

## PRIVACY POLICY

Family Engagement Lab (“Family Engagement Lab,” “we,” “our,” or “us”) understands that privacy is immensely important to our school partners (“Schools/School Partner”) who use our services and to students whose information we may access on behalf of a School. We provide a tool that enables our teachers to directly communicate with our parent stakeholders. At all times, we are 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”); and most importantly, how we protect your data. 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 “School Partner”), 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 School Partner, and therefore any User Content (defined below) you submit to the Service is also controlled by the School Partner. Where we collect or process your information, we do so on behalf of the School Partner. “You” or “Your” means a user of the Service, which could refer to an individual, a School Partner, an individual associated with a School Partner account, or any other authorized user of the Service.

### 1. How We Collect and Use Information

We collect the following types of information:

**Information about Schools/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 School Partner, 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.

**Student Data Information:** Through the course of providing its Service to a School, we may have access to personally identifiable information about students (“Student Data”) that is provided by the School, by the parent or guardian, or by the Student. Depending on the Service selected by the School, a School may authorize us to receive Student Data from the Service used by the School. We have access to Student Data only as requested by the School and only for the purposes of performing Services on the School’s behalf. The type of Student Data we collect will depend on how the School uses and connects through the Service. In all instances, we receive Student Data only from the School and never interact with the student directly.

**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 update 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:** Cookies and related technology allow us to provide you with a better user experience. For example, we may use the data collected through cookies to: (a) remember information so that a user will not have to re-enter it during subsequent visits; (b) provide custom, personalized content and information; (c) to identify you across multiple devices; (d) to provide and monitor the effectiveness of our Service; (e) monitor aggregate metrics such as total number of visitors, traffic, and usage on our website and our Service; (f) diagnose or fix technology problems; (g) help users efficiently access information after signing in, and (h) 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 email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed your email and performed certain functions with it.

**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.

**Third Party Tracking:** We do not permit third party advertising networks to collect information about your use of our website and Service over time and across websites for the purpose of serving targeted advertising and we will never use Student Data for targeted advertising.

**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.

We share information within the Service as needed to perform the Service and/or at the direction of the School. For example, information including Student Data, will be shared between and among authorized School users such as teachers and School administrators. This sharing will depend on the settings and functionality selected by the School Partner.

**How Student Data is shared:** We do not facilitate the sharing of any Student Data with third parties on the Service except on behalf of the School after the School has authorized a third party or application to access Student Data through the Service. Please remember that this Privacy Policy applies to the Family Engagement Lab Services, and not other services or third party applications, which may have their own privacy policies. School Partners should carefully read the privacy practices of each third party application before agreeing to engage with the application through the Service.

**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 School Partner 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 School Partner that created your workspace for analytic purposes.

**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;

**In the event of a change of control:** If we sell, divest or transfer our business, we will not transfer personal information of our customers unless the new owner intends to maintain and provide the Service as a going concern, and provided that the new owner has agreed to data privacy standards no less stringent than our own. In such cases, we will provide you with notice and an opportunity to opt-out of the transfer of personally identifiable Student Data;

**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](mailto: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](mailto:portal@fastalk.org). We may not be able to modify or delete your information in all circumstances.

**Access to Student Data:** Student Data is provided and controlled by the Schools. If you have any questions about reviewing, modifying, or deleting personal information of a student, please contact your School directly.

## 5. Data Protection and Security

**Data retention:** We will retain your information and content for a commercially reasonable time for backup, archival, or audit purposes, for as long as your account is active or as needed for our internal purposes, but any and all Student Data associated with the School will be deleted promptly upon termination of an agreement with a School Partner. You may request to delete your account information by contacting us at [portal@fastalk.org](mailto: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. We may maintain anonymized or aggregated data, including usage data, for analytics purposes. If you have any questions about data retention or deletion, please contact us.

**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](mailto: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. California Compliance**

California Civil Code Section § 1798.83 permits users of our Service that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. 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.

## **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. If we change the policy in a material manner, for example, if we seek to use personal information in a materially different way than we had previously, we will provide at least 30 days notice to the Schools so that you have sufficient time to evaluate the change in practice. Of course, you can always opt-out by deleting your account before the changes take effect.

## **10. Contact Us**

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

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

This Privacy Policy was last modified on [ January 25, 2021 ]. **Effective Date: February 8, 2021**