

Information Equity Initiative Privacy Notice

Last Updated: February 15, 2022

Welcome and thank you for your interest in Information Equity Initiative (“**Information Equity**,” “**we**,” “**our**” or “**us**”). Information Equity is a non-profit organization that allows teachers, public health officials, and other curators to engage individuals and provide them with digital content without broadband access. Participants are provided with a simple antenna and device, typically distributed by their school district, that allows individuals to download digital content onto a Wi-Fi connected device, such as a tablet, phone, or computer.

This Privacy Notice explains how information about you, that directly identifies you, or that makes you identifiable (“**personal information**”) is collected, used and disclosed by Information Equity in connection with the Information Equity websites and applications that post or link to this Privacy Notice, including our website <https://informationequity.org/> (collectively, the “**Site**”), and our services offered in connection with the Site (collectively with the Site, the “**Service**”).

Learner Data: The educators, schools, school districts, public health facilities, incarceration facilities, and broadcasters (collectively, “**Curators**”) that use our Service may upload data such as files, documents, videos, or images, to our Service, or we may collect data on their behalf, which may include personal information or data about the Curator’s end users, including teachers and learner data (collectively, “**Learner Data**”). We have contractually committed ourselves to only process such information on behalf and under the instruction of the respective Curator. This Privacy Notice does not apply to such processing and we recommend you read the Privacy Notice of the respective Curator or contact such entity if the processing concerns your personal information. For more information, please see our [Learner Data](#) section of this Privacy Notice.

1. How We Collect and Use Information

We collect personal information in connection with your visits to and use of the Service. This collection includes information that you provide in connection with the Service, information from third parties, and information that is collected automatically such as through the use of cookies and other technologies.

Information That You Provide

We may collect personal information from you. The categories of information we collect can include:

- **Service Inquiries.** We collect personal information that you provide when you inquire about our Service. This information includes your first name, last name, email, phone number, school information, and any other information you provide, including your interests in relation to our Service. We use this information to communicate with you about your inquiry or interests.
- **Registration Information.** We collect personal and/or business information that you provide when you register for an account to use our Service, including using the Educator Dashboard or Kiosk Dashboard. This information may include your first and last name, email, phone number, username, profile photo, and password. We use this information to administer your account, provide you with the relevant services and information, communicate with you regarding your account, the Service, and for customer support purposes.
- **Communications.** If you communicate with us through any paper or electronic form, we may collect your name, email address, mailing address, phone number, or any other personal information you choose to provide to us. We use this information to investigate and respond to your inquiries, and to communicate with you, to enhance the services we offer to our users and to manage and grow our organization. If you register for our newsletters or updates, we may communicate with you by email. To

unsubscribe from promotional messages, please follow the instructions within our messages and review the [Control Over Your Information](#) section below.

- **Marketing Emails.** If you sign up to receive news or alerts from us, we collect your email and applicable interests and communication preferences in order to send you regular updates about the Service. We use this information to manage our communications with you and send you information about services we think may be of interest to you. If you wish to stop receiving email messages from us, simply click the “unsubscribe link” provided at the bottom of the email communication. Note that you cannot unsubscribe from certain services-related email communications (e.g., account verification, technical or legal notices).
- **Employment Applications.** If you apply for employment, we collect your contact and demographic information, educational and work history, employment interests, information obtained during interviews and any other information you choose to provide. We use the information provided to evaluate your candidacy for employment, to communicate with you during the application process and to facilitate the onboarding process.

Information from Third Party Sources

We may receive personal information about you from our business partners and service providers and combine this information with other data we collect from you. The third parties may include website and service operators, payment processors, and shipping providers. The information may include contact information, demographic information, information about your communications and related activities, and information about your orders. We may use this information to administer and facilitate our services, your orders, and our marketing activities.

- **Single Sign-On.** We may use single sign-on (“SSO”) to allow a user to authenticate their account using one set of login information, including through Google. We will have access to certain information from those third parties in accordance with the authorization procedures determined by those third parties, which may include, for example, your name, username, email address, language preference, and profile picture. We use this information to operate, maintain, and provide to you the features and functionality of the Service. We may also send you service-related emails or messages (e.g., account verification, customer support, changes, or updates to features of the Site, technical and security notices).
- **Social Media.** When you interact with our Site through various social media, such as when you click on the social media icon on the Site, follow us on a social media Site, or post a comment to one of our pages, we may receive information from the social network such as your profile information, profile picture, gender, username, user ID associated with your social media account, age range, language, country, and any other information you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network. We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages about services that may be of interest to you.
- **Information from Other Sources.** We may obtain information from other sources, including through our service providers or through transactions such as a merger or consolidation. We may combine this information with other information we collect from or about you, including with publicly available information. In these cases, our Privacy Notice governs the handling of the combined personal information. We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages about services that may be of interest to you.

Other Uses of Personal Information

In addition to the uses described above, we may collect and use personal information for the following purposes:

- To operate and improve the Service, and to provide you with the features and functionality of the Service;
- To communicate with you and respond to your requests, such as to respond to your questions, contact you about changes to the Service, and communicate about account related matters;
- To authenticate your account credentials and identify you, as necessary to log you in and/or ensure the security of your account;
- For analytics and research purposes;
- To enforce our contracts, to resolve disputes, to carry out our obligations and enforce our rights, and to protect our organizational interests and the interests and rights of third parties;
- To comply with contractual and legal obligations and requirements;
- Enable you to communicate and share files with users you designate;
- To fulfill any other purpose for which you provide personal information; and
- For any other lawful purpose, or other purpose that you consent to.

We may use aggregated and/or de-identified data for any purpose.

2. How We Use Cookies and Other Tracking Technology to Collect Information

We, and our third-party partners, automatically collect certain types of usage information when you visit our services, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, web beacons, embedded scripts, location-identifying technologies, file information, and similar technology (collectively, “**tracking technologies**”).

We, and our third-party partners, use tracking technologies to automatically collect usage and device information, such as:

- Information about your device and its software, such as your IP address, browser type, Internet service provider, device type/model/manufacture, operating system, date and time stamp, and a unique ID that allows us to uniquely identify your browser or your account (including, for example, a persistent device identifier or a User-ID), and other such information. We may also work with third-party partners to employ technologies, including the application of statistical modeling tools, which permit us to recognize and contact you across multiple devices.
- When you access our Sites from a mobile device, we may collect unique identification numbers associated with your device (including, for example, a UDID), and depending on your mobile device settings, your geographical location data as we may be able to approximate a device’s location by analyzing other information, like an IP address.
- Information about the way you access and use our Service, for example, the website from which you came and the website to which you are going when you leave our Service, the pages you visit, the links you click, whether you open emails or click the links contained in emails, whether you access the Service from multiple devices, and other actions you take on the Site.
- We may collect analytics data or use third-party analytics tools such as Google Analytics to help us measure traffic and usage trends for the services and to understand more about the demographics of our users. You can learn more about Google’s practices at <https://policies.google.com/technologies/partner-Websites> and view its opt-out options at <https://tools.google.com/dlpage/gaoptout>.

We use the data collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the Site; (b) identify you across multiple devices; (c) provide and monitor the effectiveness of our services; (d) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our Site; (e) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our services.

For more information on how manage your cookies preferences, please see [Control Over Your Information](#).

3. How We Share Personal Information

We may share your personal information in the instances described below. For further information on your choices regarding your information, see [Control Over Your Information](#).

- We may share your personal information with third-party service providers or business partners who help us deliver or improve our Service or who perform services on our behalf, which are subject to reasonable confidentiality terms, and may include providing technology services, providing mailing and shipping services, providing web hosting services, or providing analytics.
- If you registered for the Service and have an account that was assigned by your Curator, certain information concerning your use of your account may be accessible to the account administrator, including your email address and access and usage history.
- Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our agreements or to protect the security or integrity of the Information Equity services, including to prevent harm or financial loss, or in connection with preventing fraud or illegal activity; and/or (c) to exercise or protect the rights, property, or personal safety of Information Equity, our Curators, visitors, or others.
- We may transfer any information we collect in the event we sell or transfer all or a portion of our organization or any portion or combination of our products, services, and/or assets. Should such a transaction occur (whether a merger, consolidation, bankruptcy, dissolution, reorganization, liquidation, or similar transaction or proceeding), we will use reasonable efforts to ensure that any transferred information is treated in a manner consistent with this Privacy Notice.
- With other third parties, with your consent or at your direction.
- With others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

4. Control Over Your Information

Modifying Account Information. If you have an account for our Service, you have the ability to modify certain information in your account (e.g., your contact information) through the account setting page or a similar option provided on the Service. If you have any questions about modifying or updating any information in your account, please contact us at the email or postal address provided below. Please note that Information Equity does not own or control the Student Data uploaded to our Service by the Curators and cannot modify or delete Student Data except at the request of the School.

Email Communications. From time to time, we may send you emails regarding updates to our Service, notices about our organization, or information about the Services we offer. If you wish to unsubscribe from such emails, simply click the “unsubscribe link” provided at the bottom of the email communications. Note that you cannot unsubscribe from certain service-related email communications (e.g., account verification, technical or legal notices).

Cookies and Other Tracking Technologies Opt-Out. Depending on your browser or mobile device, you may be able to set your browser to delete or notify you of cookies and other tracking technology by actively managing the settings on your browser or mobile device.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the sites, as some features and services on our sites may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it.

6. Learner Data

We do not use Learner Data for any purpose other than to provide the services, in accordance with our contractual agreements with our Curators, and this Privacy Notice. Information Equity does not own or control Learning Data, which belongs to the student, the learners, and/or the School or Curator that contracts with Information Equity to provide the Service.

In relation to personal information we process on behalf of schools or school districts ("**Student Data**"), the Information Equity Service is designed to provide protections for Student Data as required by applicable privacy laws. For example:

- **The Family Educational Rights and Privacy Act (FERPA).** This Privacy Notice and our Service are designed to meet our responsibilities to protect personal information from the students' educational records under FERPA. We agree to work with our Schools to jointly ensure compliance with the FERPA regulations. A school may disclose personally identifiable information from a student's education records to a third party with either written consent of the parent or by meeting one of the exemptions set forth in FERPA ("FERPA Exemption(s)"), including the exemption for the Directory Information ("Directory Information Exemption") or disclosure to school officials with a legitimate educational interest ("School Official Exemption").
- **Children's Online Privacy Protection Act (COPPA).** The Information Equity Service is not directed to children under 13 and do not knowingly collect any information from children under the age of 13. A School may not permit a child under 13 to register for the Service, unless the School represents that it has the authority to provide all necessary consents for Information Equity to collect and use such student's personal information in the manner contemplated by this Privacy Notice, as permitted by COPPA. Please contact us at info@informationequity.org if you believe we have inadvertently collected personal information of a child under 13 without proper consent so that we may delete such data as soon as possible.
- **Students Online Personal Information Protection Act ("SOPIPA").** This Privacy Notice and our Service are designed to comply with SOPIPA. We do not use Student Data for targeted advertising purposes. We do not use collected information to amass a profile of a student except in furtherance of providing the features and functionalities of the Information Equity Service. We never sell Student Data unless the sale is part of a corporate transaction, such as a merger, acquisition, bankruptcy, or other sale of assets, in which case we make efforts to ensure the successor entity honors the privacy commitments made in this policy and/or we will notify the School and provide an opportunity to opt-out by deleting Student Data before the data transfer occurs.

7. Data Retention

We will retain your personal information for the length of time needed to fulfill our business purposes unless otherwise required or permitted by law. Any Student Data that we have access to shall be retained, stored, and deleted according to our agreement with the School. We store data on servers in the U.S.

8. Links to Third-Party Websites and Services

For your convenience, our Service may provide links to third-party websites or services that we do not own or operate. We are not responsible for the practices employed by any websites or services linked to or from the services, including the information or content contained within them. Your browsing and interaction on any other website or service are subject to the applicable third party's rules and policies, not ours. If you are using a third-party website or service, you do so at your own risk. We encourage you to review the privacy policies of any website or service before providing any personal information.

9. Children's Privacy

Our services are not intended for children under the age of 13. We do not knowingly solicit or collect personal information from children under the age of 13. If we learn that any personal information has been collected inadvertently from a child under 13, we will delete the information as soon as possible. If you believe that we might have collected information from a child under 13, please contact us at info@informationequity.org.

10. Changes to Privacy Notice

We reserve the right to change this Privacy Notice from time to time in our sole discretion. We will notify you about material changes in the way we treat personal data by sending a notice to the primary email address specified in your Information Equity account and/or by placing a prominent notice on our Site. It is your responsibility to review this Privacy Notice periodically. When we do change the Privacy Notice, we will also revise the "last updated" date.

13. Contact Us

For additional inquiries about this Privacy Notice, please send us an email at privacy@informationequity.org, or contact us at:

Information Equity Initiative

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