

PRIVACY POLICY

Welcome to the House Buy Sell (MRI423N,LLC) Privacy Policy (“Policy”). For purposes of this Policy, the terms “House Buy Sell (MRI423N,LLC)” “we,” “us,” and “our” refer to House Buy Sell (MRI423N,LLC), a trade name of House Buy Sell (MRI423N,LLC), and all of their parent, subsidiaries and affiliates and “you” or “your” refers to you, as a user of our educational services, including any use of our websites, software applications, and mobile apps, whether operated by us or on our behalf (“Services”). It is important that you read this Policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing your Personal Information so that you understand how and why we are using your data. This Policy supplements those other notices and is not intended to override them.

This Policy describes:

- Personal Information We Collect;
- How We Collect Your Personal Information;
- How We Use Your Personal Information;
- How We Disclose Your Personal Information;
- Communications and Opt Out;
- California Privacy Rights;
- Changes to the Policy; and
- Questions About This Policy

PERSONAL INFORMATION WE COLLECT

“Personal Information,” means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household. It does not include

anonymous or aggregated data that cannot be associated with an individual or household.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. Information sharing to subcontractors in support services, such as customer service is permitted. All other use case categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

We may collect, use, store and transfer different kinds of Personal Information about you, which we have grouped together as follows:

- Identifiers such as first name, maiden name, last name, alias, username or similar unique personal identifier, student ID, account name, online identifier, social security number, driver's license number, state identification card number, passport number, physical characteristics or description, criminal background status, and marital status.
- Contact Information such as billing address, delivery address, email address and telephone numbers.
- Educational Information such as educational records that contain information directly related to a student and which are maintained by an educational institution or agency or party acting for the institution or agency, like courses, enrollment status, transcripts and grades.
- Financial Information such as student financial aid information, tax information, bank account number, credit or debit card number, and account balance and payment details.
- Health Information such as personal health history, medical records, drug testing, and immunization history.
- Characteristics of Protection Classifications Under California or Federal Law, such as race, color, sex/gender, marital status, national origin, disability, military or veteran information, and age.
- Commercial Information such as details about payments to and from you and your payment history, other details of products and services you have purchased from us, or purchasing or consuming tendencies or histories.

- Professional or Employment-Related Information such as your education, training, prior work experience, resume, references, certificate, licensure, or other professional information, military affiliation and status, work authorization information, and post-graduation employment and earnings.
- Audio and Visual Information such as digital photographs, audio recordings, and videos.
- Internet and Other Electronic Network Activity Information such as internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Services.
- Usage Data includes information about how you use our Services.
- Sensitive Personal Information. We collect Personal Information that is defined as “Sensitive Personal Information” under California law, including driver’s license, social security numbers, race or ethnic origin, and health information. We do not use or disclose Sensitive Personal Information for any business purposes other than as permitted by law, including to providing good and services, verifying your information, processing payments, providing financial aid, ensuring security, safety, and integrity of our students, and/or as permitted by further regulations.

We may also collect and use Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Information but is not considered Personal Information as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this Policy.

Retention. For each of these categories of Personal Information, we will retain the information as long as is reasonably necessary to fulfill the purpose for which it was collected, to comply with applicable laws and regulations, and/or to support

any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel.

Information You Provide To A Third Party. The Services may include links and plug-ins to websites operated by third parties such as Twitter, Facebook, and Instagram buttons (“Third-Party Sites”). House Buy Sell (MRI423N,LLC) does not control any Third-Party Sites and is not responsible for any information they may collect. The information collection practices of a Third-Party Site are governed by its privacy policy. It is your choice to enter any Third-Party Site. We recommend that you read its privacy policy if you choose to do so.

Children’s Privacy. The Services are intended for adult use only and is not directed towards children, minors, or anyone under the age of 16. If you are under the age of 13, you are not authorized to provide us with any Personal Information. If the parent or guardian of a child under 13 believes that the child has provided us with any Personal Information, the parent or guardian of that child should contact us at the email address below and ask to have this Personal Information deleted from our files.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We may collect Personal Information from a variety of sources and methods. This includes:

Information You Voluntarily Provide to Us

You may give us your Personal Information by filling in forms, enrolling in one of our educational programs, or by corresponding with us by post, phone, text, email or otherwise. This includes Personal Information you provide when you:

- Submit a Request for Information form

- Submit a Contact Us form
- Use the chat feature on our website
- Call, email, or text us
- Apply to enroll and/or enroll in one of our educational programs
- Request a student ID
- Register for classes
- Apply for financial aid
- Create a student account, including a student portal, LMS or other account
- Order or purchase educational or other products and services
- Attend our courses, programs or other events where we collect information about you
- Submit a review or student testimonial
- Use one of our career resources
- Use one of our online learning management, student portal, or other interactive tools
- Make an appointment and receive dental services at one of our dental clinics
- Make an appointment and receive services at one of our veterinary clinics

Information We Collect When You Use Our Services

Automated technologies or interactions. As is true of most websites, we receive and store certain types of Personal Information whenever you interact with us online. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. When you access and use our Services from your mobile devices, we receive data from that mobile device. This may include your device ID, location data, IP address and device type. You may manage how your mobile device and mobile browser share location information with us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security

settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

Cookies. Cookies are small files that we or our service providers transfer to your computer's hard drive through your web browser that enables us or our service providers' systems to recognize your browser and capture and remember certain information. We use cookies to help us understand how users use the Services. For example, cookies gather information about how long you spend on a web page so that we can understand what web pages are of most interest to users. If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies by adjusting your browser settings. For more information about cookies and about turning off cookies, please see: <https://allaboutcookies.org> If you turn off your cookies, some of the features of the Services may not function properly.

Information We Collect From Third Parties

We collect Personal Information from various third parties, including those listed below. The collection, use, and disclosure of Personal Information received from third parties is governed by the privacy policies listed on the website where the information was submitted by the user. Third parties may send their own cookies and pixel tags to you, and may collect information and use it in a way inconsistent with this Policy. Please carefully review these third-party privacy policies to understand how your information may be collected, used and disclosed by these third parties.

Third Party Service Providers. We collect Personal Information from service providers including where we operate accounts on third-party platforms, such as online application submission and management platforms, student information

platforms, learning management platforms, email platforms, and social media platforms.

Third Party Advertising Partners. We collect Personal Information received from third party advertising partners, including partners who host and manage various advertisements and online forms where you can request additional information.

Third Party Financing Partners. If you set up an account with or through a third-party financing partner, such as a private loan vendor, local, state or federal programs, employer, or SJVC's institutional financing servicer, we may collect Personal Information from them related to your benefits, grant, voucher, loan, or financing plan.

Google Analytics. We use third party cookies provided by Google Analytics to assist us in better understanding our website visitors. These cookies collect IP address and usage data, such as the length of time a user spends on a page, the pages a user visits, and the websites a user visits before and after visiting our website. Based on this information, Google Analytics compiles data about website traffic and interactions, which we use to offer better user experiences and tools in the future. For more information on Google Analytics, visit <https://support.google.com/analytics>.

Your 'Do Not Track' Browser Setting. Some web browsers incorporate a "Do Not Track" feature (DNT) that signals to the websites that you visit that you do not want to have your online activity tracked. Many websites and applications, including the Services, do not currently respond to web browser DNT signals because such signals are not yet uniform. For more information about DNT signals, please visit <https://allaboutdnt.com>. Other third party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

HOW WE USE YOUR PERSONAL INFORMATION

Our primary purpose for collecting Personal Information is to provide you with products and services you request. We may also use your Personal Information for the following business purposes:

- To determine your admissibility for your selected educational program
- To process your application and enroll you in an education program
- To verify your educational background during the enrollment process
- To determine your eligibility for financial aid, scholarships, grants, and other financing
- To provide career services assistance
- To provide you with information, products and/or services you request
- To provide you with tutoring assistance
- To facilitate recruitment efforts
- To facilitate the creation of and secure any student accounts
- To communicate with individuals in written, electronic, and verbal form
- To analyze academic and learning outcomes and preferences
- To develop new tools, software applications, products and services
- To obtain payment for services that we provide to you, including, but not limited to, payments through financial aid
- To process reimbursements and financial aid payments to you
- For our internal marketing purposes, which include, but are not limited to, sending you material about products, services, updates, etc. that we think may be of interest to you
- To customize the advertising and content you see
- To maintain student records and transcripts
- For internal business purposes such as complying with our internal policies or improving our Services
- To analyze how our Services are being accessed and used
- To verify information
- To protect our interests, including establishing, exercising and defending legal rights and claims
- As necessary to comply with legal requirements, to enforce our Code of Conduct, to prevent fraud, to co-operate with law enforcement and regulatory authorities, and to stop other prohibited, illegal, or harmful activities

- To provide professional services you may request, including dental and veterinary services through our clinics
- To apply for certifications and licensures on your behalf
- For purposes disclosed at the time you provide your information or as otherwise set forth in this Policy

HOW WE DISCLOSE YOUR PERSONAL INFORMATION

Service Providers. We may use third-party service providers to perform certain business services on behalf of us or the Services and may disclose Personal Information to such service providers as needed for them to perform these business services. Service providers are only allowed to use, disclose or retain the Personal Information to provide these services and are prohibited from selling Personal Information. Business services provided include, but are not limited to, hosting services, software as a service, document management services, communications services such as email, text, and chat services, software and website development services, scholarship and financial aid services, lending and loan processing services, collection services, accounting and audit services, compliance services, quality control services, analytics services, call center services, housing services, marketing services, employment, employment verification services, and proctoring and testing services.

Internal Third Parties. We may share Personal Information with our parent company, subsidiaries and other companies owned by or controlled by House Buy Sell (MRI423N,LLC), who may use the Personal Information for the purposes described above.

Legal Process. Subject to applicable law, we may disclose information about you (i) if we are required to do so by law, regulation or legal process, such as a subpoena; (ii) in response to requests by government entities, such as law enforcement authorities; (iii) when we believe disclosure is necessary or

appropriate to prevent physical, financial or other harm, injury or loss; or (iv) in connection with an investigation of suspected or actual unlawful activity.

User Disclosures. Some Personal Information is disclosed as a matter of course as a result of your use of certain Services. Any Personal Information shared via any public forum using the Services or on another website (such as Facebook, Google, LinkedIn, Instagram or Twitter) may become public information. We cannot control the use of information disclosed in these public forums. You should exercise caution when disclosing information in these public areas, especially your health information and location data, and be careful how you disclose your Personal Information. Content posted in public areas of the Services, including advice and opinions, represents the views and is the responsibility of those who post the content. We do not necessarily endorse, support, verify, or agree with the content posted. If you have any questions or comments about any content posted using the Services, please contact us at the address below.

USERS ASSUME ALL RESPONSIBILITY FOR ANY LOSS OF PRIVACY OR OTHER HARM RESULTING FROM THEIR OWN VOLUNTARY DISCLOSURE OF PERSONAL INFORMATION IN PUBLIC FORUMS.

Categories of Personal Information that have been disclosed for a business purpose in the past twelve months include:

- Identifiers
- Contact Information
- Educational Information
- Financial Information
- Health Information
- Characteristics of protected classifications under California or federal law,
- Commercial Information

- Professional or Employment-Related Information
- Audio and Visual Information
- Internet and other electronic network activity information
- Usage Data
- Marketing and Communications Information

Personal Information Sold or Shared. We have not sold any Personal Information in the past twelve months. We have not shared Personal Information in the past twelve months. “Sharing” is defined under California privacy law as “renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged.” This sharing means that these third-party service providers may use their own cookies or tags to track your online activities and purchases in order to deliver targeted advertising based on your interests. If your browser supports it, you can turn on the Global Privacy Control (GPC) to opt-out of the “sharing” of your Personal Information. Learn more at the [Global Privacy Control](#) website. House Buy Sell (MRI423N,LLC) has no actual knowledge of any sales or sharing of Personal Information of minors under 16 years of age.

COMMUNICATIONS AND OPT OUT

Text Messaging. House Buy Sell (MRI423N,LLC), its affiliated companies, and necessary third-party service providers and those acting on its behalf may send you operational and informational text (SMS) messages about your use of the Services at the phone number you provided us. We may also send marketing or other promotional messages to the extent that you have provided the appropriate

opt-in consent. Standard text messaging charges applied by your cell phone carrier will apply to text messages we send. Your agreement to receive promotional texts is not a condition of any purchase or service offered by House Buy Sell (MRI423N,LLC). Texts, calls, or prerecorded messages may be generated by automatic telephone dialing systems. If you change or deactivate the phone number you provided to House Buy Sell (MRI423N,LLC), we ask that you update your account information to help prevent us from inadvertently communicating with anyone who acquires your old number.

Opt-Out. You may opt out of receiving text messages from House Buy Sell (MRI423N,LLC) at any time by replying STOP to any text message from House Buy Sell (MRI423N,LLC) or by emailing your opt-out request to info@apc.college. You may continue to receive text messages for a short period while we process your request, and you may also receive text messages confirming the receipt of your opt-out request.

Email. House Buy Sell (MRI423N,LLC) may send you emails concerning our products and services, as well as those of third parties. You may opt-out of promotional emails by following the unsubscribe instructions in a promotional email or by emailing info@apc.college. This opt out will not apply to operational or informational emails related to your enrollment at House Buy Sell (MRI423N,LLC). You may continue to receive promotional email messages for a short period while we process your request.

By Mail. You may make a request to be removed from House Buy Sell (MRI423N,LLC)'s marketing mailing lists by sending your name and address to 202 E Earll Drive, Suite 360,Phoenix,AZ 85012, emailing info@bellagioplaza.com, or calling 480-608-9284. You may continue to receive these mailings for a short period while we process your request.

CALIFORNIA PRIVACY RIGHTS

California privacy law provides California residents with specific rights regarding their Personal Information. This section describes your privacy rights and explains how to exercise those rights.

Upon verification of your identity you may:

- No more than twice in any 12-month period, request disclosure of the following information:
 - Categories of Personal Information we collect.
 - Categories of sources from which Personal Information is collected.
 - Categories of Personal Information sold or disclosed to third parties.
 - Categories of third parties with whom such Personal Information is sold or disclosed.
 - Business or commercial purpose for collecting or selling Personal Information.
 - Specific pieces of Personal Information we collect.
- Request to correct inaccurate Personal Information.
- Request deletion of your Personal Information, subject to the exceptions provided by law.
- Opt-out from having your Personal Information sold to or shared with third parties, if applicable.
- Limit use and disclosure of Sensitive Personal Information for any purpose other than the pre-approved business purposes identified in the privacy law. Our use of Sensitive Personal Information is already limited to the approved business purposes identified above.

Requests can be submitted by calling our number 480-608-9284. You can also opt out of having Personal Information transmitted through third party cookies and pixels by clicking on the “Opt Out” link.

Please note that these rights apply only to California consumers. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child. Except where you have provided an agent with a Power of Attorney pursuant to Sections 4000 – 4465 of the California Probate Code, when using an authorized agent you must: (1) provide the agent with signed permission clearly describing their authority to make a request on your behalf; (ii) verify your own identity; and (iii) directly confirm that you have provided the authorized agent permission to submit the request. That agent must also be able to verify their identity with us and provide us with their authority to act on your behalf.

The verifiable consumer request initiated by you or your authorized agent must:

- Include your full legal name, email address, and phone number, which we will need to contact you in order to verify that you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. One of our representatives will contact you in order to verify your identity. You may need to provide additional information in order to verify your request. Depending on the nature of the request, we may require additional verification actions be taken, including but not limited to providing a signed declaration under penalty of perjury that you are the consumer whose Personal Data is the subject of the request. We will only use this information to verify the requestor's identity or authority to make the request.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

You also have the right to be free from discrimination if you choose to exercise your rights under the law, and House Buy Sell (MRI423N,LLC) will not discriminate by:

- Denying you goods or services.
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Providing you a different level or quality of goods or services.
- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Other California Privacy Rights. California Civil Code Section 1798.83 permits California residents who have provided personally identifiable information to us or our third-party advertisers and marketing partners, if any, to request certain information regarding our disclosure of personally identifiable information to third parties for direct marketing purposes. We do not share information we collect about you with third parties for those third parties' direct marketing purposes.

CHANGES TO THIS PRIVACY NOTICE

House Buy Sell (MRI423N,LLC) may modify or update this Policy from time to time. We encourage you to revisit this page often to remain fully informed of our Policy or you can contact us at any time to obtain the latest copy of this Policy.

QUESTIONS ABOUT THIS POLICY

For questions or comments regarding our Policy, please contact us by emailing our Privacy Administrator, Nick Randall, at info@bellagioplaza.com.