

Platform Privacy Policy

Last modified: 11/17/2023

Introduction

The Clock Tower Schools (“**our**,” “**us**,” or “**we**”) believe that communicating the progress that our students make is key to their success. Accordingly, we have created The Clock Tower Schools Stakeholder App/Portal (the “**Platform**”), accessible through your web browser or mobile device, which helps us provide daily updates to our student’s family and other parties who are invested in their continued success. The privacy of our students, their families, and all users of the Platform is incredibly important to us, and we are committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you register with, access, or use the Platform.
- Our practices for collecting, using, maintaining, protecting, and disclosing User Data (as defined below).
- Our practices for providing users access to Student Data (as defined below).

This policy applies only to information that is collected or viewable through the Platform.

This policy DOES NOT apply to information that:

- We may otherwise collect on our website.
- You provide to us in any manner other than through your use of the Platform.
- Information provided to us by third parties (such as government agencies).
- Records and copies of your correspondence (including email addresses and phone numbers) if you contact us.
- Any other lawful source.

Please read this policy carefully to understand our policies and practices regarding the information available on the Platform and how we will treat it. If you do not agree with our policies and practices, do not download, register with, or use the Platform. By accessing the Platform, you agree to this privacy policy and to be bound by our Terms of Use which are incorporated herein by reference, and are thereafter accessible through the “Downloads” tab on the Platform, or at www.clocktowerschools.org/app.

This policy may change from time to time. Your continued use of the Platform after we revise this policy means you accept those changes, so please check the policy periodically for updates.

Information We Collect and How We Collect It

We collect information from and about users of the Platform:

- Directly from you when you provide it to us.
- Automatically when you use the Platform.

Information You Provide to Us

Before you download, register with, or use the Platform, we will ask you to provide certain information to verify your right to access the Platform and to register you as a user. This information includes information by which you may be personally identified, such as your name, email address, telephone number or any other identifier by which you may be contacted online or offline (collectively, “**Enrollment Data**”).

Automatic Information Collection

When you download, access, and/or use the Platform, we may use technology to automatically collect:

- **Usage Details.** When you access and use the Platform, we may automatically collect certain details of your access to and use of the Platform, including your traffic and usage data, logs, and other communication data and the resources that you access and use on or through the Platform.
- **Device Information.** We may collect information about your device and internet connection, including the device's unique device identifier, your geolocation data, IP address, operating system, browser type, mobile network information, and the device's telephone number (collectively, “**Usage Data**” and together with Enrollment Data, “**User Data**”).

The technologies we use for this automatic data collection include, but are not limited to:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your device. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting certain parts of the Platform may not function properly. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access the Platform.
- **Flash Cookies.** Certain features of the Platform may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on the Platform. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons.** Web beacons are small pieces of code (also called pixels) that are embedded on the pages of websites or emails. The Platform may use web beacons to see what features you access and to analyze the Platform’s performance.
- **Google Analytics.** We use “Google Analytics” to collect information about the usage of the Platform. This service collects information about how often users visit the Platform, how many visitors the Platform has daily, what pages they visit and when they visit, among other additional information. We use this information primarily to improve of Platform.

You can opt-out of Google Analytics by installing the Google Analytics Opt-Out Browser Add-on.

How We Use User Data

We will use User Data to:

- To verify your identity prior to accessing the Platform.
- To provide you access to Student Data and to update you about your student's progress.
- To recognize you when you access the Platform.
- To track family engagement efforts.
- To administer, monitor, maintain, secure, and improve the Platform.

A User's access to the Platform will terminate automatically once the person that they are monitoring is no longer enrolled as a student. Any User that no longer wants access to the Platform can send an account closure request to admin@clocktowerschools.org.

Disclosure of User Data

We may disclose aggregated User Data, and information that does not or is not reasonably capable of identifying any individual, without restriction.

We may disclose User Data that we collect, or that you provide as described in this policy:

- To contractors, service providers, and other third parties we use to help support the Platform and who are bound by contractual obligations to keep User Data confidential and use it only for the purposes for which we disclose it to them.
- To other third parties who are invested in our students' success, including without limitation, educational and juvenile justice stakeholders.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you use the Platform.
- With your consent.
- For any other lawful purpose.

We may also disclose User Data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use visit www.clocktowerschools.org/app or navigate to the "Downloads" tab on the Platform.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of The Clock Tower Schools and/or its affiliates, our students, faculty, personnel, or others.

Student Data on the Platform

Our Platform allows us to communicate information regarding our students directly to the users of the Platform. The Platform presents the following student data elements:

- Student's Name.
- Student's Schedule.
- Student's Course Grades.
- Student's Goal Progress.
- Student Updates.
- Medical/Dental Appointment Attendance (collectively, "**Student Data**").

All Student Data available through the Platform is and will continue to be the property of and under the control of The Clock Tower Schools. All rights whatsoever in and to any Student Data shall remain with The Clock Tower Schools and your use of Student Data shall be subject to our Terms of Use.

Some Student Data elements will also be considered Education Records as such term is defined under the Family Educational Rights and Privacy Act ("**FERPA**").

Disclosure of Student Data

We recognize our responsibility to protect Student Data and to comply with the terms of FERPA as well as other privacy laws and regulations as applicable.

Accordingly, we will only disclose Student Data to the verified users of the Platform. No other party shall have access to Student Data through the Platform, and no disclosure of Student Data shall be made to any unauthorized third-party.

All Education Records that are viewable through the Platform are have been disclosed in compliance with FERPA.

Data Security

We have implemented measures designed to secure both User Data and Student Data from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of all information collected or viewable through the Platform will also depend on you. You will require a password to access our Platform and you are responsible for keeping this password confidential. We ask you not to share your password with anyone and to promptly notify us if you believe that someone has used your password to access the Platform without your authorization.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Email: info@clocktowerschools.org

Mail: Network Administrator
The Clock Tower Schools
99 Aldan Avenue
#5001
Glen Mills, PA 19342