

Brooke House Academy Privacy Policy

Brooke House Academy is committed to protecting the privacy and information it collects from its community. This policy explains how *Brooke House Academy* collects and handles information it receives from applicants and their families, students and their families, alumni, employees (including applicants for employment) and others who interact with *Brooke House Academy* or its website. Other than IP addresses and traffic information collected described below, we do not collect personally identifying information on our website unless you choose to provide such information to us.

This policy sets forth the type of information we collect, how it is stored and used, and the rights and options you may have with respect to your personal information.

What Personal Information We Collect; How and When We Collect It

Our goal is to collect the minimum amount of information necessary - whether from applicants, enrolled students, alumni, employees, or contractors.

We collect information you provide us. A person's interaction with *Brooke House Academy* occurs during the admissions process, during matriculation (and throughout a student's enrollment at *Brooke House Academy*), and as alumni. We also collect information from applicants for employment as well as employees and contractors of the school.

It is important to the School to protect the privacy of young children who may use our website. The School does not knowingly solicit or collect the personal information of children under the age of 11 on this website. Children under the age of 11 are not permitted to submit an inquiry form or application to the School. Parents or legal guardians of a child under the age of 11 must complete the inquiry form and consent to the submission of an application to the School.

Usage Information, Site Activity and Location Information

We automatically collect information regarding the actions you take on the website ("Usage Information"). Usage Information helps us understand trends in our users' needs and improve our website and its functionality. We also may use Usage Information for general marketing purposes. This Privacy Policy in no way restricts or limits our collection and use of Usage Information, and we may share Usage Information about our users with third parties for various purposes, including to help us better understand your needs and improve our website. When you use our website and/or provide us with information, some examples of the Usage Information we may collect include: the type of Web browser you use, your operating system, your web requests, your Internet Service Provider, your IP address, referring/exit pages and URLs, the pages you view and how you interact with links on our website, comments and other content you post, the time and duration of your visits to the website and other such information. We may store such Usage Information itself and/or such information may be included in databases owned and maintained by agents or service providers. We may also collect information that identifies the device you use to access the website, your device's unique device ID, the IP address of your device, your operating system, connection type (e.g. WiFi or cellular) and GPS technology (or other similar technology) to determine your current location when you use a mobile device to access the website. If you do not want us to have your location information, you should turn off the location services before accessing the website from a mobile device. We may use such information and pool it with other information to track, for example, the total number of visitors to our website, the number of visitors to each page of our website, etc. We use this information to help us understand how people use the website and to enhance the website.

Cookies and Web Beacons

We use cookies (a small text file placed on your computer to identify your computer and browser). We may also use Web beacons (a file placed on a website that monitors usage). We use cookies and Web beacons to improve the experience of the site and services we provide, such as pre-populating your username for easier login, to allow user-specific messaging or to permit user-specific advertising. We do not use cookies or Web beacons to collect Personal Information. Most Web browsers are initially set up to accept cookies. Currently, the school does not recognize automated browser signals regarding tracking, including "do-not-track" signals. You can remove persistent cookies and change your privacy preferences by following directions provided in your Internet browser's "help" directory. However, certain features of the site or services may not work if you delete or disable cookies. Some of our third-party providers may use their own cookies and Web beacons in connection with the services they perform on our behalf.

Admissions:

It is expected that information shared with *Brooke House Academy* during the admission process is given with the consent of a parent or guardian. The school does not knowingly collect information from anyone under the age of 18 without the consent of a parent or guardian.

During the admissions process, personal information will be collected and stored about the applicant and family for the purposes of evaluating the applicant. *Brooke House Academy* also will use the information for communicating with the family during the admissions process.

Personal information about applicants, their parents/guardians and siblings will be collected via our website (the Inquiry Form) as well as by The Standard Application Online administered by the Enrollment Management Association or other similar common applications administered by a third party. Additional information may be collected by the admissions office via various interviews, phone calls, references, and emails.

Types of personal information collected include names, addresses, phone numbers, emails, gender, dates of birth, race, ethnicity, nationality, citizenship, educational history, and legacy status. Further, we collect information about the student's academic and disciplinary history, athletic, and extra-curricular records and interests, and possibly financial information (to process financial aid requests). Additional information regarding the applicant's parents or guardians such as employment and marital status also will be collected.

As part of the admissions process, the school also may gather or receive information from other sources regarding medical/educational records, standardized tests, and other evaluative material. The types of information we collect in these cases may be specific to the individual.

We receive and process such personal information pursuant to your agreements with such third-party service providers, and in furtherance of your agreement with us concerning your application and matriculation and pursuant to our legitimate interests in assessing your application. For information on the privacy practices of such third parties, please consult your agreements with them and their own privacy policies.

You are required to provide this information if you would like to apply to or be enrolled at *Brooke House Academy*. Without this information, *Brooke House Academy* cannot process a student's application or enroll them. To the extent that any requested personal information is not necessary for the performance of *Brooke House Academy's* agreements and policies, such requests will be separately identified, and the appropriate consent obtained. Applicant information is kept permanently.

Matriculation:

It is expected that information shared with *Brooke House Academy* during a student's enrollment is given with the consent of a parent or guardian. The school does not knowingly collect information from anyone under the age of 18 without the consent of a parent or guardian.

Once enrolled, *Brooke House Academy* continues to collect and process personal information for the purposes of caring for and educating the student. The personal information is used to keep you informed about the school and to offer you access to school services. Personal information also will be collected, created, and stored (about the student and family) for the purposes of tracking student progress at *Brooke House Academy*.

The information collected for enrolled students and their families includes names, addresses, phone numbers, emails, gender, and dates of birth. Health and medical information regarding the student are collected to ensure their well-being while on campus. Further, we collect information about the enrolled student's academic, athletic, and extra-curricular records and interests, and possibly financial information. Information about performance (classes, co-curricular activities, etc.) and images of the student engaged in academic, athletic, and extra-curricular activities also may be collected and maintained. We may post information about performance and images of the student on the internet and in publications.

Brooke House Academy may gather or receive information from other sources such as testing agencies (including, medical/educational, standardized tests, etc.). The types of information we collect in these cases may be specific to the individual. We receive and process such information pursuant to your agreements with such third-party service providers, and in furtherance of your agreements with us concerning your matriculation. For information on the privacy practices of such third parties, please consult your agreements with them and their individual policies.

This information collection is required if one wants to be enrolled at *Brooke House Academy*. To the extent that any requested personal information is not necessary for the performance of *Brooke House Academy's* agreements and policies, such requests will be separately identified, and the appropriate consent obtained. Student records are kept permanently.

Alumni and Friends:

Alumni, friends, and parents are lifelong members of *Brooke House Academy* community. The Development Office of *Brooke House Academy* is dedicated to keeping our alumni, friends, and parents (past and present) connected to the school.

Types of information collected include name, address, phone number, email, gender, date of birth, employment, gifts received, and events attended. Credit card numbers are collected and used only for donation or payment processing through an encrypted, secure, third party processing system, and are not retained for other purposes.

The information we collect is used for a variety of reasons, including:

- Directory information, including the online alumni community.
- Communicating with you to let you know about receptions, reunions, and other events with alumni or *Brooke House Academy* faculty/administrators in the area.
- Making you aware of projects and opportunities to support the school (via volunteering, gifts, etc.)
- General Fundraising
- Surveys

- Promoting services, we may offer to alumni.

Since *Brooke House Academy* likes to keep in contact with you for life, we retain these records permanently.

For any questions regarding the collection or use of alumni information, please contact info@brookehouseacaemy.com

Applicants for Employment, Employees and Contractors:

Brooke House Academy collects information from applicants for employment, employees, and contractors of the school. The school uses an employment application to collect personal information such as biographical information, gender, date of birth, employment history, and employment/personal references on all applicants for employment. This information becomes part of the employee's file once hired. *Brooke House Academy* also conducts extensive criminal background checks through fingerprinting and if applicable, a credit report, on its employees. Upon hire and throughout employment at the school, the employee may provide additional information to the school such as bank information, biometric information for time-keeping purposes, health information, beneficiary and dependent information, and other information related to such employment. The school collects EIN or social security numbers from contractors and may collect bank information for payment purposes. Certain contractors with direct, unsupervised access to students will need to provide personal information such as biographical information, date of birth, employment history, and employment/personal references. The school also will conduct criminal background checks through fingerprinting of such contractors with direct, unsupervised access to students.

Email and Web Inquiries:

You also may send us personally identifying information, for example, in an email message containing a question or comment, or by completing a web form that provides us with this information. We use personally identifying information from these communications primarily to respond to you. We may forward your correspondence to school representatives who are better able to answer your questions. We may also use your email to contact you in the future about our programs that we deem may be of interest to you. We do not share your name or email address with any third parties.

Disclosure of Your Information:

We may disclose your information pursuant to legal requirements and to **comply with our school rules and policies**. We also may share your information with:

- Law enforcement or other governmental officials, in response to a verified request relating to an investigation or alleged illegal activity;
- Third parties that provide a valid subpoena or court order; or
- Third parties as requested or authorized by you (or your parent or guardian).

We also may share your information with third party vendors providing services to us in our operations. *Brooke House Academy* uses cloud-based software to efficiently assist the school in its operations. Most information, including personal information, is processed and/or stored in these systems. These cloud-based software providers also have their own security policies, terms of use and privacy policies.

External Links

Our website offers links to other sites that are not owned or affiliated with *Brooke House Academy*. These sites have their own security policies, terms of use and privacy policies. If you choose to visit one

of these websites, you should review the policies of that site. *Brooke House Academy* exercises no control over and is not responsible for the privacy practices or the content of such websites.

Your Rights Regarding Your Personal Information:

Information Access

You may request confirmation of whether *Brooke House Academy* is processing personal information about you. If so, you have the right to see or obtain a copy of that information and to learn; for what purpose(s) we are processing that information; the categories of information; the identity of those who receive the information; if we receive personal information about you from other sources, any available information about those sources; and how long we keep the information or, if the period is not determined, the factors that we use to determine that period.

Correction and Completion

You have the right to request correction of personal information that you believe is inaccurate. Where you believe the information is incomplete, you have the right to complete the information, including by supplementing the information with a statement.

Right of Erasure or "To be Forgotten"

You have the right to request that *Brooke House Academy* permanently delete your personal information when:

- we no longer need your information for the purposes for which it was collected;
- we have been processing the particular information based only on your consent, you withdraw your consent, and there is no other legal ground for us to continue processing;
- you successfully object to the processing of certain information (see "Objection" below);
- the information has been unlawfully processed; or
- erasure is required by law.

This right will not apply where continued processing of your information is necessary for:

- the exercise of the right of freedom of expression and information;
- compliance with applicable law;
- performance of a task carried out in the public interest or the exercise of official authority vested in *Brooke House Academy*;
- ensuring the functionality and stability of said system;
- for reasons of public health;
- certain types of archiving that is in the public interest, scientific or historical research or statistical purposes; or
- the establishment, exercise or defense of legal claims.

Although *Brooke House Academy* may remove most personal information such as contact information (address, phone number, etc.), there may be information we cannot remove, including, but not limited to, certain records such as the user's attendance at *Brooke House Academy* and their grades or information about certain donations made to the school.

Restriction on Processing

You have the right to request that *Brooke House Academy* stop or restrict the processing of your personal information where:

- you are contesting the accuracy of your personal information, in which case processing could be restricted for the period of time necessary for us to determine the accuracy of the information;

- the processing is unlawful and you oppose the erasure of the personal information and request instead that processing be restricted;
- we no longer need the personal information for the purposes of the processing in question, but you need the information for the establishment, exercise or defense of legal claims; or
- you object to the processing of certain information (see “Objection” below), in which case processing could be restricted for the period of time necessary for us to determine our response to the objection.

If you successfully exercise this right of restriction, we will process the information in question only: (i) where we have your consent to do so; (ii) for the establishment, exercise or defense of legal claims; (iii) for the protection of the rights of another person; or (iv) for reasons of important public interest. In the event that any such restriction is lifted and processing resumes, we will inform you beforehand.

Limited Information Portability

With respect to personal information that we have received directly from you (as opposed to information that we may receive about you from sources other than you), you have a right to request and receive such information in a structured, commonly used and machine-readable format. You also have the right to transmit such information to another entity without interference from us.

Please note that this right of portability applies only in limited circumstances, such as: where we are processing personal information based on your consent or pursuant to our contractual agreements with you, and the processing is carried out by automated means. If you request that we transmit your information directly to another individual or entity, we will comply where it is feasible to do so.

Objection

You may object to processing of your personal information that is based on *Brooke House Academy's* determination that such processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority, or that such processing is necessary for the purposes of the legitimate interests pursued by *Brooke House Academy*.

If we process your personal information for purposes of direct marketing, you may object at any time. Direct communications from *Brooke House Academy* that are for marketing, promotional, or solicitation purposes may contain an option for unsubscribing and if so, will provide instructions for how to do so.

Security

The school employs commercially reasonable physical, electronic, and procedural safeguards to protect the confidentiality and security of personal information and other information and data transmitted to us. However, no data transmission over the Internet or other network can be guaranteed to be 100% secure. You acknowledge and accept the data security risks of using our website and our services.

Note to International Users

This site is hosted, and the provision of our services are in the United States. If You are accessing the sites or using our services from the European Union, other countries in Europe, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure that differ from U.S. laws, please be advised that through your continued use of the site or our services, which are governed by U.S. law and this Privacy Policy, you are transferring your personal information to the U.S., and you consent to that transfer. Your personal information may also be accessible to law enforcement and national security authorities in the United States, without notice to you and without the knowledge or consent of the school. The laws in the U.S. may not be as protective of your privacy as those in your location. By using our site and services, you agree that the applicable laws in the U.S. will govern the

collection, use, transfer, and disclosure of your information. If you do not agree to these terms, do not use this site or our services.

Contact Information:

If you wish to exercise any of the rights described above or have any questions about this Privacy Policy, please do so by contacting info@brookehouseacademy.com

We will attend to your request promptly and will respond within a reasonable time. If you are dissatisfied with our handling of your request, we ask that you give us the opportunity to resolve the issue; however, you have a right to lodge a complaint with the supervisory authority where you are located.

Changes to this Policy

The School reserves the right, in its sole discretion, to change this Privacy Policy in whole or in part, at any time. Your continued use of the website after any changes to the Privacy Policy have been become effective will be considered acceptance of those changes. When we make changes, we will also revise the "last modified" date of the Privacy Policy page. We encourage you to review this Privacy Policy periodically.

Effective May 2021