

## Privacy Policy

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Degreed, Inc. ("Degreed") is committed to respecting the privacy of its users. We strive to provide a safe, secure online experience. This Privacy Policy sets forth the online data collection, usage, maintenance, disclosure and protection policies and practices that apply when Personal Data is disclosed in connection with the Degreed application (together: "Site") and the services provided through it, such as our Degreed learning platform ("Services"). **By using Degreed services, you are consenting to the practices described in this privacy policy.** We are not responsible for the privacy policies or practices of other websites to which links are included on this Site.

### Two types of data subjects

Degreed users fall into one of two categories as data subjects.

- 1) An **individual consumer** is someone who creates a personal account via this Site using a personal email address.

2) When Degreed enters a contractual agreement to provide services to an organization, the employees of that organization are considered **enterprise users**. In such cases, the employer remains the data controller or business and Degreed is a data processor or service provider with regard to user data. If you are an enterprise user, the written agreements between Degreed and your employer supersede some practices outlined in this Privacy Policy. These instances are noted with an asterisk (\*) in the quick links below and are called out in boxes like this one throughout this policy.

If you are an **enterprise user** and your employer has provided a privacy notice or privacy policy in relation to your use of Degreed, such privacy notices supersede the information in this document.

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(\* indicates an important note for enterprise users)

## Data collected by Degreed

We collect and process Personal Data about you when you interact with us and our Services. Such information may include:

- Your name, email address, username and password;
- Your academic history and other information you entered into your User profile ("Degreed Profile"), and how you use our Services;

- Your marketing preferences, including any consent you have given us; and
- Information related to the browser or device you use to access our Site, as also further detailed in our [Cookie Notice](#);

\*Important note for enterprise users\*

We also capture data related to your activity, such as the content you view, comments you make, users you follow, users who follow you, search terms you enter, skills you follow, your personal skill ratings, manager ratings, skill reviews, and skill certification ratings.

Within Degreed you can mark your profile, groups and pathways as private which will prevent fellow users from seeing this information or your activity within the site. Marking your profile as private will not prevent the data described above from being collected and shared with your employer. Any questions about which data elements your employer has requested from Degreed or which may be visible to your employer may be directed to your company administrator.

Most Personal Data you provide to us is voluntary, unless indicated otherwise. Examples of areas on the Site where we collect data are pages where you can open a Degreed account and create a Degreed Profile. Only you can modify your own personal Degreed Profile once it has been created. You may remove your Degreed Profile from our database at any time.

\*Important note for enterprise users\*

If you are an enterprise user, your name, email, bio, location and other profile information can all be changed by your employer if they configure the system to do so. Also -- as an enterprise user, you cannot delete your individual account but you may request that your employer do so. Since your employer is considered the data controller or business with regard to your Degreed account, any questions regarding account deletion or alteration should be sent to your employer.

To the extent you wish to retain an independent record of such your Degreed Profile, you must include a personal email address at the time of creating your Degreed Profile.

We may combine the information we collect with publicly available information and information we receive from our parent, affiliate, or subsidiary companies, business partners, and other third parties. We may use this combined information to enhance and personalize your experience with us, to communicate with you about products, services, and events that may be of interest to you, for promotional purposes, and for other purposes described in this Privacy Policy.

We may enable you to log into the Services using a social media account, and if you do so you may be asked to grant us access to certain information from your social media profile, such as your public profile, birthday, current city, and email address. Social media networks operate independently from Degreed, and we are not responsible for social media networks' interfaces or privacy or security practices. Please refer to the privacy settings of the applicable social media platform or application to determine how you may manage the interactivity between us and your social media accounts.

## **How Degreed uses your data**

We process your Personal Data for the following purposes:

- As required to provide you with our Services. This may include verifying your identity, communicating with you and providing customer services and support;
- As required by us to enable our business and pursue our legitimate interests, in particular:
  - we monitor the use of our Site and Services, and may use your information to help us monitor, improve and protect our products, content, services and websites, both online and offline;
  - we may use information you provide and information from external sources to personalize our Site and Services for you; For example - making content recommendations, making inferences about skills you may have acquired, and/or matching your profile with career opportunities.

- we may monitor our Services to prevent, investigate and/or report fraud, misrepresentation, security incidents or crime, in accordance with applicable laws;
- we may use information you provide to investigate any complaints received from you or from others;
- we may use your information to invite you to take part in market research; and
- As required for compliance with applicable laws and protection of Degreed's legitimate business interests and legal rights, including, but not limited to, use in connection with legal claims, compliance, regulatory, investigative purposes (including disclosure of such information in connection with legal process or litigation).

In addition, and where needed with your consent, we may send you messages in relation to our products and services, for example to send notifications about new features. You can opt-out of such messages by following the instructions in the communication.

\*Important note for enterprise users\*

We also capture data related to the content you view, comments you make, users you follow, users who follow you, search terms you enter, skills you follow, your personal skill ratings, manager ratings, skill reviews, and skill certification ratings.

Within Degreed you can mark your profile, groups and pathways as private which will prevent fellow users from seeing this information or your activity within the site. Marking your profile as private will not prevent the data described above from being collected and shared with your employer. Any questions about which data elements your employer has requested from Degreed may be directed to your company administrator.

Degreed does not sell your Personal Data.

## **Technical and Connection Data**

Where possible, the Degreed servers automatically recognize each User's Internet Protocol address. Based on your IP, Degreed might be able to infer your Geo-location data: for example, your locale, zip code, and general geolocation information (based

on your IP address). Also, aggregate information about Degreed Users is routinely gathered for purposes of identifying the use of [Degreed.com or of our other services](#), including information such as what pages are being visited most, what domains our visitors are coming from (e.g. google.com), when our servers are busiest, what features users use the most and what websites are referring users to us and aggregated data for purposes of analysis, gathering employment statistical information and for learning and training. This information helps us to improve our services and to evaluate our marketing efforts. We only use such data anonymously and aggregately. Degreed owns all rights in and to this anonymous and aggregated data.

## Sharing Information with Third Parties and International Transfer

If necessary for the purposes set out in this Privacy Policy we can share your information with other Degreed entities or third-party service providers, for example email and hosting providers, payment processing providers, customer management providers and marketing providers. Such third-party service providers will process your information on behalf of Degreed and for the purposes listed above. When we share your data with these parties, we make sure appropriate safeguards are taken to protect your information.

### \*Important note for enterprise users\*

If you are using a Degreed account as an employee of a Degreed customer, you are considered an enterprise user. As such, provisions in this section related to data sharing and data transfer are superseded by written agreements between Degreed and your employer. **Under no circumstances does Degreed use your Personal Data for any purpose other than as necessary to provide the services to you and your employer.** Any questions about the provisions contained in the written agreements between Degreed and your employer may be directed to your company administrator. Further, Degreed does not act as the Data Controller for any Personal Data in relation to enterprise users. The terms “Personal Data” and “Data Controller” as used herein have the meanings given in the Regulation (EU) 2016/679 or also known as General Data Protection Regulation. In accordance with the terms used in the California Consumer Privacy Act of 2018, Degreed acts as the “Service Provider”, while your employer acts as the “Business”.

As we are a global company headquartered in the United States, we handle data transfers to and from countries with differing levels of protection requirements for Personal Data. We have taken various measures to ensure adequate protection of such transfers. These safeguards include:

- Applying the [EU Commission approved standard contractual clauses](#) or the [UK approved addendum to the standard contractual clauses](#).
- Adhering to the [Binding Corporate Rules](#) some of our providers have in place.

Degreed is also certified under the EU-U.S. Data Privacy Framework and the Swiss-U.S. Data Privacy Framework. For more information on these frameworks, please see below.

We reserve the right to transfer your Personal Data to a buyer or other transferee in the event of a merger, divestiture, restructuring, reorganization, dissolution, sale, or other transfer of some or all of our assets. Should such a sale, merger, or transfer occur, we will use reasonable efforts to direct the transferee to use your Personal Data in a manner that is consistent with our Privacy Policy.

We may also share your data with other third parties, such as governmental authorities or law enforcement officials, if we are required by law to do so or if this is for the protection of our legitimate interests and/or legal rights.

## **Rights of Access, Deletion and Other Rights**

We provide you with access to your information through your Degreed Profile where you can access, update, amend or correct inaccuracies on information provided in your Degreed Profile. From each Degreed account you may also opt out of receiving newsletters and certain other correspondence from Degreed. If you wish to delete your Degreed Profile you can do so in the Personal section of their Profile Settings. Once you have arrived at the Profile Settings page you can select “Delete Profile” and select “yes” to confirm that you would like to delete your account.

In addition to the above, you are entitled to reach out to us via the contact details below and ask us for an overview or copy of your Personal Data, to correct or delete certain data or restrict processing of your data. In some cases you may object to the

processing of your information, and where we have asked you for your consent to process Personal Data, you can withdraw your consent at any time.

California Civil Code Section § 1798.83 permits users of our Services who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@degreed.com](mailto:privacy@degreed.com) or write us at: 4305 Hacienda Drive, Suite 300, Pleasanton, CA 94588. California residents are informed that the information collected from them in the past 12 months is described above.

Please note that the rights described above are not absolute, and that your request cannot always be met entirely. For example, sometimes we cannot delete or restrict the processing of your information as we may have legal obligations or contractual obligations to keep certain information.

Depending on where you are located, if we are unable to satisfactorily resolve your request you may have the right to lodge a complaint with a supervisory authority or use a specific recourse mechanism.

If you are a resident of the European Union or of Switzerland, you can benefit from the recourse mechanisms available under the EU-U.S. Data Privacy Framework and the Swiss-U.S. Data Privacy Framework. Please see below. You may also contact your local data protection authority. You can find details for your local data protection authority by visiting [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en), telephoning +32 2 299 11 11, or writing to Directorate-General for Justice and Consumers | European Commission at 1049 Bruxelles/Brussel, Belgium.

If you are in the United Kingdom you may contact the Information Commissioner's Office by visiting <https://ico.org.uk/global/contact-us/>, telephoning +44 (0) 303 123 1113 or writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

If you are a resident of Australia and you have a complaint, you may refer it to the office of the Australian Information Commissioner ("OAIC"). You can contact OAIC by visiting [www.oaic.gov.au](http://www.oaic.gov.au), forwarding an email to [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au), telephoning 1300 363 992, or writing to OAIC at GPO Box 5218, Sydney NSW 2001.

\*Important note for enterprise users\*



If you are an enterprise user, the process to delete your individual account must flow through your employer (the data controller or the business). Any requests concerning data subject rights will be resolved in cooperation with your employer.

## How Long We Retain Your Data

Where you have a Degreed Profile, we will keep your information for the duration of your use of our Services and, to the extent permitted, after the end of that relationship for as long as necessary to perform the purposes set out in this notice. Laws may require us to hold certain information for specific periods. In other cases, we may retain data for an appropriate period after any relationship with you ends to protect ourselves from legal claims or to conduct our business.

\*Important note for enterprise users\*

### **Transition from enterprise user to individual user**

Upon separation from your employer, your user account is converted into an “individual consumer” account. Proprietary information related to your employer is removed, but points achieved, skills accomplished, public users followed and public content completed will remain with your account.

To access and utilize your individual consumer account you must provide a secondary email (one for personal use) to your profile. This can be accomplished while you are still an enterprise user with your employer. If you have provided a secondary e-mail you can activate your consumer account by logging in to Degreed within 90 days of separation.

If you do not add a secondary email, the account will exist for up to 90 days during which you can still reclaim it by getting in touch with our Technical Support teams, by going to the [Degreed Knowledge Center](#) and clicking on the Contact Us or Help button at the bottom of the screen and submitting a ticket. If no action is taken within the 90 day period, the account is deleted.

## **Children Under 13 Years of Age**

Degreed does not intend to collect information from children under the age of 13 or knowingly allow those individuals to create profiles. All Degreed Profiles stored are for Users ages 13 or older and those seeking higher education who state their age to be 13 years or older. If we learn we have collected or received Personal Data from a child under the age of 13, we will delete that information. If you believe we might have any information from or about a child under the age of 13, please contact us at [privacy@degreed.com](mailto:privacy@degreed.com).

## **Degreed's use of Cookies and Similar Technologies**

Like most websites, Degreed uses cookies and other similar technologies, such as local storage, to provide a better user experience. These cookies are safe and secure and do not contain sensitive information. For more information, please see our [Cookie Notice](#).

## **Information Protection and Security**

When you submit information to Degreed we do our utmost to ensure that information is protected against loss, misuse, alteration, destruction or unauthorized access. Degreed uses standard encryption tools such as SSL (Secure Socket Layer) to help protect Personal Data and to keep information collected secure. The privacy policies of linked sites may differ from those of Degreed. Degreed is not responsible for any loss or misuse of your username and password.

## **EU-U.S. Data Privacy Framework and Swiss-U.S. Data Privacy Framework**

Degreed complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Degreed has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. Degreed has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data

Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Degreed is responsible for the processing of personal data it receives under the Data Privacy Frameworks and subsequently transfers to a third party acting as an agent on its behalf. Degreed complies with the DPF Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

The Federal Trade Commission has jurisdiction over Degreed's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

Degreed will not use User personal Degreed Profile information except as described above, or as otherwise provided by law. In certain situations Degreed may be required to disclose personal data in response to lawful requests by public authorities, including requests to meet national security or law enforcement requirements. We disclose information if requested to do so by a governmental entity, or if we believe in good faith that such action is necessary to: (a) conform to legal requirements or comply with legal process; (b) protect our rights or property of our affiliated companies; (c) prevent a crime or protect national security; or (d) protect the personal safety of users or the public.

We provide Users with 24-hour access to their Degreed Profile. Users may also wish to amend or correct inaccuracies on information provided in the Degreed Profile. If a User wishes to correct such inaccuracies or make any other changes, that User's Degreed Profile can be accessed through our password protected access facility at <https://degreed.com>. Any information gathered is to the best of our knowledge collected lawfully and fairly through [Degreed.com](https://degreed.com). All information is assumed accurate and up to date and only information which is adequate and not excessive to our purpose for collection is retained. Users may review, correct, update or change their Degreed Profile and the information therein at any time. From each Degreed account, Users may also opt out of receiving newsletters and certain other correspondence from Degreed. If a User wishes to delete his or her Degreed Profile, that User can do so in the Personal section of their Profile Settings. Once the User has arrived at the Profile Settings page the User can select "Delete Profile" and select "yes" to confirm that the User would like to delete his or her account. If a User is connected to an enterprise account, the User should direct any requests to the learning contact at their company.

In compliance with the EU-U.S. DPF and the Swiss-U.S. DPF, Degreed commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the Swiss-U.S. DPF should first contact Degreed at Degreed  
4305 Hacienda Drive  
Suite 300  
Pleasanton, CA 94588

1-800-311-7061

[privacy@degreed.com](mailto:privacy@degreed.com)

In compliance with the EU-U.S. DPF and the Swiss-U.S. DPF, Degreed commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the Swiss-U.S. DPF to JAMS Data Privacy Framework Dispute Resolution, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/eu-us-data-privacy-framework> for more information or to file a complaint. The services of JAMS Data Privacy Framework Dispute Resolution are provided at no cost to you.

Finally, as a last resort and under limited circumstances, EU and Swiss individuals with residual privacy complaints in relation to adherence to these EU-U.S. DPF and the Swiss-U.S. DPF Principles may invoke a binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. For additional information please see [Annex I of the DPF principles](#). I.

## **Consent and Revisions to this Privacy Policy**

We may revise this Privacy Policy from time to time as we add new features or as laws change that may affect our Site or Services. If we make material changes to this Privacy Policy, we will let you know in an appropriate manner and we will post a new version number at the beginning of this Privacy Policy, consisting of the date (year and month) the Privacy Policy was last revised, so that you will be able to tell when the Privacy Policy was last changed.

## **Contact Details**

If you have any questions about this Privacy Policy or any questions, complaints or claims, please contact us at:

Address: 4305 Hacienda Drive

Suite 300

Pleasanton, CA 94588

Phone: 1-800-311-7061

You can contact Degreed's Data Protection Officer, Victor Neamt, at [privacy@degreed.com](mailto:privacy@degreed.com)

Degreed's EU legal representative (art. 27 GDPR): Degreed B.V., 3e Binnenvestgracht 23-R, 2312 NR Leiden, Netherlands

Degreed's UK legal representative (art. 27 UK GDPR): Degreed Limited, 55 Baker Street, London, England, W1U 7EU, UK

We always enjoy hearing from you and appreciate your business. Should you nonetheless have unresolved concerns, you have the right to lodge a complaint with your local data protection authority.