# **Professional Credential Services Privacy Policy**

Professional Credential Services, (PCS) understands the importance protecting the personal information of website visitors, test candidates, certifying organizations, state licensing boards, and other individuals with whom we interact. Our Privacy Policy is designed to protect all of the personal information we collect for our own purposes, information collected for the state licensing departments and also that collected for other sponsors of examinations.

You can always limit the information you provide to PCS. If you are test candidate, however, we abide by the policies of the licensing organizations and test sponsors regarding the Personal Information that must be collected in order to take a test. Please contact these groups directly if you do not wish to provide the required Personal Information. You can also limit the communications that PCS sends to you. However, we may still need to contact you with important transactional information about your account. As permitted by applicable law, you may also withdraw your consent to the processing of your Personal Information. If you exercise this right you may not be allowed to take any further examinations and your licensing or credentialing body may refuse to issue exam scores.

If you have any questions, please contact us using the Contact Us link on our website. You can also write us at the address shown at the same link.

## **Personal Information**

- <u>Definition</u> "Personal Information" is any information that can be used to identify, locate or contact you. It also includes other information that may be associated with your Personal Information. Such information may include:
  - a. Personal contact details
  - b. Credit card information
  - c. Application information such as eligibility and identity verification documents
  - d. Examination or licensure related details, including examinations taken and scores
  - e. Photographs
  - f. Signatures
  - g. Testing session recordings
  - h. Other statistics and data collected during the test administration process
- 2. <u>Collection</u> PCS collects Personal Information directly from you in most cases. We will ask you for Personal Information which is required to carry out tasks that you have requested such as applying for a license or scheduling or taking a test. In some cases, we collect Personal Information from third parties such as a test sponsor regarding your eligibility to take a test. When you register or take a test, we also collect Transaction Information about you during your testing processes. We also collect Transaction Information when you visit our website, use our applications or contact us, such as for customer service purposes. If you interact with us online, we use cookies and other technological tools to collect information about your computer and your use of our website and applications. We treat this information may also be collected by our test delivery providers using identification document scanners, digital cameras, and audio-video monitoring equipment. In each case, we only use these technologies as permitted by applicable laws.

- 3. <u>Use</u> PCS uses your Personal Information to fulfill your requests for information and services, to administer testing programs securely and efficiently, and to operate our business in an appropriate manner. For example:
  - a. Candidates -PCS will respond to your requests for information about licenses, tests and testing applications, complete test registration, and provide testing delivery which includes: scheduling and administration of the test, security and detection of activities not permitted, scoring, reporting and analysis of results, and customer service. As permitted by law, PCS may send you commercial communications and offers for additional testing or training services on behalf of test sponsors.
  - Business Purposes PCS uses Personal Information to manage the regular needs of the business. This includes payment processing, financial management, contract management, website administration, analytics, security and fraud prevention, information backups, corporate governance, business continuity and disaster recovery planning, auditing, reporting and compliance with any legal or regulatory obligations. PCS also collects and uses Personal Information if you apply for employment for customary human resource purposes.
- 4. <u>Disclosure</u> PCS does not share Personal Information with third parties for marketing purposes. We limit our sharing of your Personal Information as follows:
  - a. PCS may share testing candidates Personal Information with your licensing board or test sponsor, which will use and disclose your Personal Information in accordance with their own policies. PCS provides services for these groups who are our clients. We send your Personal Information and test results to the test sponsor so that it can provide you with the accreditation, service, license or credential you seek.
  - b. We may share your Personal Information with our affiliates and test delivery providers, which may only use your Personal Information for the purposes listed above. Test delivery providers will use your information to carry out the delivery of your examination.
  - c. Occasionally PCS may share your Personal Information with our service providers for use in accordance with our instructions. These entities will be bound by law or contract to protect your Personal Information.
  - d. We may also disclose Personal Information where needed to affect the sale or transfer of business assets, to enable payment processing, to enforce our rights, protect our property, or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will also always disclose Personal Information when required to do so by law, such as in response to a subpoena, including to law enforcement agencies and courts in the United States and other countries where we operate.
  - e. Please note that we may also use and disclose information about you that is not personally identifiable. For example, we may publish reports that contain aggregated and statistical data about our test candidates or website visitors These reports do not

contain any information that would enable the recipient to contact, locate or identify you.

5. <u>Cookies and Other Data Collection Technologies</u> - When you visit our website, we may collect certain information by automated means, using technologies such as cookies, pixel tags, browser analysis tools, server logs, web beacons, and other similar technologies to ensure that we give you the best possible experience on our website. In many cases, the information we may collect using cookies and other tools is only used in a non-identifiable way, without any reference to Personal Information. For example, we use information we collect about all website users to optimize our websites and to understand and measure website traffic patterns. Continuing to use our website means that you agree to the use of cookies and you consent to receive other cookies that may be presented while visiting our website.

In some cases, we may associate the information we collect using cookies and other technology with your Personal Information. This Privacy Statement governs how we use all of this information when we associate it with your Personal Information.

When you visit our website, we may place cookies on your computer. Cookies are small text files that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store information or settings in your browser. Cookies allow us to recognize you when you return. They also help us provide a customized experience and enable us to detect certain kinds of fraud. In many cases, you can manage cookie preferences and opt-out of having cookies and other data collection technologies used by adjusting the settings on your browser. All browsers are different, so visit the "help" section of your browser to learn about cookie preferences and other privacy settings that may be available.

Our websites may use Flash Cookies (also known as Local Stored Objects) and similar technologies to personalize and enhance your online experience. The Adobe Flash Player is an application that allows rapid development of dynamic content, such as video clips and animation. We may use Flash cookies for security purposes and to help remember settings and preferences similar to browser cookies, but these are managed through a different interface than the one provided by your web browser. To manage Flash cookies, please see Adobe's website at www.adobe.com.

PCS may use pixel tags and web beacons which are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed a specific action. When you access these pages or open or click an email, the pixel tags and web beacons generate a notice of that action. These tools allow us to measure response to our communications and improve our web pages.

Our server logs and other tools collect information from the device you use to access our website, such as your operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. Our server logs also record the IP address of the device you use to connect to the Internet. An IP address is a unique identifier that devices use to identify and communicate with each other on the Internet. We may also collect information about the website you were visiting before you came to PCS and the website you visit after you leave our site. We use IP addresses

for purposes such as calculating website usage levels, helping diagnose server problems, administering the website and combating fraudulent and/or malicious web activity. We also collect customary information from web browsers, such as your Media Access Control (MAC) address, device type, screen resolution, operating system version and internet browser type and version. We use this information to ensure that our websites function properly for all devices and browsers and for security purposes.

- <u>Security Programs</u> PCS has implemented an information security program that contains administrative, technical and physical controls that are designed to safeguard your Personal Information. For example, we use firewalls and encryption technology to secure sensitive information when it is being collected and transmitted over the Internet.
- <u>Correction and Access</u> You may request access to and correction of your Personal Information at any time. If you have an online account, you can log into your account at any time to access and update the information you have provided to us. If you need assistance updating your 13. Privacy Policies of Third Parties
- 8. <u>Changes</u> From time to time, we may update this Privacy Statement to reflect new or different privacy practices. We will place a notice online when we make material changes to this Privacy Statement. Additionally, if the changes will materially affect the way we use or disclose previously-collected Personal Information, we will notify you about the change by sending a notice to the primary email address associated with your account.

# Social Security Number Protection

PCS collects Social Security numbers and other sensitive personal information in the ordinary course of its business. PCS has implemented reasonable technical, physical and administrative safeguards to help protect the Social Security numbers and other sensitive personal information from unlawful use and unauthorized disclosure. PCS associates and contractors are required to follow these established procedures, both online and offline. Access to Social Security numbers is limited to those employees and contractors who have a need to access the information to perform tasks for PCS. Social Security numbers are only disclosed to third parties in accordance with PCS's established policies. PCS will only disclose Social Security numbers to those service providers, auditors, advisors, and/or successors-in-interest who are legally or contractually obligated to protect them or as required or permitted by law.

## Security and Data Retention

PCS shall at all times protect Personal Information with operational, administrative, technical and physical security safeguards. Unless personal data is being used in connection with an active security investigation, the licensing organizations, test sponsors, and PCS shall retain candidate data in accordance with the law in the jurisdiction in which the data was obtained, or for a maximum of five years from the date of the last examination or the expiration of the purpose for which your data was collected, whichever is shorter. Other personal data collected by PCS during application, test registration, new hire, or any other administrative process, is retained by PCS in accordance with its record retention guidelines, and may also be sent to a test sponsor and retained in accordance with the test sponsor's record retention guidelines.

#### **Exam Candidates**

PCS will collect and process your personal information only as instructed or permitted by your test sponsor or you. We will collect and process that information that is reasonably needed to process an application, verify eligibility, schedule an examination, administer the test (including protecting the security and integrity of the testing process), process the test results, and resolve any issues that may have occurred during the testing process. If permitted under applicable law, we may communicate with you regarding other testing events offered by PCS and your test sponsor. You may opt-out of receiving these communications at any time.

PCS will at all times maintain reasonable and appropriate security controls to protect your information. We have special controls to protect any sensitive personal that may be collected for security and identity verification purposes. We may disclose your personal information to your licensing organization or test sponsor, who will use that information in accordance with its own privacy policies. We may disclose your personal information to our affiliates and data processors as needed to provide the services that you and the test sponsor have requested. These entities are all contractually bound to limit use of your personal information as needed to perform only the services requested. We will also always disclose personal information when required to do so by law, such as in response to a subpoena, including to law enforcement agencies and courts in the United States and other countries where we operate. PCS will comply with all local privacy laws in the collection and processing of personal information.