

PRIVACY POLICY  
Last updated January 07, 2020

Thank you for choosing to be part of our community at Oak Hill Academy (“**Company**”, “**we**”, “**us**”, or “**our**”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at oakhill@oakhillacademy.com.

When you visit our website [www.oakhillacademy.com](http://www.oakhillacademy.com), access our Facebook application, and use our Services (defined below), you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our website, applications, and our services.

This privacy policy applies to all information collected through our website, Facebook application, (“**Apps**”), and/or any related services, sales, marketing or events we conduct (we refer to these services, sales and events collectively in this privacy policy as the “**Services**”).

**Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.**

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## 1. WHAT INFORMATION DO WE COLLECT?

### Personal information you disclose to us

***In Short:*** We collect personal information that you provide to us such as name, address, contact information, passwords and security data, and payment information.

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our services, when participating in activities on the Services or Apps or otherwise contacting us. The personal information that we collect depends on the context of your interactions with us and the website, Services or Apps, the choices you make and the products and features you use. The personal information we collect can include the following:

**Publicly Available Personal Information.** We collect first name, maiden name, last name, and nickname; current and former address; phone numbers; email addresses; family member names and their related information; and other similar data.

**Personal Information Provided by You.** We collect financial information (credit card number, purchase history, invoices); and other similar data.

**Credentials.** We collect passwords, password hints, and similar security information used for authentication and account access.

**Payment Data.** We collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by Smart Tuition. You may find their privacy policy link(s) here: <https://www.smarttuition.com/wp-content/uploads/2017/05/Smart-Tuition-Privacy-Policy-5-2-17-final.pdf>.

We rely on the accuracy of the personal and financial information you provide to us. Accordingly, all personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### Information automatically collected

***In Short:*** Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our Services or Apps.

We automatically collect certain information when you visit, use or navigate our website, Services or Apps. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences,

referring URLs, device name, country, location, information about how and when you use our website, Services or Apps and other technical information. This information is primarily needed to maintain the security and operation of our website, Services and Apps, and for our internal analytics and reporting purposes. Like many businesses, we also collect information through cookies and similar technologies.

**Online Identifiers.** We collect tools and protocols, such as IP (Internet Protocol) addresses; cookie identifiers, or others such as the ones used for analytics and marketing; and other similar data.

## Information collected through our Apps

***In Short:** We may collect information regarding your geo-location, and Facebook permissions when you use our apps.*

If you use our Apps, we may also collect the following information:

- ***Geo-Location Information.** We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.*
- ***Facebook Permissions.** We by default access your Facebook basic account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other information that you choose to make public. We may also request access to other permissions related to your account, such as friends, checkins, and likes, and you may choose to grant or deny us access to each individual permission. For more information regarding Facebook permissions, refer to the Facebook Permissions Reference page.*

## 2. HOW DO WE USE YOUR PERSONAL INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our website, Services or Apps for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below. We use the information we collect or receive:

- **To send you marketing and promotional communications.** We and/or our third party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You

can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below).

- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **Deliver targeted advertising to you.** We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- **To protect our Property.** We may use your information as part of our efforts to keep our websites, Services or Apps safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for Business Purposes, Legal Reasons and Contractual.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our website, Services or Apps..
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our website, Services or Apps, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share data based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.

- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the website, Services or Apps, which will enable them to collect data about how you interact with the website, Services or Apps over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another entity.
- **Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you visit the website, Services or Apps. These companies may use information about your visits to our website and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

#### **4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

***In Short:** We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

## **5. DO WE USE GOOGLE MAPS?**

*In Short: Yes, we use Google Maps for the purpose of providing better service.*

This website, Services or Apps may use Google Maps APIs. You may find the Google Maps APIs Terms of Service here. To better understand Google's Privacy Policy, please refer to this link. By using Google Maps API, you agree to be bound by Google's Terms of Service.

## **6. HOW LONG DO WE KEEP YOUR INFORMATION?**

*In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

## **7. HOW DO WE KEEP YOUR INFORMATION SAFE?**

*In Short: We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our website, Services or Apps is at your own risk. You should only access the services within a secure environment.

## **8. DO WE COLLECT INFORMATION FROM MINORS?**

*In Short: We will comply with the Children's Online Privacy Protection Act*

We operate our website, Services and Apps in compliance with the Children's Online Privacy Protection Act and will not knowingly collect personally identifiable information from anyone under 13 except in accordance with that law.

## **9. WHAT ARE YOUR PRIVACY RIGHTS?**

*In Short: You may review, change, or request that we delete your data.* If you are resident in the European Economic Area and you believe we are unlawfully processing your personal

information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

You may request access to the data we hold about you and request that we edit or delete it. You are entitled to request copies of the data that you have provided to us in a structured, commonly used and machine-readable format and/or request that this information be transmitted to another service provider (where technically feasible). You may be able to have your data deleted or erased. We maintain a process to help you confirm that your data remains correct and up-to-date. You may choose whether or not you wish to receive material from us or some of our affiliates and partners. Please let us know by contacting us. If the processing of your data is based on your consent, you may withdraw your consent at any time as to future processing. You can ask us to stop using all or some of your data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your data is inaccurate or unlawfully held).

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our website, Services or Apps. To opt-out of interest-based advertising by advertisers on our website, Services or Apps visit <http://www.aboutads.info/choices/>.

## 10. CONTROLS FOR DO NOT TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

## 11. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California law currently permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the website, Services or Apps, you have the right to request removal of unwanted data that

you publicly post on the Services or Apps. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California.

## **12. DO WE MAKE UPDATES TO THIS POLICY?**

*In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## **13. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, you may email us at [oakhill@oakhillacademy.com](mailto:oakhill@oakhillacademy.com) or by post to:

Oak Hill Academy  
347 Middletown-Lincroft Road  
Lincroft, NJ 07738  
United States

## **HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the laws of some countries, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request form by clicking [here](#). We will respond to your request within 30 days.