

Privacy Policy

This policy was last updated in April 2019.

This Privacy Policy shall be effective immediately.

This is the web site of gccshool.org, in collaboration with Genesee Community Charter School.

Gccshool.org is an online, shared application system which streamlines the process of applying to charter schools.

This Privacy Policy lets you know how we collect, use, share and protect information that we may gather from gccshool.org, ("Site"). This policy also applies to information that we may collect from you outside of our Site, such as over the phone, by fax, through conventional mail, or by other means. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our site. By using any of the Sites, you agree to accept the terms of this Privacy Policy that are in effect at the time of use, including any provisions pertaining to changes to the Privacy Policy.

What definitions apply to the Privacy Policy?

"Cookie" means small files that a website or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the website's or service provider's systems to recognize your browser and capture and remember certain information.

"Participating School" means a school district, individual public school, charter school or private school which contracts with gccshool.org, for a specific program in which your child is or seeks to be enrolled.

"Site" or "site" means gccshool.org,

What laws generally apply to protect student's data and ensure student privacy?

In addition to New York's Education Law Section 2-d, there are federal laws that are designed to protect student data and prohibit any misuse. The Family Educational Rights and Privacy Act (FERPA) is the foundational federal law on the privacy of students' educational records. It was enacted in 1974 and applies to schools that receive federal funding, which are most public schools and some, but not all, private schools. FERPA safeguards student privacy by limiting who may access student records, specifying for what purpose they may access those records, and detailing what rules they have to follow when accessing the data. FERPA also includes provisions that guarantee a parent's right to access, review and request the correction of their child's educational record. Your child's education records will be protected by the Site, and the

Participating School, as required by the Family Educational Rights and Privacy Act (“FERPA”) and applicable state laws regarding the privacy of student records or PII. We will only disclose education records or provide access to them in compliance with FERPA and applicable state laws, and we will require third parties that contract with us and have access to education records to do the same. We will not use PII to target a student for advertising, sell PII or use PII to create profiles about a student (other than for purposes of the student’s education in a Participating School) when those activities are prohibited by law. We will not use, or will seek permission to use, a student’s PII for purposes unrelated to providing or improving their education where required by law to do so. If any provision of this Privacy Policy conflicts with FERPA or other federal or state law, we will comply with the more protective standard for the education records.

Other applicable laws are the Protection of Pupil Rights Amendment (PPRA) which defines the rules states and school districts must follow when administering tools like surveys, analysis, and evaluations funded by the US Department of Education to students, and the Children’s Online Privacy Protection Rule (COPPA) which imposes certain requirements on operators of websites, games, mobile apps or online services directed to children under 13 years of age, and on operators of other websites or online services that have actual knowledge that they are collecting personal information online from a child under 13 years of age.

What personal information do we collect from the people that visit our Site?

When registering on our site, as appropriate, you may be asked to enter your name, email address, mailing address, phone number or other details to help you with your experience.

The information we collect on or through our site may include:

- Information that you provide by filling in forms on our Site. This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting services. We may also ask you for information when you report a problem with our Site.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your search queries on the Site.

Users can visit our Site anonymously.

What information do we collect through automatic data collection technologies?

As you navigate and interact with our Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Site, including traffic data, location data, and other communication data and the resources that you access and use on the Site.

- Information about your computer and internet connection, including your IP address, operating system and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party sites or other online services (behavioral tracking). The information we collect automatically is statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Site and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Site according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Site.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site.
- Flash Cookies. Certain features of our Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Site. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Web Beacons. Pages of the Site may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an e-mail and for other related site statistics (for example, recording the popularity of certain site content and verifying system and server integrity).

We do not collect personal Information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

When do we collect information?

For each visitor to our Site, our web server automatically recognizes the consumer's domain name and e-mail address (where possible).

We collect the domain name and e-mail address (where possible) of visitors to our web page, the e-mail addresses of those who register for an account with the Site, the e-mail addresses of those who communicate with us via e-mail, the e-mail addresses of those who make postings to

our chat areas, aggregate information on what pages consumers access or visit, user-specific information on what pages consumers access or visit, information volunteered by the consumer, such as survey information and/or site registrations, name and address, telephone number, fax number.

We also collect information from you when you subscribe to a newsletter, respond to a survey, create an account, fill out a form on our Site or enter information on our site.

How do we use your information?

We may use the information we collect from you when create an account, sign up for our newsletter, respond to a survey or marketing communication, surf the Site, provide information to SchoolMint, or use certain other site features in the following ways:

- To present our Site and its contents to you.
- To administer a contest, promotion, survey or other site feature.
- To ask you for ratings and reviews of services or products.
- To follow up with user(s) after correspondence (live chat, email or phone inquiries).
- To provide you with information that you request from us.
- To notify you about changes to our Site or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Site.
- In any other way we may describe when you provide the information.
- To fulfill any purpose for which you provide it.
- For any other purpose with your consent.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

If you wish to correct your information or if you no longer wish to receive communication from us, please let us know by sending us an email, calling us or writing to us at the address listed at the bottom of this Policy.

If you are concerned about how your information is used, you should check back at our Site periodically, we will post the policy changes to our Site to notify you of these changes and we will use for these new purposes only data collected from the time of the policy change forward.

How do we protect your information?

Gccshool.org, is FERPA compliant. Our Site is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We use regular Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user creates an account, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

Do we use 'cookies'?

Yes. We use cookies to compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. Specifically, we use cookies to store visitors' preferences, record user-specific information on what page(s) users access or visit and record past activity at a site in order to provide better services when visitors return to our site. We may also use trusted third-party services that track this information on our behalf. Cookies help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your site experience more efficient may not function properly.

See also, discussion of Google Analytics cookies and DoubleClick cookies described below in the “Do we use third-party links” section.

What about Third-party disclosure?

We do not sell, trade, or otherwise transfer to outside parties your PII unless we provide users with advance notice. This does not include site hosting partners and other parties who assist us in operating our site, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others’ rights, property or safety.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

Do we use third-party links?

Yes. We use Google AdSense Advertising on our Site. Google’s advertising requirements are set forth in Google’s Advertising Principles and are in place to provide a positive experience for users. Google wants users to trust that information about them will be respected and handled with appropriate care. As such, Google’s advertising partners should not misuse this information, nor collect it for unclear purposes or without appropriate security measures. The Google AdSense principles can be found at the following website:

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

Google, as a third-party vendor, uses cookies to serve ads on our site. Google’s use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy. We have also implemented the following:

- Remarketing with Google AdSense
- Google Display Network Impression Reporting
- Demographics and Interests Reporting
- DoubleClick Platform Integration

We, along with third-party vendors such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our site.

What if a user wants to “opt out” of the Google AdSense?

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

What if a user is a California resident?

The California Online Privacy Protection Act (CalOPPA) is the first state law in the nation to require commercial sites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates sites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its site stating exactly the information being collected and those individuals or companies with whom it is being shared.

In accordance with the CalOPPA, we agree to the following:

Users can visit our site anonymously.

This Privacy Policy can be found at a link on our home page or as a minimum, on the first significant page after entering our site, in a manner that is distinguishable from the remaining text. Our Privacy Policy link includes the word 'Privacy' and can easily be located on the page specified above.

You can change your personal information by either emailing us, calling us or writing us in the mail using the contact information provided at the end of this Policy.

See, Changes to our Privacy Policy Section below.

How does our Site handle Do Not Track signals?

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Does our Site allow third-party behavioral tracking?

We do not allow third-party behavioral tracking.

How does our Site treat information about children under 13 years of age in accordance with the COPPA (Children Online Privacy Protection Act)?

We do not specifically market to children under the age of 13 years old.

We understand that children who are under 13 years of age need enhanced safeguards and privacy protection, as set forth in the Children's Online Privacy Protection Act (COPPA). COPPA protects the information privacy of children under the age of 13 by requiring web site operators

and online services to post privacy policies and obtain verifiable parental consent before collecting information from those children.

We may access personal information about children who are under the age of 13 strictly from their parents or guardians when they provide such information on SchoolMint. We want to provide assurances that information about young children is safe. If you want to notify us that we have inadvertently received information for a child under the age of 13 as, for example, by fraud or deception by others, please email us or write us in the mail using the email address/ mailing address provided at the end of this Policy. Also, you can review certain personal information that a school has regarding your children by making such a request in writing to the Participating School directly.

What about Fair Information Practices?

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

We will notify the users via in-site notification within 7 business days.

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

What about the CAN-SPAM Act?

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions
- Process transactions and to send information and updates pertaining to the transaction.
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

In accordance with CANSPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, you can follow the instructions at the bottom of each email and we will promptly remove you from ALL correspondence.

What if this Privacy Policy changes?

We may make changes to this Privacy Policy from time to time for any reason. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we use Personal Information, or Children's Personal Information or important changes to the security of the data, we will notify you by posting an announcement on the Site. Users are bound by any changes to the Privacy Policy when he or she uses the Site after such changes have been first posted.

Contacting Us

If there are any questions regarding this privacy policy, you may contact us using the information below.

Write us:

657 East Avenue
Rochester, NY 14607
Call us: (585) 697-1960

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