LACKAWANNA TRAIL EDUCATION FOUNDATION (LTEF) PRIVACY POLICY

Thank you for visiting our website and viewing this privacy policy. We use this policy to tell you about the types of information we collect from you when you visit our site or use authorized features or apps that link to this policy.

More specifically, this policy tells you:

- the types of information we collect and how we collect it;
- the ways in which we use, share and protect that information;
- the choices you have in controlling the collection of your information; and
- your ability to access and update your information.

This policy provides you with the information you need to make an informed choice about your use of the website, any social media features and apps we offer and whether to share personal information with us through the services. By using our site or authorized features and apps, you are signifying to us that you agree with our policy.

This privacy policy was amended on February 23, 2021 and is effective as of that date.

USES OF INFORMATION

We do not sell, share, or rent your personal information to third party data vendors or marketing companies- we only share your information to the schools and education programs you authorize in your profile. We do not share any personal information about LTEF donors, including the amounts donated without their express written consent.

Anyone interested in registering for our Alumni Association can receive free access to utilize the AlumniToolkit platform but cannot access your personal data without your explicit consent. Authorized LTEF officers can download this data at any time but <u>may only use it and share it as expressly allowed by you</u>. We only use data for two purposes related to the LTEF mission: (1) organizing and inviting alumni to LTEF events, and, (2) connecting alumni, with their consent, with education opportunities and programs they would like to support as a volunteer or financially.

LTEF and their representatives can use the voluntarily provided personal information to communicate directly with you via email and text and by sending you newsletters and program announcements. Alumni Toolkit can also use the voluntarily provided personal information to communicate directly with you via email and text and by sending you newsletters and program announcements.

We use non-personal information to administer our site, services, and apps, make them better, and to make business decisions about what programs our communities might like. As you might expect, we also disclose your information when required by law.

INFORMATION COLLECTED

There are two types of information that we obtain from you, and then store and use:

non-personal information that's collected automatically; and personal information that you voluntarily provide to us.

We do not collect any personal information from you when you visit our site or use authorized features and apps unless you expressly and voluntarily participate in an activity that asks for it and you voluntarily provide it. To put it another way, FOR US TO HAVE ACCESS TO YOUR PERSONAL INFORMATION, YOU HAVE TO HAVE MADE A CHOICE TO KNOWINGLY GIVE IT TO US. ALUMNI DATA IS NOT SUBJECT TO FERPA AND COPPA.

The Family Educational Rights and Privacy Act, or "FERPA," is a U.S. Federal law that protects the privacy of student education records. Although we work with high schools and their alumni, we are not subject to FERPA. We are similarly not subject to the Children's Online Privacy Protection Act because we're not directing our efforts at children under the age of 13.

YOUR PRIVACY CHOICES

You do not have to provide personal information to enjoy most of the features of our site or apps. You also can opt-out of certain activities like newsletters and announcements by sending us an opt-out email.

SOME IMPORTANT VOCABULARY

This privacy policy is a legal document, so clarity is important. At the same time, if we used the kinds of defined terms that appear in most contracts this policy would be much harder to read. So instead of doing that, we'll use this section to let you know about some words that have special meanings whenever you see them in this policy. Let's start with the word "policy" itself: when we reference "this policy" and "our policy" we mean the Privacy Policy you are reading now. Wherever we say "Alumni Toolkit" we are referring to, the organization that is part of Big Picture Learning, a registered 501(c)3.

Whenever we reference "this site", "our site" or "the site" we mean the web site found at http://www.ltefoundation.org. When we talk about "authorized features and apps" we're referring both to elements of our social media presence viewable from Facebook, Twitter, Instgram, YouTube, Google+, LinkedIn or any of the many other available external third party social media platforms, as well as mobile or other apps we've created and distributed to let our community of students, alumni, educators and community partners view our site or otherwise interact with our content.

When referring to our "services" we mean the sites, authorized social media features and apps collectively. Last, but definitely not least, when we refer to "personal information" we mean information that can be used to identify your or that can be easily linked to you. Thus, a fairly comprehensive list of "personal information" would include such things as your name, address, telephone number, fax number, e-mail address, social security number and date of birth. In contrast, a domain name or an internet protocol address would not be considered personal information.

USER AGE REQUIREMENTS AND CHILDREN'S PRIVACY

Users of our services, including registration for accounts, must be at least 14 years of age. We take this age-related legal requirement very seriously, and consistent with it do not intend for the services to be used by children under the age of 14. Moreover, we do not knowingly collect personal information from minors under the age of 18. If we become aware that anyone under the age of 18 has submitted personal information through the services, we will delete that information and will not use it for any purpose whatsoever. We encourage parents and legal guardians to talk with their children about the potential risks of providing personal information over the internet.

AUTOMATICALLY COLLECTED INFORMATION

When you use our services, basic information is passively collected through various means including through your web browser via use of tracking technologies, such as "cookies" which utilize simple text files sent from our servers to your computer hard drive. The information we collect through these means is not personal information and does not individually identify you. It includes things like:

- the domain name and IP address from which you accessed our site.
- the type of browser and operating system you use.
- the date and time and length of your visit.
- the specific page visited, graphics viewed and any documents downloaded.
- the specific links to third party content you accessed from our services.
- the specific links from other sites you used to access our site.
- demographic categories such as age range or gender. This applies to a web browser on a given computer and is not associated directly with your identity.

Mobile devices are the one possible exception to the rule that our passive, automatic collection activities exclude personal information. We say that because, if you access our website or services from a phone, hand-held game or other mobile device, the mobile services provider may transmit to us uniquely identifiable mobile device information which allows us to then collect mobile phone numbers and associate them with the mobile device identification information. Some mobile phone service providers also operate systems that pinpoint the physical location of devices and we may receive this information as well. It is possible to opt out of these analytics features by updating your preferences through Google opt-outs. More information can be found at https://tools.google.com/dlpage/gaoptout/.

Regardless, we use both automatically collected non-personal information and mobile device information only to compile generic reports about our services, such as, popular pages on our site, and to see how members of our communities are accessing our services. We then use that data to administer the services, make your activities more convenient and efficient and to enhance the functionality of our services, such as by remembering certain of your information thereby saving you time.

Although the site and authorized features and apps contain links to other sites and services, you should be aware that we are not responsible for the privacy practices of those, or any other, sites and services. If you have questions about how those sites and services collect and use data, you should carefully read their privacy policies.

VOLUNTARILY SUBMITTED INFORMATION

If you participate in certain activities through our services and programs, you may need to provide us with information about yourself. For example, if you choose to send us an e-mail, register for an account or fill out an on-line form, or participate in a survey, you are voluntarily providing personal information to us. In doing so, you are giving us your consent to collect, use and disclose that information in the ways we describe in this policy. We may use voluntarily-provided personal information to communicate directly with you on a one-to-one basis.

We do not sell, rent or trade personal information with third parties. If you don't want us to collect your personal information, don't provide it! This means you shouldn't participate in the activities offered through our services that request or require it. Participation is strictly your choice. Not participating may limit your ability to take full advantage of the services.

Here are some of the ways you voluntarily give us your personal information and how we use it:

Emails and Texts- When you send us an email, your email address, and any other personal information that may be in the content of your message or attached to it, are retained by us and used to respond back directly to you. The same is true if you send us a text message. If you prefer we not collect, use or store this information, please do not email or text us. Instead, you may want to communicate with us by phone.

Taking Surveys - When you take surveys offered through our website or a third party survey application like SurveyMonkey, you will be submitting personal information in the course of completing the survey. We use that information for our own internal marketing purposes. If you include your email address or mobile phone number in your registration information we'll use it to communicate with you via email and/or text.

Filling out Forms - Our services contain a number of forms that allow you to do things like schedule one of our employees to be a speaker for a meeting or engagement you may have. We use the information provided by you in filling out these forms to contact you in connection with the subject matter of the form.

Note that some authorized features and apps may allow users to post or upload messages, comments, screen names, computer files and other materials. If you choose to make personally identifiable information public through these means, we will consider that information to be in the public domain and will not limit its disclosure in the manner described by this policy.

CHOICES: OPT OUT AND ACCOUNT CHANGES

If we are using personal information you provided to send you materials, such as newsletters, event invitations and program announcements, via text or email, and you decide you don't want to receive such materials, you may opt out by sending an e-mail to us with your name, mailing address and/or e-mail address to webmaster@ltefoundation.org. When we receive your request, we will take reasonable steps to remove your name from our distribution lists.

If the services offer a user profile or account feature, and you've created an account for yourself,

you may review and change or delete the personal information stored in your user account by visiting the "My Account" section or by e-mailing us at webmaster@ltefoundation.org. Deleting an account does not relieve us of our data retention obligations, so we want to be clear that we will still have your information in our archives until we're allowed to destroy it via our established records retention and destruction procedures. Users also need to understand that deletion of an account or profile may not stop all communications from us. For instance, if you continue to separately submit forms to us or take surveys after you delete your user account/profile, you will be voluntarily submitting your personal information through those separate means.

INFORMATION SECURITY

We will take all reasonable security precautions to protect your personal information provided through our services. Due to the inherently open and somewhat risky nature of the Internet, however, we cannot guarantee that your information, whether during transmission or while stored on our systems or otherwise in our care, will be free from unauthorized access or that loss, misuse, destruction, or alteration will not occur. We disclaim any liability for any theft or loss of, unauthorized access or damage to or interception of any data or communications. You should also note that third party companies who help us operate and maintain both our services and our corporate technology environment will have incidental access to your information, including your personal information, as part of the work they perform. We require that they enter into confidentiality and other agreements, but cannot guarantee their compliance.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to change or update this policy from time to time. Please check this policy periodically for such changes since all information collected is subject to the policy in place at that time. Typically, we will indicate the effective/amendment date at the beginning of this policy. If we feel it is appropriate, or if the law requires, we'll also provide a summary of changes we've made near the end of new policy. A full PDF version is available to download here.

CONTACTING US

If you have questions about our privacy policy or privacy practices, please contact us at: secretary@ltefoundation.org