# **Privacy Policy**

For Individuals Visiting EPISCOPAL CHILDREN'S SERVICES PARENT RESOURCE MOBILE APP:

# Effective March 22, 2023

Episcopal Children's Services (ECS) is a nonprofit agency whose mission it is to create opportunity so that the children we serve can achieve their full potential. We value the trust you have placed in us and seek to provide information families will find useful. Sometimes, we may need to collect information about our users and their use of our services to help us achieve that goal.

We are committed to creating a safe and secure environment that family can enjoy with confidence. We do not collect information that, on its own, directly identifies you or your child.

This privacy policy ("Privacy Policy") describes how we use, share, and protect information that we collect from you and your child, who may be under the age of 13 or 18, through EPISCOPAL CHILDREN'S SERVICES PARENT RESOURCE MOBILE APP (Mobile APP) operates or that link to this Privacy Policy (collectively, the "Services"). This Privacy Policy applies only to the Mobile App. Please note there is a separate privacy policy for the website, ecs4kids.org.

Please note that a separate privacy policy may apply to third-party services you use to access our content. Additionally, if we conduct a research study we may do so pursuant to a separate agreement, therefore this Privacy Policy may not govern the processing of information from that research study. We strongly encourage you to familiarize yourself not only with this Privacy Policy, but any other privacy policies or agreements that may govern your use of services.

#### What information do we collect?

- Contact information. We may ask parents to provide their email address so they may access certain services, and/or receive tips about EPISCOPAL CHILDREN'S SERVICES PARENT RESOURCE MOBILE APP content.
- Rough geolocation information. We collect your zip code and other rough information about your location when using the Services, solely to display information to provide you with localized content.
- Search queries. Our Services may include search fields that allow you to search (only within the Services) for content or answers to questions. We may collect information about what items and topics you query, and any additional search terms.
- Your content. We collect comments and other information that you post through interactive online features. However, all such information is either canned or moderated to avoid collecting personal information and to help maintain a safe environment for users.
- Correspondence you send to us. We may store correspondence with parents related to our Services.
- Information about how our Services are used. We may collect information such as preferences, or services used.

• Device information. We may collect information about your device, including hardware model, operating system version, and unique identifiers.

## We do not collect...

- Student education records (and therefore EPISCOPAL CHILDREN'S SERVICES PARENT RESOURCE MOBILE APP is not subject to the Family Educational Rights and Privacy Act ("FERPA"));
- Biometric or health data;
- Information that directly identifies a child (such as name, e-mail address, phone number); or
- Personal information of a child, unless we endeavor to obtain a parent or legal guardian's consent or otherwise comply with law.

#### We use the information we collect to...

- Provide local ECS information including which services parents are using;
  Please note that we only use rough geolocation information, such as zip code, as necessary to identify your local station. A user's IP address is stored in a local cookie. Users may be able to disable this cookie using their browser settings. Users can also change their local station by manually providing their zip code.
- Provide users with other localized content, for instance our EPISCOPAL CHILDREN'S SERVICES PARENT RESOURCE MOBILE APP community resources;
- To debug, or cap the frequency of, underwriting messages;
- Save a user's content;
- Send users other materials related to our services;
- Analyze use of the Services to understand, develop and improve our Services, such as determining which pages are most popular, which browsers are most used, how long users spend on the Services, and from which websites they come;
- Otherwise support the internal operations of the Services;
- Provide users with notifications pursuant to our legal obligations, including in the case of a data incident;
- Prevent potentially prohibited or illegal activities and enforce the Terms of Use; and
- For any other purposes disclosed to you at the time we collect the information or pursuant to your consent.

We will not use personal information we collect, if any, for marketing or online advertising.

#### Do we share information we collect with any third parties?

We may share information that is collected from you as follows:

- Authorized third-party vendors. We may share information with our third-party vendors to help us evaluate, develop, and improve the Services, including performing usage analytics and data processing.
- Legal purposes. We do not rent or sell information to third parties, but we may disclose information to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims, or government inquiries, and to protect and defend the rights, interests, property, safety, and security of ECS, users, or the public.
- With your consent. We otherwise may share your or your child's information with your consent.

#### How do we collect information?

We may use JavaScript, cookies, web beacons, Local Shared Objects, and other similar technologies to collect information about a user's use of the Services. Local Shared Objects (sometimes referred to as "Adobe Flash cookies") are downloaded to a computer or mobile device by the Adobe Flash media player.

We use these technologies for measurement, analytics, and to improve our Services. For example, we use these technologies to help us recognize a user's browser as a previous user and save any preferences that may have been set; to help us customize the content shown while you use the Services; to provide you with content customized to your interests; to understand whether users read email messages and click on links contained within those messages, so that we can deliver relevant content and offers; and to help measure and research the effectiveness of our Services.

We may allow third parties to place and read their own cookies, web beacons, and similar technologies to collect information through the Services, including to help us with traffic measurement, research, and analytics. We permit these third parties only to collect cookie information and similar identifiers that do not, on their own, directly identify you, the user.

You may be able to refuse or disable cookies by adjusting your web browser settings. Because each web browser is different, please consult the instructions provided by your web browser (typically in the "help" section). You may need to take additional steps to refuse or disable Local Shared Objects and similar technologies. For example, Local Shared Objects may be controlled through the instructions on Adobe's Setting Manager page. If you choose to refuse, disable, or delete these technologies, some of the functionality of our Services may no longer be available to you.

Note regarding do-not-track signals and similar mechanisms: Some web browsers transmit "do-not-track" signals to websites. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not take action in response to these signals.

#### Does ECS aggregate information? If so, what does ECS do with aggregated information?

We may aggregate your information with information about other users in a way that does not directly identify you.

We also may share aggregated or de-identified information with third parties, including to help us develop, analyze, and improve content and Services. It is possible that the third parties may use this aggregated or de-identified information to develop their own products and service offerings.

# Information regarding parental consent, access, and deletion

As EPISCOPAL CHILDREN'S SERVICES PARENT RESOURCE MOBILE APP does not collect personal information, we are not able to identify the user and therefore are not able to fulfill modification, access, correction, deletion, or portability requests.

If EPISCOPAL CHILDREN'S SERVICES PARENT RESOURCE MOBILE APP ever does in the future collect, use, or disclose personal information from your child, we will endeavor to obtain a parent or legal guardian's consent before doing so or otherwise comply with law. We will not keep this personal information for longer than necessary. Parents or legal guardians may also contact us to ask if we have collected their child's personal account information, to review that information, if any, and request that EPISCOPAL CHILDREN'S SERVICES PARENT RESOURCE MOBILE APP stop collecting this information and have it deleted. Such requests are subject to EPISCOPAL CHILDREN'S SERVICES PARENT RESOURCE MOBILE APP verifying to our satisfaction that the requester is in fact the child's parent or legal guardian.

#### How do we protect information we collect?

We are committed to protecting your and your child's information. We have adopted reasonable technical, administrative, and physical procedures to help protect this information from loss, misuse, and alteration, including encryption as appropriate. Please note that no data transmission or storage can be guaranteed to be 100% secure. We want you to feel confident using the Services, but we cannot ensure or warrant the security of any information you transmit to us.

#### Notice for international users

The Services are designed for and targeted to United States audiences and are governed by and operated in accordance with the laws of the United States. We make no representation that the Services are operated in accordance with the laws or regulations of any other nations. Information collected through the Services may be stored and processed in the United States. Our service providers may transfer information that we collect about you, including personal information, across borders and from your country or jurisdiction to other countries or jurisdictions, some of which may not have the same data protection laws as your jurisdiction. By using the Services and providing us with information directly, you consent to the transfer of information to the U.S. or to any other country in which our service providers maintain facilities for processing by us in accordance with this Privacy Policy.

#### Can ECS make changes to this Privacy Policy? Will I be notified?

We may revise this Privacy Policy, for example, to reflect changes in the law, our practices, or the features of the Services. We will notify you via this Service before we make any material changes and give you the opportunity to review the revised policy before you choose to continue using our Services.

Non-material changes will be effective immediately upon posting, however we will always note the effective date of such changes at the top of this Privacy Policy. Please periodically review this Privacy Policy so that you are up to date on our most current policies and practices.

## Do you have any questions about this Privacy Policy?

If so, please contact us at:

**Episcopal Children's Services** 8649 Baypine Road Bldg. 7, Suite 300 Jacksonville, FL 32256

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EPISCOPAL CHILDREN'S SERVICES PARENT RESOURCE MOBILE APP

ECS Privacy Policy Effective Date --/--/----Approved by Board of Trustees --/--/ Revised --/--/----