

PRIVACY POLICY

Family Engagement Lab (“Family Engagement Lab,” “we,” “our,” or “us”) is committed to protecting your privacy. This Privacy Policy explains how we collect, use, and share the personal information we collect from visitors to our website, web-based software platform and related services, including the FASTalk tool (collectively, our “Service”). By accessing or using our Service, you signify that you have read, understood and agree to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy and our Terms of Use.

We provide the Service on behalf of organizations such as schools and school districts (each, a “Customer”), to enable parents to engage directly with their children’s teachers and promote at-home parent involvement and parent-teacher collaboration. Each workspace is created and controlled by the Customer, and therefore any User Content (defined below) you submit to the Service is also controlled by the Customer. Where we collect or process your information, we do so on behalf of the Customer. “You” or “Your” means a user of the Service, which could refer to an individual, a Customer, an individual associated with a Customer account, or any other authorized user of the Service.

1. How We Collect and Use Information

We collect personal information from our users in a variety of ways, including:

- **Information you provide to us directly.** We may collect and store personal information when you register for our Service or provide it to us in some other manner. For example, if you are a teacher and you register with the Service for FASTalk, we may collect your name, phone number, e-mail address, password and information about your classroom (including information about parents). If you are a Customer, we also collect information about your school/district, such as school name and contact information, as well as any information you provide about your teachers, including your teachers’ contact information. We may also collect any communications you exchange with us, any information you provide if you take part in any interactive features of the Service, and any other information you provide to us.
- **Data collected through the use of the Service.** We collect information about how you use the Service, your actions on the Service, and content you post to the Service, including the groups you belong to, your interaction with others on the Service, and any content you provide through text messages or other functionality (“User Content”). Please remember that we may, but we have no obligation to, monitor, record, and store User Content in order to protect your safety or the safety of other users, to assist with regulatory or law enforcement efforts, or to protect and defend our rights and property. By using the Service, you consent to the recording, storage and disclosure of such communications you send or receive for these purposes.

We use this information (i) to operate, maintain, and provide to you the features and functionality of the Service; (ii) to send you Service-related emails or messages (e.g., account

verification, messages and schedules, change or updates to features of the Service, technical and security notices); (iii) to analyze trends to better understand how users are using the Service and improve them; (iv) to communicate directly with you, such as to send you promotional email messages about products and services that may be of interest to you; and (v) to prevent or address service, security, technical issues or at a Customer's request in connection with customer support matters. For more information about your communication preferences, *see* "Control Over Your Information" below.

2. How We Use Cookies and Other Tracking Technology to Collect Information.

- **Unique Identifiers.** We may collect certain information through unique identifiers such as IP address when you are using the Service.
- **Cookies.** We may use "cookies" and other technologies to collect data that enable us to better understand and improve the usability, performance and effectiveness of our Service. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set your browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. Please be aware that some features of our Service may not function or may be slower if you refuse cookies. You may also get cookies from other third parties with links on the Service as described below. We do not directly control these cookies.
- **Third-Party Analytics.** We use third parties' analytic and tracking tools to better understand who is using the Service, how people are using the Service and how to improve the effectiveness of the Service and its content. Those third party companies may use cookies, pixel tags or other technologies to collect and store anonymous information such as time of visit, pages visited, time spent using the Service, device identifiers, type of operating system used and other website(s) you may have visited. They might combine information they collect from your interaction with the Service with personal information they collect from other sources. We do not have access to, nor control over, third parties' use of cookies or other tracking technologies.
- **DNT.** Do Not Track (DNT) is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by websites and online services. We do not recognize DNT.

3. How We Share Your Information

We do not sell, trade, lease or loan the personal information we collect or maintain to any third party for any reason, which means that we do not sell or otherwise share student personal information with direct marketers, advertisers, or data brokers. We may share your personal information in the instances described below. For further information on your choices regarding your information, *see* the "Control Over Your Information" section below.

- a. **Other Service Participants.** We will share your information with other users of the Service, as needed to provide the Service to you. For example, your information may be shared with the Customer that created your workspace in order to provide the Service and facilitate communication. You may be able to control the visibility of some of your information and actions through your Settings (see “Your Choices Regarding Your Information” below). We may also share information about your use of the Service with the Customer that created your workspace for analytic purposes. For example, we provide reporting tools to allow the Customer to evaluate the efficiency of its organization and individuals’ responsiveness and availability;
- b. **Related Organizations.** We may share your personal information with other entities that we own or control (i.e., our subsidiaries) and any organization that owns or controls us (i.e., parent companies), as well as any subsidiaries of such parent companies. These companies will abide by the terms of this Privacy Policy when handling your personal information;
- c. **Third Parties Assisting in Our Operations.** We may share your personal information with third party vendors, consultants and other service providers that perform services on our behalf, as needed to carry out their work for us, which may include hosting services or providing analytics services;
- d. **Business Transfers.** We may share personal information with third parties in connection with the sale of a business (including merger, acquisition, or sale of all or a material portion of its assets, change in corporate control, or insolvency or bankruptcy proceedings); and
- e. **Disclosures Under Special Circumstances.** We may share your personal information with third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use or to protect the security or integrity of our Service; and/or (c) to exercise or protect the rights, property, or personal safety of Family Engagement Lab, our visitors, or others.

We may also share information with others in an aggregated and anonymous form that does not reasonably identify you directly as an individual. We do not use or share student personal information to target advertising to students or other users.

4. Control Over Your Information

Profile and Data Sharing Settings. You may update your profile information, such as your name and profile photo, and may change some of your data sharing preferences by emailing us at portal@fastalk.org.

Communication Preferences. You can stop receiving promotional email communications from us by clicking on the “unsubscribe link” provided in such communications. We make every effort to promptly process all unsubscribe requests. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Service, technical and security notices).

Modifying or Deleting Your Content: If you have any questions about reviewing, modifying, or deleting your information, or if you want to remove your name or comments from our website or publicly displayed content, you can contact us directly at portal@fastalk.org. We may not be able to modify or delete your information in all circumstances.

5. Data Protection and Security

Data retention: We will retain your information for as long as your account is active or as needed for our internal purposes. You may request to delete your account information by contacting us at portal@fastalk.org. We will use our best efforts to delete any student information within a reasonable amount of time upon request. However, please be aware that we will not be able to delete any content you have shared with others on the Service.

Data storage and transfer: The Service and the services upon which the Service is hosted are located in the U.S. and are intended only to be used by individuals in the U.S. Personal information you submit using the Service will be transferred to and stored in the United States. By using the Service and submitting personal information, you authorize this transfer.

Keeping information safe: We care about the security of your information and use commercially reasonable physical, technical and organizational measures designed to preserve the integrity and security of all information we collect and protect your information from unauthorized access, destruction, use, modification or disclosure. However, no security system is impenetrable and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

6. Children's Privacy

Our Service is intended for use strictly by adults. We do not knowingly solicit or collect personal information from children under the age of 13. If we learn that any personal information has been collected inadvertently from a child under 13, we will delete the information as soon as possible. If you believe that we might have collected information from a child under 13, please contact us at portal@fastalk.org.

7. Links to Third-Party Websites and Services

For your convenience, our Service may provide links to third-party websites or services that are not governed by this Privacy Policy. To the extent that any linked third-party websites or services you visit are not owned or controlled by us, we are not responsible for those websites' or services' content or information practices. We encourage you to review the privacy policies of any website or service before providing any personal information.

8. Changes to this Privacy Policy

We may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. If you object to any changes, you may close your account.

9. Contact Us

For additional inquiries about this Privacy Policy, please send us an email at portal@fastalk.org, or contact us at:

Family Engagement Lab
548 Market Street, #42210
San Francisco, CA 94104

This Privacy Policy was last modified on July 27, 2018.