



# Technology and Personal Information Privacy Policy 2023

## **Purpose:**

At Tulsa Educare, we take the privacy of your data and information seriously. We understand that we ask for a lot of information, either through our child or employment applications, online forms, or throughout the onboarding process, including financial information, educational information, or other information that can identify you or your child. We appreciate your trust and would like to share how we safeguard this information and what it may be used for.

## **Applicability:**

This Privacy Policy guides our use of the personal information you share with us or that is collected by our website or social media platforms. This only applies to information that is not publicly available, not information obtained from public records or another person or entity.

## **Types of Information:**

Tulsa Educare and our programs offer many types of services, each requiring us to gather different information. These are some types of information we may collect:

- 👤 Information provided directly by you, either on applications, online forms, or other communication: in writing, email, in person, or by telephone;
- 👤 Information we receive from a consumer-reporting agency;
- 👤 Information collected by our affiliated companies or others;
- 👤 Information collected by your interactions with our website and social media platforms using Google Analytics or web-based forms;
- 👤 And the information collected during the employment application process.

## **Use of Information:**

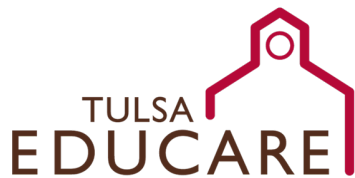
We'll follow all state, and federal laws pertaining to the information you provide, most notably the [Family Educational Rights and Privacy Act \(FERPA\)](#) which governs our treatment of child education records and the [Health Insurance Portability and Accountability Act \(HIPAA\)](#) governs our treatment of identifiable health information. Summary information about these acts can be found by clicking their hyperlinked names above.

In general, the information we request from you will be used and disclosed in association with the services provided to you and your child, the payment for such services, and Tulsa Educare business operations (including quality control efforts and customer analysis). We will not release you or your child's information to nonaffiliated parties unless necessary to provide a service you requested of us or as permitted by law.

We may share information with companies under contract or otherwise affiliated with Tulsa Educare to provide you and your children with the best services. These can include community-based nonprofit organizations, educational organizations, school officials, and state agencies. We may share aggregated information without prior permission (this is non-identifiable information that describes a group and can include things like the average age of parents, overall race/ethnicity demographics of students, or overall attendance rates of a class or school). Without your consent, we will limit identifiable information only to that which is necessary to provide or improve services or business operations.

## **Disclosure of Personal Information:**

Tulsa Educare will *never* sell your information to a third party. We may share information collected with other parties, including the following:



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- 👤 With third-party service providers (some are listed below) to assist us with providing and marketing our services, such as payment processors, data hosting services, analytics services, advertising partners, and email service providers.
  - 👤 With Constant Contact, with permission, to send email marketing and text message communications. For more information, [click here](#).
  - 👤 With partners assisting with program monitoring and quality assurance, these may be [The University of Oklahoma's Early Childhood Education Institute](#) (our Local Evaluation Partner), [Devereux Advanced Behavioral Health](#), provider of the Devereux Early Childhood Assessment (DECA), and [The Frank Porter Graham Child Development Institute](#) (our National Evaluation Partner),
  - 👤 With [ChildPlus](#), our enrollment and child management software, and [Teaching Strategies Gold](#), our child assessment software.
  - 👤 With any affiliates or joint venture partners that we may have in the future.
  - 👤 As part of a corporate sale, merger, acquisition, or other transfer of all or portion of our assets, including as part of a bankruptcy proceeding.
  - 👤 If necessary, to comply with applicable laws and regulations, to respond to a subpoena, search warrant, or other lawful requests for information we receive, or otherwise to protect our rights or the rights of third parties, or to protect the safety or security of any person or entity.
  - 👤 Others, with your consent or as otherwise disclosed at the time of data collection or sharing.
- We may share aggregated information without prior consent.

## **Website, Social Media, Digital Advertising, and Analytics:**

Our website may offer interactive features, such as the ability to request to be contacted or to be sent event reminders. If you disclose information in one of these forms, the information gathered is protected under this policy, and you agree that we may contact you by the requested means. See "Email and Text Message Communications" below for more information.

We may also work with third parties that collect data about your use of our website and other sites or apps over time for non-advertising purposes. We use Google Analytics and other third-party services to improve the website's performance and for analytics and marketing purposes. For more information about how Google Analytics collects and uses data when you use our website, [click here](#). To opt out of Google Analytics, [click here](#). We may also use Meta Pixels for Facebook Ad tracking. [Click Here](#) for Meta's privacy policy. Meta's policy applies to visiting our Facebook and Instagram, as well.

Privacy policies of other websites that provide services for us are listed below:

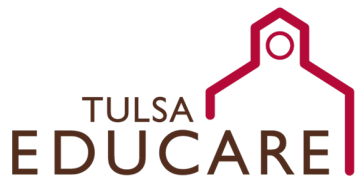
- [YouTube](#)
- [LinkedIn](#)
- [Indeed](#)
- [Paycom](#)

We may also use sites that are not listed here. Please view that website's Privacy Policy for their specific information.

Your web browser may allow you to block or disable cookies; however, parts of our website may not function properly if you do so.

## **Email and Text Message Communications:**

Tulsa Educare uses various services to send electronic communication, including Email, [Remind](#), Google Chat, and mass messaging through [Constant Contact](#) and Child Plus.



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Early Learning Works uses Constant Contact to send event invitations and reminders. You must request this service by contacting Early Learning Works or using the form on our website. Terms and conditions are located here.

Tulsa Educare uses Child Plus to send mass messages via Email or Text to parents and guardians of currently enrolled families to send important updates about our schools, including COVID-19 and weather alerts. You must opt-in to receive these messages and can do so at your family orientation or by contacting your Family Advocate.

If you wish to unsubscribe from our email campaigns, please click on the Unsubscribe link at the bottom of any marketing email sent from us. If the message comes from "[SchoolMessage@childplus.com](mailto:SchoolMessage@childplus.com)," please contact your Family Advocate to unsubscribe.

If you wish to stop receiving text messages from us, reply STOP, QUIT, CANCEL, OPT-OUT, or UNSUBSCRIBE to any text message sent from us. For more information, see our Mobile Messaging Terms and Conditions on our website.

## **Parents of Former Students & Former Employees:**

Even if your child is no longer enrolled at Tulsa Educare or you no longer work for Tulsa Educare, this policy will still apply to you or your child's information, which we may keep on file as required by state and federal regulations.

## **Confidentiality and Security**

We restrict access to your and your child's personal information to those individuals and companies described above. We will use our best efforts to ensure that unauthorized parties do not have access to any of your data. We will use our best efforts to train and oversee our employees and agents to ensure that your and your child's information will be handled responsibly and in accordance with this Privacy Policy. We currently maintain physical, electronic, and procedural safeguards that comply with federal and state regulations to guard your and your child's personal information.

## **Notification of Rights under FERPA:**

The Family Educational Rights and Privacy Act (FERPA) affords parents and children ("eligible students") certain rights concerning the child's records. These include:

1. The right to inspect and review the child's education records. Parents or guardians should submit to Tulsa Educare a written request that identifies the records they wish to inspect. Tulsa Educare will notify the parents or guardians when and where the records may be reviewed.
2. The right to request the amendment of the child's education records that the parent or guardian believes are inaccurate, misleading, or otherwise violating the child's privacy rights under FERPA. Tulsa Educare retains the right not to amend the record as requested. If Tulsa Educare chooses not to amend the record as requested, Tulsa Educare will notify the parent or guardian of the decision and advise them of the right to a hearing regarding their request for amendment.
3. The right to consent to disclosures of personally identifiable information contained in the child's education records except to the extent that FERPA authorizes disclosure without consent. One exception that permits disclosure without consent is disclosure to school officials with legitimate educational interests. A school official is a person employed by Tulsa Educare as an administrator, supervisor, instructor, or support staff member, including health and medical staff, a person serving on the Tulsa



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Educare Board, a person or company with whom Tulsa Educare has contracted as its agent to provide a service instead of using its employees or officials or a parent or student serving on an official committee, such as a disciplinary or grievance committee or assisting another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record to fulfill their professional responsibility.

In accordance with The Family Educational Rights and Privacy Act (FERPA), Tulsa Educare may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors, and awards, and dates of attendance. However, Tulsa Educare must tell parents and eligible students about directory information and allow them a reasonable amount of time to request that the school not disclose directory information about them. Tulsa Educare must notify parents and eligible students annually of their rights under FERPA.

### **Changes to this Privacy Policy:**

Tulsa Educare can update this Privacy Policy at any time. Please review it frequently.

### **How to Contact us or Request a Copy of this Notice.**

If you have any questions about this policy or our privacy practices or request a paper copy of this notice, please email us at [info@tulsaeducare.org](mailto:info@tulsaeducare.org).