



## **PRIVACY POLICY**

**Our Commitment:** StartEdUp has a firm commitment to protecting the privacy and security of the users of our sites. Your privacy is important to us and we go to great lengths to keep your personal information secure.

This privacy policy will advise you about our guidelines concerning the use of your personal information, including, without limitation, the reasonable efforts we make to protect your personal information in accord with these guidelines, and about what choices you have concerning our use of such information. Please read this policy carefully. We may need to change this policy from time to time in order to address new issues and reflect changes on our sites. We will post those changes here so that you will always know our policies regarding what information we gather, how we might use that information and whether we will disclose that information to anyone. Please refer back to this policy regularly.

**What We Know About You:** Our site and the sites of our affiliates and partners collect information about you, including your email and IP addresses. In addition, information you agree to provide us, such as your name, address, telephone number, job title, employer is collected when you register in our courses.

As a service provider to educational institutions, StartEdUp is committed to protecting the privacy of children, including any children under the age of 13. We adhere to the Children's Online Privacy Protection Act and do not knowingly register or otherwise collect personally identifiable information from any child under the age of 13 without the prior verifiable consent of the child's parent or guardian. Any student information collected by StartEdUp on or through the Site is collected solely for the benefit of such students and their school systems, and for no other commercial purpose. Accordingly, schools and teachers that we contract with act as a parent's/guardian's agent for obtaining consent for the collection of a child's personal information on the parent's/guardian's behalf. Notwithstanding the foregoing, StartEdUp will provide to parents/guardians, upon request, a description of the types of personal information collected on the Site; an opportunity to review the child's personal information and/or have the information deleted; and the opportunity to prevent further use or online collection of a child's personal information. Subject to any legal and/or regulatory record keeping requirements, StartEdUp retains personal information collected from a child for only as long as is necessary to fulfill the purpose for which it was collected and deletes such personal information using reasonable measures to protect against its unauthorized access or use.

**How We Use Your Information:** We compile and use your information to administer, support, and improve our services; and to detect and prevent faults, breaches of our network security, the law or our contract terms. We will also use all this information to assess what products and services may be of interest to individuals to personalize our services and marketing.

We may provide access to your personally identifiable information, when legally required to do so, to co-operate with police investigations or other legal proceedings; to protect against misuse or unauthorized use of this Web Site; to limit our legal liability and protect our rights; or to protect the rights and safety of visitors to this Web Site or the public. In those instances, the information is provided only for those limited purposes.

We will share with certain parties: If you are enrolled in innovation school and your license was purchased on your behalf as part of a multi-user license agreement, we may share your information, including data related to your progress in the program, with the organization that purchased the group package.

Otherwise, we do not sell our mailing lists and we will not share your personally identifiable information in ways unrelated to those described above. Should we wish to do so in the future we will provide you with an opportunity to opt out of such use or prohibit such uses altogether.

**Safe Transactions:** When collecting your credit card to pay for products or services, StartEdUp and/or its service providers facilitating such transactions agree to abide by the Payment Card Industry Data Security Standards (PCI DSS) to process all transactions.

**Data Security:** We take reasonable steps to maintain the security of the personally identifiable information that we collect, including using secure passwords for access and limiting the number of people who have physical access to our database servers. We use industry standard encryption methods when required and whenever possible. However, no data transmission over the Internet can be guaranteed to be completely safe. Accordingly, we cannot ensure or warrant the security of any information that you transmit to us, so you do so at your own risk.

**Cookies / Web Server Logs:** Similar to other commercial Web sites, this Web Site utilizes standard technology called “cookies” and Web server logs to collect information about how the Web Site is used. Cookies are a feature of Web browser software that allows Web servers to recognize the computer used to access a Web Site. Cookies are small pieces of data that are stored by a user’s Web browser on the user’s hard drive. Information gathered through cookies and Web server logs may include the date and time of visits, the pages viewed, time spent at this Web Site, and the Web Sites visited just before and just after this Web Site. This information is collected on an aggregate basis. None of this information is associated with you as an individual.

You can, of course, disable cookies on your computer by indicating this in the preferences or options menus in your browser. However, it is possible that some parts of our Web Site will not operate correctly if you disable cookies. You should consult with your browser’s provider/manufacture if you have any questions regarding disabling cookies.

Some of StartEdUp third party content providers also may place a cookie on the user’s computer. If a user chooses to monitor or restrict cookies that are placed on his/her computer, the user can determine the Web site that is attempting to place a cookie. Content providers control cookies and users should refer to that provider’s privacy policy for further information regarding its use of cookies.

**Consent to Transfer:** Please be aware that StartEdUp may develop a global audience and subsequently may transfer your personal information to countries that may not guarantee the same level of protection for personal information as the one in which you reside. We are taking appropriate steps to provide an adequate level of protection to your personal information and your personal information will be processed in accordance with the other provisions of this Privacy Statement. By using our Web Site, participating in any of our services and/or providing us with your information, you consent to this transfer.

**Partners and Affiliates:** StartEdUp delivers its coursework on the Canvas Learning Management System by Instructure. Please also refer to Instructure’s terms of use and privacy policy. It can be found at [www.instructure.com](http://www.instructure.com), from our Innovation School landing page and in our virtual classroom at [startedup.instructure.com](http://startedup.instructure.com).

**Amendments to Policy.** StartEdUp reserves the right to amend this policy periodically. Any amendments made to this policy will be considered effective immediately after the amended policy is posted on the Site.

**For additional information please contact us at:** [info@startedupinnovation.com](mailto:info@startedupinnovation.com)

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