



# Privacy Policy

At Project ECHO, we honor and respect the importance of maintaining the privacy of your personal information. This statement is to inform you of our policies and practices regarding information we collect about you or that you may provide when you access or visit our website at "Project ECHO.org", and our programs and services, including web-based programs delivered through the PROJECT ECHO's learning management system (LMS). You acknowledge this privacy policy is part of our Terms of Use, and by accessing our Websites or using our programs and services, you agree to be bound by all of the Terms of Use and understand this privacy policy. We refer to ourselves as "we", "our", "Project ECHO", "PE" and "ECHO" in this policy.

This Privacy Policy is part of our Website Terms and Conditions. Questions pertaining to this policy should be directed to: [info@projectecho.org](mailto:info@projectecho.org) for clarification.

## Your Privacy Is Important to Us

Your privacy is important to Project ECHO. We believe you should know what information we collect from you and how we use it. Project ECHO wants you to make the best decisions about the personal information and other information that you share with us. Personal information means information that can be used to identify you, and may include, but is not limited to, your name, address, phone number and email address. This privacy policy describes how PROJECT ECHO collects and uses personal information, and the rights and choices available to you regarding such information.

## Our Privacy Vow to Our Donors

We will not sell, share, or trade our donors' names or personal information with any other entity, nor send mailings to our donors on behalf of other organizations.

This policy applies to all information received by Project ECHO, both online and offline, on any Platform ("Platform" includes all Project ECHO USA websites and mobile applications), as well as any electronic, written, or oral communications.

To the extent any donations are processed through a third-party service provider, our donors' information will be used for purposes necessary to process and acknowledge the donation.

## Types of Personal Information We Collect and How We Collect It

PROJECT ECHO collects or may be provided personal information in the normal course of its operations as described in this policy. When you access certain Websites, programs, services or other online or social media platforms, we may ask that you provide us with some personal information, which lets us know who you are. If you do not provide that information, depending on the program or service, you may not be able to engage in that activity. It is completely optional for you to engage or not engage in those activities.

When you access certain Websites, programs, or services, we may collect personal information such as first name, last name, email address and username. For certain Websites, programs, or services we may also collect other personal information such as phone number, and postal address, some of which will be used for personalization and identification purposes only.

Project ECHO offers certain school-based programs in a blended learning format, which may include the use of web-based programs, games and related content, and you may be asked to provide certain personal information to access such content. In some cases, additional information, such as the name of a volunteer, educator, school or school district, information about when or how a program was offered, information on what class or program you may be associated with or a part of, and user feedback on our programs, may be associated with the personal information we collect from users of our Websites, programs, or services..

## How We Use Personal Information

We do not sell or trade your personal information to others. Project ECHO collects and uses personal information only for the purposes explained in this privacy policy. Those purposes include the following:

- We may share your personal information with service providers, vendors and consultants who help us operate, maintain, and improve our Websites, programs, and services. For example, we may work with service providers, vendors, and consultants to assist us with data analysis, promotional marketing, and customer support. We use third party

vendors to collect funds from you when you purchase our products or make donations. We do not receive your credit card numbers or other personal financial information from those third-party vendors, other than information about the amount you paid when making a donation or when purchasing our products. These parties may have access to personal information to perform services for PROJECT ECHO but may not use such information for any other purpose.

- Certain use of Project ECHO's trademarked intellectual property is licensed to contracted users of our program materials. We collect your information to provide you with programs and services that you have requested or that PROJECT ECHO or PROJECT ECHO Mentorship Network believe may be of interest to you, but only for use in connection with the overall Project ECHO organization.
- We use aggregate program and student data collected for the purpose of evaluating and improving our programs, reporting collective data to our funders, and to promote collective data on marketing materials to include printed and online marketing tools. Individual information collected is never shared, sold, or promoted.
- Non-specific, aggregate data is also used for the purposes of collecting general demographic information, measuring user interests, and analyzing the collective characteristics and behaviors of our registered individuals. The collection of this information allows us to appropriately change and update our programs and service our Websites and web platforms to improve our programs and services and the user experience.
- From time to time, Project ECHO may use your information to inform you of changes and enhancements to our content and services.
- Project ECHO collects permission slips, which includes a general liability waiver and photo release form for program participants. This data includes personal information which will never be shared or sold.
- If you enter a sweepstakes or contest, we may use any personal information that you provided to contact you if you should win
- You should be aware that if you voluntarily disclose personal information (i.e., your name, e-mail address, etc.) in any discussion forums or other public areas on this site, any information you disclose in your communication can be collected and used by third parties. Such activities are beyond our control and this policy does not apply to such information.
- Ultimately, you are solely responsible for maintaining the secrecy of your password and/or account information. Please be careful and responsible whenever you are online.
- Project ECHO is committed to protecting your personal information and using it in compliance with applicable data privacy laws, including the Children's Online Privacy Protection Act of 1998 (COPPA). Project ECHO

makes reasonable efforts to avoid collecting or retaining the personal information of anyone under the age of 13, except in compliance with COPPA and other applicable data privacy laws. Where certain personal information is requested, it must be indicated that the user is 13 years of age or older in order for the information to be collected, stored, or transmitted, unless otherwise collected and retained in accordance with COPPA and other applicable data privacy laws. In some cases, Project ECHO may provide notification to and obtain consent from a school or district on behalf of the parents or guardians of users under 13 years of age as permitted by COPPA with respect to the collection and use of personal information as described in this privacy policy. Such personal information is not used or shared for commercial purposes not related to online services offered in cooperation with the school or school district.

- We respond to subpoenas, warrants, or other court orders and judicial authorities regarding personal information concerning any member or visitor. We also reserve the right to release that information concerning a user who we believe is in violation of Project ECHO's Terms of Use or other published guidelines and official rules, even without a subpoena, warrant, or other court order. We cooperate with law enforcement agencies in identifying those who use our servers for illegal activities. We also reserve the right to report any activity to law enforcement that we in good faith believe to be unlawful.
- Project ECHO uses SSL security on any form that requires credit card information. We will never ask for information that could be used in a phishing scheme without the SSL security behind the form.
- Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations of the Internet which are beyond our control; (b) the security, integrity, and privacy of any and all information and data exchanged between you and us through our Websites cannot be guaranteed; and (c) any such information and data may be viewed or tampered with in transit by a third party.

## Aggregate Data

Demographic information, if collected, may be disclosed in aggregate to third parties, such as foundations who fund grants and programs. This aggregate information cannot be used to personally identify you or your computer.

# Safeguarding Your Personal Information

The security, confidentiality and integrity of your personal information is important to us. We maintain organizational, physical, and technical security arrangements for the personal information we collect to guard your personal information against accidental loss and from unauthorized access, use, alteration, and disclosure. However, despite such efforts, no security controls are 100% effective, and PROJECT ECHO cannot ensure or warrant the security of personal information that you provide to us. There is no guarantee that the data may not be accessed, disclosed, altered, or destroyed by breach of any physical, technical, or managerial safeguards.

## Accessing, Correcting or Deleting Your Personal Information

You are entitled to know what personal information we collect about you and to have access to that information. If you have registered as a user, you may access, edit, or correct the personal information you have provided in your profile at any time. Otherwise, you can request to access, review or correct your personal information, or to have your personal information or account deleted, at any time by emailing us at [info@ProjectECHO.org](mailto:info@ProjectECHO.org).

You can choose not to receive any communications about events or publications we believe might be of interest to you. Individuals may opt-out of communications, including by sending an email to [info@ProjectECHO.org](mailto:info@ProjectECHO.org).

## Retention of Personal Information

PROJECT ECHO will retain your personal information for as long as you allow PROJECT ECHO to retain your data, or as otherwise necessary to provide you with information about PROJECT ECHO and its programs and services. When you register as a user or obtain a user account, we process and keep your personal information for as long as your account is active. Once your account is deleted, we will retain your personal information for up to 60 days before permanently deleting it, unless we are legally required to retain the information for a shorter or longer period.

## Policies and Practices of Third Parties

Our Websites may, from time to time, contain links to other third-party websites. This privacy policy does not apply to other third-party websites. If you follow a link to any

such websites, please note that they may have their own privacy policies and their own data collection, use and disclosure practices. PROJECT ECHO does not accept any responsibility or liability for such third-party policies or practices. Please check the applicable privacy policies before you submit personal information to any third-party websites. Additionally, in the event other companies place advertising or other links on our Websites, they may collect information about you if you view their advertising or click on their links, including through the use of cookies. We cannot control this collection of information; rather you should contact these parties directly if you have any questions about the information they collect. However, it is Project ECHO's policy not to have third-party ad providers on its websites.

## Use of Cookies to Collect and Store Information

Project ECHO does not use cookies to track any information.

## Updates to Privacy Policies

We regularly review and, if necessary, update our privacy policy. Periodically, we may change, modify, make additions to or deletions from this policy, without giving you prior notice, or any notice. Any modifications to this policy will be posted as part of this policy. We suggest that you review and update yourself regarding this policy. Your continued use of our Websites, programs or services, including online programs, after any changes or modifications to this privacy policy constitutes your agreement to follow and be bound by any changes or modifications.

## Questions or Concerns

If you have a privacy question, concern, or request, please contact us at: [info@ProjectECHO.org](mailto:info@ProjectECHO.org). We welcome any questions or comments you may have.