

## Privacy Policy

*Effective date: January 1, 2025*

By using or accessing our websites, applications or services (collectively the “Services”) in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

Remember that your use of Big Picture Learning’s (hereinafter “BPL”) Services is at all times subject to the Terms of Service, either provided within those agreements you entered into between you and BPL or as available on BPL’s website from time to time, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Service.

If you have any questions or concerns about our Privacy Policy, please send a detailed message to [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org), and we will try to resolve your concerns.

### **Our Core Commitments**

**We think these are the most important commitments we can make to you about how we handle personal information, so we put these commitments before anything else in the Privacy Policy.**

#### *Completeness*

This Privacy Policy covers all the categories of data that we collect from individuals across all Services provided by BPL and its affiliates, and we do not exclude any categories of collected data from this Privacy Policy.

#### *Marketing to Students or Families*

BPL does not sell student data. Further, we will not use, sell, share, or disclose personally identifiable information we receive from our Services to: (a) market or advertise to students or families/guardians; (b) inform, influence, or enable marketing or advertising to students or families/guardians; or (c) develop a profile of a student or family member/guardian, for any commercial purpose. Data collected is only used for providing or improving the Services.

We will not sell, share or disclose personally identifiable information of individuals, teachers or administrators we receive from the Services to third parties for marketing or advertising purposes.

Aggregated and anonymized data regarding students, individuals, teachers or administrators is not considered student data or personally identifiable information under relevant laws and regulations or by BPL under this Privacy Policy as the information cannot be re-identified.

#### *Limits on Advertising and Data Collection within the Applications*

Within the Services, we do not: (a) display advertising, including any behavioral or contextual advertising; (b) permit the collection of data by third party advertising or tracking services for any purpose except to collect data for us to understand the use of the Services in order to maintain and improve the Services; or (c) collect data, including any behavioral data, for use in targeting advertisements on third party services or websites.

#### *Limits on Data Collection as a General Matter*

We do not, either within the Services, collect protected health information, biometric data or other sensitive personal information. See “Advertising Partners” below regarding the collection of behavioral data within the Services.

### *Legal Compliance*

As set forth in this section, we comply with the following laws concerning the protection of student personally identifiable information, including educational records: the Family Educational Rights and Privacy Act (“FERPA”) at 20 U.S.C. 1232g (34 CFR Part 99);, Protection of Pupil Rights Amendment (“PPRA”) 20 U.S.C. 1232h, AB 1584 (codified at California Education Code § 49073.1), and the Student Online Personal Information Protection Act (codified at California Business and Professions Code § 22584 et seq.), and all other specific state laws (as applicable to us) protecting student personally identifiable information. As a non-profit organization BPL and its affiliates do not fall under the provisions of the Children’s Online Privacy Protection Act (“COPPA”).

In the provision of student data from a local education agency and/or postsecondary institution, BPL shall be considered a School Official as that term is used in FERPA.

As to any applicable federal or state law or regulation which requires consent or authorization from a parent or guardian for the collection or use of information concerning a student, the parent, guardian, teacher, school or school district, is responsible and liable for fulfilling any applicable consent requirement. BPL will work with the responsible party to provide the appropriate notices and other information required for proper notification and compliance with such laws and regulations.

In accordance with the California Consumer Privacy Act legislation, compliance information and any user actions are available in Exhibit A below.

### **Definitions**

As used in this policy:

- “personally identifiable information” means information that can be directly associated with an individual and includes educational records, student-generated content, names, addresses, telephone numbers, email addresses, and other contact information. To the extent non-personally identifiable information is combined with personally identifiable information, we treat the combination as personally identifiable information. As described below, BPL does collect and process a minimal amount of personally identifiable information, including from students, but only as needed to provide Services.
- “personal information” means personally identifiable information, together with information indirectly associated with an individual, such as IP addresses, pseudonymous identifiers, etc. and other information associated with that individual that is indexed to any of the foregoing. As described below, we do collect personal information, including from students as needed to provide Services to those students.
- “educational records” means official records, files and data directly related to a student and maintained by the school or local education agency, including but not limited to, student-generated content, records encompassing all the material kept in the student’s cumulative folder, such as general identifying data, internship data, geolocation data and internship attendance data. As described below, we do collect and process some

educational records, including from students as needed to provide the Services to those students.

- “student” is interchangeable with “pupil” or “minor” and means any student or individual under the age of 18 accessing and using the Services for educational purposes.
- “student-generated content” means materials or content created by a student in the Services including but not limited to notes, feedback, messages and goals.

Other terms are defined elsewhere in this Privacy Policy or in the Terms of Service.

### **Persons Covered by this Privacy Policy**

#### *Generally*

This Privacy Policy covers the personally identifiable information and the personal information of anyone who visits our websites or uses our Services. More specifically, it covers the personal information of:

- Visitors to our websites or people who correspond with us through our websites, outside of our Services
- Registrants or attendees of our conferences and/or events
- Teachers or administrators who use or manage the use of our Services
- Students who use our Services

We gather different personally identifiable information and personal information from each of those groups of people, and may handle that personally identifiable information and personal information differently for each group, as we explain below.

#### *Students / Children*

If you are not of legal age to form a binding contract (in many jurisdictions, this age is 18), you may only use the Services and disclose information to us with the express consent of your parent, guardian, school or school district. Please make sure that you have reviewed this Privacy Policy with your school, school district, parent or legal guardian to make sure you understand it.

As we explain below, we rely on third party service providers to help us with the provision of the Applications. We treat all student personal information uniformly, so any consent to our collection and use of student personal information necessarily includes consent to disclosure of personal information to those third party service providers under the terms of this Privacy Policy.

#### *School Based Users of Services.*

If you are a student, teacher, or other user of our Services, then our obligations to you may be controlled by a separate written agreement which may have terms which are different from this Privacy Policy. That agreement is between us and (usually) the school or school district through which you are accessing the Services, and any questions about the specific terms of that agreement should be directed to an appropriate person in authority in that school or school district.

Students, teachers, and other users of our Services should be aware that: (1) the school or school district with which we have an agreement may, and likely will, provide personal information about you to us, and most schools or school districts require that most notifications which we

would normally provide to you directly (for example, regarding legal or parental requests to access your personal information) will be provided to the school or school district.

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

#### *Correspondence*

If you correspond with us through a web form, email or otherwise, we will collect and retain your correspondence like any other ordinary business correspondence, subject to the information retention policies and legal requirements applicable to us and standard in our business.

#### *Teachers/Administrators*

In order to provide the Services to teachers (including home-schooling teachers) or administrators, we receive and store the personally identifiable information you knowingly provide to us.

As part of the registration and account setup process, we require your name, email address, school and school district affiliation, the classes and/or grades using the Applications. If your school or school district uses a third-party single sign-on (“SSO”) we will also have access to the personally identifiable information we describe below under “Third Party SSO Information”. We will also receive any feedback on student work that you may enter into the Applications.

#### *Students – ImBlaze & BUnbound*

In order to provide the ImBlaze and BUnbound services, we receive and store the personally identifiable information that you as a student or user (or your teacher, school or school district) knowingly provide to us.

As part of the registration and account setup process and the ongoing use of the ImBlaze or BUnbound services, we require your name, email address, school name, assigned teacher/educator, internships in which you participate, internships searched by you within ImBlaze and/or BUnbound, login history, internship attendance, internship location, and in some instances geolocation data related to internship location and attendance. You may also provide us with optional demographic data including a profile picture, gender, grade level, and student ID. In using the ImBlaze or BUnbound services you or your mentor may provide information related to goals and accomplishments and feedback. If your school or school district uses a third-party single sign-on (like Clever), we will also have access to the personally identifiable information we describe below under “Third Party SSO Information”.

Some of this information will be provided to us by your teacher, internship mentor or school, so we may not ask you for it directly, but we will still have it.

#### *Students – Harbor Freight Fellows*

In order to provide the Harbor Freight Fellows service, we receive and store the personally identifiable information indicated as collected for ImBlaze and BUnbound above, home address, date of birth, phone number and relevant application related data that you provide.

#### *Adults Participating in the other BPL Initiatives*

In order to provide BPL’s services related to initiatives for adult participants, we receive and store the personally identifiable information identified within the ImBlaze and BUnbound section above along with that information identified in the Harbor Freight Fellows section.

### *Individuals Registering for Conferences and other BPL Events/Activities*

In order to provide conferences and other events, we receive and store the personally identifiable information that you as a registrant, participant, presenter or vendor provide.

As part of the registration process and to facilitate your participant in the given conference or event, you may provide us with your name, email address, school affiliation, phone number, home address, work address, other optional demographic data and headshot image.

### *Third Party SSO Information*

If your school or district chooses to use third party single sign-on (e.g., a Clever account) for access to the Services, you may have to provide us with your username (or user ID) so that your identity can be authenticated through the third-party account (the “SSO Account”). When the authentication is complete, we’ll be able to link your account with the SSO Account. That linking may allow us to access and collect certain personal information, such as your name and email address, your user ID for the SSO Account, data tokens used to implement single sign-on and connect with your SSO Account profile, and other personal information that your privacy settings on the SSO Account permit us to access, in connection with creating your Services account. We may also share some information back to the SSO Account. For example, Clever allows the exchange of information about the schools, classes and students with which a teacher is associated, all to make it easier to set up and manage an account for the Services. We encourage you and all schools or districts to carefully choose privacy settings in SSO Accounts to limit the exchange of information to what you (or the school / district) want to share with us and want us to share. However, we don’t try to access any information in the SSO Account that we don’t have to access to allow you to use it to sign onto the Services. We never receive or store passwords for any of your SSO Accounts.

### *Other Third-Party Information*

Like many other companies, we may acquire from third parties lists of publicly available contact information for individuals, teachers or administrators who may be interested in our services. We do not correlate this contact information with information about users of the Services.

## **Information Collected Automatically**

### *Log Data*

Our Services, automatically receive and record some information from your browser or device (“Log Data”), just like all web services have to in order to function. The Log Data our Services automatically collect may include some personal information, but does not include personally identifiable information. Log Data includes information like your IP address, the type of browser and/or device you're using to access our Services, the capabilities of that browser or device, and the page or feature you requested. Log Data, together with the information that we collect through the Tracking Mechanisms, comprise “Analytics Data”. As described below under “Use and Sharing of Personal Information: Analytics Data,” we may share the collected Analytics Data (*but no personally identifiable information*) in a de-identified and aggregated form with third parties for analytics and tracking purposes.

### *Tracking Technologies*

We, and third parties with whom we interact, including our third-party service providers or business partners, may use cookies, web beacons, and similar technology in connection with

your use of the Services (collectively referred to in this policy as “Tracking Mechanisms”). Cookies are small text files that may have unique identifiers, and reside, among other places, on your mobile device or your computer. Web beacons are small strings of code that provide a method for delivering a graphic image on a web page or in an email message for the purpose of transferring data.

If Tracking Mechanisms are used, they may be used to collect information about you and your use of our Services, such as your browser type, and the date and time of your use. Tracking Mechanisms may also be used in order to help us learn more about how users engage with the Services, enable Applications features and processes (like enabling you to return to password-protected areas of the Applications without having to re-enter your password), provide authentication and security for your use of the Applications, or store your preferences.

#### *Specific Service Providers*

Our third-party analytics service providers include Google Analytics. For Google’s privacy practices see [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html). To opt out of data recording and analysis by Google Analytics, see <https://tools.google.com/dlpage/gaoptout>.

We may also utilize Google Signals, a feature of Google Analytics. Google Signals will associate the visitation information collected from users of our Website with Google Information from accounts of signed-in Google-account users who have consented to this association for the purpose of ad personalization. This Google Information may include location, search history, YouTube history and Data from sites that partner with Google. The information is used to provide aggregated and anonymized insights into users’ cross device behaviors. If you fall under this described association, you may access and/or delete such data via <https://myactivity.google.com/myactivity>. To opt out of the collection and features of Google Signals, see <https://adssettings.google.com/authenticated>.

#### *Disabling Cookies or Web Beacons*

It may be possible to disable cookies through your device settings. Most browsers allow disabling either third party cookies or all cookies. The method for disabling cookies may vary by device but can usually be found in preferences or security settings. However, doing so may cause portions of the Services to not function, or to function improperly, or otherwise affect your ability to use the Services. You may also disable web beacons by disabling HTML images in your email program, which may also affect other images in emails you receive.

#### *Do Not Track*

The Services will respond to the Do Not Track setting in your browser and will honor other standard opt-out mechanisms (e.g., browser cookie settings and advertising opt-out cookies). Further, we do not ourselves use cookies to collect personally identifiable information and track users’ online activities over time (except specifically in the Services for the purposes we describe above) or across different websites. However, certain of the third-party analytics providers we use (e.g., Google Analytics) may be able to do so, though we do not have access to or control of that information. For information regarding Do Not Track mechanisms, see <http://allaboutdnt.com>.

### **Use and Sharing of Personal Information**

This section explains how we use and share personal information, consistent with our statements above under “Our Core Commitments”.

#### *To Provide, Maintain, and Improve the Services*

We use the information we collect to provide, maintain and improve the Services. Uses of personally identifiable information for those purposes are:

- To deliver the Services, including diagnosing and correcting any errors in the Services.
- Enabling communications among the users of the Services. For example, mentors, teachers and their students need to communicate.
- Enabling registration and participation for conferences and other events.
- Providing for initiative/fellowship nominations and the provision and completion of relevant applications and enrollment forms.
- Only after we have removed any identifying information, we may use collected information for development, research, and/or improvement of the Services or other educational services or materials we may offer. We may also share aggregated information based on such de-identified (or never-identifiable) information with third parties working with us for development, research, and/or improvement of the Services or other educational services or materials we may offer. We don’t share any personally identifiable information or information other than in an aggregated format, with third parties for those purposes.

To provide the Services, we must allow the organizations we work with to have access to your personally identifiable information. So, you should know that:

- If you are a student, your mentor, teacher, and your school administrators may be able to access your Services account and the personally identifiable information in that account.
- If you are a mentor or teacher, your school administrator can access your Services account and the personally identifiable information in that account.
- Upon request, we are required to provide a school or school district with a copy of all the personal information in any Services account for any student or teacher in that school or school district.

If you have questions about how your teacher, school, school district, or any of their personnel handle your personal information, you should direct your questions to the appropriate person in your school or school district.

#### *To Communicate with You*

We may communicate with you if you've provided us the means and permission to do so. For example, if you've given us your email address:

- For individuals who have provided their contact information to us through our websites or otherwise outside the Services, we may email you about the Services including new features or options in which you may be interested, opportunities to learn about the Services, whether other teachers or administrators in your school district are using the Services or are interested in doing so, or to respond to your inquiries. You may also receive communications regarding participating in conferences or other BPL events.

- For teachers and administrators, we may email you about updates to the Services including new features or options in which you may be interested, opportunities to learn more about the using the Services, whether other teachers or administrators in your school district are using the Services or are interested in doing so, to respond to your inquiries, or to provide operational or legal notices. If you are a teacher or administrator, you may also be asked if you want to participate in peer-to-peer email conversations about how you use the Services. You may also receive communications regarding participating in conferences or other BPL events.
- For teachers, administrators, and individuals who provide their contact information to us outside of the Services, we may offer you the opportunity to participate in surveys or promotions. Those opportunities will be offered under additional terms we will provide at the time.
- We do not email students except for those circumstances when necessary to offer the Services or when the system generates emails to students as requested/triggered by the students' teacher/educator. The mobile applications provided by BPL may also include push notifications that serve a similar purpose to the emails to students.

If you do not want to receive communications from us, please indicate your preference by emailing [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org), or by using an opt-out link provided within a given email. We also send school or school district technical administrators administrative and operational notices which we believe are necessary for their effective use of the Services; we do not presently allow opt-out from those notices.

#### *Service Providers and Our Affiliates*

We may engage trusted third-party service providers to work for us in connection with the operation of our Services and our business, in the following roles: hosting of our websites and applications, error and bug tracking, data storage and analysis, technical and user support, and email delivery. We may provide those service providers with, or authorize those service providers to access, your personal information, including personally identifiable information. In certain cases, third party service providers may collect information from you directly on our behalf (for example, web data analytics providers).

All third-party service providers we engage will use the information only to provide services to us and will retain and use this information in a manner consistent with BPL's own Privacy Policy. Our third-party service providers are not allowed to augment, extend, or combine personal information shared with them with information from third party sources. If we learn that any third-party service provider has misused personal information which we have provided to them or to which we have allowed them access in a manner inconsistent with BPL's Privacy Policy, we will delete that personal information (and potentially all the personal information) held for us by that third party service provider.

We do not presently share any personal information with any of our affiliates or subsidiaries but may do so in the future consistent with this Privacy Policy.

#### *Analytics Data*

BPL uses Analytics Data to enable us to learn how often users use parts of the Services, so that we can customize and improve those Services. As part of our use of such information, we may provide such Analytics Data to our partners (only in a de-identified and aggregated format) about



how our users use the Services. We may link Analytics Data to personal information that we collect through the Services, but we will only use the information in this form internally (for example, to customize your experience), and will not disclose it in linked format to third parties.

#### *Business Transfers and Delegation*

In the event of our acquisition, merger, the sale of our assets, or if we go out of business, enter bankruptcy, or go through some other change of control, we can and will transfer your personal information to the successor to business or assets, but we will not transfer your personal information unless the buyer or acquirer (1) intends to maintain and provide the Applications as a going concern and (2) agrees to honor the terms of this Privacy Policy, including providing notice and an opportunity for you to cease use of the Services before any changes to the terms of this Privacy Policy take effect.

#### *Protection of BPL and Others*

Always subject to our legal compliance obligations, we reserve the right to access, read, preserve, and disclose any information that we reasonably believe is necessary to comply with law or court order; enforce or apply our conditions of use and other agreements; or protect the rights, property, or safety of BPL, our employees, our users, or others. If we are required to disclose your personal information by a government or legal request, we will notify you of that request if we are permitted to do so by law.

#### **Security**

If you are accessing our digital services, your account is protected by a password for your privacy and security, and you select that password, so we encourage you to select a strong password. If you use an SSO Account to access your account, you may have additional or different sign-on protections via that third party site or service. You should prevent unauthorized access to your account and the personally identifiable information in that Account by selecting and protecting your password and/or other sign-on mechanism appropriately, not sharing those sign-on credentials with anyone, and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other personal information we hold in our records, and we use industry standard data security measures to protect your personal information. This includes: (1) only storing your personal information under our control, (2) using multi factor authentication for our personnel to access your personal information, (3) implementing physical access controls to those areas where personal information is stored, (4) limiting access to your personal information to only those of our personnel who need to have that access to do their jobs, and (5) encrypting all of your personal information both in transit and at rest. We also regularly conduct audits of our security practices to make sure that they are up to date. Unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information.

In the event of an unauthorized disclosure of your personal information, we will provide notice as required by applicable law.

You should also be aware that:

- If you are a student, your teacher, your internship coordinator and/or your school administrators can access your account and its personally identifiable information.
- If you are a teacher, your internship coordinator and/or school administrator can access your account and its personally identifiable information.

This means that your account security is only as good as the security precautions of the teachers and school administrators who can access your account, and you should check with them about those precautions and their information handling policies.

### **Retrieving, Changing and Deleting Information**

We store analytics data and information collected through our websites separately from the information stored in the individual applications (like ImBlaze, BUbound, etc.). We have no meaningful ability to provide you with information concerning analytics data. For personally identifiable information collected through the websites (e.g., by signing up for a mailing list), please contact us at [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org) if you would like us to delete that information, or if you would like to know which personal information of yours we have or have shared with third parties.

We use technical efforts to ensure the integrity of the personal information we collect and store. However, because we receive all personal information either from you directly, or from the school or school district with which you are affiliated, we have no ability to determine the accuracy of that information and rely on you or the relevant school or school district to either correct or inform us of any inaccuracies so that we can correct them.

Through your account settings, you may access, and, in some cases, update or delete the personally identifiable information in your Applications account. Please note that in some cases, the information in your Applications account can only be changed by your teacher, school, or school district, and you cannot change it yourself. In that case, you will need to contact the relevant person in your school or school district. If you cannot delete or update your personally identifiable information and the ability to do so is not controlled by our school or district, please contact us at [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org) and we will facilitate the deletion of your requested personally identifiable information.

Parents or guardians may request that we cease collection of personal information about their child. If you are a parent or guardian and would like to request that personally identifiable information regarding your child (or, if you are a teacher, a child that is in your class) be updated or personal information about your child no longer be collected (and/or that it be deleted) and you do not have the ability to do so yourself, please contact us at [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org). In most cases we will refer your request to the relevant school or school district, but if you or your child is not affiliated with a school or school district, we will respond to your request within thirty (30) calendar days of receipt.

You may be able to add or update information as explained above. By emailing us at [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org) you may request that we delete your account or provide you with a list of all personal information of yours we have or have shared with third parties. In most cases we will refer your request to the relevant school or school district, but if you or your child are not affiliated with a school or school district, we will respond to your request within thirty (30) calendar days of our receipt of such request.

Generally speaking, unless a legal request has been made for a user's personally identifiable information, we do not retain and will delete personally identifiable information in Services accounts within a reasonable period after we are informed the account will no longer be used. We may use aggregated or de-identified information derived from your personally identifiable information after you update or delete it, but not in a manner that would identify you personally.

The information you can view, update, and delete may change as the Services change. If you have any questions about viewing, updating or deleting information we have on file about you, please contact us at [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org).

### **United States Operation**

As a matter of our practices and policies, we adhere to the principles set out in the European Union General Privacy Directive and the relevant privacy principles of the Australian Privacy Act of 1988, however our Services are operated from the United States, and the privacy laws of the United States may not be as protective as those in your jurisdiction. If you are located outside of the United States and choose to use the Services or provide your information to us, you agree that your information will be transferred, processed, and stored in the United States. Your use of the Services represents your agreement to this practice. For the purposes of the GDPR, we act as a data controller for the personal data which we collect directly from users who interact with us outside of an agreement we have with school or school district, but we act as a data processor for the personal data which we collect and process as part of our agreement with a school or school district. We have established an individual within our executive team as our data protection officer, who can be reached at [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org).

### **Changes to this Privacy Policy or our Data Practices**

We will alert you to material changes to this Privacy Policy, to the context in which we collect personal information, or to our personal information collection practices, at least thirty (30) days before they take effect. We will also alert you if we become aware of an inconsistency between our data collection practices and our contract with you. We will provide such notices by placing a banner notice on [bigpicture.org](http://bigpicture.org) or by sending you an email. The notice provided will clearly state that your continued use of our Services indicates your understanding of and consent to any Privacy Policy updates and changes. We do reserve the right to effect important changes more quickly as needed, as in the case of a requirement for legal compliance, a security threat or other emergency situation, or if we are granting you more rights than you had under the previous version of the Privacy Policy. Those important changes will be effective immediately and notice will still be provided via a banner notice on our site or by sending an email. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them.

### **Questions; Contacting Us**

If there are any questions regarding this Privacy Policy, we may be contacted using the information below.

[dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org)

325 Public Street

Providence, RI 02905



## Exhibit A

### California-Specific Personal Information Policy

#### California Consumer Privacy Act Notice

If you are a natural person who is a California resident, as defined in the California Consumer Privacy Act of 2018 (the “CCPA”, then you are a “**consumer**” and this California Consumer Privacy Act Notice (“**CCPA Notice**”) applies to you and your personal information as defined in the CCPA (“**personal information**”).

#### 1. Rights of California Consumers

Except for personal information we have because you or a business you work for or own has a direct business relationship with us, you have the following rights under the CCPA.

- You have the right to request that we disclose to you the categories of personal information we have collected about you, the categories of sources from which we collected that personal information, the business purposes for which we use that information, and the specific pieces of personal information we have about you.
- You have the right to request that we disclose to you the categories of personal information we have collected about you, the categories of personal information we have sold about you, and for each category of your personal information we have sold, the categories of third parties to which we sold that personal information.
- You have the right to request the categories of your personal information we have disclosed for a business purpose.
- You have the right to request that we delete any of your personal information that we have collected from you.

All consumers have the following rights under the CCPA:

- You have the right to opt-out of our disclosure of your personal information to third parties in exchange for consideration (“**sell**”, “**sale**”, “**selling**”, “**sold**” under the CCPA). We don’t sell personal information, but if you wish to confirm this to us, please email us at [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org). Please be aware that we may still disclose your personal information as permitted under the CCPA, including to comply with laws, to comply with government investigations, to cooperate with law enforcement agencies concerning the violation of laws, to assert our rights in connection with legal claims, and if we have de-identified and/or aggregated your personal information in compliance with the CCPA.
- You have the right to not be discriminated against because you have exercised any of your rights under the CCPA.

- You have the right to designate an authorized agent to make requests to us to exercise any of your rights under the CCPA.

To make any of the requests exercising your rights listed in this Section, you may contact us at [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org). Please note that we have to be able to verify your identity in order to comply with any of your requests to exercise your rights, and as we explain below, we collect limited categories of personal information that can be used to verify your identity.

## 2. Personal Information Collected Through Our Corporate Website or for Marketing

This category of information is only for our corporate website, not our student directed services. We do not sell personal information collected through our corporate website or for marketing. Personal information we do collect, the business purpose for which we collect it, and the service providers or other third parties who may receive it are in the table below:

Personal Information Categories	Business Purposes	Recipient Categories
<p>Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.</p> <p>NOTE: We collect only your name, email address, phone number, school, home address, work address and other optional demographic data when you opt to provide such information. We collect the same information in lists we obtain from third parties of potentially interested parties who may wish to use our services. Our website/webserver collects IP addresses automatically, as does every other website.</p>	<ul style="list-style-type: none"> <li>• Marketing communications</li> <li>• Tracking and responding to CCPA consumer requests</li> <li>• Auditing and tracking website usage (Internet Protocol address only)</li> <li>• Detecting and responding to security incidents (Internet Protocol address only)</li> <li>• Fixing and improving our website (Internet Protocol address only)</li> </ul>	<ul style="list-style-type: none"> <li>• Customer relationship management service provider</li> <li>• Email service provider</li> <li>• Cloud storage service provider</li> <li>• Legal counsel</li> </ul>
<p>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.</p>	<ul style="list-style-type: none"> <li>• Tracking analytics of website usage</li> <li>• Detecting and responding to security incidents</li> </ul>	<ul style="list-style-type: none"> <li>• Cloud storage service provider</li> <li>• Website analytics service provider</li> </ul>

**Personal Information Categories****Business Purposes****Recipient Categories**

- Advertising on to website visitors
- Fixing and improving our website

- Website hosting service provider
- Security and web development service providers
- Legal Counsel

**3. Personal Information Collected within the Service.****Personal Information Categories****Business Purposes****Recipient Categories**

Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.

NOTE: The only information in this category we collect within the BPL Services are names, email addresses, the school with which a user is affiliated, and in some cases, optional demographic information. The BPL Services webserver also collects IP addresses automatically, as does every other webserver.

- Providing the BPL services
- Detecting and/or preventing malicious or invalid activity

- Cloud storage service provider
- Customer relationship management service provider
- Email service provider
- Other service providers who work for us (e.g., help desk providers)
- Legal counsel

Demographic information: sex, age group, and household income  
NOTE: The only information we collect in this category is gender/sex (on a volunteer basis), grade (or status as an adult for non-student users), school and

- Providing the BPL services
- Fixing and improving the BPL services

- Cloud storage service provider
- Other service providers who work for us (e.g., help desk providers)
- Legal counsel

**Personal Information Categories**

**Business Purposes**

**Recipient Categories**

school district affiliation (from the student, teacher or school).

Professional Information  
NOTE: The only information we collect in this category is (for adult users) whether they are a teacher or other class of user in our system, the grades or classes with which the user are associated, and the school and district with which they are associated.

- Providing the BPL services
- Fixing and improving the BPL services

- Cloud storage service provider
- Customer relationship management service provider
- Email service provider
- Other service providers who work for us (e.g., help desk providers)
- Legal counsel

Education Information  
NOTE: In addition to the information above under “Identifiers” and “Demographic Information” we collect student internship attendance, searches, goals and mentor feedback.

- Providing the BPL services
- Fixing and improving the BPL services

- Cloud storage service provider
- Other service providers who work for us (e.g., help desk providers)
- Legal counsel

Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.  
NOTE: Within the BPL Service, our web hosting service provider only collects standard website log data and analytics through our website.

- Providing the BPL services
- Fixing and improving the BPL services
- Detecting and/or preventing malicious or invalid activity

- Cloud storage service provider
- Website analytics service provider
- Website hosting service provider
- Other service providers who work for us (e.g., help desk providers)
- Legal counsel

*We do not knowingly collect or sell the personal information of minors under the age of 13.*

**“Do Not Sell My Information” and Other Consumer Requests**



1. You can send a request to BPL in order to exercise any of your rights under the CCPA. We will check our records to see if we have your contact information based on the email address you provide us in that request.

You can contact us via email at [dataprivacy@bigpicturelearning.org](mailto:dataprivacy@bigpicturelearning.org). In addition to using this email address to submit requests under the CCPA, you can also use them to ask questions or communicate concerns about our privacy policies and practices.

By submitting your personal information to make your request, the personal information you provide for that purpose will be collected and retained for the duration required by the CCPA, used only to respond to your request and to keep the legally-required records. By submitting a request to us, you represent to us that you are (or you are an authorized agent of) the person you identify in the request. The CCPA requires us to verify that personal information is being released to the correct party for whom the information is being requested. In order to ensure that we only provide personal information to the correct person, we may also contact you via email at the address you provide to authenticate you are the owner of the email address being used. BPL operates as a service provider when collecting and processing information for the schools we work with, so we will not be able to provide you with personal information we received through those schools.

2. If you want to opt-out of our corporate website tracking mechanisms, you can disable all cookies (which will affect the functionality of most websites), or only third party cookies, which may affect the functionality of some websites. Most tracking mechanisms use third party cookies. Then if you know which cookies you want to delete, you can delete those, or you can delete all of your cookies (which again, will affect the functionality of most websites— for example, you may lose your login status). You have to repeat the process for each browser you use. Google Analytics has a special link you will need to visit to learn how to stop it from tracking you: <https://tools.google.com/dlpage/gaoptout>.

3. Each time you use a different computer or browser, we may not recognize that browser as one that has opted out from our corporate website tracking mechanisms. We also may not be able to recognize that we collected personal information from that computer or browser before you made the change unless it's information that you volunteered to us or which we stored as part of your user account.