

PRIVACY POLICY

Family Engagement Lab, LLC (“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, mobile applications, and 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 Service.

User Content (defined below) and information you submit to the Service is controlled by the organization or other third party that created the workspace (the “Customer”). Where we collect or processes 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, when a teacher registers with the Service for FASTalk, we may collect your name, phone number, email 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 in-app 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.

Like most websites and online services, we and our third party partners automatically collect certain types of usage information when you visit our Service, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, web beacons, Flash cookies (locally stored objects), embedded scripts, location-identifying technologies, and similar technology (collectively, “tracking technologies”). These tracking technologies collect information about how you use the Service (e.g., the pages you view, the links you click, and other actions you take on the Service), information about your browser and online usage patterns (e.g., IP address, browser type, browser language, referring / exit pages and URLs, pages viewed, whether you opened an email , links clicked), and information about the device(s) you use to access the Service (e.g., mobile device identifier, mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, and depending on your mobile device settings, your geographical location data (which could include GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device), or we may be able to approximate a device’s location by analyzing other information, like an IP address. We, or our third party partners, may link your various devices so that content you see on one device can result in relevant advertising and content displayed on another device, and so that we may recognize and contact you on the various devices you may use. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service. Although we do our best to honor the privacy preferences of our visitors, we are not able to respond to Do Not Track signals from your browser at this time.

We use or may use the data collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the Service; (b) provide custom, personalized content and information, including targeted content and advertising; (c) recognize and contact you across multiple devices; (d) provide and monitor the effectiveness of our Service; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our Service.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the Service, as some features and services on our Service may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it. Deleting cookies does not delete Local Storage Objects (LSOs) such as Flash objects and HTML5. You can learn more about Flash objects - including how to manage privacy and storage settings for Flash cookies – on Adobe’s website or by clicking [here](#). If you choose to delete Flash objects from our website, then you may not be able to access and use all or part of the Service or benefit from the information and services offered.

We and our third party partners may also use cookies and tracking technologies for advertising purposes. For more information about tracking technologies, please see “Third Party Tracking and Online Advertising” below.

3. How We Share Your Information

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.

We may share your personal information with:

- a. Other members of the Service. Your information will be shared with other users of the Service, as needed to provide the Service to you. For example, some of 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 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. Other companies and brands owned or controlled by Family Engagement Lab and other companies owned by or under common ownership as Family Engagement Lab , which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use your personal information in the same way as we can under this Privacy Policy;
- c. 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 identifying and serving targeted advertisements, hosting services, or providing analytics services;
- d. Other parties in connection with a company transaction, such as a merger, sale of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party, or in the event of a bankruptcy or related or similar proceedings; and
- e. 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 Service 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.

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. Third Party Tracking and Online Advertising

We participate in interest-based advertising and use third party advertising companies to serve you targeted advertisements based on your browsing history. We permit third party online advertising networks, social media companies and other third party services, to collect, information about your use of our Service over time so that they may play or display ads on our Service, on other websites, apps or services you may use, and on other devices you may use. Typically, though not always, the information we share is provided through cookies or similar tracking technologies, which recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the website and other information. We may also share a common account identifier (such as an email address or user ID) to help us identify you across devices. We and our third party partners use this information to make the advertisements you see online more relevant to your interests.

As noted above, depending on your browser or mobile device, you may be able set your browser to delete or notify you of cookies and other tracking technology by actively managing the settings on your browser or mobile device. You may also be able to limit interest-based advertising through the settings on your mobile device by selecting “limit ad tracking” (iOS) or “opt-out of interest based ads” (Android). To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Network Advertising Initiative’s online resources, at <http://www.networkadvertising.org/choices>, and/or the DAA’s resources at www.aboutads.info/choices, and you may also adjust your ad preferences through your Facebook settings. Some of these opt-outs may not be effective unless your browser is set to accept cookies. Furthermore, if you use a different device, change browsers or delete the opt-out cookie, you may need to perform the opt-out task again. You may also be able to opt-out of some – but not all – interest-based ads served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app. You may also manage certain advertising cookies by visiting the EU-based Your Online Choices at www.youronlinechoices.eu. If you have any questions about opting out of the collection of cookies and other tracking/recording tools, you can contact us directly at portal@fastalk.org.

6. Data Protection and Security

Data retention: We will retain your information for as long as your account is active or as needed to for our internal purposes. You may request to delete your account information by contacting us at

portal@fastalk.org. 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: Your information may be stored and processed in the U.S. or any other country in which we or our subsidiaries, affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which we or our parent, subsidiaries, affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

Keeping information safe: We care about the security of your information and uses commercially reasonable physical, technical and organizational measures designed to preserve the integrity and security of all information we collect. 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.

7. 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.

8. 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.

9. 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.

10. 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
1999 Harrison St. Ste. 1100
Oakland CA 94612

This Privacy Policy was last modified on November 2, 2017.