

Privacy Policy

Date: March 4th, 2024 (Pending Board Approval)

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use our Website and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve our Website. By using our Website, You agree to the collection and use of information in accordance with this Privacy Policy.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

Submission refers to any type of information You submit to the School using the Website. Such examples may include but are not limited to use of the contact form, voluntarily registering for a mailing list, or submitting an enrollment application.

School (referred to as either "the School", "We", "Us" or "Our" in this Agreement) refers to Compass Charter Schools, 850 Hampshire Rd, Suite R, Thousand Oaks, CA 91361.

Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

Country refers to: California, United States

Device means any device that can access the Website such as a computer, a cell phone, or a digital tablet.

Do Not Track (DNT) is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.

Personal Data is any information that relates to an identified or identifiable individual. May also be referred to as Personal Identifying Information (PII).

Service Provider means any natural or legal person who processes data on behalf of the School. It refers to third-party companies or individuals employed by the School to facilitate the Website/Web Services, to provide the Website/Web Services on behalf of the School, to perform services related to the Website/Web Services, or to assist the School in analyzing how the Website/Web Services are used.

Usage Data refers to data collected automatically, either generated by the use of the Website/Web Services or from the infrastructure of the Website/Web Service itself (for example, the duration of a page visit).

Website refers to the website for Compass Charter Schools and its connected web services, accessible from <https://compasscharters.org>

Web Services refers to third party websites or online service providers that Compass Charter Schools uses to conduct its business and service scholars.

You refers to the individual accessing or using the Website or another legal entity on behalf of which such individual is accessing or using the Website, as applicable.

Contact Forms

Our Website offers a Contact Form that You can use to send Us inquiries. Only Your name and email address are required to submit an inquiry using the Contact Form. Providing a phone number in the Contact Form is optional.

Should You provide us with your name, email, or phone number using the Contact Form, this information will only be used to contact You pertaining to Your inquiry.

Names, emails, and phone numbers submitted via the Contact Form will not be shared with any third party providers, Service Providers, or affiliates.

Collecting and Using Your Personal Data

Types of Data Collected

Personal Data

While using Our Website or Web Services, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Usage Data

Usage Data

Usage Data is collected automatically when using the Website.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Website that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Website by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use,

Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Website or when You access the Website by or through a mobile device.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Website and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Website. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Website. Unless You have adjusted Your browser setting so that it will refuse Cookies, our Website may use Cookies.
- **Web Beacons.** Certain sections of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the School, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with Websites available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the Websites that You have asked for cannot be provided, and We only use these Cookies to provide You with those Websites.

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering Your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter Your preferences every time You use the Website.

Tracking and Performance Cookies

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify You as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device You use to access the Website. We may also use these Cookies to test new pages, features, or new functionality of the Website to see how our users react to them.

Use of Your Personal Data

The School may use Personal Data for the following purposes:

- **To provide and maintain our Website**, including to monitor the usage of our Website.
- **To manage Your Submissions** as a user of our Website or Web Services. The Personal Data You provide can give You access to different functionalities of our Website and Web Services or to different School services.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication pertaining to your inquiries or (assuming You have enrolled your student with the School) to other programs/events associated with the School that you have registered for. Such programs/events are voluntary or opt-in programs unless otherwise specified at the time of registration. To opt-out of such communications, you may contact Us using the information found in the Contact Us section of this Privacy Policy.
- **To provide You** with news and general information about other programs, services, and events which We offer that are similar to those that You have already enrolled in or inquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **To deliver targeted advertising to You:** We may use Your Usage Data to develop and display content and advertising to you after you visit our website. Usage Data does not include contact information, such as phone numbers, emails, or names. Please review the “Analytics” section of this Privacy Policy for more information (see also “Google Analytics” and “Google AdWords”).
- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our Website, programs, marketing, and user experiences.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with our Service Providers in order to provide you with certain services that you have requested, to monitor and analyze the use of our Website or Web Services (e.g., online learning programs), or to advertise on third party websites to You after You visited our Website (e.g., Google AdWords). Note that contact information (e.g., phone numbers, email addresses) is not shared with third parties for marketing or advertising purposes, but may be shared with Service Providers in order for You to be provided with services that You have requested through the School. You may opt out of these services and any related communications at any time.
- **With partners:** We may share Your information with Our business or organizational partners to offer You or your student certain services that You have requested through the School. You may opt out of these services and any related communications at any time.
- **With other users:** when You share personal information or otherwise interact in public areas (both online or offline) with other persons/users, such information may be viewed by all persons/users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

Retention of Your Personal Data

The School will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain Your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The School will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Website or Web Services, or when We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the School's operating offices and in any other places where the parties involved in the processing are located. This means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your Submission of such information represents Your agreement to that transfer.

The School will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data

will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Deleting Your Personal Data

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You.

You may contact Us to request access to, correct, or delete any personal information that You have provided to Us.

Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

Please review the section of this Privacy Policy entitled “Family Educational Rights and Privacy Act (FERPA)” for more information on how these rights pertain to or may differ with regards to educational records.

Disclosure of Your Personal Data

Law enforcement

Under certain circumstances, the School may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The School may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the School
- Prevent or investigate possible wrongdoing in connection with Our Website or Web Services
- Protect the personal safety of Users of Our Website/Web Services or the public
- Protect against legal liability

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

Detailed Information on the Processing of Your Personal Data

The Service Providers We use may have access to Your Personal Data. These third-party vendors collect, store, use, process and transfer information about Your activity on Our Website or Web Services in accordance with their Privacy Policies.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Website and Web Services.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Website. This data is shared with other Google Websites. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made Your activity on the Website available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>

SchoolPathways

SchoolPathways is a Student Information System (SIS) that supports schools with managing student data, educational records, enrollments, and communications.

Their Privacy Policy can be viewed at

<https://schoolpathways.com/about-school-pathways/k12-privacy-pledge/>

Opt-In Email and SMS Communications

Should You choose to enroll Your child with Compass Charter Schools, You may receive periodic newsletters, marketing, or promotional materials and other information that may be of interest to You or Your child. Should You wish to not be contacted in this way, You may opt-out of receiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send or by contacting Us via the information provided in the Contact Us section of this Privacy Policy.

We use the following Email Marketing Service Providers to manage and send emails or notifications to You.

ParentSquare

ParentSquare is a mass notification and social networking system for schools. It supports schools with maintaining communications with students, parents, and families. Their Privacy Policy can be viewed at

<https://www.parentsquare.com/privacy/>

Should You choose to enroll Your child with Compass Charter Schools, You may receive periodic phone calls or SMS notifications (i.e., text messages) from Your child's teacher or other school staff pertaining to Your child's progress in Our educational programs and any other pertinent information. Should You wish to not be contacted in this way, You may opt-out of receiving any, or all, of these communications from Us by contacting Your child's

teacher or by contacting Us via the information provided in the Contact Us section of this Privacy Policy.

Behavioral Remarketing

The School uses remarketing Websites to advertise to You after You accessed or visited our Website. We and Our third-party vendors use cookies and non-cookie technologies to help Us recognize Your Device and understand how You use our Website so that We can improve our Website to reflect Your interests and serve You advertisements that are likely to be of more interest to You.

These third-party vendors collect, store, use, process and transfer information about Your activity on Our Website in accordance with their Privacy Policies and to enable Us to:

- Measure and analyze traffic and browsing activity on Our Website
- Show advertisements for our products and/or Websites to You on third-party websites or apps
- Measure and analyze the performance of Our advertising campaigns

Some of these third-party vendors may use non-cookie technologies that may not be impacted by browser settings that block cookies. Your browser may not permit You to block such technologies. You can use the following third-party tools to decline the collection and use of information for the purpose of serving You interest-based advertising:

- The NAI's opt-out platform: <http://www.networkadvertising.org/choices/>
- The EDAA's opt-out platform <http://www.Youronlinechoices.com/>
- The DAA's opt-out platform: <http://optout.aboutads.info/?c=2&lang=EN>

You may opt-out of all personalized advertising by enabling privacy features on Your mobile device such as Limit Ad Tracking (iOS) and Opt Out of Ads Personalization (Android). See Your mobile device Help system for more information.

We may share information, such as hashed email addresses (if available) or other online identifiers collected on Our Website with these third-party vendors. This allows Our third-party vendors to recognize and deliver You ads across devices and browsers. To read more about the technologies used by these third-party vendors and their cross-device capabilities please refer to the Privacy Policy of the vendors listed below.

The third-party vendors We use are:

Google Ads (AdWords)

Google Ads (AdWords) remarketing Website is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page:

<http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on -

<https://tools.google.com/dlpage/gaoptout> - for Your web browser. Google Analytics

Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>

Usage, Performance and Miscellaneous

We may use third-party Service Providers to maintain and improve our Website.

Invisible reCAPTCHA

We use an invisible captcha Website named reCAPTCHA. reCAPTCHA is operated by Google.

The reCAPTCHA Website may collect information from You and from Your Device for security purposes.

The information gathered by reCAPTCHA is held in accordance with the Privacy Policy of Google: <https://www.google.com/intl/en/policies/privacy/>

"Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our Website does not respond to Do Not Track signals.

However, some third party websites do keep track of Your browsing activities. If You are visiting such websites, You can set Your preferences in Your web browser to inform websites that You do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of Your web browser.

Family Educational Rights and Privacy Act (FERPA) Statement

The Family Educational Rights and Privacy Act or FERPA provides certain rights for Parents regarding their children's educational records. "Education Records" are generally defined as records that are directly related to a student and maintained by an educational agency or institution or by a party acting for the agency or institution. A "Parent" refers to a parent of a student and includes a natural parent, a guardian, or an individual acting as a parent in the absence of a parent or a guardian.

In accordance with FERPA, the School will provide a parent with an opportunity to inspect and review their child's education records within a reasonable period of time, but not more than 45 calendar days following receipt of a request.

Parents may request an amendment or correction of their child's education records that the parent believes to be inaccurate, misleading, or in violation of the child's rights of privacy. In such instances, the School is not required to amend an education record, but will alert the parent of the decision and reason for the decision.

When a student reaches 18 years of age, they become and are referred to as an "Eligible Student" and all rights under FERPA transfer from the parent to the student.

The School will typically not disclose Personal Identifying Information (PII) from a student's education records to a third party unless the student's parent has provided prior written consent. However, there are a number of exceptions. PII may be released:

- To School officials, including teachers, in order to conduct School-related business.
- To another school where the student seeks to enroll.
- If the information is regarded as "Directory Information" or information in a student's Educational Record that would not generally be considered harmful for an invasion of privacy if disclosed.
- To the parents of a "Dependent Student" (including Eligible Students) or a student claimed as a dependent on the parent's most recent tax return.
- To State or local educational authorities in connection with an audit, program evaluation, or compliance enforcement.
- To a representative of a State or local child welfare agency or Tribal organization regarding a child in foster care.
- To State and local officials pursuant to a statute concerning the juvenile justice system.
- To organizations conducting studies for, or on behalf of, the School for specified purposes including improving instruction.
- To comply with a judicial order or lawfully issued subpoena.
- In connection with a health or safety emergency.

For more information about FERPA, You may review the U.S. Department of Education's guide for Parents here: <https://studentprivacy.ed.gov>

If You need to contact the School with to a FERPA related inquiry or request, You may do so using the information listed in the Contact Us section of this Privacy Policy.

Children's Online Privacy Protection (COPPA) Statement

The Website may contain content appropriate for children under the age of 13. As a parent, You should know that through our Website or Web Services children under the age of 13 may participate in activities that involve the collection or use of personal information. We use reasonable efforts to ensure that before we collect any personal information from a child, the child's parent receives notice of and consents to our personal information practices.

We also may limit how We collect, use, and store some of the information of Users between 13 and 18 years old. In some cases, this means We will be unable to provide certain functionalities or services associated with our Website or Web Services to these Users. If We need to rely on consent as a legal basis for processing Your information, We may require Your parent's consent before We collect and use that information.

We may ask a User to verify their date of birth before collecting any personal information from them. If the User is under the age of 13, certain Web Services may be blocked or redirected to a parental consent process.

Information Collected from Children Under the Age of 13

The School may collect and store persistent identifiers such as cookies or IP addresses from Children without parental consent for the purpose of supporting the internal operation of the School, Website, or Web Services.

We may collect and store other personal information about children if this information is submitted by a child with prior parent consent or by the parent or guardian of the child.

The School may collect and store the following types of personal information about a child when submitted by a child with prior parental consent or by the parent or guardian of the child:

- First and/or last name
- Date of birth
- Gender
- Grade level
- Email address
- Telephone number
- Parent's or guardian's name
- Parent's or guardian's email address

For further details on the information We might collect, You can refer to the "Types of Data Collected" section of this Privacy Policy. We follow our standard Privacy Policy for the disclosure of personal information collected from and about children.

Parental Access

A parent who has already given the School permission to collect and use their child's personal information can, at any time:

- Review, correct or delete the child's personal information
- Discontinue further collection or use of the child's personal information

To make such a request, You can write to Us using the contact information provided in this Privacy Policy.

Please review the section of this Privacy Policy entitled "Family Educational Rights and Privacy Act (FERPA)" for more information on how these rights pertain to or may differ with regards to educational records.

For more information about COPPA, You may visit the Federal Trade Commission's website here: <https://www.ftc.gov/business-guidance/privacy-security/childrens-privacy>

Children's Internet Protection Act (CIPA) Statement

In accordance with CIPA requirements, the School takes precautions to block or filter access to media (e.g., pictures, videos, text) that may be deemed unsuitable for students under the age of 18. In alignment with this policy, and when deemed appropriate and feasible, the

School may need to monitor the online activities of minors when they use the School's associated Web Services or devices managed by the School. The School also makes efforts to educate students about appropriate online behavior, including interacting with other individuals on social networking websites and in chat rooms, and cyberbullying awareness and response.

While the School is able to exercise reasonable control over content created and purchased by the School, it has limited control over content accessed via the internet and no filtering system is 100% effective. Neither the School nor its staff shall be responsible for the failure of any technology protection measures, violations of copyright restrictions, or user mistakes, misuse or negligence.

For more information about these measures and policies, please consult with the most up-to-date Compass Charter Schools Acceptable Use Policy Agreement and the Compass Charter Schools Scholar Handbook available on Our Website.

Compass Charter Schools utilizes the following security and filtering services to protect students by blocking undesirable content and monitoring online behaviors:

LineWize by Qoria

LineWize offers an advanced network and content filtering system to help enforce school policy and keep students from accessing inappropriate content. Their Privacy Policy can be viewed at <https://qoria.com/privacy>

For more information about CIPA, You may visit the Federal Communications Commission's website here: <https://www.fcc.gov/consumers/guides/childrens-internet-protection-act>

Links to Other Websites

Our Website or Web Services may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party Websites or Web Services.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Website, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If You have any questions about this Privacy Policy, You can contact us:

By email: itteam@compasscharters.org

By visiting this page on our website: <https://www.compasscharters.org/contact/>

By phone number: 855-937-4227

By mail: 850 Hampshire Road, Suite R, Thousand Oaks, California 91361