

Acatar Privacy Policy

Glossary

Affiliated Users: “Affiliated Users” refers to the Organization, School regulators, persons authorized to have access to education records held by Acatar, Administrative Users, teaching staff, and other Users designated by Organization, the instructor(s), or by law

Organization: The company, institution, or other legal entity

Tenant: A secured and isolated organizational entity within Acatar

The Service: Acatar services, as described in our Terms of Service (TOS) (<https://github.com/Acatar/terms/blob/master/TermsOfService.pdf>)

Information Collected and Received

Acatar collects various types of information. Some information is personally identifiable and some is non-identifying or aggregated such as:

- **Organization information.** When a Tenant is created for the Organization on Acatar, Acatar collects the email address (as the Organization owner), the Organization name, Tenant domain (e.g. your-org-name.uncompromising.education), the name that appears in the Acatar Tenant, a username, and password.
- **Account and profile information.** Acatar requires a first name and email address to create an account. Optional information may include last name, location, biographical information, and links to share. Acatar has no control over optional information collected. Any information added to a profile is visible to other people on the Tenant. Profile information may be pre-populated with information that was shared by the Organization. Acatar is not responsible for the accuracy of such information, and modifications to it must be made through Organization resources.
- **Participation in Online Courses:** Participation in an Acatar course will create additional information associated with the user personally, such as Your Data, as defined in the Terms of Service, grades, grade feedback, information or content entered by others about the user, and/or evidence of review or interaction with certain course materials or others, such as faculty or students. Acatar will share some of that information subject to applicable law.
 - Acatar may offer the opportunity to share comments and thoughts with other users, such as students and teaching staff. Any information provided there can be seen by Administrative Users, and also by users who are enrolled in or otherwise affiliated with that course. User agrees: (a) to post only personal information user is willing to share, (b) not to post personal information about others without their permission, and (c) not to use outside of Acatar, personal information posted in Acatar (absent permission of the data subject). Any failure of a user to do so will expose Your Data.
- **Device information.** In addition to log data, Acatar may also collect information about the device used to access Acatar, including the type, operating system, device settings, unique device identifiers, and crash data.
- **Geo-location information.** Precise GPS from mobile devices is collected only with user permission. WiFi and IP addresses received from a browser or device may be used to determine approximate location.
- **Acatar usage information.** Information about which teams, channels, people, features, content, and links user interacts with within Acatar and what integrations with related service used.

- **Service integrations.** If integration occurs with a service on Acatar, that service will be connected to the Acatar service.
 - Depending on Tenant settings, team members may be able to add integrations to a course or its elements. Integrations are viewable and may be removed by the administrators, owners, or designated users.
 - Acatar does receive or store passwords for any of these services.
 - If an integration is added, the third party provider of the integration may share certain information about the account with Acatar. Acatar is not responsible for how the organization may use and collect data through integrations.
 - An integration can be removed at any time. Removing an integration unbinds that integration on a go-forward basis. Removal does not delete the content that was received from the integration and indexed within Acatar, which must be deleted manually.
- **Communication content sent and received within Acatar.** This includes:
 - Content itself, which may include messages, pictures, files and video among other types of files.
 - When messages or files were sent and by whom, when or if they were seen, and from where they were received.
- **Information from partners or other 3rd parties.** Acatar may receive information from partners or others Acatar may use to make its information better or more useful.

Technologies

Acatar uses a variety of technologies (collectively, "Technologies") that may change or evolve without notice. Technologies that are used in Acatar or related Acatar services include:

- **DOM Storage**
 - According to Wikipedia (see http://en.wikipedia.org/wiki/Web_storage), DOM Storage (also referred to as Browser Storage and Web Storage) is often compared to HTTP cookies and allows storage of per-session or domain-specific data. Unlike cookies, DOM Storage makes it easier to control how information stored by one browser window is visible to another. Read the link to learn more. Acatar uses DOM Storage to do the types of things described under "Cookies" below.
- **Federated Identity Services/Protocols**
 - Federated identity services may coalesce access credentials for several websites to more easily be recognized for purposes of authentication and authorization to access web-sites, and other HTTP related resources, such as data APIs. "Single sign on" is a related concept. Acatar may use several different federated Technologies, including JSON Web Tokens and SAML. You may learn more about JSON Web tokens and SAML at the following URLs:
 - JSON:
<https://jwt.io/>
<https://developer.atlassian.com/static/connect/docs/latest/concepts/understanding-jwt.html>
 - SAML:
https://en.wikipedia.org/wiki/Security_Assertion_Markup_Language
 - Acatar may use federated identity services and protocols in conjunction with Third-Party services, or with the Organization, to facilitate access to Acatar and its affiliated services.

Acatar uses federated identity services and protocols to do the types of things described under “Cookies” below. You may learn more about federated identity at https://en.wikipedia.org/wiki/Federated_identity.

- **Cookies**

- Acatar uses cookies, or similar technologies like single-pixel gifs, web beacons, DOM Storage, and federated identity technologies, such as JWT and SAML tokens, to record log data, and as part of authentication and authorization strategies (collectively, "Cookies"). Acatar uses both session-based and persistent cookies.

Acatar sets and accesses its own cookies on its company-owned domains. In addition, Acatar uses third parties like Microsoft Application Insights for website analytics. Acatar does not currently recognize or respond to browser-initiated Do Not Track signals, as there is no consistent industry standard for compliance (California Disclosure for residents of California, CA Bus. & Prof. Code § 22575).

How Acatar Uses Your Information

Acatar uses your information for the following:

- **Providing the Acatar service.** Acatar uses information provided to authenticate the user and deliver content.
 - Acatar may use and process personal information including, but not limited to, tracking attendance, progress, and completion of a course in Acatar. For example, Acatar may share personal information related to performance in Acatar courses and activities with Affiliated Users, to assist with the creation, modification, operation, facilitation, or review of a course.
- **Recording.** Live events, such as lectures, recitations, and group meetings facilitated by The Service, or affiliated services may be recorded and provided to Affiliated Users and affiliates to playback at a future date.
- **Understanding and improving our products.** Acatar, to improve the product, must understand how users are using it. This policy does not place limits on what Acatar may do with usage data that is aggregated or de-identified so it is no longer tied to an Acatar user. Acatar may share information in its identifiable form with Organization.
- **Communication.**
 - Acatar will actively work to solve problems and respond to requests.
 - In-product communications.
 - Email messages. These messages are considered part of the service so opt-out is not available. In addition, Acatar sometimes send emails to Acatar users about new product features or other news about Acatar, for which opt-out is available.
- **Archival.** Acatar may archive personal information and/or use it for future communications.
- **Service Providers.** Acatar may share personal information with its service providers, including but not limited to providers used for operations and maintenance, such as hosting services, and vendors used to provide services to you, such as help & support.
- **Government Authorities, Legal Rights and Actions.** Acatar may share, subject to applicable law and any agreement that may exist between Acatar and the Organization, personal information (a) with various government authorities in response to subpoenas, court orders, other legal process, (b) with courts to establish or exercise their legal rights to protect their property and/or to

defend against legal claims, (c) or as otherwise required by law. In such cases, each reserves the right to raise or waive any legal objection or right available to them, respectively.

- **Other Uses Permitted Under FERPA or Other Laws.** Acatar may also use and/or disclose personal information in any other manner permitted by FERPA or other applicable laws, subject to any agreement that may exist between Acatar and the Organization
- **International Data Transmission.** If Acatar is accessed from outside the United States, personal information will be transmitted into and out of the U.S. and any other country, worldwide, including, without limitation, information that is shared among user with other users located around the world. Any affiliated users who interact with course data, and/or Your Data from countries outside of the U.S. will also result in such transmissions.

User Choices

- The browser used may provide the ability to control cookies or other types of local data storage.
- The mobile device used may provide choices around how and whether location or other data is shared.
- Acatar does not control these choices or default settings.

Sharing and Disclosure

Acatar may share communications and related content as well as other information, as described below. Organizations and institutions that use Acatar may have their own policies for sharing and disclosure of information they can access through Acatar. Acatar may share information:

- **With consent, to comply with legal process, or to protect Acatar and its users.** When Acatar has consent or if it is believed that disclosure is reasonably necessary to comply with law, regulation or legal request; to protect the safety, rights, or property of the public, any person, or Acatar; or to detect, prevent, or otherwise address fraud, security or technical issues. If law enforcement or other third party request for information is received, Acatar will provide prior notice to the subject of the request when legally permitted to do so.
- **With third party service providers and agents.** Acatar may employ third party companies or individuals to process personal information on its behalf based on instructions and in compliance with this Privacy Policy.
- **Integrations.** If an integration is added, Acatar may share information with the provider of the integration. Acatar is not responsible for how the provider of the integration may collect and use User data.
- **About User, User's Organization, or Team Administrator(s).**
 - Acatar may share a user email address with user's organization. If the email address under which user registered belongs to or is controlled by an organization, Acatar may disclose that email address to that organization in order to help it understand who associated with that organization uses Acatar, and to assist the organization with its enterprise accounts. Please do not use a work email address for Acatar unless you are authorized to do so.
 - If user contacts Acatar with a team-specific issue, in order to help resolve the issue, Acatar may contact administrator about concern.
 - As described above in the Message Retention Settings and Export Option section, team owners and administrators have certain rights to export their team's messages and files.

- If Acatar engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all Acatar's assets financing, acquisition of all or a portion of our business, or similar transaction or proceeding that involves the transfer of the information described in this Privacy Policy.
- Acatar may also share aggregated or de-identified information with its partners or others for business or research purposes. This policy is not intended to prohibit the disclosure and use of aggregated or de-identified data.

Security

Acatar has employed administrative, technical, electronic and contractual security measures to protect this information from intentional or unintentional use or disclosure. Acatar cannot eliminate all security and privacy risks inherent in Internet use. User acknowledges awareness of and accepts such risks, including, but not limited to, the limitations of security and authentication measures and the chance that any information transferred via the Site may be susceptible to eavesdropping, hacking and other security hazards or misappropriation. Acatar will not be liable for damages of any kind associated with these security risks.

Children's information

Acatar is not directed to children under 13. If user learns that a minor child has provided us with personal information without your consent, please contact us at privacy@learninghouse.com.

Changes to this Privacy Policy

Acatar may change this policy and will post any changes on this page. If user continues to use Acatar after those changes are in effect, user agrees to the revised policy.

Contacting Acatar

Please note that Acatar is owned by The Learning House, Inc., a Kentucky corporation located at 427 South Fourth Street, Suite 300, Louisville, Kentucky 40202, and may be contacted at privacy@learninghouse.com.