

PRIVACY POLICY

Welcome to College Club™, operated by Refuel Agency, Inc. and located at 1350 Broadway, Suite 830, New York, NY 10018.

This Privacy Policy explains how data collected through the College Club™ website (<https://recruiting.collegeclub.com/>), a division of the Refuel Agency website (<http://www.refuelagency.com/>) is used. It only applies to data collected through it's website, or other websites owned by Refuel Agency and its partners and linked to it's website.

1. **Collection and Use of Your Information**

When you visit our websites, we may collect certain information from you. Refuel Agency may collect: (a) the email addresses of users that communicate with Refuel Agency via email; and (b) information knowingly provided by the user through our Services in informational sections, including any contact, registration, or application forms. We may also track information collected as you navigate our sites.

2. **Personal Information You Provide to Us**

We may retain and use Personally Identifiable Information (PII) for our business purposes, including: to contact you, to provide services, to provide customer assistance, and to send online communications to you. The (PII) may include your name, email address, company information, school information, age, zip code, and phone number, as well as other information you provide us voluntarily. Refuel Agency may also desire to contact you for market research purposes or to provide you with marketing information that Refuel Agency believes would be of particular interest. You will have the option of not being contacted by Refuel Agency and opting-out of such contacts in the manner set forth below.

3. **Use of Cookies on Our Websites**

Cookies are small, unique strings of code stored on your computer that make it easier for you to use our site and help us improve site functionality, user experience, and security. We may use both session cookies (which expire once you close your browser) and persistent cookies (which stay on your computer until you remove them).

We use our own proprietary cookies and we may use cookies hosted by third party vendors. These cookies include Non-Personally Identifiable Information that allows advertisers and content owners to provide a more customized web experience. They may be used to customize advertisement content and display on our site as well as on sites you may visit in the future. They may collect data such as your browser type, your operating system, web pages visited, length of visits, content viewed, and links clicked. (These first-party cookies, targeted at our customers and site users, are different from the cookies deployed through the College Club™ service, which may capture browser data including but not

limited to your IP address, browser version, OS type, etc. Additionally, emails we send to you may contain link tags from Google Analytics. This code helps us understand the time and date that a user has opened an email and has selected a link within the email to visit a website, allowing us to collect analytics about our traffic, customize our services, and send you ads about our services.

We may also use cookies to automatically collect information about your computer when you visit our sites, and automatically store it in log files. This may include the type of browser software you use, the operating system you are running, the website that referred you, and your Internet Protocol (IP) address.

Your Internet browser may permit you to reject or delete cookies, but this may prevent proper working of our website. If you do not want to allow advertising cookies from us, please disallow them on your browser settings.

4. We May Disclose Your Personal Information as Follows:

We will share your personal information with third parties only in the ways that are described in this privacy policy and are permitted by law. We do not sell your personal information to third parties.

5. Vendors and other Service Providers

We may use third-party service providers for network, security, email, and hosting services. Suppliers and service providers are required by contract to keep the information received on our behalf confidential, and may not use it for any purpose other than to carry out the services they are performing for us.

6. Disclosure Required by Law

Under certain circumstances personal information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders. Also, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, to investigate fraud, or to respond to a government request or to any other third party, it will only eventuate with your prior consent to do so. If we are ever legally compelled to disclose your personal information to a third party, we will notify you with the contact information we have unless doing so would violate the law or a court order.

7. Disclosure of Non-Personal Information

We may share with third parties or service providers Non-Personally Identifiable Information about your use of our website, which could include demographics, interests, and other online habits.

8. Access, Control and Opt-Out

To opt out of our database and delete your account, login to your College Club™ account, navigate to My Profile, then navigate to My Account, then click the Delete Account button.. However, this opt-out form does not apply to the data that you have provided to us through our website, to which the below options apply.

If your personal information changes, or if you no longer desire our service, you may correct, update, amend, delete/remove, or deactivate it by emailing our customer support at info@collegeclub.com.

We will retain your information for as long as you are opted-in. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If you wish to subscribe to our newsletter and alerts, we will use your name and email address to send you such communications. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page or you can contact us at info@collegeclub.com.

Other Important Information

9. **Child Privacy:** We do not knowingly collect personal information about children. Our systems are not designed for use by children under the age of 13. If we learn we have collected or obtained personal information of someone under the age of 13, we will delete that information from our database within 48 hours. If you believe that this has occurred, please contact us at info@collegeclub.com.
10. **Security:** We take the security of our data and client's information seriously. We always take what we believe are reasonable precautions to protect against unauthorized access to our systems and to prevent data from being disclosed to unauthorized parties. We follow generally-accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee absolute security.
11. **Business Transitions:** If College ClubTM ever goes through a business transition such as a merger, acquisition, or sale of all or a portion of its assets, your personal information and non-personal information will likely be among the assets transferred. You will be notified in advance by email where possible, and we will post a prominent notice on our website. We will require an acquiring company or merger agreement to uphold the material terms of this privacy statement, including honoring requests for account deletion.
12. **Links to 3rd Party Sites**

Our website includes links to other websites whose privacy practices may differ from those of College ClubTM. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.
13. **Changes to this Policy**

Refuel Agency reserves the right at any time to modify, alter or update this Privacy Policy. Your use of our Services following any changes means that you agree to follow and be bound by the Privacy Policy as changed. Any change to this Privacy Policy shall be effective as to any visitor who has visited our Services before the change was made. It is the obligation of users visiting our Services before the change to learn of changes to the Privacy Policy since their last visit.

14. Contact Information

If you have any questions or need to contact us, we recommend you reach out to info@collegeclub.com. If your question is urgent, you may contact 866-360-9688.

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