

Newton Chinese Language School Privacy Policy

Last revised and effective as of: April 15, 2021

This Privacy Policy applies to information collected online by The Newton Chinese Language School, Inc. (“NCLS” “we” or “us” or “our”) through your use of the NCLS website at <https://www.newtonchineseschool.org/> and any subdomains thereof (the “Site”) and the services, features, and information available on the Site (together with the Site, along with associated and successor websites, applications, features, information, and services, or any part thereof, the “Service”). As used herein, “you” and “your” mean a user of the Service.

You should carefully read this Privacy Policy. As used in this Privacy Policy, the terms “using” and “processing” information include using cookies on a computer, subjecting the information to statistical or other analysis and using or handling information in any way, including collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information as described in this Privacy Policy.

This Privacy Policy serves to notify you of the following:

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WHAT INFORMATION ABOUT ME IS COLLECTED?

Depending on your use of the Service, we may collect two types of information: personally identifiable information and non-personally identifiable information.

Personally Identifiable Information

Personally identifiable information is information that identifies you or can be used to identify or contact you. Such information may include your name, Chinese name, address, e-mail address, log-in ID, password, home telephone number, emergency telephone number, the name of your emergency contact. Personally identifiable information collected may also include the name and email address of your spouse, your child’s or children’s name, grade level, and date of birth. Additionally, our Outside Contractor (as defined below) that is responsible for billing and payment

processing services (the “Payment Services Provider”) may collect your billing and credit card information from you directly. If you are an NCLS teacher or staff person, personally identifiable information may include your school-assigned phone number and email address.

Non-Personally Identifiable Information

Non-personally identifiable information is information, any single item of which, by itself, cannot be used to identify or contact you, including non-identifiable demographic information, browser types, unique device identifiers, device types, requested URL, referring URL, browser language, the pages you view, the date and time of your visit, domain names, and statistical data involving the use of the Service. Certain non-personally identifiable information may be considered a part of your personally identifiable information if it were combined with other identifiers in a way that enables you to be identified. However, the same pieces of information are considered non-personally identifiable information when they are taken alone or combined only with other non-personally identifiable information (for example, your viewing preferences) in a way that would not enable you to be identified.

WHERE AND WHEN IS INFORMATION COLLECTED (INCLUDING THROUGH THE USE OF COOKIES AND ACTION TAGS)?

We will collect personally identifiable information that you submit to us. We may also receive personally identifiable information about you from third parties providing credit and debit card authorization and fraud screening services as part of your use of the Service.

Registering to Use the Service and in the Course of Using the Service.

You may be required to establish an account in order to take advantage of certain features of the Service. If so, if you wish to establish an account you will be required to provide us with information (including personally identifiable information and non-personally identifiable information) such as your name, Chinese name, address, e-mail address, log-in ID, password, home telephone number, emergency telephone number, the name of your emergency contact, and billing information directly to the Payment Services Provider. We may also receive personally identifiable information about you from third parties providing credit and debit card authorization and fraud screening services as part of the registration process. In addition, we may obtain your personally identifiable information from you if you identify yourself to us by sending us an e-mail with questions or comments. Also, we will have access to any personally identifiable information that you choose to share through the Service, including any information you provide in the comment box in the “Feedback” section or the “Donations” section of the Site.

Directory Information.

NCLS teachers and staff may be assigned phone numbers and email addresses by the school, which along with their names are included in a directory within the Site that is publicly available.

Cookies and Action Tags.

While we generally do not collect information passively using “cookies” and “action tags”, you should be aware that other third parties may use their own cookies or action tags when you link to their websites or services on or from the Service. This Privacy Policy does not govern the use of cookies or action tags or the use of your information by such third-party websites or services.

“Cookies” are small text files that can be placed on your computer or mobile device in order to identify your web browser and the activities of your computer on websites.

“Action tags,” also known as web beacons or gif tags, are a web technology used to help track website usage information, such as how many times a specific page has been viewed.

Log Files.

We also collect information through our Internet log files, which record data such as user IP addresses, browser types, domain names, and other anonymous statistical data involving the use of the Service. This information may be used to analyze trends, to administer the Service, to monitor the use of the Service, and to gather general demographic information. We may link this information to personally identifiable information for these and other purposes such as personalizing your experience on the Service and evaluating the Service in general.

Public Areas.

The Service features various public forums (the "Public Areas"), such as the teachers' blog, where users can share information. These Public Areas are open to the public and should not be considered private. We cannot prevent information included within a Public Area from being used in a manner inconsistent with this Privacy Policy, the law, or your personal privacy. We are not responsible for the results of such postings or for the accuracy of any information contained in those postings.

Any information you share in a Public Area (including personally identifiable information) is by design open to the public and is not private. You should think carefully before posting any information in any Public Area. What you post can be seen, disclosed to or collected by others and may be used by others in ways we cannot regulate or predict. As with any public forum on any website, the information you post may also show up in third-party search engines like Google, Yahoo, MSN, and Bing. If you mistakenly post personally identifiable information in a Public Area you can send us an e-mail to request that we remove it by contacting us at principals@newtonchineseschool.org

IS INFORMATION SUBMITTED TO THE PUBLIC AREAS OF THE SERVICE PRIVATE?

No. Any information shared in the Public Areas of the Service is available to the public, including to all users. Such information is not protected or treated as confidential, can be used in any manner, and is not subject to this Privacy Policy. If you wish to keep any information private or proprietary, do not submit it to the Public Areas of the Service. NOTWITHSTANDING THE FOREGOING, WE HAVE NO RESPONSIBILITY OR LIABILITY IF A USER'S INFORMATION OR IDENTITY IS MISUSED OR STOLEN, OR IF A USER SUFFERS HARM AS A RESULT OF VOLUNTARY DISCLOSURES.

DOES NCLS COLLECT INFORMATION FROM CHILDREN UNDER 13 YEARS OF AGE?

We are committed to protecting the privacy of children. The Service is not designed for or directed to children under the age of 13. We do not collect personally identifiable information from any person we actually know is under the age of 13.

WHAT DOES NCLS DO WITH THE INFORMATION IT COLLECTS?

We use the information collected to provide the Service to you and process your course registrations and transactions, to help us understand who uses the Service, for internal operations such as operating and improving the Service, to contact you for customer service and billing purposes, and, if you "opt in", so that we can contact you about course offerings and services that may be of interest to you.

We may use your information to send you a welcoming e-mail that may confirm your user name and password. If you opt in, we may subsequently send you electronic newsletters, contact you about the Service, products, services, information and news that may be of interest to you, and provide you with targeted feedback. If you no longer desire to receive these communications, we will provide you with the option to change your preferences in each communication we send to you. You may also inform us by email to: privacy@NCLS.com.

If you identify yourself to us by sending us an e-mail with questions or comments, we may use your information (including personally identifiable information) to respond to your questions or comments, and we may file your questions or comments (with your information) for future reference.

We may also use the information collected to send announcements and updates regarding the Service or, if applicable, about your billing account status. You will not be able to unsubscribe from these Service announcements and updates as they contain important information relevant to your use of the Service and are necessary for the performance of our agreement with you.

We may also use the information gathered to perform statistical analysis of user behavior or to evaluate and improve the Service. We may link some of this information to personally identifiable information for internal purposes or to improve your experience with the Service.

WHEN DOES NCLS DISCLOSE INFORMATION TO THIRD PARTIES?

We generally disclose information we gather from you through the Service to the following types of third parties and as otherwise set forth in this Privacy Policy or as specifically authorized by you.

Laws and Legal Rights.

We may disclose your information (including personally identifiable information) if we believe in good faith that we are required to do so in order to comply with an applicable statute, regulation, rule or law, a subpoena, a search warrant, a court or regulatory order, lawful requests by public authorities, including to meet national security or law enforcement requirements, or other valid legal process. We may disclose personally identifiable information in special circumstances when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating a contract with us, to detect fraud, for assistance with a delinquent account, or to protect the safety and/or security of our users, the Service or the general public.

Third Parties Generally.

We may provide to third parties non-personally identifiable information, including where such information is combined with similar information of other users of the Service. For example, we might inform third parties regarding the number of unique users who use the Service, the demographic breakdown of our users of the Service, or the services purchased using the Service and the vendors of such products and services.

Outside Contractors.

We may employ independent contractors, vendors and suppliers (collectively, "Outside Contractors") to provide specific services and products related to the Service, such as hosting and maintaining the Service, providing credit card processing and fraud screening, including the Payment Services Provider, and developing applications for the Service. In the course of providing products or services to us, these Outside Contractors may have access to information collected through the Service, including your personally identifiable information. We use reasonable efforts to ensure that these Outside Contractors are capable of protecting the security of your personally identifiable information.

Affiliates, Merger or Sale of Assets.

We reserve the right to transfer information to a third party in connection with an affiliation with another organization or a sale, merger or other transfer of all or substantially all of the assets of NCLS, or that portion of NCLS to which the Service relates, or in the event that we discontinue our business or file a petition in bankruptcy, reorganization or similar proceeding.

DOES THIS PRIVACY POLICY APPLY WHEN I LINK TO OTHER WEBSITES OR SERVICES?

Our Site may provide links to access to other websites and services. Please be aware that we are not responsible for the privacy practices of any websites or services other than the Service. A link to a third-party website does not constitute or imply endorsement by us. Additionally, we cannot guarantee the quality or accuracy of information presented on those websites. We encourage you to read the privacy policies or statements of each and every such website and service. This Privacy Policy applies solely to information collected by us through the Service.

IS THE INFORMATION COLLECTED THROUGH THE SERVICE SECURE?

We want your information (including personally identifiable information) to remain secure. We strive to provide transmission of your information from your computer or mobile device to our servers through techniques that are consistent with commercially reasonable standards and to employ administrative, physical, and electronic measures designed to protect your information from unauthorized access.

Notwithstanding the above, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that others could find a way to thwart our security systems. As a result, while we strive to protect your information, we cannot ensure or warrant the security or privacy of any information you transmit to us, and you do so at your own risk.

FOR HOW LONG WILL MY PERSONALLY IDENTIFIABLE INFORMATION BE KEPT?

We will only retain your personally identifiable information for as long as necessary to fulfill the purposes for which we collected it.

To determine the appropriate retention period for personally identifiable information, we consider the amount, nature, and sensitivity of that information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process your personally identifiable information and whether we can achieve those purposes through other means, and the applicable legal requirements.

WHAT CHOICES DO I HAVE REGARDING MY PERSONALLY IDENTIFIABLE INFORMATION?

We generally use personally identifiable information as described in this Privacy Policy or as authorized by you or as otherwise disclosed at the time we request such information from you. You generally must "opt in" and give us permission to use your personally identifiable information for any other purpose. You may also change your preference and "opt out" of receiving certain marketing communications from us by following the directions provided in association with the communication or such other directions we may provide or by contacting principals@newtonchineseschool.org.

DO NOT TRACK

The term "Do Not Track" refers to a HTTP header offered by certain web browsers to request that websites refrain from tracking the user. We take no action in response to automated Do Not Track requests. However, if you wish to stop such tracking, please contact us with your request, using our contact details provided below.

HOW WILL I KNOW IF THERE ARE ANY CHANGES TO THIS PRIVACY POLICY?

We may revise this Privacy Policy from time to time. We will not make changes that result in significant additional uses or disclosures of your personally identifiable information without allowing you to "opt in" to such changes. We may also make non-significant changes to this Privacy Policy

that generally will not significantly affect our use of your personally identifiable information, for which your opt-in is not required. We encourage you to check this page periodically for any changes. If any non-significant changes to this Privacy Policy are unacceptable to you, you must immediately contact us and, until the issue is resolved, stop using the Service.

WHO DO I CONTACT IF I HAVE ANY PRIVACY QUESTIONS?

If you have any questions or comments about this Privacy Policy or feel that we are not abiding by the terms of this Privacy Policy, please contact us in any of the following ways:

By e-mail:

principals@newtonchineseschool.org By postal mail or courier:

Attn: Privacy
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