



# HUMANITY FIRST USA

## **The Education Project**

**Privacy Policy** 

# Introduction

Humanity First USA, its affiliates, successors, assigns, officers, directors and agents (collectively, "HF", "we" or "us, which shall include HF-TEP (as hereinafter defined)) feels strongly about protecting your privacy to provide a great user experience. Please carefully review the following Privacy Policy for Humanity First-The Education Project ("HF-TEP") which explains our collection, use, disclosure, and other processing of your information. The terms "you" or "User" refers collectively to parents or guardians ("Parents"), students, and tutors who use this website ("Site") and any related services we provide (the "Services"). By visiting our Site or using our Services, you consent and accept the information handling practices described in this Privacy Policy. If you do not agree to all the terms and conditions of this Privacy Policy, do not use this Site or Services.

## **Information We Collect**

HF takes the information Users provide very seriously and HF strives to make it clear which information is collected about you. There are two main types of information HF may collect when you access our Site and Services: information automatically collected and information that you voluntarily provide.

## Information Automatically Collected

Whenever you access any HF Site, we may automatically collect and store routine internet traffic information which includes, but may not be limited to, the type of browser used, access time, pages viewed, IP address, and operating system. This information does not reveal personally identifiable information and may be retained as appropriate to understand and enhance user experience and improve website content.

## Information Voluntarily Provided

If you choose to complete the registration form seeking tutoring services for a student or to volunteer as a tutor, we collect certain personal information and non-personal information necessary to provide the Services. Personal information collected during registration includes, but may not be limited to, full name, email, phone number, and other voluntary information that can be used to identify you. This information is only maintained so long as necessary to provide the Services, as mandated by federal or state law, other regulations, and/or in connection with any routine backup procedures.

## Students and Parents

As specified in HF-TEP Terms and Conditions, Parents aged 18 or older may register their child for the Services. In addition to parental contact information mentioned above, we collect student personal information which includes, but may not be limited to, full name and age. For information regarding handling of personal information of individuals under the age of 13, please see the section herein entitled "Children and Our Services". We also collect student non-personal information which includes, but may not be limited to, educational level, tutoring subjects, state of residence, languages spoken, and additional voluntary information relating to student interests. This information is used to match the student with an appropriate tutor. To protect your privacy, we encourage you to not disclose unnecessary additional personal information.

#### Tutors

In order to verify tutor academic status for eligibility, we request submission of a transcript, proof of employment, or other supporting documentation as we may deem appropriate or necessary from time to time. This information is only used for verification purposes, is not shared with other parties, and is deleted once an application decision has been made. We may also view information about you through background checks and identity verification from public sources, but this information will not be stored in our systems. Non-personal information including, but not limited to, academic institution and focus, profession, tutoring subjects, and additional voluntary information relating to interests will be collected to match tutors with appropriate students.

#### **Children and Our Services**

Parents may register student information for children under the age of 13 with verifiable parental consent. HF does not allow children under the age of 13 to use our Site. We do not knowingly collect personal information of children under the age of 13 without parental consent. If we learn that personal information of a child under the age of 13 has been collected without parental consent, we will take appropriate measures to purge any such information. If you are the Parent of a child under the age of 13 who may have provided such information without your knowledge, please contact us to have this information purged. All contact, including tutoring sessions and communication, between tutors and students under the age of 18 should only take place under parental supervision.

Personal information that we may collect, with parental consent, of students under the age of 13 includes, but may not be limited to, a child's full name, age, and parent contact information. This consent is verified by electronic affirmation from a Parent during student registration and a confirmatory email. The information collected is used to provide Services as specified in "How we use your information". We do not disclose or share personal information of children under 13 beyond what is reasonably necessary to provide Services and as specified in "Information we share and disclose". We also only retain this personal information for as long as reasonably necessary to provide Services. Parents have the right to review their child's personal information by contacting us at <u>info@theeducationproject.net</u>. Parents may also request that we no longer collect, delete, share, or disclose personal information about their child. These measures are in accordance with the Children's Online Privacy Protection Act of 1998.

#### How we use your information

HF uses the information we collect in the following ways:

- To provide all features of our Site and Services to best match students with tutors;
- To communicate with Users in order to connect students and tutors and respond to inquiries;
- To promote safety and security by verifying User information and eligibility;
- To enable your participation in features we may offer with third parties to the extent you wish to participate in such programs; and
- To continually improve, personalize, and enhance our Site and Services.

#### Information we share and disclose

HF does not rent or sell your personal information. We may only share your personal information in the following situations:

- Information shared between Users: HF shares student and tutor registration information with each other in order to facilitate the arrangement of a first meeting and subsequent tutoring sessions.
- Information shared with HF: We may share your information with our core volunteer team in order to provide the Services and overall management.
- Third-Party Service Providers: In certain situations, we may engage other entities to perform tasks related to our functions and services. Any personal information shared in this way will be limited to what is necessary for that particular purpose and is subject to obligations consistent with this Privacy Policy.
- Law & Public Interest: We may store, use, or disclose your personal data or other information if we believe that it is necessary to comply with a law, regulation, or government request; to protect the rights or safety of any person; to protect the rights or safety of our Site and Services; or to prevent misuse, fraud, and security issues.
- Change of Ownership: If HF is involved in a merger, acquisition, transfer, closure, or other ownership change, your personal information may be transferred accordingly. Protective measures at least as stringent as this Privacy Policy would apply to your transferred data.
- Aggregate & Non-identifiable Data: We may use data which has been de-identified and/or aggregated for any business purpose including research, analytics, and development. In certain situations, we may share this data with partners to improve our Services.

## **Data Security & Storage**

HF uses physical, managerial, and technical safeguards designed to maintain the privacy and safety of your information. Once information has been collected, we encrypt sensitive data in our database for added security. We may also ask you to provide certain personal information to confirm your identity when requesting information. We strive to collect and maintain as little data as possible on record only as necessary. Despite these measures, we cannot guarantee security of personal information. By using the Services you acknowledge and agree that we make no guarantee of security, and that you use the Services at your own risk.

# **Managing Your Personal Information**

If you have completed a registration form, you may access, modify, or delete your information by contacting us at <u>info@theeducationproject.net</u>. You can also contact us to terminate your account to discontinue using the Services. We may send administrative emails as long as you continue to use the Services.

# **Privacy Policy Changes**

HF reserves the right to change or update this Privacy Policy from time to time. We may notify Users of any changes by posting a notice and revised policy with an updated date of revision on our Site. We may also communicate changes over email to your registered email address we have on file. It is your responsibility to pay attention to any such notices.

# **Contact Information**

If you have questions or concerns about this Privacy Policy or other related policies, please contact us at info@theeducationproject.net.