacy Statement, our [Customer Financial Privacy Notice](#), and/or the [Customer Financial Privacy Notices of the financial institutions](#) for which Aspire Servicing Center is the loan servicer (if applicable).

We disclose Personal Information to our affiliated companies, individuals and third parties that perform services and functions on our behalf under various legal agreements that have confidentiality requirements. These entities include, but are not limited to, financial institutions; auditors; background and credit check organizations; fraud prevention service providers; marketing service providers; database managers; customer service providers and representatives; debt collectors; and others who perform technical, logistical, financial, tax, legal, compliance or administrative functions on our behalf. They may perform functions including, but not limited to, providing products and services; analyzing data; supplying marketing assistance; providing search results and links; sending postal mail and email; providing background and credit checks; providing fraud checks; providing customer service; assisting in debt collections; and providing other financial, technical, logistical, tax, legal, compliance or administrative functions. All third parties who receive your Personal Information are required to maintain reasonable safeguards to protect the privacy of your Personal Information.

In addition, we may disclose Personal Information where:

- Required by law, by court rules concerning the production of records or by an order or requirement of a court, administrative agency, law enforcement authority or other government entity.
- We have reasonable grounds to believe that use or disclosure is necessary to

protect the rights, privacy, property or safety of our users, employees or others.

- We have reasonable grounds to believe that the information relates to the breach of an agreement or violation of the law that has been, is being or is about to be committed.
- It is necessary for fraud protection, risk reduction or the establishment or collection of funds owed to us.
- It is necessary to enforce or to apply our legal agreements, to pursue remedies or to limit damages to us.
- The information is public.
- You have provided consent or with your direction.
- Other reasons allow it or other laws require it.

We may share depersonalized aggregate or statistical data with third parties for public relations or other purposes.

Storing and Protecting Your Personal Information

Your Personal Information that we collect through the website may be stored and processed in the United States or any other country in which we or our subsidiaries, affiliates or service providers maintain facilities. We may transfer information that we collect about you, including Personal Information, to affiliated entities or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world.

We care about the security of your Personal Information and take reasonable technical and organizational measures to protect your data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. These measures vary depending on the sensitivity of the information we have collected from you. However, no method of transmission over the internet or via mobile device or method of electronic storage is absolutely secure. Therefore, while we strive to use commercially reasonable means to protect your information, we cannot guarantee its absolute security. We are not responsible for the functionality or security measures of any third party.

To protect your privacy and security, we take steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from us, at all times. Do not share your password with anyone and do limit access to your computer or other devices by signing off after you have finished accessing your account.

For information about how to protect yourself against identity theft, please refer to the Federal Trade Commission's website at www.ftc.gov and search for the latest [identity theft](#) and data security resources.

Retaining Your Personal Information

Following termination or deactivation of your account or any other actions we may take, we may retain your profile information for an additional period for backup, archival or audit purposes. In certain circumstances, we are required by federal and state regulations to store various information. In order to comply with those requirements, we may be unable to delete your Personal Information from our systems until the expiration of the applicable period. This is known as retaining information. Afterward, your Personal Information will be deleted or destroyed in accordance with our policies for information security and privacy that comply with applicable law.

Opting Out of Future Product, Service, or Event Notifications

We may contact you or send you information about new products or services or upcoming events. If you do not want to receive information about products, services or events, you may send an email to Privacy@StudentLoan.org or use the information in the Contact Information section below to contact us. If possible, please provide your exact name and address or email address as it appears on any mailings you have received from us. Your election not to receive information does not change our ability to send you information about your account with us.

Protecting Your Personal Information: Security Measures

We protect your Personal Information by maintaining administrative and technical safeguards. We use encryption technology to secure your information when being transmitted. Because no data transmission is completely secure, you understand there is some risk when you send us your information.

We also train our employees in the proper handling of Personal Information. When we

use other companies to provide services, we require them to protect the confidentiality of any Personal Information they may receive. We combine these technical safeguards with physical safeguards and employee policies to protect your information.

Maintaining Children's Privacy

We do not knowingly collect, maintain or use Personal Information from our websites about children under age 13. If you are under age 13, do not share Personal Information with us.

Managing Linked Sites

This website may display links to websites of other companies. If you link to a site that is not a website we own and control, the privacy policy of that site applies to you. We are not responsible for the way that site may collect, use, disclose or secure the personal information that you provide to them. Please read their privacy policy to learn how they use your personal information.

Changing this Privacy Statement

We may change the Privacy Statement on one or more occasions by posting a revised Privacy Statement on this website or a website replacing this website. Any changes to this Privacy Statement will become effective when posted unless indicated otherwise. Your continued use of our websites shall constitute your agreement to any revised Privacy Statement. Please save and print a copy of this Privacy Statement for your records.

California Privacy Rights

Under California Civil Code Section 1798.83 (known as the "Shine the Light Law"), if you are a resident of California, you may request certain information about our disclosure of personal information about you during the prior calendar year to third parties for their direct marketing purposes. To make such a request, please write to us at the following address:

Privacy Department
Iowa Student Loan
P.O. Box 659704
West Des Moines, IA 50265-0970

Alternatively, you may send us an email at Privacy@StudentLoan.org.

If you are a California resident, the California Consumer Privacy Act, as modified by the California Privacy Rights Act (collectively, the “CCPA”, along with subsequent clarifying CCPA legislation and implementing CCPA regulations), provides you certain rights and choices regarding how we collect, share, use, and protect your "personal information" and how you can exercise those rights. The CCPA defines "personal information" as information that identifies, relates to, describes, or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

We do not share or sell "personal information" (as defined in the CCPA and as used in this section), nor have we sold it, in the last 12 months. We do not use or disclose “sensitive personal information” (as defined in the CCPA and as used in this section) for purposes other than those specified in Cal. Code Regs. Tit. 11, § 7027(m). We do not sell or share the personal information of consumers under age 16.

Exceptions

Certain information that we collect may be exempt from the CCPA because it is considered public information or it is covered by financial privacy laws, such as the Gramm-Leach Bliley Act, the California Financial Information Privacy Act, the Health Insurance Portability and Accountability Act, or the Fair Credit Reporting Act, or because it may be exempt for other legitimate business purposes.

To the extent that we collect "personal information" and “sensitive personal information” subject to the CCPA, that information, our practices, and your rights are described below, and otherwise throughout this Online Privacy Statement.

We collect the following categories of “personal information” or “sensitive personal information” for the purposes outlined in this Privacy Statement, also in accordance with our written contracts and pursuant to applicable laws:

- Unique personal identifiers that include, but are not limited to:
 - Name
 - Email address
 - Internet Protocol (IP) address
 - Postal address
 - Driver’s license number

- Passport number
 - Social security number; and/or
 - Other similar identifiers
- Customer records information which includes, without limitation:
 - Name
 - Signature
 - Address
 - Education
 - Employment
 - Bank account number
 - Driver's license number or state identification card number
 - Telephone number
 - Passport number
- Professional or employment-related data
- Education information

We collect your “personal information” or “sensitive personal information” from the following categories of sources for the purposes outlined in this Privacy Statement, and for legitimate business purposes in accordance with applicable law:

- Yourself, whether from digital processes like sending electronic mail or forms, or physical correspondence such as mailing forms, letters, and other documents.
- Third parties, including, without limitation: consumer reporting agencies and credit reports; other financial institutions; schools; employers; law firms; and service providers that offer background and reference checks. Google and similar third parties may return deidentified information to us.
- This website via automated processes that we use, such as cookies, web beacons, and log information.

We collect your “personal information” or “sensitive personal information” for the business or commercial purposes of:

- Registering you with this website and/or creating an online account.
- Providing you with products or services.
- Processing your loan applications and/or administering your online account.

- Processing your employment application and satisfying our legal obligations arising from the recruitment and hiring processes.
- Providing you with customer service, dispute resolution, or other troubleshooting.
- Communicating with you.
- Providing you with service updates.
- Providing you with marketing and surveys.
- Providing you with information you requested regarding our products or services or other questions.
- Verifying your identity and reducing credit risk.
- Detecting and preventing fraud, violations of our legal agreements, and illegal activity.
- Complying with legal or regulatory requirements and other purposes.
- Making business decisions.
- Recovering debt and collections.
- Fulfilling other technical, logistical, financial, tax, legal, compliance, administrative or back-office functions.

For personal information subject to the CCPA, California residents have the right to:

- Know what personal data a business has collected about the consumer by requesting that a business that collects personal information about the consumer disclose to the consumer, free of charge, the following:
 - The categories of personal information that it has collected about that consumer.
 - The categories of sources from which the personal information is collected.
 - The business or commercial purpose for collecting or selling personal information.
 - The categories of third parties with whom the business shares personal information.
 - The specific pieces of personal information it has collected about that consumer.
- Delete any personal information about the consumer that the business has collected from the consumer, subject to exceptions.
- Correct any inaccurate personal information that is maintained about the consumer.
- To be free from discriminatory treatment, including retaliation, for the exercise of your privacy rights as conferred by the CCPA.

You may submit a CCPA request by providing your first name, last name, email

address, telephone number and ZIP code (personal identifiers) via one of the following methods:

- Calling us toll-free at (800) 507-3814 and leaving a message with the above information and your specific CCPA request as described above; or
- Referring to the 'Contact Information' section of this Privacy Statement for sending emails and mailing correspondence.

We verify requests to know, requests to delete, and requests to correct based on the above personal identifiers that you provide to us and will reply to requests within 10 business days (starting from the day the request is received). We may also receive your request from and share your request with other authorized individuals, permissible under the CCPA and this Privacy Statement. We thoroughly search our records to verify requests and if no relationship with you can be verified, our response to your request will indicate as such. You may submit an unlimited number of requests to exercise your rights under the CCPA; however, our response may remain the same as provided to you in a previous response.

We deny requests pursuant to the exceptions provided in the CCPA; our responses to your requests will include detailed explanations to such effect.

You may also designate an authorized agent to make such requests on your behalf by mailing a signed Power of Attorney to:

Compliance Department
Iowa Student Loan
P.O. Box 659704
West Des Moines, IA 50265-0970

We will not discriminate against you because you exercise any of your rights under the CCPA. You will not be retaliated against for the exercise of your rights under the CCPA.

Nevada Residents Disclaimer

Nevada residents have the right to opt out of the sale of certain pieces of their information. We do not sell "personal information" of Nevada residents, but, if you are a Nevada resident who has questions or who wants to make this type of request, please send your email to Privacy@StudentLoan.org.

Contact Information

If you have questions about this Privacy Statement, please contact:

Privacy Department
Iowa Student Loan
P.O. Box 659704
West Des Moines, IA 50265-0970

(800) 507-3814

Alternatively, you may send us an email at Privacy@StudentLoan.org.