



## **Online Privacy Practices**

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The following terms describe the type of information Pennsylvania Higher Education Assistance Agency (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 also conducts loan servicing operations as American Education Services 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 logging or analytics purposes; 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. IP addresses may be shared with data owners and in accordance with law. We may record aggregate information about the usage of Online Services. We may also record aggregate information regarding whether emails that we send have been accessed or acted upon. “Aggregated information” is de-identified information. PHEAA may, in its discretion, engage third-party companies to assist in the analysis of aggregated data. This data analysis is used to troubleshoot and 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 information to permit the origination and servicing of the account. PHEAA will only share this information as permitted by law, such as where you have authorized sharing or to provide a financial product or service, to complete a transaction requested by a user, with the owner of the data (in cases where PHEAA is collecting data and performing work on behalf of a third party like the loan owner), 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 allow third-party service providers to collect information on its behalf and/ or PHEAA may share this information with third-party service providers to complete routine business transactions. PHEAA does not authorize third-party service providers to use personally identifiable information for any other purpose other than the business transaction. For more information about how we collect and use personally identifiable information, please see PHEAA’s privacy notice (GLBA). Such information will be safeguarded from unauthorized access and use through the implementation of security measures that comply with applicable federal law and regulation.

### **Cookies**

PHEAA uses cookies to enhance the delivery of products, services, and information on PHEAA websites. A cookie is a piece of data from a website that is stored within a web browser that the website can retrieve at a later time. Cookies are used to tell the server that users have returned to a particular website. Cookies are used to manage your website and web-based application session and enable PHEAA to protect 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 device or browser identity when you attempt to log into your PHEAA online account and help us to understand how you use our websites. PHEAA does not automatically collect and store personally identifiable information through the use of cookies. PHEAA does not employ cookies in the mobile application. However, 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. If you choose to leverage your device's biometric capabilities as a sign-in method in the mobile application, a biometric indicator associated with your device 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. PHEAA does not track personal information collected from online users 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 PHEAA unknowingly collected personally identifying information from a child under 13 years of age, PHEAA will immediately take all reasonable measures to delete the information from PHEAA 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 us using the information below to request a change to personal information associated with an account or loans serviced by PHEAA, or to request more information about our privacy policy.

American Education Services – 1-800-233-0557

PHEAA – 1-800-692-7392

Avereo – [info@avereo.com](mailto:info@avereo.com)