

## Overview

Actionaly is a simple platform for communication between home and school. Actionaly is designed for whole-school adoption and collaborative use by principal, admins, teachers, staff, parent leaders and parents at preK-12 schools. Users can respond to activities about school logistics, newsletters, volunteer requests, payments, registration data, various forms such as field trips, parent teacher conferences, calendaring of events and more.

## Commitment to Your Privacy

Actionaly understands that privacy is extremely important to users of our services and website, the district, school or organization that registers for our services ("School"), and the students, their parents and other users whose information we may access on behalf of a School.

## Changes to Our Privacy Policy

Actionaly reserves the right to change this privacy policy. Any changes to this privacy policy will be posted to this page and a notice will be put up on our website and other places we deem appropriate such as our blog. In case of material changes to how we use your personal information, we will notify you prior to the change becoming effective, by email, by means of notice on our home page, and by email to your parents in case you are under 18, in order to obtain consent for the new uses of your personal information if required.

Please make sure that you read the Actionaly [Terms of Use](#) to understand additional terms and conditions that apply to the use of our Web site. If you have any questions or comments concerning our privacy policy, please contact us at [support@actionaly.com](mailto:support@actionaly.com).

## Information Collection, Use and Protection

Our goal is to be transparent in our practices regarding collection and data usage. We believe your personal identifiable information and any user data are something we protect, not something we own.

- We are simply stewards of the data provided to us by our schools and users.
- We will never sell the data we obtain.
- We use the latest best practices from the broader security industry to protect all the data we obtain.
- We do not own any of the content that is added to our platform.
- We do not own any of the personal identifiable information that is added to our platform.
- We are transparent about our practices, and we will always notify users if anything changes.
- We will never advertise on our platform or app.

## **1. Information We Collect**

We collect two types of information: personal information your School knowingly chooses to disclose that is collected on an individual basis, and website use information collected on an aggregate basis as you and others browse our website.

### **Information Your School Provides to Us**

Student and user data is provided and controlled by your School. When your School chooses to use Actionaly, the School provides us personal information about the student and their parents and guardians. For a student, the School provided personal information includes student name, ID, gender, grade level, enrolled courses, other enrolled groups and extracurricular activities, and information about student's parents/ contacts: their name, relationship to student, address, email, phone number and communication language. For users other than parents/ student contacts, such as staff members, the information may include their title at the School and courses taught at the School. The School may also choose to provide additional student information such as their English language learning status, enrollment in free and reduced lunch program, attendance records, lunch balances, bus routes, grades and assignments if the School is using the corresponding Actionaly functionality.

Actionaly complies with Family Educational Rights and Privacy Act ("FERPA") and all other applicable confidentiality and privacy laws and rules, and requires its employees, consultants, and subcontractors to similarly comply.

### **Additional Contact Information Your School May Provide to Us About Students**

The School may choose to provide student with Actionaly logins to communicate with students within Actionaly. In such cases, we collect the login credentials for students provided to us by the School, which may include a student's email address and cell phone number. Pursuant to Children's Online Privacy and Protection Act ("COPPA"), Actionaly relies on the School to obtain verifiable parental consent to provide our services to students under 13 years of age.

If we learn that we have collected personal information from a child under age 13 other than pursuant to the above, or if we learn that a child under 13 has provided us personal information beyond what we request from him or her, we will delete that information as quickly as possible after we have identified it.

If you have questions about modifying or deleting personal information of a student, please contact your School directly or you may also contact us at [support@actionaly.com](mailto:support@actionaly.com). We will get in touch with your School to honor your request.

### **Information You Provide to Us**

You may choose to provide additional information about yourself in your user profile or while using Actionaly, such as in messages and responses. All information you provide to us may be made accessible to "group owners" in your School. This information is not shared with users outside of your School, but may be made available to your School's district office should they request it.

### **Information We Collect when You Interact With Actionaly**

In addition to the personal information you and your School provide to us, we also collect usage information as you interact with Actionaly. Collecting this information allows us for more

accurate reporting and helps us to improve our services. The following describes how we use this information:

a. Site and App Activity Information

We monitor some of the actions you perform on Actionaly. For example, we store your chat messages and all responses to activities posted on Actionaly (e.g. when you RSVP to an event, upload images, or sign a consent form)

b. Notification Activity Information

We monitor email delivery, text delivery, app downloads, and engagement through clicks in order to understand your interaction with our services and improve your experience with Actionaly. We may include clear gifs in the HTML-based emails we send our Schools in order to track which emails are being opened and which links are being clicked on by recipients.

c. Access Device and Browser Information

When you access Actionaly from a computer, mobile phone, or other device, we may collect information from that device such your browser type, location, and IP address. We also record which pages you visit, the date and time of visits, and the time spent at our website. This information is collected on an aggregate basis. None of this information is associated with you as an individual.

d. Cookie Information

We may send one or more cookies to be stored on your computer in order to personalize your experience with Actionaly and make our services easier to use. A cookie is a small text file containing a string of alphanumeric characters that allows us to uniquely identify your browser and allows you to log in automatically whenever you return to Actionaly. We also use cookies to identify and maintain your logged status as well as enhance your navigation through the website. You can remove or block cookies using the technical settings of your browser though you may not be able to do so on certain browsers or mobile devices. Note that disabling cookies

may impact your ability to use our services fully, so we recommend that you leave them enabled for the quality of your experience.

## **2. How We Use Information**

Your privacy and your child's privacy are extremely important to us. The student data we collect is used for communication and educational purposes at the discretion of your School only. We use the information we collect to provide a safe, efficient, and customized experience for our users. Here are some of ways we do that:

### **To Manage the Service**

We use the information we collect to provide our personalized services and features to you and provide you with customer support. In addition, we use the information we collect to analyze how you use the services and features so that we can measure and improve those services and features.

### **To Contact You**

We may contact you with service-related announcements from time to time. This includes contacting you for any school-related activities. We may include content you see on Actionaly in the emails we send to you. We may also contact you in order to notify you about important changes to our services.

### **To Provide Relevant Information to Your School**

We use the information we collect to report usage levels to your School. This allows your School to monitor how successful their posts and activities are so that they can improve their use of Actionaly.

## **3. How We Share Information**

### **What Can Other Users in Actionaly See**

Access to the School's Actionaly website and app is restricted to parents and staff at your School, and other users that the School may deem appropriate, e.g., Board Members. Parents can only view posts addressed to the entire School and to any groups or classes they or their child belongs to. Parents do not see posts for classes and private groups they do not belong to. Parents are responsible for maintaining the security of their password.

Notwithstanding the foregoing, your School may choose to share some Actionaly posts and associated pictures on social websites, such as Twitter and Facebook. Actionaly will require your School to confirm that it has prior permission from parents before doing so. Sharing posts and pictures on social website will make the posts and pictures viewable by users outside of Actionaly, and Actionaly' privacy policy will no longer apply to those posts and pictures. All such posts will be clearly marked so Actionaly users can know that those posts are shared via social networks.

Your contact information, i.e., your email, phone and address may be made available to other registered parents at your School as part of an online School Directory according to your School's discretion. This information is not shared outside of the School or with any third parties. By default, your email address is visible on your profile page to teachers and administrators but not your phone or address. You have the option to adjust your settings to keep all your contact information (email, phone and address) hidden from other parents at your School. Your contact information will be visible to registered staff members at your School.

### **No Disclosure to Third Parties**

Actionaly uses the data received from the School for the sole purpose of delivering products and services to the School. We do not rent, trade, or sell or otherwise distribute your information to any third parties and will only disclose information when allowed by FERPA and required a) by applicable laws or government orders or b) to maintain and operate our service or c) when authorized by the School.

We work with a number of third-party service providers and contractors to maintain and operate our service. For instance, we use third parties

- For secure credit card transaction processing for supporting payments in Actionaly
- To provide customer support communication to our users
- To analyze use of our website and app
- For our blog and to facilitate social sharing on our blog
- To send emails, texts and phone calls
- For hosting our services and databases

Additionally, we use our commercially reasonable efforts to cause our service providers and contractors to adhere to confidentiality and security obligations that are consistent with this Privacy Policy and our Terms of Use.

### **No Advertising**

Actionaly does not use student or user records or data collected for purposes of targeted advertising, and no student profile is built by Actionaly for reasons other than furtherance of School purposes.

### **Corporate Restructuring**

In the case of a corporate event such as a sale of assets, a future sale, or a merger of Actionaly with another organization, we may transfer your personal information. However, we will provide you with notice and an opportunity to opt-out of the transfer of personally identifiable student data if the new organization does not have privacy policy at least as stringent as our own.

## **4. How We Protect Information**

### **Security**

We take great measures in keeping your data safe and secure. Actionaly uses secure infrastructure to ensure that student data is always encrypted during transfer and transmitted securely. Access to Actionaly is authenticated through username/password. Actionaly stores and protects your account information on a secured server behind a firewall. We utilize encryption/security software to safeguard the confidentiality of personal information we collect.

- Actionaly is hosted using Amazon Web Services (AWS). AWS data centers adhere to the highest standards of physical security and processes. For more information on AWS security infrastructure visit <http://aws.amazon.com/security/> and <http://aws.amazon.com/compliance/>
- Actionaly uses the Amazon Cognito customer identity and access management (CIAM) service. For more information on the advanced security features of Cognito visit <https://aws.amazon.com/cognito/details/>.
- Data is stored in MongoDB Atlas cluster. MongoDB offers robust encryption features to protect data while in-transit, at-rest, and in-use, providing encryption of your data through its full lifecycle.
  - The default at-rest encryption that WiredTiger uses is AES-256 via OpenSSL.
  - In Atlas, customer data is encrypted at-rest by default using AES-256 to secure all volume (disk) data.
- Network traffic is encrypted with TLS1.2 (SHA256withRSA).

If Actionaly becomes aware of a security breach of its users' personally identifiable information, Actionaly will notify affected users as required by applicable laws and may post a notice on our services as required by applicable laws.

#### **Information Hosted in the United States**

Actionaly and all of our data is hosted within the United States. Please note that if you use our service from a country or region with laws differing from the United States' laws governing the collection and production of data, you may be transferring your personal information outside of the jurisdiction of your region and to the United States. By using our service, you consent to the transfer, use and storage of your personal information in accordance with our Privacy Policy and Terms of Use.

## **5. Choices About Your Information**

### **Managing Your Account**

You may review, update, and correct the information in your account by logging into Actionaly. Your School may not allow you to update your account information directly in Actionaly. In such event, an alternate School contact or instructions will be provided for you to update your Actionaly contact information. You can adjust your notification settings within Actionaly so that you receive instant text, instant email, or digest email, or you may opt out of Actionaly communications and receive no notifications at all. If you choose not to receive notifications from Actionaly this will not stop you from receiving emergency notifications, for example those regarding school closure, threats, etc.

### **Deleting Your Account**

If you or your child graduates from the School or leaves the School and you are no longer associated with the School, the School will delete your account, i.e., you will no longer be able to access your information on Actionaly and no other Actionaly user will be able to access your personal information either, including your School.

If you cease to agree with Actionaly' terms of use and privacy policy at some point in the future or if you no longer desire our service, please unsubscribe directly by clicking the link in the Actionaly email sent by your School or contact the School directly to delete your account. You may also contact us at [support@actionaly.com](mailto:support@actionaly.com). We will get in touch with your School to honor your request and respond within a reasonable time not exceeding thirty (30) days.

We will retain your information for as long as your account is active or as needed to provide services to you and your School. We will also retain and use your information as necessary in order to comply with our legal obligations, resolve disputes, prevent abuse, and enforce our agreements.

### **European Union Residents**

Our computer systems are currently based in the United States, so your personal data entered at our Site or related to your use of our services (i) will not be processed in the European Economic Area (EEA) and (ii) will be processed by our service providers or us in the United States and other non-EEA countries. By using Actionaly, you (a) agree to and accept the terms stated in this Privacy Policy and (b) expressly consent to the processing of your personal data on equipment and by service providers outside the European Economic Area. If you reside in the European Union and we do not seek your explicit consent to process your personal data, we are relying on the legitimate commercial interest of our company in providing the services to you and other customers and the need to process your personal data as previously described to accomplish that legitimate interest. You also have the right to withdraw consent and request that we halt processing of your personal data at any time. This withdrawal of consent does not invalidate the consent-based processing that occurred prior to withdrawal.

As an EU resident, you also have the following rights under the General Data Protection Regulation:

- Right of access to personal data
- Right to rectification of personal data held where it is incorrect or incomplete
- Right of erasure of personal data (“right to be forgotten”) if certain grounds are met
- Right to restrict/suspend processing of personal data
- Right to complain to a supervisory authority
- Right to object to processing (if processing is based on legitimate interests)
- Right to object to processing of personal data for direct marketing purposes

- Right to receive your personal data in a standard electronic format (data portability)

You may withdraw this consent or exercise any of the foregoing rights applicable to you by contacting the Privacy Officer at the address below or notifying us at [support@actionaly.com](mailto:support@actionaly.com)

## How to Contact Us

If you have questions or concerns pertaining to your information, your registration, your account, or unsubscribing please contact your School directly. Otherwise if you have questions about this privacy policy or Actionaly, you may contact us at [support@actionaly.com](mailto:support@actionaly.com).