# **Privacy Policy**

Last updated on 6/1/17

Westside Waldorf School values, respects and protects your private information. This privacy policy describes how your "Personally Identifiable Information" is used in its website data collection via <a href="https://www.westsidewaldorf.org">www.westsidewaldorf.org</a> (or <a href="https://www.westsidewaldorf.org</a>). Information gathered is used to better serve prospective families and website users, and is never sold, nor shared with third-parties. However, the school makes use of third-party services and websites in order to conduct its daily business, in which case the sharing and protection of personally identifiable information on such third-party sites and services is described within this policy. By using Westside Waldorf School's website, you are deemed to have consented to the practices described in this policy. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your "Personally Identifiable Information" on our website.

## Collection of Personal Information

Westside Waldorf School shall keep confidential personal information that it collects in order to help it provide information and services relevant to admissions, programs, enrollment and the school in general. We collect information from you when you fill out a web form or enter information on our site, such as for inquiries, admissions, program, donations or school related questions. Westside Waldorf does not record credit card numbers or account numbers.

"Personally identifiable information" refers to details collected online about individual consumers, including first and last names, street address, email address, telephone number, or any other information that permits a specific individual to be contacted via phone, mail or email. For the purposes of Westside Waldorf, the term extends to details such as the prospective student's name, birthdate, gender, and relationship to the prospective student(s), example: guardian and child, that allow us to better serve you. By providing this information to the school, you are deemed to have consented to our using this information, as well as consented to being contacted concerning your inquiry, request or submission.

There is also information about your computer hardware and software that may be automatically collected by Westside Waldorf and Edlio (our web host). This information can include: your IP address,

browser type, domain names, access times and referring website addresses. This information is used by Westside Waldorf or Edlio for the operation of the service, to maintain or improve the quality of the service, and to provide general statistics regarding use of the Westside Waldorf website.

## Use of Personal Information & Third Party Disclosure

Westside Waldorf does not transfer, sell or otherwise share your personal information to outside third parties without your consent, except under the limited conditions described below. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential.

Westside Waldorf uses BigSIS, which is a School Management Software and Student Information System (SIS) for private schools. When you provide us with your personal information, or else inquire, apply to, enroll, or register with the school, the personally identifiable information provided, as well as student records, will be stored on a secure database server (BigSIS). We will use that information at Westside Waldorf or we may transfer it to the same third party database service provider as necessary for the maintenance or backup of the records. Information collected is kept private and helps us to provide you with better customer service, and to offer information, products or services that are relevant to you, as well as contact or solicit you regarding those requests or submissions. Your personal information is contained behind secured networks and is only accessible by a limited number of staff who have special access rights to such systems, and are required to keep the information confidential. Westside Waldorf will only disclose your personal information if required to do so by law, subpoena, or injunction, or in urgent circumstances, such as, but not limited to, those that involve the need to protect an individual's personal safety or rights, the protection of the public, or the protection of Waldorf School's rights or property.

All financial transactions for our website are processed through these gateway providers: PayPal (for donations), Authorize.net (via Eventbrite for purchases or donations), and FACTS (for tuition payments and tuition assistance applications), and therefore financial, credit card and account information are not stored or processed on Westside Waldorf's servers. Online donations may be submitted and are secured via our direct link to PayPal, as well as Authorize.net. Therefore, please refer to PayPal's (<a href="www.paypal.com">www.paypal.com</a>) or Authorize.net's (<a href="www.paypal.com">www.paypal.com</a>) or Authorize.net's (<a href="www.paypal.com">www.paypal.com</a>) or Authorize.net's (<a href="www.paypal.com">www.paypal.com</a>), respective privacy policies for more details concerning the protection of your information while using their services. Families who apply for tuition

assistance, or who enroll in tuition payment plans, will do so through the third-party site FACTS (<a href="www.online.factsmgt.com">www.online.factsmgt.com</a>), and should refer to the Privacy and Security policy as posted on that site concerning protection of your information while using their services.

Westside Waldorf School reserves the right to change, add or use other additional third-party services, as well as payment processing websites, without notice in order to conduct its business. All school-related "personally identifiable information" as provided by you through our gateway providers, including but not limited to PayPal, Authorize.net, Eventbrite, FACTS, Edlio, BigSIS, and other third-party services, which are relevant to your applications, tuition payments, student enrollment, event participation, donations, purchases, or school business that are transmitted to, viewed by, or received by the school, are kept confidential in accordance with the same guidelines that govern our use of private information on our premises as described in this privacy policy. However, information that is processed and stored by third-party sites shall be the responsibility of those sites, and Westside Waldorf therefore has no responsibility or liability for the content, policies, security and activities of any of these sites.

## Internet Security

Westside Waldorf strives to protect your personal information. Because no online transmission can ever be guaranteed as secure, we urge you to be proactive and take every precaution to protect and secure your personal data and your computer when you are online or connected to the Internet. Westside Waldorf will not be liable for any breach of information through westsidewaldorf.org (or wswaldorf.org) or related services as described in this policy.

## Edlio (Host Site) & BigSIS (Database) Security & Privacy

### **Edlio**

Westside Waldorf School's webpage is hosted by Edlio, which means that any "personally identifiable information" (as already described within this policy) entered by site visitors on our web forms is encrypted by Edlio. Edlio's privacy and security measures are summarized below.

Edlio has security measures stipulating that information or data transmitted between Westside Waldorf and the Site and Services will be encrypted using industry-standard technology while stored on Edlio's

systems and servers and while not in active use. Edlio will take reasonable measures to ensure that Client Data is not disclosed except as required or permitted pursuant to the functions of the Site, App, or Services. Edlio and its employees will not access, use or share ["personally identifiable information"] with third-parties. Edlio may use third-party vendors, contractors, service providers, networks, and computer systems to provide services to the Site or App, and to store and transmit Client Data. Any such third-parties will be contractually bound: (i) not to access or use ["personally identifiable information"] except as required to perform services to Edlio; and (ii) not to disclose the same information to any third parties except as required to comply with a judicial order or lawfully issued subpoena, if otherwise authorized by applicable law.

#### **BigSIS**

Site visitors who enter "personally identifiable information" (as already described within this policy) will have that information stored on BigSIS, the school's database service provider so that the school may contact them regarding their query or request, as well as manage queries, applications and enrolled student records. Information on the database is kept private and confidential by Westside Waldorf in keeping with terms described within this policy. BigSIS, Inc.'s privacy and security measures are summarized below.

BigSIS, Inc. is committed to protecting Westside Waldorf's privacy, as well as the privacy of people, students or users whom Westside Waldorf adds into the BigSIS database. BigSIS, Inc. warrants: a) that it will not resell or abuse the school's private information; b) that it will not share any of the school's information, unless mandated by the government. The BigSIS software and database is hosted and runs on secure servers (currently Rackspace servers, but subject to change in order to provide the most secure service) and all our client sites run SSL (https) for both login and data transfer. Sensitive data is encrypted. BigSIS performs regular security assessments on the system and keep the servers up to date with all the latest security patches. The Company also strives to stay in compliance with all federal laws, such as HIPAA, COPPA and FERPA, as they apply to BigSIS.

#### Edlio & BigSIS Disclaimer

Edlio & BigSIS will implement the security measures and procedures as described above, however, no data transmission over the Internet or any wireless network, and no system, data storage or service connected to the Internet, can be guaranteed to be secure. As a result, Edlio, BigSIS and Westside

Waldorf cannot ensure or warrant the security of any information transmitted to or provided to the School, Edlio or BigSIS, and therefore will not be liable for any inability, failure or mistake in doing so.

## Third party links

Westside Waldorf's website may contain links to other websites. These third party sites have separate and independent privacy policies. Please be aware that we are not responsible or liable for the content, activities or privacy practices of such other sites. Westside Waldorf encourages you to learn about the privacy practices and policies of those sites and use them at your own discretion.

### Do Not Track Notice

Westside Waldorf School does not track its visitors over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third party sites and web browsers do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. In such cases, refer to the privacy policy of those sites, browsers or providers.

### Use of Cookies

Westside Waldorf School's website uses "cookies," which are small files that the site or its service provider places on your hard drive through your web browser (if you allow) for identification purposes. Cookies capture and remember certain information and preferences that will improve your experience when re-visiting the website. Cookies cannot read information from your hard drive. They will also not run programs or deliver viruses to your computer. Westside Waldorf reserves the right to use cookies to help compile aggregate data about site traffic and site interaction in order to offer better site experiences and tools in the future. Our webhost, Edlio, may also use this aggregate data to improve its future services and improve future website experiences.

Your web browser may notify you when you are receiving a cookie and it may give you the choice to accept or reject it. You can set your browser (such as Firefox, Google Chrome, Safari, etc.) to warn you about cookies, and to determine if you want to refuse all cookies. If you choose not to accept cookies, some pages or features on this site may not fully function, and/or you may not be able to access certain information on this site.

## **COPPA (Children Online Privacy Protection Act)**

Children under 13 years old are not the target audience for our website. To protect their privacy, Westside Waldorf prohibits the solicitation of personal information from these children.

The Federal Trade Commission, the nation's consumer protection agency, enforces the COPPA Rule, which spells out certain requirements of what operators of websites and/or online services must do to protect children's privacy and safety online. Our website is not directed or marketed to children under 13 years of age.

## Changes to this Privacy Policy

Westside Waldorf reserves the right to change, modify or update this policy at any time without notice. Any substantial changes in the way Westside Waldorf uses your personal information will be posted on this site.

## Unsubscribe

If you disclose your email address, we will keep it in order to communicate regarding school information, community events and announcements. If at any time you would like to unsubscribe from receiving future emails, or request changes to your personally identifiable information, you can email us at admin@wswaldorf.org and we will remove you from all correspondence.

## **Contact Information**

If you feel that Westside Waldorf is not abiding by this privacy policy, you should contact us **via email at businessmanager@wswaldorf.org**.

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