

Website Privacy Notice

INTRODUCTION

Early Light Academy cares about your privacy. Through our website, we collect information needed to provide a quality educational experience for our students. We safeguard the data we collect and do not monetize or improperly share it.

We are providing this Website Privacy Notice in compliance with Utah Code § 63A-19-402.5.

We are committed to protecting your privacy. This Notice explains how we handle your information when you use our website. We want you to understand how your data may be collected, used, and secured.

WHO WE ARE AND HOW TO REACH US

Early Light Academy is a Utah public charter school (K-9) in South Jordan. As a service to our staff, students, parents, and other stakeholders, we have a website to provide users with a variety of detailed information about our school, including but not limited to information about our curriculum, programs, people, and resources. We operate this website.

If you have any questions or concerns about our website, please reach out to us:

• Phone: (801) 302-5988

• Email: info@earlylightacademy.org

WHAT INFORMATION WE COLLECT

Below describes information that we collect through our website:

- Parents/guardians may complete and submit a lottery application for their student through our website. The lottery application asks for such information as parent/guardian name, phone number(s), address, email address as well as student identifying information (e.g., name, DOB, grade, and student ID#).
- Junior high students may register for classes through our website. When doing so, they input their name and desired classes.
- Our website provides an online payment system operated by Core Business Technologies through which parents/guardians and our employees may input payment information to pay for meals served at the school. This same online payment system can be used to pay for school fees and donations. This system can be accessed through the "Lunch" and "Payments" tabs on our website. Core Business Technologies is PCI ASV certified.
- Through our website, parents/guardians may opt in to the texting service use by the school. When signing up for this service, parents/guardians provide their name, email, and mobile phone number.

• Our website uses cookies, but the cookies do not include any personally identifiable information, however.

HOW WE USE YOUR INFORMATION

We use your information for the following purposes:

- We use information submitted via our lottery applications to enroll students whose applications have been processed and accepted.
- We use name and class information submitted by junior high students to register students for courses at the school.
- Online payment information submitted through Core Business Technologies' platform is used to pay for meals served at the school as well as to receive payment for school fees and donations. The online payment information is hosted and stored by Core Business Technologies, whose Privacy Policy is available on our website. The school only has limited access to the online payment information submitted to Core Business Technologies, including basic payor information (name and contact information), associated student name and ID, and limited payment information such as payment date, payment amount, payment type, and item(s) paid for. We do not have access to payors' full credit card numbers.
- Mobile numbers provided by parents/guardians are used to provide school-related messages and notifications to parents/guardians via text message.

DISCLOSURE PRACTICES

We care about your privacy and take it very seriously. We only share your information when necessary. When student personally identifiable information is involved, we only share such information in accordance with the Family Educational Rights and Privacy Act ("FERPA") and Utah student data privacy laws. This means that we do not disclose student personally identifiable information outside of the school unless we first obtain parent/guardian consent or an exception to the prior consent requirement applies. Exceptions to the prior consent rule include disclosures such as to a person or entity to whom the school has outsourced a service or function that a school employee would typically perform (e.g., the school's accountant, bookkeeper, or related services provider), to an individual who needs to know in cases of health and safety emergencies (e.g., a police officer or an EMT), or in connection with an audit or evaluation of federally or state supported education programs.

ACCESS AND CORRECTIONS

You have the right to access and correct your information. If you would like to access, correct, or delete any information submitted or otherwise collected through our website, please contact the school using the contact information provided on page 1 of this Notice.

KEEPING YOUR INFORMATION SECURE

We prioritize the safety of your data and have taken adequate measures to protect it. We have implemented a variety of security measures designed to safeguard your data and prevent unauthorized access to your data. Our website is secured with hypertext transfer protocol secure ("HTTPS"), which encrypts all communication between your browser and our website server. This is particularly important when you transmit sensitive data through our website. HTTPS also allows

your browser to verify that it is communicating with our actual website and not some other entity or person on the internet that is impersonating our website.

We limit and restrict the disclosure of your data in accordance with applicable law. In addition, if personally identifiable data needs to be shared with a third-party service provider who performs services on our behalf, we ensure that such parties are bound contractually to keep the data confidential and use it only for the purpose for which we disclose it to them.

NOTE ON RECORDS CLASSIFICATION

Personally identifiable information is not a classification of records under Utah's Government Records Access and Management Act ("GRAMA") in Utah Code § 63G-2-101 *et seq*. Access to government records is governed by GRAMA.

AT-RISK GOVERNMENT EMPLOYEES

If you are an at-risk government employee and believe we have personal information about you that should be classified as a private record under GRAMA, please contact the school's Record Officer using the contact information provided on page 1 of this Notice. The Record Officer will, consistent with Utah Code § 63G-2-303(2)(c), provide you with an at-risk government employee application by which you may provide notice to the school of your status as an at-risk government employee and request that the school classify as private any records or parts of records in its possession that contain your personal information.

COMPLAINTS

If you have data privacy concerns with respect to our website, please contact the school using the contact information provided on page 1 of this Notice. You may also file a complaint with Utah's Data Privacy Ombudsperson, whose contact information can be found at the Utah Office of Data Privacy's website (https://privacy.utah.gov/office-of-data-privacy/).