

## **Special Notice for U.S. Residents of Colorado, Connecticut, Delaware, Iowa, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia**

**November 2025**

This Special Notice supplements the Privacy Notice and applies only to individuals who are United States residents of Colorado, Connecticut, Delaware, Iowa, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah or Virginia.

This notice describes the rights that you have with respect to your Personal Data, including Sensitive Data, in our capacity as a “Controller” under the Arkansas Children & Teens’ Privacy Protection Act (ACTPPA), Colorado Privacy Act (CPA), Connecticut Data Protection Act (CTDPA), Delaware Personal Data Privacy Act (DPDPA), Iowa Consumer Data Protection Act (ICDPA), Minnesota Consumer Data Privacy Act (MNCDPA), Montana Consumer Data Privacy Act (MTCDPA), Nebraska Data Privacy Act (NDPA), New Hampshire Privacy Act (NHPA), Indiana Consumer Data Protection (ICDP), Kentucky Consumer Data Protection Act (KCDPA), New Jersey Data Protection Act (NJDPA), Oregon Consumer Privacy Act (OCPA), Rhode Island Data Transparency and Privacy Protection Act (RIDPPA), Tennessee Information Protection Act (TIPA), Texas Data Privacy and Security Act (TDPSA), Utah Consumer Privacy Act (UCPA), and Virginia Consumer Data Protection Act (VCDPA), (collectively “State Data Privacy Acts”). The definition of “Personal Data” and “Sensitive Data” have the meaning given in the respective State Data Privacy Acts and do not include information excluded from their scope.

The Personal Data we collect about you will depend upon how you interact with us and the information you voluntarily provide us. In addition, we may collect information about you from other sources, or we may collect and/or use additional types of information after providing notice to you and obtaining your consent to the extent such notice and consent is required by the State Data Privacy Acts.

To the extent that we collect Personal Data subject to the State Data Privacy Acts, your rights, information we collect, and our practices are described below. Persons with disabilities may obtain this notice in alternative format by emailing us at [dpo@kaplaninternational.com](mailto:dpo@kaplaninternational.com)

### **1. What Are My Rights?**

#### **Right to Access/Obtain a Copy of Personal Data**

You have the right to request access to Personal Data collected about you and information regarding the purposes for which we collect it and the third parties and service providers with which we share it. You have the right to request a copy of the Personal Data that you previously provided to us as controller in a portable format. Our collection, use, and disclosure of Personal Data is described in our Privacy Notice.

#### **Right to Correct Inaccurate Personal Data**

You have the right to request we correct inaccurate Personal Data collected about you.

#### **Right to Deletion of Personal Data**

You have the right, in certain circumstances, to request that we delete any Personal Data that we have collected directly from you. We may have a reason under the law why we do not have to comply with your request or why we may comply in a more limited way than you anticipated. If we do, we will explain that to you in our response.

### **Right to Opt Out of Targeted Advertising**

You have the right to opt out of targeted advertising based on your Personal Data obtained from your activities over time and across websites or applications. You may exercise your right to opt-out of targeted advertising by emailing [dpo@kaplaninternational.com](mailto:dpo@kaplaninternational.com).

### **Right to Opt Out of Sale of Personal Data to Third Parties**

You have the right to opt out of any sale of your Personal Data. However, **we do not sell Personal Data to third parties.**

### **Right to Appeal (CO/CT/DE/IA/MN/NE/NH/NJ/OR/TN/TX/VA)**

If we decline to take action in any request that you submit in connection with the rights described in the above sections, you may ask that we reconsider our response by sending an email to the same email box (referenced in the section below) from which you receive the decision. You must ask us to reconsider our decision within 45 days after we send you our decision. If your appeal is denied, Kaplan will inform you of how to submit a complaint to your State Attorney General.

## **2. What Personal Data Do We Collect, Process and Share?**

Consistent with the "Information We Collect" and "How We Use Information" sections in the Privacy Notice, the below information provides additional detail about certain information we process that is linked or reasonably linkable to an identified or identifiable consumer ("Personal Data"), the purposes for processing this data, and the Personal Data that we share with third parties as defined by the State Data Privacy Act. **We do not sell Personal Data to third parties.** Please carefully review the Privacy Notice applicable to all data subjects for complete information about our data privacy practices.

### **Personal Data We Collect**

Personal data means any information, including Sensitive Data, that is linked or reasonably linkable to an identified individual or identifiable individual. The term includes pseudonymous data when the data is used in conjunction with additional information that reasonably links the data to an identified or identifiable individual. Personal data does not include de-identified data, aggregated data, or publicly available information.

The information we collect about you is listed in the Privacy Notice.

Purpose for Processing Personal Data: To fulfil or meet the reason for which the information was provided to us; To provide the services you requested; To manage payments, fees, and charges; To provide you with support and respond to your inquiries, including to investigate and address your concerns; To monitor and improve our responses; To provide you with email alerts, event registrations, and other notices concerning our products or services, or events or news that may be of interest to you; To respond to law enforcement requests and as required by applicable law, court order, or

governmental regulations; To personalize your website experience; To improve and deliver content and product and service offerings relevant to your interests through our website, third-party sites, and via email or text messages; As an education service provider with consumers some of which are of school age, we store this information to optimize your experience with us and assist you in achieving your desired language proficiency and other academic and career goals.

Third Parties With Which We Share Personal Data: Service providers such as payment processors or courts of law/enforcement.

### **Profiling Information We Collect**

Profiling Information means any form of automated processing performed on Personal Data to evaluate, analyze or predict personal aspects related to an identified or identifiable individual's economic situation, health, personal preferences, interests, reliability, behavior, location or movements. We may collect information from sources other than you to build a consumer profile of your preferences.

**We do not profile as defined by the State Privacy Acts.** Any consumer profile, if created, is used to understand your preferences for services we offer and not for automated decision making that would produce legal or similarly significant effects concerning you.

Purpose for Processing Personal Data: To determine how best to serve you over your lifetime, how you may achieve success when using our products, and how we may modify our offerings for the success of others.

Third Parties With Which We Share Profiling Information: Kaplan companies and affiliates.

### **Commercial Information**

Personal Data we collect in this category: Online activity data, information about products or services purchased or considered, or other purchasing or consuming histories or tendencies, to provide you with information, products or services that you request from us and to improve them.

Purpose for Processing Personal Data: To provide lifelong learners information of interest and opportunities for development.

Categories of third parties with whom we share Commercial Information: Service Providers such as Payment processors; Other Kaplan Businesses; Courts of Law/Enforcement; Data Analytic, Intelligence and Augmentation Firms.

### **Financial Information**

Personal Data we collect in this category: Credit card number, debit card number, or any other financial information.

Purpose for Processing Personal Data: Process payments, fees, charges, billing and collections, so that we provide you with information, products or services that you request from us.

Categories of third parties with whom we share Personal Data: Service Providers such as Payment processors.

## **Sensory Information**

Personal Data we collect in this category: Your audio or voice recordings if you submit or post a recording when applying to or participating in the program, for instance in a personal statement, assignment, or discussion board, as part of delivering service to you; or if your program is recorded as part of the delivery of services for quality assurance and internal review.

Purpose for Processing Personal Data: We retain recordings you submit as part of your educational record. We retain program recordings for the benefit of other participants in the program, internal research and quality assurance.

Categories of third parties with whom we share Personal Data: **We do not share Sensory Information with third parties.**

## **Sensitive Data We Collect**

Sensitive Data means Personal Data that includes (A) data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation or citizenship or immigration status, (B) genetic or biometric data for the purpose of uniquely identifying an individual, or (C) Personal Data from a known child.

Personal Data we collect in this category: We may collect age or date of birth from you in forms to validate that you are not under the age of thirteen (13) because children under the age of thirteen (13) are not permitted to use the Site and, for those thirteen (13) or over, to determine eligibility for the program you selected and create or maintain your educational records.

Purpose for Processing Sensitive Data: We collect age or date of birth to comply with the law, to determine whether an applicant can be admitted into a program, and as may be required to maintain a student's educational records

Third Parties With Which We Share Sensitive Data: **We do not share Sensitive Data with third parties.**

## **3. Communication Preferences**

You may receive communications from us via email or text based on your preferences. You have the right to opt out at any time:

- Emails: Click the "Unsubscribe" link in any email to stop receiving future emails.
- Text Messages: Text "STOP" to unsubscribe from text communications.

**Text Messaging Terms:** If you opt-in to receive text messages, the following terms apply:

- Message Frequency: Message frequency may vary per user.
- Message and Data Rates: Standard message and data rates may apply based on your carrier plan.
- Help and Support: Text "HELP" for assistance.
- Unsubscribe: To stop receiving messages, text "STOP"
- Carrier Liability: Carriers are not liable for delayed or undelivered messages.

**Sharing of Information:** We do not share your personal information, including mobile or email details, with third parties or affiliates for marketing or promotional purposes. All opt-in data and consent for communications are strictly confidential and will not be shared with any third parties.

#### **4. How Do I Exercise My Rights?**

You may submit a request to exercise your State Data Privacy Rights through any of the following means:

(1) By filling out a Privacy Request Form available at this [link](#)

(2) By sending us an email at [dpo@kaplaninternational.com](mailto:dpo@kaplaninternational.com)

If you choose to send an email, please help us locate your data by including the website(s) you interacted with and any email addresses you provided or used to create an account.

#### **Authentication Process**

To protect consumers' Personal Data and to comply with the State Data Privacy Acts, we will use an authentication process to confirm your identity before we act on your request. You or your authorized agent may make an authenticated consumer request related to your Personal Data. If you use an authorized agent to submit a request on your behalf, we may require that you (1) provide the authorized agent written permission to do so and (2) provide us a copy of the authorization or a copy of a power of attorney.

In authenticating requests, we employ reasonable measures to detect fraudulent requests and prevent unauthorized access to your personal information. To meet our obligations, we are required to authenticate your identity and the identity of your authorized agent, if the request is submitted via an agent, by associating the information provided in your request to Personal Data previously collected by us.

If we suspect fraudulent or malicious activity on or from the password-protected account, we may decline a request or request that you provide further authenticating information.

Making an authenticated consumer request does not require you to create an account with us. We will only use Personal Data provided in an authenticated consumer request to authenticate your identity or authority to make the request.

Rev. November 2025