



# Online Privacy Practices

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The following terms describe the type of information PHEAA collects from the users of its website(s), web services, web-based applications, and mobile applications ("Online Services"), how PHEAA collects the information through Online Services, and how PHEAA uses and shares the information it collects through Online Services. Any questions about PHEAA's Online Privacy Practices can be directed to the contacts listed below. PHEAA is the Pennsylvania Higher Education Assistance Agency, also conducting loan servicing operations as American Education Services and FedLoan Servicing and digital technology services as Avereo.

## What We Collect, How We Collect It, How We Share It

PHEAA protects the privacy of information owned by or entrusted to it, including information that may be collected through the use of Online Services. PHEAA does not automatically collect, store, or share personally identifiable information from visitors to our public websites. However, we may automatically collect and store certain data from all website visitors or mobile application users, for example, the name of the domain and host from which the visitor accessed the Internet, the Internet Protocol (IP) or Media Access Control (MAC) addresses, computers and browser software used to access a PHEAA website, the date and time the visitor accessed Online Services, and the Internet address of the website from which a visitor linked directly to a PHEAA website. We may record aggregate information about the usage of Online Services and whether emails that we send have been accessed or acted upon. PHEAA may, in its discretion, engage third party companies to assist in the analysis of collected data. PHEAA will not share or transmit any personally identifiable information for this purpose. This data collection and analysis is used to improve the services we provide to our customers.

PHEAA customers who use Online Services in order to manage their PHEAA financial accounts may be subject to collection of their personally identifiable information. This may include but is not limited to Social Security Number, birth date, address, and account information. PHEAA will only share this information as permitted by law, such as where you have authorized sharing or in order to provide a financial product or service, to complete a transaction requested by a user, or as required, such as in response to a subpoena or court order, as mandated by law, with law enforcement agencies, and with consumer reporting agencies. PHEAA may share this information with third party service providers in order to complete routine business transactions. PHEAA does not authorize third party service providers to use your information for any other purpose other than the business transaction. For more information about how we collect and use your personally identifiable information, please see PHEAA's privacy policy. Such information will be safeguarded from unauthorized access and use through the implementation of security measures that comply with federal law and regulation.

## Cookies

PHEAA uses cookies to enhance the delivery of products, services, and information on PHEAA websites. A cookie is a small file that a website transfers to a visitor's computer hard drive to remind our website about the visitor when they return to our site. Cookies are used to manage your website and web-based application session and enable PHEAA to protect your personal information by ensuring that only your web browser may exchange information regarding your account with PHEAA servers. Cookies also assist PHEAA in verifying your identity when you attempt to log into your PHEAA online account and help us to understand how you use our websites. You can set your browser to notify you before accepting a cookie, so that you can decide whether to accept or reject the cookie. PHEAA does not automatically collect and store personally identifiable information through the use of cookies. PHEAA does not employ cookies in the mobile application. A session identifier is used each time you log into the mobile application in order to confirm your identity during the active session. Once the session is over, the identifier expires and is not used for any other purpose. In the event that you choose fingerprint identity as a sign in method in the mobile application,

a session identifier may remain on your mobile device in order to confirm your identity over multiple sessions. It will expire after an established period of time or occurrence of an event. A new session identifier will then be created at the next sign in. PHEAA does not track user's personal information over time and across websites and does not engage third parties for that purpose. Although some internet browsers allow a user to send a "Do Not Track" signal, PHEAA does not respond to a "Do Not Track" signal.

## **Children's Online Privacy Protection Act**

Consistent with the Children's Online Privacy Protection Act (COPPA), PHEAA will not knowingly collect or retain information submitted by children under the age of 13. If PHEAA learns that we unknowingly collected personally identifying information from children under 13 years of age, we will immediately take all reasonable measures to delete the information from our computer systems and all other data systems.

## **Modification**

PHEAA may modify its Online Privacy Practices at any time. In the event that PHEAA makes any material changes to this policy, PHEAA will notify users of Online Services by posting an updated copy of the policy on its websites, web services, and web based applications.

## **Requesting More Information**

PHEAA does not maintain a process for a user of Online Services to review and request changes to any of the information PHEAA may collect through its Online Services. However you may contact using the information below to request a change to personal information associated with an account or loans are serviced by PHEAA, or to request more information about our privacy policy.

1-800-233-0557 for American Education Services

1-800-699-2908 for FedLoan Servicing

1-800-692-7392 for PHEAA

**info@avero.com** for Avereo