

Privacy Policy

Georgia Center for Civic Engagement Privacy Policy

Georgia Center for Civic Engagement, Inc., is committed to protecting your privacy. In this Privacy Policy, we describe how we collect, use and disclose information that we obtain about you when you visit our website www.georgiacivics.org and any other website or online service which links to this Privacy Policy, purchase our products or activities, and access and use our online platform and mobile service (collectively, the “Service”). “You” or “your” means a visitor or a user (whether signed in or not) of our Service. Your use of the Service is conditioned on your acceptance of this policy and our Terms of Service.

A Note About Student Data

Our Service may be used by a school, school district, or teacher (collectively referred to as a “School”) in a classroom setting. Through the provision of our Service to a School, we may collect personally identifiable information from or about students (“Student Data”). We consider Student Data to be highly confidential and do not use such data for any purpose other than providing our Service to the School and as otherwise provided in our agreements with the School. If you have any questions about reviewing, modifying or deleting personal information of a student, please contact your School directly.

1. What Information Do We Collect?

We collect information both directly from you and automatically when you visit our Site or use the Service.

Information We Collect Directly

- **School and Teacher Information.** When a teacher or school administrator registers for an account on our Service or corresponds with us online, we collect certain personal information such as a full name, email address, username and password. We may also collect additional information about the School, such as a school or district identifier, information about teachers and others authorized to use the Service, and payment information.
- **Student Information.** Once registered, a School may provide, or permit the Georgia Center for Civic Engagement to collect information about its students authorized to use the Service, such as a first name and last initial, username and class code (all personally identifiable information collected from or about students is referred to as “Student Data”). The School may elect to provide non-personally identifiable usernames or identifiers in lieu of a full student name, at its discretion, or, may elect to not provide any Student Data at all.
- **Usage and Activity Information.** During the course of providing the Service, we collect information about your use of the Service, as well as any information that you submit to the Service, such as answers to questions or creation of games. In addition, we may ask you for personal information at other times, such as when you contact our technical support team, send us an email, complete a user survey or otherwise communicate with us.

Information We Collect Automatically

Like most websites and online services, we automatically collect certain types of information about visitors to our Site and users of our Service through cookies and other similar technologies. We may combine this information with personal information we collect from you. Examples include referring URL; IP address; device identifier; browser type and version; device name and model; operating system type, name and version; web pages viewed; links clicked; and length of time spent engaged with the Service. We may collect analytics data, or use third-party analytics tools, such as Google Analytics, to help us measure traffic and usage trends for the Service and to understand more about the demographics and behaviors of our users. You can learn more about Google's practices at <http://www.google.com/policies/privacy/partners>. We may also work with third-party partners to employ technologies, including the application of statistical modeling tools, which permit us to recognize and contact you across multiple devices. Although we do our best to honor the privacy preferences of our users, we are unable to respond to Do Not Track signals set by your browser at this time.

We use this automatically-collected information to (i) improve user experience and personalize your content; (ii) provide and monitor the effectiveness of our Service; (iii) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our Service; (iv) diagnose or fix technology problems; (v) investigate fraud or misuse of the Service and (vi) otherwise to plan for and enhance our Service.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some features and services (particularly those that require you to sign in) may not function properly if your cookies are disabled. 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 e-mail and performed certain functions with it.

2. How Do We Use Your Information?

We use the information we collect for the following purposes:

- **To provide and maintain the Services:** To provide our Service, to communicate with School users, to process payments, to respond to inquiries and for other customer service purposes.
- **Personalization and improvement:** We use information to tailor the content and information that we may send or display to users, to offer personalized content and instructions, and to otherwise personalize your experience while using the Service, including on various devices you may use to access the Service. We collect statistics to better understand how users access and use our Service, monitor the effectiveness of our Service, detect usage patterns, and to diagnose or fix technology problems. We also use information to demonstrate the effectiveness of the Service and perform research, and to develop, support, and improve our Service and other educational products and services.
- **Communication:** We use your information to provide transactional notifications for certain activities relating to your use of our Service. For example, we may send email notifications when a user completes an activity, to provide receipt for payment or other such notices. From time to time, we may send periodic promotional or informational emails to School users. We do not use Student Data to send marketing communications.

You may opt-out of such communications by following the opt-out instructions contained in each email.

3. How Do We Share Your Information?

We may share or disclose your personal information as needed to provide our Service or with your consent or permission. We may also share personal information in the circumstances described below.

- **Other School Users:** Depending on your account settings and permissions, we permit information to be shared between and among authorized School users. For example, a Teacher can see information about her students' activities on the Service.
- **Consent.** We may share information with consent and at the direction of a School or parent. For example, if a School directs us to share content with the parent or guardian of a student.
- **Service Providers.** We may share information with our trusted vendors, third party service providers and individuals to provide services or products for us or on our behalf, which may include analytics, hosting, billing, targeted advertising and marketing. Vendors and service providers who have access to Student Data, if any, shall be contractually bound to uphold privacy and confidentiality terms no less protective than those provided herein.
- **Business Transfers.** We may disclose personal information in the context of a company transaction, such as a merger, sale of company assets or shares, financing, change of control, bankruptcy or other corporate event. If the transaction involves the transfer of Student Data to a third party, we will require the new owner to continue to honor the terms provided in this Privacy Policy or we will provide you with notice and an opportunity to opt-out of the transfer of Student Data by terminating your account and deleting your data – and the data of Students associated with your School account - before the transfer occurs.
- **Aggregate and De-Identified Information.** We may share aggregate or de-identified information which does not reasonably identify you as an individual with third parties for research, marketing, advertising, or similar purposes.
- **Other.** We may release personal information if it has a good faith belief that access, use, preservation, or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process, or enforceable governmental request; (b) enforce applicable Terms of Service, including investigation of potential violations thereof; (c) detect, prevent or otherwise address fraud, security or technical issues; (d) protect the rights, property, or personal safety of our products, its users, or the public; or (e) as required or permitted by law.

4. Third-party tracking and online advertising

The Georgia Center for Civic Engagement does not display any targeted advertising on the Service.

5. Security of Personal Information

The security of your personal information is important to us. We have implemented a variety of physical, administrative and technological safeguards designed to preserve the integrity and security of all personal information we collect. Our employees are required to protect personal

information in a manner consistent with the terms of this Privacy Policy, and violators will be subject to disciplinary action, up to and including termination and further legal action.

Please be aware that despite our best efforts, no data security measures are impenetrable and we cannot guarantee the security of our systems 100%. In the event that any personal information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and take all steps required by law and regulations. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared device, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

6. Reviewing and Modifying Information

Upon request, we will provide Schools with an opportunity to review, modify and/or delete the personal information collected from their students. If you are a parent and you have questions about your child's use of our Service and any information collected, you should discuss your questions with your child's School, which will submit the request to Georgia Center for Civic Engagement at the School's discretion.

7. Retention and Deletion

We will retain your information for as long as necessary for the identified purpose, which may extend beyond the termination of our relationship with you. For example, we may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, or if required by law. We may retain indefinitely information which has been de-identified or aggregated such that it can no longer reasonably identify a particular individual. All retained personal information will remain subject to the terms of this Privacy Policy. Otherwise, we will delete personal information upon request or according to our standard data retention schedule.

Student Data. We will not knowingly retain Student Data beyond the time period required to support an educational purpose, unless authorized by the School or parent, and will delete Student Data promptly upon request from the School. We do not delete or de-identify any Student Records associated with an active School account except at the direction of the School. The School is responsible for maintaining current class rosters and managing Student Data which the School no longer needs for an educational purpose through the School roster or by submitting a deletion request.

We retain Student Data for a period of up to six months after termination of the contract to continue to provide the School access to its records, after which the Student Data will be deleted and/or de-identified, unless we receive a deletion request from a School prior to that date. We will not be required to delete any information which has been de-identified or disassociated with personal identifiers such that it can no longer be used to reasonably identify a particular individual.

8. Compliance with Laws

Our collection, use, and disclosure of Student Data is governed by our Terms of Service and/or any other agreement with the School, by the provisions of the Family Educational Rights and Privacy Act ("FERPA"), the Children's Online Privacy Protection Act ("COPPA") and applicable

state laws relating to the collection and use of personal information of students. If you have any questions about our collection and use of Student Data, please contact us at info@georgiacivics.org. If you have any questions about reviewing, modifying, or deleting the personal information of a student, please contact your School directly.

The Family Educational Rights and Privacy Act (“FERPA”)

This Privacy Policy and our Service are designed to meet our responsibilities to protect personal information from the students' educational records under FERPA. We agree to work with each School to jointly ensure compliance with the FERPA regulations.

The Children's Online Privacy Protection Act (“COPPA”)

This Privacy Policy and our Service are designed to comply with COPPA. We do not knowingly collect personal information from a child under 13 unless and until a School has authorized us to collect such information through the provision of the Service on the School's behalf. When a teacher, school or district uses our Service in the classroom or in an educational context, we rely on the School to provide appropriate consent and authorization for a student under 13 to use the Service and for Georgia Center for Civic Engagement to collect personal information from such student(s), as permitted by COPPA. Upon request, we will provide teachers, schools or districts with an opportunity to review and delete the personal information collected from their students. If you are a parent and you have questions about your child's use of our Service and any information collected, you should discuss your questions with your child's teacher, school or district. The GCCE asks each third-party vendor to complete an assurance of COPPA compliance—and will address any vendor specific questions.

Students Online Personal Information Protection Act (“SOPIPA”)

This Privacy Policy and our Service are designed to comply with SOPIPA. We do not engage in targeted advertising based on student information that we collect through our Service. We do not use collected information to amass student profiles except in furtherance of teacher, school or district purposes. We never sell Student Data unless the sale is part of a corporate transaction, such as a merger, acquisition, bankruptcy, or other sale of assets, in which case we will use our best efforts to ensure the successor entity honors the privacy commitments made in this policy and/or we will notify you of such a sale and provide you an opportunity to opt-out by deleting your account – and the Student Data associated with your account - before the data transfer occurs.

10. Changes to This Policy

This Policy is current as of the Effective Date set forth below. If we make any material changes to this Policy, we will post those changes here. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of the Service signifies your acceptance of any changes.

We will not make any material changes to our Privacy Policy that relate to the collection or use of Student Data without first giving notice to the School and providing a choice before Student Data is used in a materially different manner than was disclosed when the information was collected.

11. Contact Us

If you have a question regarding this Privacy Policy, or if a question was not addressed in this privacy policy, you may contact technical support using the contact information below. We will do our best to answer your question promptly and accurately. If you are a parent and you have questions about your child's use of our Service and any information collected, you should discuss your questions with your child's teacher, school or district. If you have general questions or concerns about COPPA you can contact iKeepSafe at COPPAPrivacy@ikeepSAFE.org.

info@georgiacivics.org

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