
STAIRWAY ONLINE PRIVACY POLICY

LAST UPDATED: JUNE 2023

Your privacy is important to us. This Online Privacy Policy explains how we collect, share, use, and protect information when you visit or use the online services offered by Stairway. This policy covers Stairway's website and Stairway-branded social media sites or pages. If you have questions after reviewing this policy, please contact us.

Information we collect

When you visit or use our online services, we may collect personal information from or about you such as your name, email address, mailing address, telephone number(s), account numbers, user name and password. We may also collect social security numbers where we believe it is reasonably required for ordinary business purposes.

In addition to the personal information described above, we may collect certain information about your use of our online services. For example, we may capture the IP address of the device you use to connect to the online service, or the type of operating system and browser you use. We may also use cookies, web beacons or other technologies to collect and store other information about your visit to, or use of, our online services. In addition, we may later associate the usage and other information we collect online with personal information about you.

Use of Information

We use the information discussed above in a number of ways, such as:

- 1) Processing applications and transactions.
- 2) Verifying your identity (such as when you access your account information).
- 3) Preventing fraud and enhancing the security of your account or our online services.
- 4) Responding to your requests and communicating with you.
- 5) Managing your preferences.
- 6) Performing analytics concerning your use of our online services, including your responses to our emails and the pages.
- 7) Providing you tailored content and marketing messages; Operating, evaluating and improving our business (including developing new products and services; improving existing products and services; performing data analytics; and performing accounting, auditing and other internal functions).
- 8) Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies.
- 9) For any other purposes that we may specifically disclose at the time you provide or we collect your information.

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations.

Disclosure of Information

We may share the information we collect from and about you with other third parties only under the following circumstances:

- 1) Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of Stairway with another businesses.

- 2) Other third parties to comply with legal requirements such as the demands of applicable subpoenas and court orders; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties.
- 3) We may share anonymous or aggregated information with third parties to help deliver products, services, and content that are better tailored to the users of our online services and for other purposes.

Understanding Cookies, Web Beacons and Other Tracking Technologies

We, or our service providers, and other companies we work with may deploy and use cookies, web beacons, local shared objects and other tracking technologies for various purposes, such as fraud prevention and monitoring our advertising and marketing campaign performance. Some of these tracking tools may detect characteristics or settings of the specific device you use to access our online services.

- 1) "Cookies" are small amounts of data a website can send to a visitor's web browser. They are often stored on the device you are using to help track your areas of interest. Cookies may also enable us or our service providers and other companies we work with to relate your use of our online services over time to customize your experience. Most web browsers allow you to adjust your browser settings to decline or delete cookies, but doing so may degrade your experience with our online services.
- 2) Clear GIFs, pixel tags or web beacons—which are typically one-pixel, transparent images located on a webpage or in an email or other message— or similar technologies may be used on our sites and in some of our digital communications (such as email or other marketing messages). They may also be used when you are served advertisements or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns and measure site or campaign engagement.
- 3) Local Shared Objects, sometimes referred to as "flash cookies" may be stored on your hard drive using a media player or other software installed on your device. Local Shared Objects are similar to cookies in terms of their operation, but may not be managed in your browser in the same way.

Linking to Third-Party Websites

Stairway may provide links to websites that are owned or operated by other companies ("third-party websites"). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

Security

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us.

Updating Your Information

Keeping your account information up-to-date is very important. You may review, or update certain account information by logging in and accessing the "Settings" section. If you cannot change the incorrect information, please use the Contact Us option on our site. You can also speak to your designated account manager.

Changes to this Online Privacy Policy

We may change this Online Privacy Policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised policy on the Stairway website with a new "Last Updated" date. Any changes to this Online Privacy Policy will become effective when posted unless indicated otherwise.