

Effective Date: January 15, 2025	PRIVACY NOTICE FOR EDUCATIONAL, CERTIFICATE AND DEGREE PROGRAMS	Last Updated: N/A

This Privacy Notice describes the policy on, and procedures related to, the Processing of Personal Data that is provided to Virtua Health, Inc. or one of its divisions, subsidiaries or affiliates (“Virtua”) to consumers directly or as part of the educational, certificate, and degree classes and programs (“Educational Services”) that Virtua operates or participates in, including:

- Virtua Our Lady of Lourdes School of Nursing
 - Virtua Health EMS Education Center
 - Virtua Health AHA Training Center

In addition, this Privacy Notice addresses the collection, use, and disclosure of Student Records (including the Personal Data contained therein) by Virtua and the rights and responsibilities you may have with respect to such Student Records and Personal Data.

1. Definitions

For purposes of this Privacy Notice, the definitions set forth in Annex A shall apply.

2. Scope

This Privacy Notice applies to (i) current and former participants in Virtua Educational Services, (ii) individuals who have registered or otherwise provided information to Virtua to participate in Virtua Educational Services, regardless of whether they have attended any education, learning, or training events, and (iii) individuals who otherwise provide information, either directly or indirectly, to Virtua as part of their, or their employers’, participation in a Virtua Educational Service. This Privacy Notice does not apply to current Virtua employees or individuals working at Virtua to satisfy their educational clinical requirements.

In addition, this Privacy Notice applies to all information and data provided to any website or online service operated by, or under the control of, Virtua Educational Services (collectively, the “Virtua Educational Service Websites”). In the event that an individual accesses any other website or online service operated by Virtua, then the privacy policy applicable to such other website or online service (and not this Privacy Notice) shall apply to Personal Data collected therefrom or processed thereon.

THIS POLICY DOES NOT APPLY TO INFORMATION VIRTUA RECEIVES OR USES TO RENDER MEDICAL CARE; SUCH INFORMATION IS CALLED “PROTECTED HEALTH INFORMATION” UNDER THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (“HIPAA”). PLEASE NOTE THAT VIRTUA’S HIPAA [NOTICE OF PRIVACY PRACTICES](#) IS A SEPARATE DOCUMENT THAT GOVERNS HOW WE PROTECT AND MAY USE OR DISCLOSE OUR PATIENTS’ PROTECTED HEALTH INFORMATION.

3. Identification of Data Controllers; Your Responsibilities

The Virtua entity providing you with Educational Services and with which you have a primary relationship (such as the entity providing, operating, or facilitating the professional training or educational classes, or an entity whose representatives you have interacted with via educational platforms or video teleconferencing) will act as the Controller of your Personal Data. If you have questions about who the Controller of your Personal Data is, please contact the Virtua Privacy Officer in accordance with the “Contact Us” section of this Privacy Notice.

Your Responsibilities. You are permitted, and hereby agree, to only provide Personal Data to Virtua Educational Services if such Personal Data is accurate, reliable, and relevant to our relationship and only to the extent such disclosure will not violate any applicable law, statute, or regulation or infringe upon any individual’s data privacy rights or privileges. If you provide Virtua Educational Services with any Personal Data about a third party, you expressly represent that you have the full right and authority to provide the Personal Data to Virtua and will fully reimburse Virtua for any expenses incurred, or damages or liabilities arising, from breaches of any of the terms or conditions set forth in this Privacy Notice.

4. Programs Funded or Sponsored by Public Authorities

Virtua may administer programs and curriculum that are sponsored or funded by public authorities. In the event you participate in any such program or scholarship sponsored or funded by public authorities, you hereby acknowledge that your Personal Data will be collected, used, and otherwise processed in accordance with the applicable rules, regulations, and requirements related to this Privacy Notice and to the program or scholarship sponsored or funded by public authorities.

5. Collection of Personal Data; Data Sources

Virtua collects a broad range of Personal Data about individuals that apply to, or otherwise participate in, Virtua Educational Services, including the following categories and types of Personal Data as part of our routine business and our curriculum and programs. Note that some of the Personal Data set forth below is only collected as part of a specific program we are providing (e.g., a program sponsored or funded by a public authority).

Personal Data Categories	Description
Identity and Contact Data	Names (first, last), date of birth, gender, residential address, telephone number, email address, student identification numbers, and similar identifiers.
Government Identifiers	Social security numbers, driver’s license numbers, passport numbers, military identification numbers, immigration identification numbers (e.g., Alien number).
Online Data	Information related to a usage of Virtua information technology equipment (e.g., computers, smart devices); and Virtua Educational Service Websites, including registration data, online browsing history, search history, and information regarding your interaction with Virtua Educational Service Websites or their online applications.

Professional Data	Name of employer, employer address, occupation, professional title, department, and specialization.
Student Record	Any information or data that relates to an individual’s engagement in Virtua Educational Services, including grades and transcripts, registration, status, attendance, participation and performance, training certifications, disciplinary records, and class credits.
Education Data	Educational institutions attended, level of education completed, clinical training history, and information contained within a transcript.
Financial Data	Information related to payment charges and financial obligations to Virtua for our programs or services.
Equipment Data	Information related to how an individual controls, operates, or otherwise uses equipment owned, rented, or leased by Virtua.
Visitor Information	Information an individual provides when visiting any physical location or premises of Virtua (e.g., visitor logs and registries, vehicle and parking information).
Video and Images	We may record you via a video camera (e.g., on-premises security systems) or through video conferencing.

We may collect this Personal Data directly from the participant (e.g., registration forms) or from a third party (e.g., employers, other educational institutions, instructors, background-check service providers, distributors of our services).

6. Use of Personal Data and Legal Basis for Processing

Virtua Processes Personal Data for a variety of purposes related to the administration, functionality, and marketing of the Virtua Educational Services, as well as other legitimate business activities, on the basis of the following legal bases in accordance with the applicable Data Protection Laws:

Processing Purposes
Generate Student Records related to participation in Virtua Educational Services.
Create, improve, or provide educational content.
Conduct statistical analyses on student performance.
Provide information about new products, services, newsletters, and marketing.
Allow purchase and download of products, access educational programs.
Provide technical support or assistance.
Disseminate transaction-related communications.
Send surveys or marketing communications.
Comply with legal, regulatory, and contractual obligations.

7. Disclosure of Personal Data to Third-Parties

Virtua retains Personal Data in a confidential manner and does not Sell Personal Data to any other party for profit. Virtua does not share Student Records with an individual's parent or legal guardian without the express consent of the student or unless permitted by applicable law or contract. Notwithstanding the foregoing, Virtua may disclose any of the abovementioned identified Personal Data in the following circumstances:

- To any individual or entity when such disclosure is based upon written consent.
- To administrators and instructors, including teachers, faculty, clinical instructors and supervisors, and teaching assistants, or other employees at Virtua or the applicable school, college or university affiliated with Virtua, to inform them about the completion of our academic program courses.
- To federal, state, or local government agencies or officers, including for legal and regulatory compliance related to the execution of programs sponsored or funded by public authorities.
- To accrediting agencies or certifying bodies (such as the American Heart Association or the Department of Health), carrying out their administrative and educational functions.
- To employers or similar professional sponsors of an individual applying for, or participating in, a Virtua Educational Service.
- In response to a judicial order, lawfully issued subpoena, or similar regulatory or administrative request.
- To security officers or to law enforcement agencies in the investigation of a criminal matter.
- To the appropriate person in connection with an emergency, if the knowledge of such information is necessary to protect the health or safety of a person or company.
- To federal or state-funded educational agencies and institutions that request records when a student seeks to enroll or is already enrolled.
- To service providers who perform services on our behalf (e.g., learning management system providers, payment processors, website administrators, data storage and marketing service providers).

Business Restructuring. Circumstances may arise where, for strategic or other business reasons, Virtua decides to sell, buy, divest, merge or otherwise reorganize our businesses. We may disclose your personal information to the extent reasonably necessary to proceed with the negotiation or with the completion of a merger, acquisition, member substitution, affiliation, divestiture, sale or purchase of all or a portion of Virtua or another entity's assets.

Surveillance Disclaimer. We install and use video surveillance equipment to monitor our property and premises. We may, from time to time, disclose our video recording activities with property owners or managers, insurance companies, law enforcement and regulatory agencies upon their request or when we believe such disclosure promotes our legitimate business interests, including ensuring the safety and security of our employees, patients, and visitors.

Consent; Legally Permitted. In addition to the reasons for disclosure set forth herein, we may also disclose your personal information upon your consent or when such disclosure is consistent with Virtua's other legal obligations.

8. Retention Policy and Data Transfers

Virtua maintains Personal Data and Student Records only as long as required to comply with the purposes for which the Personal Data was collected, unless otherwise required by law or regulation or to defend or protect our legal or business interests during the applicable statute-of-limitation period.

Virtua is located in the United States, has a principal purpose of delivering health care to customers located in the United States, and the personal information we collect is governed by U.S. law. The Educational Services described in this Privacy Statement are directed only to customers located in the United States. If you are not located in the United States when you use the Educational Services, by accessing or using the Educational Services or otherwise providing personal information to us, you consent to your personal information being transferred to, stored, or processed in the United States and/or maintained on computers or servers located in the United States, where the privacy laws may not be as protective as those in your jurisdiction.

9. Privacy Rights

Data Privacy Rights. According to the New Jersey Data Protection Act, New Jersey residents have the following legal rights with respect to their Personal Data:

- To confirm whether or not we are processing your Personal Data and access such Personal Data.
- To correct inaccuracies in your Personal Data, taking into account the nature of the Personal Data and the purposes of the processing of your Personal Data.
- To delete Personal Data provided by, or obtained about, you.
- To obtain a copy of your Personal Data processed by us, in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.

Submit a Privacy Request. To submit these abovementioned privacy requests, please complete your request at <https://www.virtua.org/forms/consumer-data-request> or contact us in accordance with the “Contact Us” section below.

Privacy Request Verification Process. If you make any request related to your Personal Data, Virtua will ascertain your identity to the degree of certainty required or permitted under the law before addressing your request. In particular, before granting you access to, erasing, or correcting, specific pieces or categories of Personal Data or otherwise responding to your request, Virtua will, to the extent required or permitted by law, (i) require you to verify your request via email, (ii) request certain contact information or government identifiers, and (iii) match at least two pieces of such Personal Data with data that we have previously collected from you. None of your privacy rights are absolute, and such rights are subject to exceptions and exemptions.

Privacy Requests Appeals Process. If you would like to appeal a decision Virtua has made with respect to your privacy request, please email us at DSRappeals@virtua.org, with the subject line “ATTN: Privacy Appeals,” and describe the nature of your request, and the reason for requesting an appellate review.

Opt-Out Rights / The Sale of Personal Data. You may have the right to opt out of the “Sale” of your Personal Data. However, Virtua does not sell your Personal Data to third parties for monetary consideration or other valuable consideration, and therefore we do not provide opt-out request processes for the sale of Personal Data (because we do not undertake such activities).

Opt-Out Rights / Profiling. You may have the right to opt out of having your Personal Data used for profiling in furtherance of decisions that produce legal or similarly significant effects. However, Virtua does not engage in such activities.

Opt-Out Rights / Targeted Advertising. You may have the right to opt out of having your Personal Data used for Targeted Advertising. However, Virtua does not engage in such activities through Virtua Educational Services. To the extent you access or use other Virtua services (e.g., Virtua’s publicly

accessible website), then the terms and conditions applicable to those services, such as the website privacy statement, apply thereto, and they may offer you additional rights with respect to Targeted Advertising.

Complaints. You may file a complaint about our data processing activities with the New Jersey Division of Consumer Affairs at: <https://www.njconsumeraffairs.gov/>.

10. Accessing and Transferring Student Records

Individuals participating in an Educational Service should contact the Controller (Section 15) for information on how to access a Student Record and transfer a Student Record to a third party.

11. Persons with Disabilities

Virtua strives to ensure that every person has access to information related to our products and services, including this Privacy Notice. Please contact us if you would like this Privacy Notice provided in an alternative format, and we will seek to meet your needs.

12. Data Security

Virtua seeks to protect the security of your Personal Data and uses a variety of security technologies and procedures to help protect Personal Data from unauthorized access, use, or disclosure. HOWEVER, NO INFORMATION SYSTEM CAN BE FULLY SECURE, AND WE CANNOT GUARANTEE THE ABSOLUTE SECURITY OF PERSONAL DATA. MOREOVER, WE ARE NOT RESPONSIBLE FOR THE SECURITY OF PERSONAL DATA TRANSMITTED TO VIRTUA AND/OR THE EDUCATIONAL SERVICES OVER NETWORKS THAT VIRTUA DOES NOT CONTROL, INCLUDING THE INTERNET AND WIRELESS NETWORKS, AND YOU PROVIDE VIRTUA WITH ANY PERSONAL DATA AT YOUR OWN RISK. TO THE EXTENT PERMITTED BY LAW, VIRTUA SHALL NOT BE LIABLE OR OTHERWISE RESPONSIBLE FOR ANY DATA INCIDENT OR EVENT THAT MAY COMPROMISE THE CONFIDENTIALITY, INTEGRITY, OR SECURITY OF YOUR PERSONAL DATA CAUSED BY A THIRD PARTY. The safety and security of your Personal Data also depends on you. Where Virtua has given you (or where you have chosen) a username and password to access our Educational Services, you are responsible for maintaining the security and confidentiality of those credentials and not revealing them to others. You must contact Virtua immediately (and in any event within twenty-four (24) hours) if you have reason to believe that your username or password to our Educational Services has been compromised. You acknowledge and agree that we may contact you via email or other electronic communications in the event we are legally required to notify you of a data security incident or event related to your Personal Data.

13. Virtua Educational Service Websites

Virtua Educational Service Websites may also contain third-party advertisements that contain embedded hyperlinks to websites operated by third parties. All third-party advertising is paid for by the relevant third-party advertiser. You can use an embedded hyperlink to access the third-party advertiser's website; however, Virtua does not recommend or endorse any third-party advertiser or the goods or services it advertises on Virtua Educational Service Websites. The third-party advertiser is solely responsible for any representations or offers made by it, for the delivery of goods or services, and for its data processing.

14. Consents; Updates and Amendments

By providing Personal Data to Virtua, you hereby represent that you understand and agree with the terms, conditions, and disclaimers set forth in this Privacy Notice. Virtua may update this Privacy Notice from



time to time, and Virtua will, when required by law, notify you of such changes or updates.

15. Contact Us

If you have questions regarding this Privacy Statement or our handling of your Personal Data, would like to request more information from us, or would like to exercise a data privacy right, please contact us at <https://www.virtua.org/forms/consumer-data-request>; (mail) Virtua Health Privacy Officer, 303 Lippincott Drive, 3rd Floor Marlton, NJ 08053; or (email) privacyofficer@virtua.org.

Annex A Definitions

“Child” shall be ascribed the same meaning as provided in the federal Children's Online Privacy Protection Act, 15 U.S.C. § 6501 et seq., and any rules, regulations, guidelines, and exceptions thereto, as may be amended from time to time.

“Controller” refers to means an individual or legal entity that, alone or jointly with others, determines the purpose and means of processing personal data.

“Data Protection Law” refers to any data protection law, statute, and regulation applicable to Virtua in the context of its collection, processing, retention, dissemination, disclosure, transfer, disposal, or use of Personal Data through the Educational Services, including the New Jersey Data Protection Act (codified, as amended, at N. J. S. A. § 56:8-166 et seq.).

“De-Identified Data” means: data that cannot be reasonably used to infer information about, or otherwise be linked to, an identified or identifiable individual, or a device linked to such an individual, if the Controller that possesses the data: (i) takes reasonable measures to ensure that the data cannot be associated with an individual, (ii) publicly commits to maintain and use the data only in a de-identified fashion and not to attempt to re-identify the data, and (iii) contractually obligates any recipients of the information to comply with the requirements of this paragraph.

“Personal Data” refers to any information that is linked or reasonably linkable to an identified or identifiable person. “Personal data” shall not include De-Identified Data or Publicly Available Information.

“Precise Geolocation Data” means information derived from technology, including, but not limited to, global positioning system level latitude and longitude coordinates or other mechanisms, that directly identifies the specific location of an individual with precision and accuracy within a radius of 1,750 feet. “Precise geolocation data” does not include the content of communications or any data generated by or connected to advanced utility metering infrastructure systems or equipment for use by a utility.

“Process” or Processing” means an operation or set of operations performed, whether by manual or automated means, on personal data or on sets of personal data, such as the collection, use, storage, disclosure, analysis, deletion, or modification of personal data, and also includes the actions of a Controller directing a processor to process personal data.

“Publicly Available Information” means information that is lawfully made available from federal, state, or local government records or widely distributed media or information that a Controller has a reasonable basis to believe a consumer has lawfully made available to the general public and has not restricted to a specific audience.

“Sale” means the sharing, disclosing, or transferring of personal data for monetary or other valuable consideration by the Controller to a third party. “Sale” shall not include: (i) the disclosure of personal data to a processor that processes the personal data on the Controller's behalf; (ii) the disclosure of personal data to a third party for the purposes of providing a product or service requested by the consumer; (iii) the disclosure or transfer of personal data to an affiliate of the Controller; (iv) the disclosure of personal data that the consumer intentionally made available to the general public through a mass media channel and did not restrict to a specific audience; or (v) the disclosure or transfer of personal data to a third party as an asset that is part of a proposed or actual merger, acquisition, bankruptcy, or other transaction in which the

third party assumes control of all or part of the Controller's assets.

“Sensitive Data” means personal data revealing racial or ethnic origin; religious beliefs; mental or physical health condition, treatment, or diagnosis; financial information, which shall include a consumer's account number, account log-in, financial account, or credit or debit card number, in combination with any required security code, access code, or password that would permit access to a consumer's financial account; sex life or sexual orientation; citizenship or immigration status; status as transgender or non-binary; genetic or biometric data that may be processed for the purpose of uniquely identifying an individual; personal data collected from a known Child; or Precise Geolocation Data.

“Student Record” refers to all academic records, applications, documents, and similar materials, in whatever format and medium, related to an individual’s registration or participation in Virtua Educational Services.

“Targeted Advertising” means displaying advertisements to a consumer where the advertisement is selected based on personal data obtained or inferred from that consumer's activities over time and across nonaffiliated Internet web sites or online applications to predict such consumer's preferences or interests. “Targeted advertising” shall not include: advertisements based on activities within a controller's own internet websites or online applications; advertisements based on the context of a consumer's current search query or visit to an internet website or online application; advertisements directed to a consumer in response to the consumer's request for information or feedback; or processing personal data solely to measure or report advertising frequency, performance, or reach.