

## Privacy

# Scholastico privacy policy

This policy effective April 4, 2019.

At Scholastico, we are committed to protecting your privacy and collecting only the minimum amount of information needed to provide our software and services (referred to as “Services”). Our goal is to have the best and the most understandable privacy policy possible.

Your use of the Services indicates you agree to this policy and our terms of use. (<https://scholastico.com/terms-and-conditions/>)

## Summary

Nothing in this policy contradicts the following statements:

1. We collect only the minimal amount of personally-identifiable information in order to provide our Services.
2. We do not sell or give your personal info to advertisers or other third parties.
3. We share your personal info only when legally required, or when reasonably necessary to prevent harm in an emergency situation.
4. We retain your personal info for no more than 30 days after you request deletion.

## Complete privacy policy

As used in this policy, “Personal Info” is data that can identify a particular person. Aggregate data isn’t considered Personal Info.

1. Scholastico never collects your Personal Info except in ways you would expect: to communicate with you and to provide our Services

To improve the Services and your experience on our site, we may collect aggregate usage data from the Services and our website, including number of page views, visitor browser types, operating systems, or the links clicked to navigate to and from our site. We use Google Analytics to understand how customers find and use our websites. Most browsers allow you to refuse cookies or disable them, you can find out more here (<http://www.civicuk.com/cookie-control/browser-settings>). Or check your browser preferences.

We use Braintree Payments (a PayPal company) to process payments. Scholastico does not store your credit card or billing information. Your payment information and email are subject to their respective privacy policies. <https://paypal.com/privacy> (<https://paypal.com/privacy>)

We use MailChimp to manage our newsletter and other email lists. There's no third-party tracking in messages we send through MailChimp besides MailChimp's own analytics, which may aggregate how many subscribers open a message or click the links inside. MailChimp's privacy policy is available at <http://mailchimp.com/legal/privacy> (<http://mailchimp.com/legal/privacy>).

You can unsubscribe from our newsletter by clicking on the unsubscribe link provided at the end of the newsletter. You can also email [info@scholastico.com](mailto:info@scholastico.com) to update your email address, or to request that we delete your email.

We use administrative, technical, and physical safeguards to protect information in our possession and control against foreseeable hazards. This may include collecting data such as geographic location or IP address if necessary to prevent unauthorized password resets or to protect your data against attacks or intrusions.

## 2. Scholastico never sells your email address or any other Personal Info you volunteer

We don't receive payment in cash or in kind from third parties in exchange for your Personal Info.

## 3. Scholastico shares your Personal Info only in specific circumstances

There are a few, rare circumstances when we may have to share your Personal Info either to obey the law or protect our rights. We'll share your Personal Info only to comply with laws or legally enforceable requests, to enforce our own rights and contracts with users or third parties, or to prevent harm to others and their property in an emergency situation. We are required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In all instances, we'll share the minimum info necessary to meet the immediate need and inform you of our disclosure when legally and practically possible.

## 4. Scholastico retains the Personal Info you volunteer for one month or less

We remove your Personal Info from our records within 30 days of any request to do so. In most cases, you can easily and immediately purge your own data from our system.

## **Types of Scholastico Users**

We have two types of users, and we treat their data differently. This is important, since many of our users are children. This section will explain the difference between *Scholastico Customers* and *End Users of our Services (including children)*.

### Scholastico Customers and potential customers

Many of our clients are schools. Our customers are usually an adult, such as a principal or secretary who signs up their school for Scholastico services.

When a customer signs up for Scholastico services or requests additional information, we collect the minimum amount of personally-identifiable information in order to communicate with them and (if needed) process their payments.

We use Google Analytics on our public-facing websites (such as [scholastico.com](http://scholastico.com) and [ecoballot.com](http://ecoballot.com)) in order to understand the needs of our clients and potential customer and to improve the design of our websites. You may opt out of Google Analytics Visitors to our public-facing website can opt out of having any data collected by using the Google Analytics Opt-out Browser Add-on (<http://tools.google.com/dlpage/gaoptout?hl=en>). Opting out of Analytics will not negatively affect your use of our public-facing websites. For more information, see the Google Analytics privacy policy (<http://www.google.com/intl/en/policies/privacy/>).

We use WordPress on our public-facing blogs and help files in order to allow commenting and discussion. Wordpress users who comment on our blogs may be subject to the WordPress privacy policy. (<https://wordpress.org/about/privacy/>)

End users of the Scholastico Services, including children

When a customer configures their Services, they may create accounts for other users. These typically include “admins” or “sub-admins” – trusted people, like a school secretary or student government president, who will help administer the use of the Services. These accounts hold a minimum of Personal Info to provide authentication; typically only name, username, and email address.

When a customer or their sub-admin configures their Services, they will create accounts for end users. These typically include accounts for students, parents, teachers, voters, or other users. These accounts use the minimum amount of personally identifiable data possible in order to provide the services.

Scholastico does not use Google Analytics or any other type of data analysis on the end users of our services. We do not retain tracking information or usage patterns of end users.

Scholastico does not collect data about end users or ask end users for additional information aside from the requested Services. We do not request, prompt or encourage end users to provide any additional information about themselves.

The data stored in Scholastico about the end users is provided by the Customer or the sub-admin. It is owned by the Customer. Scholastico will not use it except to provide requested Services.

The data about end users can be easily purged by the Customer at any time, using the available purge tools. Purged data is not retained.

End user data will never be shared with any third party, except in rare circumstances as outlined in section 3, above.

# Data collected about children

Since Scholastico products (including Ecoballot and PTC) are designed for use in schools, users (such as voters) will often be children. Ecoballot clients may create voter or sub-administrator accounts for use by anyone, regardless of age. The small amount of personally-identifiable information (name, username, and password) collected for voters and the more detailed information collected for candidates is not collected by Ecoballot, and is not submitted by children. Rather, it is provided by the client school or its sub-administrators. Scholastico clients (schools and organizations) collect, own and control the information they upload to the Scholastico database, and can easily delete (or “purge”) this information at any time. If their organizational rules require them to store voter information, they may also store the data in their Ecoballot account as long as their accounts remain active and their annual subscription is paid. Ecoballot makes every effort to maintain the data in the same state in which it was provided. Maintenance of this data is part of the service provided by Ecoballot to its subscribers.

If an Ecoballot client wishes to conduct a school election using a ballot that displays personally identifiable information about a candidate who is a child, Ecoballot recommends getting parental permission before you collect the information. You should attempt to understand your local rules and regulations regarding the collection and display of information about a child.

## Specific Data Collected

In order to contact and bill customers, we typically collect their name, email address, billing address, details about their school or organization, and time zone.

In order to provide the Services, the customers will typically upload this personal information about their end users:

**Ecoballot Voting Services:** voter name, voter email, candidate name (and optionally, additional candidate information such as photo or biography)

**After-School Activity Services:** student name, student grade level, parent name, parent email

**Parent-Teacher Conference Services:** student name, parent name, parent email, teacher name, teacher email

**Student-Teacher Feedback Survey Services:** student name, student email, teacher name, teacher email

In addition, Customers will typically add non-personally identifiable information such as course names, course identification numbers, household identification numbers, or usernames. It is the responsibility of the Customer to ensure that the data they are using were collected in compliance with local regulations.

## Changes to this policy

We may make small, inconsequential changes to this policy with or without notice to you, so you're encouraged to review the policy from time to time. Substantive changes to this policy will be emailed to users who subscribe to the Scholastico newsletter or to those who submit a

request to [info@scholastico.com](mailto:info@scholastico.com)

If Scholastico becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice before personal information is transferred and becomes subject to a different privacy policy.

## **Contact**

You can contact us at [info@scholastico.com](mailto:info@scholastico.com) if you have any questions about this policy.

## **How Scholastico Complies with the EU-US Privacy Shield Framework and the EU General Data Protection Regulation**

Scholastico complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Scholastico has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/> (<https://www.privacyshield.gov/>)

In compliance with the Privacy Shield Principles, Scholastico commits to resolve complaints about our collection or use of your personal information. EU or Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Scholastico at: [info@scholastico.com](mailto:info@scholastico.com)

Scholastico has further committed to refer unresolved Privacy Shield complaints to the EU data protection authorities (DPAs). The EU DPAs are independent public authorities that supervise, through investigative and corrective powers, the application of the data protection law. If you do not receive timely acknowledgment of your complaint from Scholastico, or if we have not addressed your complaint to your satisfaction, please contact or visit the DPA in the EU Member State where you or your company are based for more information or to file a complaint. The services of the EU DPA are provided at no cost to EU members. There exists the possibility, under certain conditions, for an individual to invoke binding arbitration when other dispute resolution procedures have been exhausted.

Scholastico is subject to the investigatory and enforcement powers of the United States Federal Trade Commission (FTC).

Our privacy policy informs you about our information practices. Our website has our contact information clearly displayed. We only use data for the purposes our users would expect. We do not disclose data to any third parties, except as outlined in our policy, above. We may need to share your Personal Info to comply with laws or legally enforceable requests, to enforce our own rights and contracts with users or third parties, or to prevent harm to others and their property in an emergency situation. We are required to disclose personal information in

response to lawful requests by public authorities, including to meet national security or law enforcement requirements. As Scholastico does not plan to transfer personal information to third parties, the provision of the EU GDPR regarding liability for the actions of agent processors does not apply because we do not disclose data to any third parties, except as outlined in our policy, above. Scholastico acknowledges the potential liability in cases of onward transfers to third parties of personal data of EU or Swiss individuals received pursuant to Privacy Shield.

In all instances, we'll share the minimum info necessary to meet the immediate need and inform you of our disclosure when legally and practically possible.

Scholastico takes reasonable precautions to protect data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, including administrative, technical, and physical safeguards.

We use the minimal amount of personally identifiable data possible in order to conduct our services. The data we collect will only be processed for the purpose indicated at the time of collection, chiefly to contact you. The data provided to Scholastico by our customers will only be processed to provide the expected services.

Scholastico customers can access their information at any time through the dashboard on their account, and can update or edit it as needed. They can delete all or part of their data with convenient data purge tools.

We do not collect or store or use any "HR Data," that is, data about Scholastico employees. Any HR Data that is used (for example, teacher's name for parent conferences or names of voters in a company election) is provided by the client school or organization and can be purged by them at any time.

We collect no data that is considered sensitive, including personal information specifying medical or health conditions, personal sexuality, racial or ethnic origin, political opinions, religious, ideological or trade union-related views or activities, or information on social security measures or administrative or criminal proceedings and sanctions.

Scholastico has established internal mechanisms to verify its ongoing adherence to its Privacy Policy. Scholastico encourages individuals affected by its Privacy Policy to raise any concerns about the processing of their personal information by contacting Scholastico at the address indicated in the Privacy Policy, by emailing [info@scholastico.com](mailto:info@scholastico.com), or by using the Contact Us feature of the Scholastico website. Scholastico will seek to resolve any concerns as quickly as possible.

## **How Scholastico Complies with COPPA (Children's Online Privacy Protection Act)**

Scholastico provides some services to schools, such as student government election ballots or student-teacher feedback surveys which may be used by children. Most Scholastico services end users are teachers, parents, or school employees. Scholastico customers (as defined in our privacy policy) own and control the information about the end users at their school, including data about children. We use the minimal amount of personally identifiable data possible in

order to conduct our services. For children, we may store their name, email address, grade level, and information about the teachers they have or the classes they take. This information is provided by our customers (not by children directly) and only used to provide the services our customers expect. The Personal Info data we store is *about* children, provided by adults, and not data *from* children.

Scholastico provides Services for the use and benefit of the school (or organization, if the customer is not an educational institution.) We do not use the Personal Info for any other commercial purpose or share it with any third party. We presume that the school's authorization for the collection and use of their students' Personal Info is based on the school having obtained the parents' consent. The types of data collected are outlined in our privacy policy, which is publicly available. In addition, our help files give a more detailed technical description of the data we collect and are also publicly available. We encourage schools to share the link to our privacy policy with their school community.

The Services used by end users, including children, are accessed via a password or authentication token and are not open to the general public. We do not use cookies or other types of tracking mechanisms on these Services. Children do not need to visit our public-facing website in order to use the Service.

The data submitted by children are stored in aggregate, and not visibly connected to their names or accounts. The votes children cast in school elections are usually (depending on the school's election rules and regulations) completely anonymous. The feedback they provide to teachers is designed to be anonymous. Students are not intended to include their names or other Personal Info on feedback they submit to their teachers. This data is shared with the teacher, and (depending on the school's feedback policies) with the school administration. It is not shared with any third parties or used for any purpose other than as expected by the customer.

Scholastico's customers are in charge of collecting, maintaining, and uploading the data to Scholastico's servers.

Scholastico takes reasonable precautions to protect data from loss, misuse, and unauthorized access, disclosure, alteration and destruction, including administrative, technical, and physical safeguards.

Scholastico customers can access their information at any time through the dashboard on their account, and can update or edit it as needed. They can delete all or part of their data with convenient data purge tools.

For more information, please visit <https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions> (<https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions>)

## **Data collected about sub-administrators of Ecoballot clients**

Ecoballot clients may create sub-administrators. This allows them to delegate tasks such as creating or running elections. During the creation of these accounts, a small amount of PII may be uploaded by the client. This is typically limited to the sub-administrator's first and last name, email address, and username. This information is used by the Ecoballot client to manage and contact their sub-administrators. Ecoballot does not use this information to contact sub-administrators directly or provide this information to third parties, including advertisers.

## **Data collected about voters and candidates**

Ecoballot clients and their sub-administrators may upload lists of data or create accounts individually for voters and candidates. The PII stored for voters is limited to first name, last name, username and password. The first and last name are optional, and may be omitted by clients with privacy concerns.

Ecoballot clients will frequently upload detailed PII on behalf of candidates. The ballots may include detailed biographies, photographs, names, contact information, and other personal information. Typically, the security of such elections is such that this information is only available to voters, and not shared with the public or any third parties. Ecoballot and its employees will not disclose ballot information or share it with any other third party.

## **Informing parents of candidates in school elections**

To fully inform parents, we recommend that you print the ballot or create an electronic copy in a format such as PDF, so that you can provide the parents of the child candidate with all the information that will be displayed on the ballot. You should inform the child's parents about the scope of the election, the number of voters who will see the ballot, and the method in which the winners will be announced. You may wish to get the parents and the candidate to sign the copy of the ballot itself. This will also ensure that there are no embarrassing typographical errors which might cause problems during the election.

## **Google Analytics and your privacy**

Ecoballot uses Google Analytics to help improve the main information site and help file. Visitors to Ecoballot.com who have javascript enabled are tracked using Google Analytics. Ecoballot employees can view a variety of reports about how visitors interact with our website so they can improve it. Google Analytics collects information anonymously. It reports website trends without identifying individual visitors.

Google Analytics collects the following types of information from users:

- Type of user agent (web browser) used, software manufacturer and version number.
- Type of operating system
- Screen colors (color processing ability of the user's screen)
- Javascript support
- Flash version
- Screen resolution



- Network location and IP address, including country, city, state, region, county, or any other geographic data.
- Hostname
- Bandwidth (internet connection speed)
- Time of visit
- Pages visited
- Time spent on each page of the website
- Referring site statistics
- The website (URL) the user came through in order to arrive at this website (example: clicking on a hyperlink from Yahoo.com that took the user to this website)
- Search engine query used (example: typing in the phrase “Online voting for schools” into a search engine like Google, and clicking on a link from that search engine)

This data is primarily used to optimize our website for our visitors.

This data DOES NOT include any personally-identifiable information (PII) such as:

- Names
- Phone Numbers
- Email Addresses
- Mailing Addresses
- Social Security Numbers
- Bank Account Numbers
- Credit Card Information

## **Opting out of Google Analytics**

Website visitors to the public-facing pages of Scholastico or Ecoballot can opt out of having any data collected by using the Google Analytics Opt-out Browser Add-on (<http://tools.google.com/dlpage/gaoptout?hl=en>).

## **Google Analytics on election ballots**

Ecoballot does not use Google Analytics or any form of tracking on the ballots used for elections. However, we allow our clients and their sub-administrators the ability to edit the footers of these ballots. They may choose to use their own analytics systems to track voting results. Typically, this tracks technical information but not personally-identifiable information.

## **Use of cookies**

All of the functions of Scholastico, including Ecoballot, are designed to work properly even if a visitor or client has cookies disabled. Ecoballot uses cookies minimally; specifically to track the length of time that a PHP session is in use, in order to keep our clients signed in while they are working on ballot design

## Testimonials

We only post customer testimonials on our web site after removing all personally identifiable information aside from first name. If you want your testimonial removed please contact us at [info@scholastico.com](mailto:info@scholastico.com)

## Social Media Features and Widgets

Our public-facing web sites and blogs include social media features, such as the Facebook Like button and widgets, such as the “Share this” button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it. The pages used by Scholastico End Users, including children, do not include such social media features or widgets.

## Further reading

For more details, you may wish to consult:

- Fair Information Practice Principles ([http://www.ecoballot.com/help/FTC\\_Fair\\_Information\\_Practice\\_Principles.pdf](http://www.ecoballot.com/help/FTC_Fair_Information_Practice_Principles.pdf)), June 2007. This document is released to the public domain by the United States Federal Trade Commission.
- How to Comply with the Children’s Online Privacy Protection Rule (<http://www.ecoballot.com/help/childrens-online-privacy-protection-rule.pdf>), August 2000. This document is released to the public domain by the United States Federal Trade Commission.
- Data Protection in the European Union (English) ([http://www.ecoballot.com/help/Data\\_Protection\\_in-the-EU\\_English.pdf](http://www.ecoballot.com/help/Data_Protection_in-the-EU_English.pdf)), May 2001.
- Best Practices for Online Service Providers (<http://www.eff.org/wp/osp>), from the Electronic Frontier Foundation.
- Google Analytics Privacy Overview (<http://www.google.com/intl/en/analytics/privacyoverview.html>)

This information was last updated on April 3, 2018



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