

The 925 Plan – Privacy Policy

Last updated: May 10, 2024

Sequitur Partners LLC (“we”, “our”, or “us”) understands that privacy is important to our users. This Privacy Policy describes our practices regarding the collection, use, sharing, and protection of your personal information for the website located at <https://www.kaypartners.co/925plan> (the “Website”), and the career coaching services provided by us (the “Services”). This Privacy Policy also tells you about the rights and choices you have with respect to your personal information, how you can assert those rights, and how you can contact us to get answers to your questions. **BY USING OR ACCESSING THE SERVICES, YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH OUR POLICIES OR PRACTICES, YOU SHOULD NOT USE OR ACCESS THE SERVICES OR PROVIDE US WITH ANY PERSONAL INFORMATION.**

Personal Information We Collect From You. The term “personal information” refers to information that reasonably identifies, relates to, describes, or can be associated with you. Data that has been deidentified or that otherwise cannot reasonably be related back to a specific person is not considered personal information. The precise definition of personal information may vary depending on your place of residence, but we take the same general approach to protecting your privacy, subject to any additional measures that may be required by applicable laws.

Depending on how you interact with the Services, we collect personal identifiers, such as your name, address, email address, phone number, education information, and any other personal information that you voluntarily provide us. The Website may also collect device and online identifiers and related information, including internet protocol (IP) address.

How We Collect Your Personal Information. We collect personal information that you provide to us directly when you when you contact us, or during a coaching session, whether in person, on the telephone, or online. We also collect any other information that you provide to us on or through the Services, or through your responses to surveys that you choose to complete for us.

We do not collect personal information from you automatically, but we may link the personal information that you provide with personal information that we collect from other sources.

How We Use Your Personal Information. We collect and use personal information for the following purposes:

- *To provide our Services*, including career coaching sessions and related consulting;
- *To communicate with you*, which may include responding to your direct inquiries, requests, issues or feedback, and/or adding you to our mailing lists and sending you emails from time to time;
- *For marketing and promotional purposes*, which may include marketing our services or those of our affiliates, business partners, and other third parties;

- *For security and fraud prevention*, which may include investigating suspected fraud, harassment, or other violations of any law, rule, or regulation, or the policies for our Services;
- *To comply with legal obligations*, which may include compliance with legal or regulatory obligations, establishing or exercising our rights, and defending against a legal claim;
- *To support core business functions*; and
- *For any additional purposes that you specifically consent to.*

How We Disclose or Share Your Personal Information. *Personal information and coaching sessions will remain confidential, even if a parent or guardian purchased the card for a student.* Please note that if you specifically consent to additional uses of your personal information, we may use your personal information in a manner consistent with that consent. We may also disclose personal information to other affiliates and entities in the following instances:

- *Service Providers:* We may share your personal information with third-party service providers who may use your information to provide us with services including, but not limited to, website hosting, email delivery services, and payment processing. These service providers may have access to personal information that is necessary to perform their functions, but they are only permitted to do so in connection with performing services for us. They are not authorized by us to use the information for their own benefit.
- *Corporate Affiliates:* We may share personal information with our corporate affiliates, who process personal information on our behalf, where necessary to provide a service that you have requested, or in other circumstances with your consent or as permitted or required by law.
- *Business and Sponsorship Partners:* We may share your personal information with third parties who partner with us to sponsor or promote our Services. We do not control how these third parties use and share your personal information once they receive it. You will need to contact such third parties directly for information about their privacy practices or to exercise any rights you may have (including if you would like to opt-out of marketing messages).
- *Legal Compliance and to Defend Our Rights:* We may disclose personal information and other information as we believe necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to protect our operations or those of any of our affiliates; (e) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; and (f) to allow us to pursue available remedies or limit the damages that we may sustain.

- *Business Transfers:* We may share your personal information and other information with third parties in connection with a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of Sequitor Partners LLC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which the assets transferred may include information about the users of our Services.

Links to Other Sites and Social Media Services. We may create links to other websites that we think may be of interest to you, such as providers of various products and services. We may also provide links that allow you to send or forward a post from our Services through or to third-party social media sites, or other means of electronic communication, such as an email or text messaging service. We do not endorse any other websites, providers, or services by providing such links, and this Privacy Policy applies only to your use of our Services. We are not responsible for the privacy policies of any websites and services we link to on our Services, and you should read the privacy policies of each site you visit to determine what data that site may collect about you.

The Services may also integrate with social media services. We do not control such services and are not liable for the manner in which they operate. While we may provide you with the ability to use such services in connection with our Services, we are doing so merely as an accommodation, and are relying upon those third-party services to operate properly and fairly.

You should be aware that any personal information which you voluntarily include and transmit online in a publicly accessible blog, forum, social network, or otherwise may be viewed and used by others. By using such features, you assume the risk that the personal information provided by you may be viewed and used by third parties.

How We Protect Your Personal Information. Personal information is maintained on our servers or those of our vendors, and is accessible by authorized employees, independent contractors, representatives, and agents as necessary for the purposes described in this privacy policy. We use reasonable and appropriate physical, technical, and organizational safeguards designed to promote the security of our systems and protect the confidentiality, integrity, availability, and resilience of personal information. However, no method of safeguarding information is completely secure, and we cannot guarantee that our safeguards will be effective or sufficient. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting 925@kaypartners.co.

Data Retention. We will retain your personal information for as long as your inquiry is active or as needed to provide you with the Services, and for a reasonable time thereafter in accordance with our standard procedures or as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements. Even if we delete some or all of your information, we may continue to retain and use anonymous or aggregate data, or any other data that constitutes non-personal information. Please note that we will not be liable for disclosures of your data due to errors or unauthorized acts of third parties.

Communication Opt-Out. We may send you marketing messages via email. If you receive a marketing message from us, you may unsubscribe from future messages in accordance with our standard unsubscribe process (where applicable, by using the unsubscribe link included in an

email), or by sending an unsubscribe request to us at 925@kaypartners.co. We will process your request within a reasonable time after receipt. Please note that if you opt out in this manner, certain aspects of our services may no longer be available to you.

Children's Privacy. Our Services are intended for users ages 16 and over, and we do not knowingly collect personal information from children under the age of 13. When we become aware that personal information (or other information that is protected under applicable law) from a child under 13 has been collected, we will use all reasonable efforts to delete such information from our databases. If you believe we might have any personal information from or about a child under 13, please contact 925@kaypartners.co.

Changes to this Policy. We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time, provided that any such modifications will only be applied prospectively. We encourage you to periodically review the Website for the latest information on our privacy practices. Your continued use of the Services following the posting of any changes to this Privacy Policy means you accept such changes.

Contact Us. If you have any questions about our privacy or security practices, or would like more information about how users with disabilities can access this Privacy Policy in an alternative format, please contact us by email at 925@kaypartners.co or call 212-920-4160.