

**PRIVACY AND SECURITY POLICY**  
**for**  
**PROVIDENCE PREPARATORY SCHOOL**

**Introduction**

Providence Preparatory School, LLC (“PPS”) operates the [www.ProvidencePrepSchool.com](http://www.ProvidencePrepSchool.com) website (hereinafter referred to as the “Service”). This page informs you of PPS’ privacy and security policy (the “Policy”) regarding the collection, use and disclosure of personal data when you use PPS’ Service and the choices you have associated with that data. PPS use your data to provide and improve the Service. By using PPS’ Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Policy, the terms used in this Policy have the same meanings as view on PPS’ Service or in the documents viewable from PPS’ Service.

**Additional Definitions or Processes**

- **Personal Data:** “Personal Data” means data or certain personally identifiable information about you or a living individual who can be identified from such data (or from those and other information either in PPS’ possession or likely to come into PPS’ possession). While using PPS’ Service, PPS may ask you to provide PPS with certain Personal Data that can be used to contact or identify you. Personal Data may include, but is not limited to [a] email address, [b] first name and last name, [c] phone number, [d] address (including the street and street number, county, town or city, state, province, ZIP/Postal code, and [e] cookies and Usage Data
- **Usage Data:** “Usage Data” is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit). PPS may also collect information on how the Service is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of PPS’ Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.
- **Cookies:** “Cookies” are files with a small amount of data stored on your device (computer or mobile device) which may include an anonymous unique identifier. PPS may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from PPS by contacting PPS. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze PPS’ Service. You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of PPS’ Service. Examples of Cookies PPS may use are [a] Session Cookies (to operate PPS’ Service), [b] Preference Cookies (to remember your preferences and various settings), and [c] Security Cookies (for security purposes). PPS uses Cookies and similar tracking technologies to track the activity on PPS’ Service and PPS hold certain information.
- **Data Controller:** “Data Controller” means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Policy, PPS is a Data Controller of your Personal Data.
- **Data Processors (or Service Providers):** “Data Processors” (or “Service Providers”) means any natural or legal person who processes the data on behalf of the Data Controller. PPS may use the services of various Service Providers in order to process your data more effectively.
- **Data Subject (or Data User):** A “Data Subject” (or “Data User”) is any living individual who is using PPS’ Service and is the provider or subject of Personal Data.
- **Information Collection and Use of Data:** PPS collect several different types of information for various purposes to provide and improve PPS Service to you. PPS may use the collected data for various purposes to [a] provide and maintain PPS’ Service, [b] notify you about changes to PPS’ Service, [c] allow you to participate in interactive features of PPS’ Service when you choose to do so, [d] provide customer support, [e] gather analysis or valuable information so that PPS can improve PPS’ Service, [f] monitor the usage of PPS’ Service, [g] detect, prevent and

address technical issues, and [h] provide you with news, special offers and general information about other goods, services and events which PPS offers that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

**Payments:** PPS may provide paid products and/or services within the Service. In that case, PPS use third-party services for payment processing (e.g. payment processors). PPS will not store or collect your payment card details. That information is provided directly to PPS' third-party payment processors whose use of your personal information is governed by their own privacy policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express, Discover and PayPal. PCI-DSS requirements help ensure the secure handling of payment information and require either SSL (Secure Socket Layer) software or the industry's standard for secure internet commerce transactions.

The payment processors PPS may work with are:

- Tuition Express link: <https://www.tuitionexpress.com/privacy.aspx>
- Heartland link: <https://www.heartlandpaymentsystems.com/privacy-policy>

**Legal Basis for Processing and Protecting Personal Data under the General Data Protection Regulation (GDPR):** If you are a resident of or from the European Economic Area (EEA), you may have certain data protection rights. PPS' legal basis for collecting and using the personal information described in this Policy depends on the Personal Data PPS collects and the specific context in which PPS collects it. PPS may process your Personal Data because [a] PPS needs to perform a contract with you, [b] you have given PPS permission to do so, [c] the processing is in PPS' legitimate interests and is not overridden by your rights, [d] for payment processing purposes, and [e] PPS needs to comply with the law. PPS aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data. If you wish to be informed about what Personal Data PPS holds about you and if you want it to be removed from PPS' systems, please contact PPS.

**Retention of Data:** PPS may retain your Personal Data only for as long as is necessary for the purposes set out in this Policy. PPS may retain and use your Personal Data to the extent necessary to comply with PPS' legal obligations (for example, if PPS is required to retain your data to comply with applicable laws), resolve disputes and enforce PPS' legal agreements and policies. PPS may also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of PPS' Service, or PPS is legally obligated to retain this data for longer periods.

**Transfer of Data:** Your information, including Personal Data, may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. If you are located outside United States and choose to provide information to us, please note that PPS transfers the data, including Personal Data, to United States and process it in the United States. Your consent to this Policy followed by your submission of such information represents your agreement to that transfer. PPS will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

**Disclosure of Data:**

- **Business Transaction:** If PPS is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. PPS will provide notice before your Personal Data is transferred and becomes subject to a different Policy.
- **Disclosure for Law Enforcement:** Under certain circumstances, PPS may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).
- **Legal Requirements:** PPS may disclose your Personal Data in the good faith belief that such action is necessary to [a] comply with a legal obligation, [b] protect and defend the rights or property of PPS, [c] prevent or investigate possible wrongdoing in connection with the Service, [d] protect the personal safety of users of the Service or the public, and [e] protect against legal liability.

**Security of Data:** The security of your data is important to PPS but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While PPS strives to use commercially acceptable means to protect your Personal Data, PPS cannot guarantee its absolute security.

**PPS' Policy on "Do Not Track" under the California Online Privacy Protection Act (CalOPPA):** PPS does not support Do Not Track ("DNT"). DNT is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable DNT by visiting the Preferences or Settings page of your web browser.

In certain circumstances, you have the following data protection rights:

- The right to access, update or delete the information PPS has on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact PPS to assist you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to PPS' processing of your Personal Data.
- The right of restriction. You have the right to request that PPS restricts the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information PPS has on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where Providence Preparatory School relied on your consent to process your personal information.

Please note that PPS may ask you to verify your identity before responding to such requests. You have the right to complain to a Data Protection Authority about PPS' collection and use of your Personal Data. For more information, please contact your federal, state or local data protection authority.

**Service Providers:** PPS may employ third party companies and individuals to facilitate PPS' Service ("Service Providers"), provide the Service on PPS' behalf, perform Service-related services or assist PPS in analyzing how PPS' Service is used. These third parties may have access to your Personal Data only to perform these tasks on PPS' behalf and are obligated not to disclose or use it for any other purpose.

PPS' Service may contain links to other sites that are not operated by PPS. If you click a third party link, you will be directed to that third party's site. PPS strongly advises you to review the privacy policy of every site you visit. PPS has no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

**Children's Privacy:** PPS' Service does not address anyone under the age of 18 ("Children"). PPS do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided PPS with Personal Data, please contact PPS. If PPS becomes aware that PPS has collected Personal Data from Children without verification of parental consent, PPS will take the necessary steps to remove that information from PPS' servers.

**Changes to This Privacy Policy:** PPS may change or update this Policy from time to time. PPS will notify you of any changes by posting the new Policy on this page. PPS will let you know via email and/or a prominent notice on PPS' Service (such as the preschool2me application), prior to the change becoming effective and update the "Effective Date" at the end of this Policy. You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page.

**To Contact PPS:** If you have any questions about this Policy, please contact Andrew Weathersbee either by email at [SandyW@ProvidencePrepSchool.com](mailto:SandyW@ProvidencePrepSchool.com), or by phone at 704-335-3800.

EFFECTIVE DATE: January 3, 2019

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