

EFBA Privacy Policy

Effective Date May 11, 2020

Thank you for visiting EFBA's website and learning more about our mission and technology products and services to promote bilingualism and multicultural education, specifically by teaching French and Francophone cultures. This privacy policy describes the information we collect, use, and store when you visit the efba.us website, when you enroll for you or your child in any of our educational programs, classes or camps (including after-school classes, summer camps, summer school, cultural outings or experiences or professional training), whether onsite or online ("**Programs**").

This privacy policy is an agreement between you and EFBA. If you do not agree to any of these terms, please cease using our website, our services and participating in our Programs. By viewing or using any of the information on this website, creating an account to enroll in a Program or participating in our Programs, you expressly consent to the information handling practices described in this privacy policy.

1. Information We Collect When You Visit our Website

Our website is intended for an audience over the age of 13 years old. We do not knowingly collect information from children under the age of 13 years old.

When you visit our website, we collect certain data by automated means, including:

- **System Data:** Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, browser, browser language and time zone settings, internet provider, or mobile carrier name.
- **Usage Data:** Usage statistics about your interactions with the website, including the last webpage or application you visited before visiting our website (referrer information), the website pages visited, the time spent on each page, the date and time of your visit, and the features and resources you accessed or used (for example, if you viewed or downloaded a resource document, signed up to receive our newsletter, or made a donation).
- **Approximate Geographic Data:** An approximate geographic location, including information like country, city, and geographic coordinates, calculated based on

your IP address. If you are using a mobile device, your mobile device's geographic location (specific geographic location if you have enabled collection of that information, or general geographic location automatically).

We collect this data for the following purposes:

- To recognize your browser if you leave the site and come back, so we understand you are the same visitor.
- To provide the content and services on our website and improve them. We analyze information about how many visitors we have, how our visitors use our website and what content, resources, and features they access and use, to improve the site experience and provide additional resources to our students, teacher, counselor and volunteer community.
- Testing and site analytics, so we can understand any technical problems or issues with our website and fix them.
- Complying with our obligations. We may use visitor information to carry out fraud prevention checks or comply with other legal or regulatory requirements, where this is explicitly required by law.

2. Information We Collect when you Create an Account

You need to create an account to enroll yourself or your child in any of our Programs. When setting up and maintaining your account, we request that you provide information concerning yourself or your child:

- Name and email of guardian and additional parent
- Mailing Address of guardian
- Primary and secondary Phone number of Guardian
- Name of child to be enrolled in our Program(s)
- Date of Birth of child, and gender
- School attended by the child, grade, level of proficiency/fluency of child in the French language
- Emergency contacts for the child
- Name of Persons authorized to pick up the child from a Program location
- Medical information related to the enrolled child including allergies and dietary restrictions, medical conditions, prescriptions and non-prescription medication and reason for such medication, past health treatments, and immunization records

- For certain Programs, you may at your option, provide the name of another Program attendee who is a friend of your child. Please ensure that you have received the consent of the parents or guardians of any child whose personal information you share with us.

Once you have provided this information, EFBA assigns login credentials to you or your child to enable access to online Programs. You receive such login credentials via email. Login credentials for Programs administered via the Google Classroom platform comprise of an assigned email address (st.firstname.lastname@efba.us) and a classroom code. You must validate the assigned email address for your child. Only Program participants with valid credentials can access an online Program.

We collect Program registration information and assign login credentials in order to administer the Programs, select the right program for your child, foster your child's social and emotional wellbeing while attending the Programs, assist your child in case of an emergency, make the online Programs as secure as possible, and comply with applicable laws, regulations and licensing requirements.

EFBA does not permit children under the age of 13 to create an account. Only their parent or legal guardian can create an account on their behalf. Please contact us at info@efba.us if you believe we have inadvertently collected information from a child under 13 without parental consent so that we may delete the information as soon as possible.

If you are registering for a DELF sanctioned exam, we also collect your country and town of birth, your nationality, native language, and if applicable, any previous DELF candidate registrant number. We collect this information to administer the DELF exam in accordance with applicable DELF rules and policies.

Upon creating an account, we also ask you how you heard about EFBA, so we understand which of our promotion and outreach channels are the most effective.

3. Information We Collect About You or Your Child While Attending the Programs

While you or your child attends a Program, we take photographs and any video/audio recordings that may include your child's image and voice for marketing purposes or to use to train our staff. We also collect and store the work product of your child while attending the Programs, as well as your child's name or login credentials in attendance

logs and any written incident report in the event of a disciplinary, medical or other incident.

4. Information We Collect When You Contact Us or Sign Up to Receive Our Newsletter

Our website provides various ways for you to contact us and provide additional information to us about you.

If you choose to use the donation feature to financially support our mission, you may be asked to provide your first and last name, email address, physical address, country and whether you are an EFBA member or client, as well as your payment information. EFBA will use this information to process your donation, issue a tax receipt to you where applicable, and send you email communications about our mission, activities, resources to survivors and their allies, impact reports, as well as messages regarding our fundraising efforts.

If you choose to subscribe to our EFBA newsletter, you will receive periodic email updates about our mission, activities, impact reports, as well as messages regarding our fundraising efforts. We may also add you to our subscriber list if you register for one of our Programs or promotional/fundraising events, or otherwise share your contact information with us via means other than our website.

You can "opt out" of receiving our emails at any time via the unsubscribe link in the footer of each of our email messages.

You may provide to us the name of an individual that may be interested in our Programs. Please make sure that you have received the consent of anyone whose personal information you share with us.

If you choose to apply for a job at EFBA, you will share your application information (which may include your name, contact information, citizenship or immigration status, resume, LinkedIn profile, cover letter, names of you references, and other information you submit). We will only use this information to process your job application.

If you contact us via one of the email addresses published on our website, we will store your email address and the text of your message to us, and only use this information to respond to your question, feedback, or request.

4. With Whom We Share Your Information

Your Program registration information is hosted on the [ASAPschool administration software platform](#).

Google Classroom login and access information is shared with Google and subject to the privacy and security policies of [Google Education](#).

When you make a payment for the Programs, your credit card information is processed by [Authorize.net](#) and [Dharma Merchant Services](#). EFBA does not collect or store any credit card information.

EFBA is an education nonprofit organization that is licensed by various accreditation agencies. Such agencies may have access to aggregated information about our Program attendees, and may in some cases inspect documents which may include personal information of you or your child.

If you make a donation via our website, we will share your information with Donorbox who provides donation payment processing services to EFBA. Information shared includes your first and last name, email address, and postal address, as well as your payment information. To learn more, visit [Donorbox's Privacy Policy](#).

Our donation page allows you to share on Facebook, LinkedIn, Instagram and Twitter information about our fundraising campaigns. These social media features may allow the third-party social media provider to collect data like your IP address and which page of our website you are visiting, and to set a cookie to enable the feature. Your interactions with these features are governed by the Facebook, LinkedIn, or Twitter's respective privacy policies.

Job application information is in certain cases collected via a Google Form and the information you submit is hosted by Google and subject to [Google's privacy policy](#).

Mailchimp is EFBA's email service provider. Mailchimp sends emails to our donors and subscribers on our behalf. When you interact with an email message that you receive

from us, MailChimp may collect information about your device and whether you opened, read, deleted the email, or took any action promoted by the email. MailChimp use cookies and other tracking technologies to collect some of this information. If you have enabled the "Social Profiles" feature in your Mailchimp account, additional information may be shared between MailChimp and your social media platform (such as Facebook or Twitter). For more information, you can visit [MailChimp's Privacy Policy](#).

We use Google Analytics to help analyze how visitors use our website. Google Analytics collects the IP address assigned to you when you visit the site. They also place a persistent cookie on your web browser to identify you as a unique user the next time you visit the site, and recognize you when you visit other sites that use Google Analytics. Google continues to collect and store this information even if the "Do Not Track" function of your browser is turned on. Google's ability to use and share information collected by Google Analytics about your visits to our site and other sites is governed by the [Google Analytics Terms of Use](#). To see an overview of privacy at Google and how to opt out of certain Google practices, visit [Google's Privacy Policy](#).

In addition to the vendors listed above, we work with other vendors and service providers to help us run our website and platform.

- We use cloud-based data hosting providers to host the user data we collect and store.
- We use vendors to help with our website infrastructure and network protection from third-party attacks.
- We use customer support software to help us receive and answer your messages asking for help with our products or services.
- We also utilize internal communications tools, such as G Suite, Slack, Trello, and Asana.
- We may implement a customer management system to manage marketing and communications with our donors, members, customers and prospects.

We require all third parties to respect your privacy and to treat your information in accordance with the law. We only permit third parties to process your personal data for specified purposes and in accordance with our agreements with them.

5. Changes and Updates

We may occasionally update this privacy policy. When we do, we will revise the "last updated" date posted at the top of this privacy policy page. Please revisit this page to stay aware of any changes. If we make any material changes in the way we collect, process or share personal information, we will notify you via the contact information we have, or if we have no contact information, via a notification at the top of this privacy policy page.

In general, we only use your personal information in the manner described in this privacy policy in effect when we received that personal information. Your continued use of our website and online services constitutes your agreement to this privacy policy and any future updates.

6. Applicable Law

The efba.us website is controlled and operated by EFBA from its offices in the State of California. This privacy policy shall be construed in accordance with, and governed by the laws of the United States and the State of California, without reference to their rules regarding conflicts of law. You hereby irrevocably consent to the exclusive jurisdiction of the state or federal courts in San Francisco, California, USA in all disputes arising out of, or related to, this privacy policy or our use of your data. If, for whatever reason, a court of competent jurisdiction finds any term or condition in this privacy policy to be unenforceable, all other terms and conditions will remain unaffected and in full force and effect.

7. How to Contact Us

If you have any questions, comments, or concerns about this privacy policy, your personal information, or our third-party disclosure practices, please email us at info@efba.us.