

**PRIVACY POLICY**

This Privacy Policy governs the manner in which Barnstable Academy (“Barnstable,” “we,” “us,” “our”) collect, use, and disclose information when you use our website at barnstableacademy.com (the “Site”), including all content, information, and functionality available through the Site, and through the use of any other Barnstable products, services, or offerings, including student learning experiences (hereinafter collectively referred to as the “Services”). Barnstable works to maintain a high standard of data privacy in accordance with your data protection rights under applicable law. The protection and proper use of the personal information that you entrust to us is a responsibility that we take seriously.

**Your acceptance of these terms**

By using our Services, including the Site, you agree to accept the terms of this Privacy Policy as they may be amended from time to time. This Privacy Policy applies to all users of the Services. By providing information to Barnstable, you understand and consent to the collection, maintenance, processing, and transfer of such information in and to the United States and other countries and territories, in accordance with United States law. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.

**Collection, Use, and Sharing of Personal Information**

In order to provide our Services and fulfill other purposes as outlined below, we need to collect and process some information. “Personal Information” is information that is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal information does not include de-identified or aggregated information, which is information in which identifiable information is removed and cannot reasonably be used to identify an individual. We may use de-identified or aggregated information for any purpose, and we may share de-identified or aggregated demographic information not linked to you with our business partners, affiliates, and advertisers. Please see the following disclosure regarding what we may collect, use, and share:

<b>Categories of Personal Information that may be Collected (preceding 12 months)</b>	<b>Category of Sources From Which that Information was Collected</b>	<b>The Business or Commercial Purpose(s) for Which the Information was Collected</b>	<b>The Categories of Third Parties with Which we may share the Personal Information</b>
Identifiers, such as your name, postal address, unique personal identifier, internet protocol address, and email address.	Consumers provided this information directly to us or automatically through their interaction with our products or services, and marketing partners.	<ul style="list-style-type: none"> <li>• to provide our products and services;</li> <li>• to improve the quality, safety, and security of our products and services;</li> <li>• to administer your account(s) and process your payments for products and services;</li> <li>• to operate our websites and applications, including online registration processes;</li> <li>• to develop new products and services;</li> <li>• to customize and improve communication content;</li> <li>• to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity; and</li> <li>• to debug to identify and repair errors that impair existing intended functionality.</li> </ul>	Our service providers, including marketing partners.

<p>Categories of Personal Information described in Cal. Civ. Code § 1798.80(e), such as bank account number, credit card number, debit card number or any other financial information (loan provider), and medical information.</p>	<p>Consumers provided this information directly to us.</p>	<ul style="list-style-type: none"> <li>• to provide our products and services;</li> <li>• to improve the quality, safety, and security of our products and services;</li> <li>• to administer your account(s) and process your payments for products and services;</li> <li>• to operate our websites and applications, including online registration processes;</li> <li>• to develop new products and services;</li> <li>• to customize and improve communication content;</li> <li>• to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity; and</li> <li>• to debug to identify and repair errors that impair existing intended functionality.</li> </ul>	<p>Our service providers, including marketing partners.</p>
<p>Protected classification characteristics under California or federal law, such as age (40 years or older), color, national origin, citizenship, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, sexual orientation, and veteran or military status).</p>	<p>Consumers provided this information directly to us.</p>	<ul style="list-style-type: none"> <li>• to provide our products and services;</li> <li>• to improve the quality, safety, and security of our products and services;</li> <li>• to administer your account(s) and process your payments for products and services;</li> <li>• to operate our websites and applications, including online registration processes;</li> <li>• to develop new products and services;</li> <li>• to customize and improve communication content;</li> <li>• to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity; and</li> <li>• to debug to identify and repair errors that impair existing intended functionality.</li> </ul>	<p>Our service providers, including marketing partners.</p>
<p>Commercial information, including records of products or services purchased, obtained, or considered or consuming histories.</p>	<p>Consumers provided this information directly to us or automatically through their interaction with our products or services.</p>	<ul style="list-style-type: none"> <li>• to provide our products and services;</li> <li>• to improve the quality, safety, and security of our products and services;</li> <li>• to administer your account(s) and process your payments for products and services;</li> <li>• to operate our websites and applications, including online registration processes;</li> <li>• to develop new products and services;</li> <li>• to customize and improve communication content;</li> <li>• to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity; and</li> </ul>	<p>Our service providers.</p>

		<ul style="list-style-type: none"> <li>• to debug to identify and repair errors that impair existing intended functionality.</li> </ul>	
Internet or other electronic network activity information, including browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.	Consumers provided this automatically through their interaction with our products or services, and marketing partners.	<ul style="list-style-type: none"> <li>• to operate our websites and applications, including online registration processes;</li> <li>• to customize and improve communication content;</li> <li>• to improve the quality, safety, and security of our products and services;</li> <li>• to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity; and</li> <li>• to debug to identify and repair errors that impair existing intended functionality.</li> </ul>	Our service providers, including marketing partners.
Geolocation data.	Consumers provided this automatically through their interaction with our products or services, and marketing partners.	<ul style="list-style-type: none"> <li>• to operate our websites and applications, including online registration processes;</li> <li>• to customize and improve communication content;</li> <li>• to improve the quality, safety, and security of our products and services;</li> <li>• to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity; and</li> <li>• to debug to identify and repair errors that impair existing intended functionality.</li> </ul>	Our service providers, including marketing partners.
Audio, electronic, or visual information.	We collect this information through security systems (i.e. cameras), video conferencing sessions, and marketing videos and photos.	<ul style="list-style-type: none"> <li>• to improve the quality, safety, and security of our products and services; and</li> <li>• to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.</li> </ul>	Our service providers.
Professional or employment-related information.	We collect this information in scholarship applications.	to provide scholarships.	
Education information, defined as information that is not publicly available personally identifiable information	Consumers provided this information directly via the enrollment form	<ul style="list-style-type: none"> <li>• to provide our products and services;</li> <li>• to improve the quality, safety, and security of our products and services;</li> <li>• to operate our websites and applications, including online registration processes;</li> <li>• to develop new products and services; and</li> </ul>	Our service providers.

as defined in the FERPA, 20 USC 1232g.	and personal interactions.	<ul style="list-style-type: none"> <li>to customize and improve communication content.</li> </ul>	
Inferences drawn from other Personal Information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Employees track student progress and behaviors over time.	<ul style="list-style-type: none"> <li>to provide our products and services;</li> <li>to improve the quality, safety, and security of our products and services;</li> <li>to operate our websites and applications, including online registration processes;</li> <li>to develop new products and services; and</li> <li>to customize and improve communication content.</li> </ul>	Our service providers.

In addition, where consistent with applicable laws and regulations, we may disclose Personal Information if such disclosure is:

- necessary to prepare, negotiate or perform a contract with you;
- needed to respond to subpoenas, court orders, or other legal process, or otherwise required by law or competent governmental or judicial authorities;
- necessary to establish or preserve a legal claim or defense;
- part of a corporate restructuring, sale of assets, merger or divestiture; or
- necessary to prevent fraud or other illegal activities, such as willful attacks on our information technology systems.

We will not sell, distribute, or lease your Personal Information to non-affiliated third parties unless we have your permission or are required by law to do so. We also have not and will not sell the Personal Information of minors under 16 years of age to non-affiliated third parties without affirmative consent. We take reasonable steps to ensure that companies with which we share your Personal Information are contractually obligated to keep the Personal Information that we provide to them confidential and to use such information only as we permit.

**Information about Cookies**

We may from time to time contract with third-party vendors to provide ads to our customers on our behalf via the Internet or to send direct mail to customers whom we think may be interested in our products or services. In order to do so, such vendor may collect anonymous information about your visits to our website using a “cookie.” A cookie is a small piece of data that is sent to your browser or mobile device by websites, mobile apps, and advertisements that you access or use. This data is stored on your browser or mobile device and helps websites and mobile apps to remember things about you to improve your experience with the website. Third-party vendors may then pool the anonymous information that they collect from our website with other sources of information, which may include your name and mailing address, for purposes of determining whether you might be interested in receiving direct mail. If you do not wish for cookies to be placed on your computer, most web browsers permit you to prevent that from taking place. Additionally, information about opting out of cookie-based Internet advertising can be found via the following links: <http://optout.networkadvertising.org/> and/or <https://www.neustar.biz/privacy/opt-out>. However, please keep in mind that these technologies are an important part of how the website works; removing, rejecting or limiting the use of cookies or other similar technologies might affect the availability and functionality of the website. To opt-out of receiving our direct mail, you may send us an email at [barnstableprivacy@barnstableacademy.com](mailto:barnstableprivacy@barnstableacademy.com).

## **Rights of EU Data Subjects**

### *Our role as data controller and data processor*

We generally act as the data controller of your Personal Information submitted through the Services. Where we need to collect Personal Information by law or under the terms of an agreement we have with you and you fail to provide that Personal Information when requested, we may not be able to provide you with the Services.

If you are situated in the EU and have any complaints regarding our privacy practices as a data controller, you have the right to make a complaint at any time to your local Supervisory Authority. We would, however, appreciate the chance to deal with your concerns before you approach your Supervisory Authority so please contact us first. Please see our contact details below in the section titled "Contact Us." If you are situated in the EU and have a complaint, please contact us at [barnstableprivacy@barnstableacademy.com](mailto:barnstableprivacy@barnstableacademy.com).

### *Legal basis for our processing of your Personal Information*

We rely on your Personal Information for the legitimate commercial purposes of providing our Services to you, to provide you the best service/product and the best and most secure experience, or to perform our responsibilities under our contractual agreement with you. We also may rely on your consent to collect, use, or disclose your Personal Information. We make sure we consider and balance any potential impact on you (both positive and negative), and your rights before we process your Personal Information. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at [barnstableprivacy@barnstableacademy.com](mailto:barnstableprivacy@barnstableacademy.com).

### *Change of purpose*

We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [barnstableprivacy@barnstableacademy.com](mailto:barnstableprivacy@barnstableacademy.com). If we need to use your Personal Information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that we may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### *Withdrawing your consent*

If we are relying on your consent to process your Personal Information, you have the right to withdraw your consent at any time by contacting us at [barnstableprivacy@barnstableacademy.com](mailto:barnstableprivacy@barnstableacademy.com).

### *Your rights*

Under certain circumstances, you have rights under data protection laws in relation to your Personal Information. You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your Personal

Information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons that we will notify you about, if applicable, at the time of your request.

- Object to processing of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- Request restriction of processing of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise, or defend legal claims; or (d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your Personal Information to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information that you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. To exercise your rights, please contact us at [barnstableprivacy@barnstableacademy.com](mailto:barnstableprivacy@barnstableacademy.com).

### **Rights and Choices of California Consumers**

We provide California consumers with certain rights regarding their Personal Information. This section explains how to exercise those rights. You have a right not to receive discriminatory treatment for exercising these privacy rights.

#### *Right to Know About Personal Information Collected, Used, or Disclosed*

You have the right to request that we disclose certain information to you about our collection, use, and disclosure of your Personal Information over the past 12 months. Once we receive your request and verify your identity, we may disclose to you information such as: (1) the categories of Personal Information we collected about you; (2) the categories of sources for the Personal Information; (3) our business or commercial purpose for collecting or disclosing that Personal Information; (4) the categories of third parties with whom we shared that Personal Information; and (5) the specific pieces of Personal Information we collected about you in the preceding 12 months.

To submit a request to know about Personal Information collected, please either:

- Call 1-800-409-4036
- Use our online form by [clicking here](#).

#### *Right to Delete Personal Information Collected or Maintained*

You have the right to request the deletion of Personal Information we have collected from you and retained, subject to certain exceptions. Once we receive and confirm your request and verify your identity, we will permanently delete your Personal Information from our records, unless a legal exception to deletion applies. In our response to your request to delete, we will specify the manner in which we have deleted your Personal Information or, if we must deny your deletion request, the basis for this refusal.

To submit a request to delete, please:

- Call 1-800-409-4036
- Use our online form by [clicking here](#).

### *Authorizing an Agent*

You may designate an authorized agent to submit your consumer request on your behalf, so long as the authorized agent has your written permission to do so and you have taken steps to verify your identity directly with us.

### *Verifying Your Request*

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify your identity or authority to make the request.

To verify your identity, we ask that you provide us with the following information when you submit your request: (1) first name; (2) last name; and (3) phone number or email. We will use the above information to verify your identity. We will require additional information to verify your identity and fulfill your request depending on your type of request or the information requested by you.

### **Contact Information**

If you have any questions about this Privacy Notice, please contact us at:

Barnstable Academy  
1-800-409-4036  
barnstableprivacy@barnstableacademy.com

### **Security**

The security of your Personal Information is important to us. We use reasonable precautions to protect our customers' Personal Information and to store it securely. However, security risk is inherent in all information technologies, and we cannot guarantee the security of your Personal Information.

### **Children**

The Children's Online Privacy Protection Act ("COPPA") protects the privacy of children under the age of 13. It requires website operators and online services to post privacy policies and obtain parental consent before collecting information from those children. We receive Personal Information about children who are under the age of 13 strictly from their parents or guardians when those children are enrolled in our program. The only information we receive from children is the information they provide as part of their educational program. We do not have any website or online service that asks children under 13

to provide Personal Information. We do not intentionally contact or collect Personal Information from children except as noted above. If you believe that we accidentally received information pertaining to a child under the age of 13, please contact us using the information below.

### **Notification and Changes**

If we change our Privacy Statement, we will post those changes on this page so our users are aware of what information we collect, how we use it and under which circumstances, if any, we disclose it. Users should check this policy frequently to keep abreast of any changes.

This Privacy Policy was last updated on: 8/1/20.