

American Student Assistance®
Research Participant Privacy Policy

Our Privacy Commitment to Research Participants

Research about United States school-aged students is crucial to ASA's mission of providing tools and resources to students that allow them to explore post-high school education and career opportunities in innovative ways. ASA relies on research to inform all of its work, including the development of digital tools, the formation of partnerships to deliver new kinds of programming, and the promotion of impactful policies at the state and national level.

ASA often invites individuals in the United States to become research participants in research projects administered by ASA, or a third party on behalf of ASA. Research participants may complete surveys to provide feedback, attitudes, and opinions on a range of questions, and may contribute other types of data. Research participants may receive certain benefits or incentives from ASA for participating in ASA research.

Eligibility to Participate

ASA does not intend to and does not knowingly collect information from individuals younger than thirteen (13) years of age. If we learn that we have collected or received information from a child younger than thirteen (13) years of age, we will delete that information. If you believe we might have information about such an individual, please contact us at: webmaster@asa.org.

ASA takes measures to ensure that it only includes residents of the United States in its research studies. ASA does not knowingly collect information from anyone that is a resident of any other country and does not comply with personal data privacy laws of other countries. ASA protects the privacy of research participants as required by applicable United States laws. Residents of countries other than the United States should not circumvent ASA questions about residence in order to participate in ASA research.

ASA respects the privacy of every research participant. This Privacy Statement outlines the types of information ASA may collect from or about you, how we may use that information, and how we protect that information. Participation in all ASA research is voluntary, and if you object to any aspect of ASA's collection, handling, or use as described in this policy, you may choose not to participate.

Information that ASA Collects

Information You Submit

ASA collects personally identifying or identifiable information ("PII") about research participants, such as email address, telephone number, age, and address for the purpose ensuring eligibility to participate in ASA research, administering the survey, and contacting participants about the survey.

ASA collects and uses some of this same information, other demographic data elements that respondents provide to ASA, and answers to surveys to measure and understand the impact of its tools and programming amongst different populations of students and to strategize about new ways to serve United States school-aged students.

For research purposes, ASA never collects sensitive personal information, Social Security numbers, health information, or political views. If a research participant participates in promotion and wins \$600.00 or more in a calendar year in prizes, ASA would require the participant to complete an IRS W-9 form, which requires a Social Security Number.

Information Collected about Research Participants through Automated Means

Cookies are small files that store certain data on a device or computer. ASA, or a third party on behalf of ASA, may use session and persistent cookies for several purposes including to provide a better survey experience, to promote quality control, to validate survey responses, to enable or facilitate survey participation, to track completed surveys or other completed actions, and to detect and prevent fraud. Session cookies expire when you close your browser. Persistent cookies remain on your device or computer indefinitely until deleted.

If ASA is administering its research via its own website, then the descriptions of ASA's use of cookies is described in the privacy policy found at asa.org/legal will apply. If a third-party is administering research on behalf of ASA, then the third party's cookie policies will apply. ASA ensures via contract that third parties do not use cookies in ways that substantially diverge from ASA's own use of cookies

Information Collected from Third Parties

ASA may obtain additional PII and demographic information about you from third parties, including from information services bureaus, government databases, other sample suppliers, and/or social media platforms. ASA may use the PII for various purposes, including data validation, data append, fraud detection purposes, and/or sending you a one-time email to invite you to participate in research.

ASA'S Use of the Information it Collects

ASA uses information it collects about participants to measure the impact of its services and programming and to make improvements in what it can offer. ASA may use PII to inform respondents about resources related to secondary education and career opportunities.

In addition, ASA may use information as follows: (i) to communicate with you regarding your participation in our research; (ii) to comply with any and all legal obligations; (iii) to update ASA's records; (iv) to comply with any data suppression obligations or requirements; (v) for fraud detection and/or prevention purposes; and (vii) as otherwise permitted pursuant to this Privacy Policy or as otherwise authorized by you.

ASA will not ever sell research respondents' PII. The purpose of ASA's research is to learn and understand population-level trends and therefore does not deal with individual data sets as separate from other data sets.

ASA may retain PII and other information relating to your research participation to the extent required or permitted by law. Although ASA may have collected PII to study a particular question, ASA may use the PII to investigate a different question in the future.

Disclosure to Third Parties

ASA does not generally disclose PII to third parties, except as necessary to facilitate its mission as described herein.

Generally, disclosures of PII by ASA to a third party are made pursuant to a written agreement between ASA and the third party, which, among other things, limits the third party's use of the PII and requires particular protections of PII.

ASA will otherwise disclose PII collected through ASA's Services to third parties ONLY as follows:

- With your consent
- Pursuant to applicable law or in response to a subpoena or an order of a court or government agency.
 - To establish, exercise, or defend legal claims of an individual or ASA, including in order to protect the safety of an individual or to protect ASA's rights and/or property.
 - To authorized agents and/or subcontractors of ASA, who are providing services, including, without limitation, data append services, data validation services, fraud detection and/or prevention services, database-matching services, coding services, data segmentation services, and reward, incentive, and sweepstakes related services.
 - In connection with a change of ownership or control, provided that the party receiving or acquiring the PII agrees to use, protect, and maintain the security, integrity, and confidentiality of PII in accordance with this Privacy Policy.
 - As otherwise permitted pursuant to this Privacy Policy.

Data Security

ASA utilizes the most stringent technical, administrative, and physical safeguards to protect ASA's and other information disclosed to or collected by ASA. ASA reviews, monitors, and evaluates its privacy practices and protection systems on a regular basis.

ASA reviews third parties' safeguards to ensure that they are at least as protective of PII as ASA's own safeguards. ASA ensures that third parties continue to have such safeguards via contractual agreements.

Notwithstanding the foregoing, transmissions over the Internet and/or a mobile network are not one hundred percent (100%) secure and ASA does not guarantee the security of transmissions. Please be apprised all Internet-based communication is subject to the remote likelihood of tampering from an outside source. ASA is not responsible for any errors by individuals in submitting PII to ASA.

Changes to this Privacy Policy

We may update this privacy statement to reflect changes to our information practices. We encourage you to periodically review our website for the latest information on our privacy practices.

Questions or Concerns?

If you have any questions or concerns regarding ASA's privacy practices and/or this Privacy Policy, please contact us via email at webmaster@asa.org. You may also send a letter by U.S. Mail to:

Corporate Counsel
American Student Assistance
33 Arch Street
Suite 2100
Boston, MA 02110

We value the opinions and feedback of our research participants to help improve our service.

Last updated: November 1, 2019