

## Privacy Policy

Effective date: August 21, 2024

At Summer, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and disclose your information as described in this Privacy Policy.**

Remember that your use of Summer's Services is at all times subject to our [Terms of Use](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

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### What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. "Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage.

### Personal Data

#### Categories of Personal Data We Collect

This chart details the categories of Personal Data that we may collect or have collected over the past 12 months:

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties With Whom We Disclose this Personal Data:</u>
<b>Profile or Contact Data</b>	<ul style="list-style-type: none"><li>● First and last name</li><li>● Email</li><li>● Phone number</li><li>● Mailing address</li></ul>	<ul style="list-style-type: none"><li>● Service Providers</li><li>● Business Partners</li><li>● Parties You Authorize, Access or Authenticate</li></ul>

	<ul style="list-style-type: none"> <li>• Unique identifiers such as passwords</li> </ul>	
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>• Social security number</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Payment Data</b>	<ul style="list-style-type: none"> <li>• Payment card type</li> <li>• Last four digits of payment card</li> <li>• Billing address, phone number, and email</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers (specifically our payment processing partner, currently <u>Stripe, Inc.</u>)</li> </ul>
<b>Device/IP Data</b>	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Domain server</li> <li>• Type of device/operating system/browser used to access the Services</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> </ul>
<b>Web Analytics</b>	<ul style="list-style-type: none"> <li>• Referring webpage/source through which you accessed the Services</li> <li>• Non-identifiable request IDs</li> <li>• Statistics associated with the interaction between device or browser and the Services</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Analytics Partners</li> </ul>
<b>Social Network Data</b>	<ul style="list-style-type: none"> <li>• Email, phone number, user name, IP address, and device ID</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Consumer Demographic Data</b>	<ul style="list-style-type: none"> <li>• Age / date of birth</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Professional or Employment-Related Data</b>	<ul style="list-style-type: none"> <li>• Income verification</li> <li>• Certification of employment</li> <li>• Employer name</li> <li>• Industry</li> <li>• Job title</li> <li>• Employment history, including start date, termination date, and employment type</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Business Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Financial Information</b>	<ul style="list-style-type: none"> <li>• Student loan information, such as account number, balance, payment due dates</li> <li>• Investment, bank and other financial account information</li> <li>• Household income</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Business Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Non-Public Education Data</b>	<ul style="list-style-type: none"> <li>• Student financial information</li> <li>• Grades, transcripts, class details, payment receipts</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Business Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Sensory Data</b>	<ul style="list-style-type: none"> <li>• Photos, videos, or recordings of you and/or of your environment that you provide to us</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Business Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>
<b>Other Identifying Information that You Voluntarily Choose to Provide</b>	<ul style="list-style-type: none"> <li>• Emails, letters, texts, or other communications you send us</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Business Partners</li> <li>• Parties You Authorize, Access or Authenticate</li> </ul>

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**
  - When you provide such information directly to us.
    - When you create an account or use our interactive tools and Services.

- When you voluntarily provide information in free-form text boxes or uploaded documentation (such as receipts, grades, and student loan records) through the Services or through responses to surveys or questionnaires.
  - When you send us an email or otherwise contact us.
  - When you authorize a third party (e.g. your student loan servicer) to provide information regarding your student loans via Plaid or otherwise.
- When you use the Services and such information is collected automatically.
  - Through Cookies (defined in the “Tracking Tools, Advertising, and Opt-Out” section below).
  - If you use a location-enabled browser, we may receive information about your location.
  - If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.
- **Government Records**
  - From the government or other public sector sources (e.g. the Department of Education, Federal Student Aid).
- **Third Parties**
  - Vendors
    - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
  - Your Employer
    - Your employer may provide information to authorize an account for you, including but not limited to attributes about your employment relevant to Summer’s provision of the Services.
    - Your employer may provide information certifying your employment.
  - Social Networks
    - If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.

*Our Business Purposes for Collecting Personal Data*

- **Providing, Customizing and Improving the Services**
  - Creating and managing your account or other user profiles.
  - Providing you with the products, services or information you request.
  - Meeting or fulfilling the reason you provided the information to us.
  - Providing support and assistance for the Services.
  - Processing orders or other transactions; billing.

- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- **Marketing the Services**
  - Marketing and selling the Services.
- **Corresponding with You**
  - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Summer or the Services.
  - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
  - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
  - Protecting the rights, property or safety of you, Summer or another party.
  - Enforcing any agreements with you.
  - Responding to claims that any posting or other Content violates third-party rights.
  - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

### **How We Disclose Your Personal Data**

We disclose your Personal Data to the categories of service providers and other parties listed in this section.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
  - Hosting, technology and communication providers.
  - Security and fraud prevention consultants.
  - Support and customer service vendors.
  - Product fulfillment and delivery providers.
  - Payment processors.
  - If you are paying for the Services, one of our payment processing partners, such as Stripe, Inc. (“Stripe”), will collect your voluntarily-provided payment card information necessary to process your payment, if applicable.
    - Please see Stripe’s terms of service and privacy policy for information on its use and storage of your Personal Data.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
  - Companies that track how users found or were referred to the Services.
  - Companies that track how users interact with the Services.
- **Business Partners.** These parties partner with us in offering various services. They include:

- Businesses that you have a relationship with, including your employers.
- **Parties You Authorize, Access or Authenticate**
  - Third parties you access through the Services.
  - Current and former employers.
  - U.S. Department of Education and other student loan servicers.
    - If you decide to submit a Financial Program Application (as defined in the Terms of Use), we disclose your Financial Program Application materials, including your Student Loan Information, with the U.S. Department of Education, which may further disclose your Financial Program Application materials, including your Student Loan Information, with its affiliates. We encourage you to visit the U.S. Department of Education website to learn more about how they treat your Personal Information when you apply for PSLF or an IDR plan.
  - Other users.

### Legal Obligations

We may disclose any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Business Purposes for Collecting Personal Data” section above.

### Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).

### Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and disclose it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not disclose such data in a manner that could identify you.

### Tracking Tools, Advertising and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- **Essential Cookies.** Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services' content for those who engage with our advertising. For example, Google LLC ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and disclose information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at [www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html) or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.
- **Retargeting/Advertising Cookies.** Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled "Information about Interest-Based Advertisements."

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

### **Session Replay Technology**

We may use session replay technology in order to identify and resolve customer issues, to monitor and analyze how you use our Services, to better understand user behavior, and to improve our Services. By continuing to use the Services, you consent to the use of session replay technology. If you would like to change your settings with respect to session replay technology, you can access your Cookie management settings through your internet browser's settings.

### **Data Security and Retention**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately

selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

### **Personal Data of Children**

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under 13 years of age; if you are a child under the age of 13, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 13 years of age, we will delete that information as quickly as possible. If you believe that a child under 13 years of age may have provided Personal Data to us, please contact us at support@meetsummer.com.

### **State Law Privacy Rights**

#### **California Resident Rights**

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at support@meetsummer.com.

#### **Nevada Resident Rights**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at support@meetsummer.com with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. We do not sell Personal Data.

### **Changes to this Privacy Policy**

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Summer website. If any changes materially reduce your rights or increase your responsibilities, we will send you an email or attempt to notify you by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

### **Contact Information:**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- <https://www.meetsummer.com/>
- [support@meetsummer.com](mailto:support@meetsummer.com)
- 33 Irving Place, New York, NY 10003