

Pathway Preparatory Academy dba. Pathway Christian Preparatory Academy

Privacy Policy

(Last Modified July 1, 2020)

Introduction

Pathway Preparatory Academy, Inc. dba Pathway Christian Preparatory Academy ("Pathway Preparatory Academy," "we" or "us") provides an online service, the Pathway Preparatory Academy websites, www.pathwayprep.org and www.pathwaychristian.org (the "Site"), related subdomains, and programs hosted by or on behalf of Pathway Preparatory Academy and related services (together with the Site and the Products, the "Service"). The terms "you" and "user" means all individuals and entities that access the Service.

This Privacy Policy describes how we use Personal Information (defined below) that we collect from you as part of you using our service and also applies to information that we may collect from you outside our Service, such as over the phone, by fax, through mail services, or any other related means. This Privacy Policy also describes the choices available to you regarding our use of your Personal Information and how you can access and update this information, and what information you provide that we will retain even if you decide to stop using the Service. Our Privacy Policy is not a contract, and it does not create any legal rights or obligations.

You should also read our Terms of Service, available at <https://pathwaychristian.org/terms-of-service> which contains important information about the scope and nature of the Service, and the rules that apply to your use of our Service. All capitalized terms used in this Privacy Policy that are not defined in this Privacy Policy have the meaning given to them in the Terms of Service for Pathway Preparatory Academy.

Your use of the Service indicates that you consent to our collection, storage, use and disclosure of your personal information and other information as described in this Privacy Policy and the Pathway Preparatory Academy Terms of Service located at <https://pathwaychristian.org/terms-of-service>. If you do not consent to the use of your Personal Information as described in this Privacy Policy or do not agree to the Term of Service, do not use the Service.

This Privacy Policy is provided in compliance with the Children's Online Privacy Protection Act ("COPPA"); to inform parents of the information we collect from users of the Services, to describe how we use and disclose that information, and how we obtain their required consent to collect information from children under 13 years of age. For purposes of clarity, the term

“children” or “child” may refer to “student(s)” in connection with our services and privacy policy. We only receive personal information about children under the age of 13 strictly from their parents and/or legal guardians at the time those children are enrolled into a participating school using our Services. The only information we directly collect from minor children is the information they provide (such as test answers, electronic mail and class discussions) as part of their education in a participating school in contract with our Services.

As we take the privacy of young children very seriously and want to ensure proper safeguarding of their personal information, in the event we inadvertently received information from a child under the age of 13 as, for example, by fraud or deception by others, please email us at service@pathwayprep.org.

“Select” or “Participating School”

As applied in our Terms of Service and this Privacy Policy, select or participating school means a school (public or private) that offers curriculum and/or services provided by Pathway Preparatory Academy under a written agreement with us.

“Personally Identifiable Information” or “PII” means information that, alone or in combination, is linked or linkable to a specific person that would allow a reasonable person, who does not have personal knowledge of the relevant circumstances, to identify the person with reasonable certainty.

What laws generally apply to student records?

A student’s education records are protected by Pathway Preparatory Academy as required by the Family Educational Rights and Privacy Act (“FERPA”) and applicable state laws regarding the privacy of student records or PII. In performing our services, we will only disclose education records or provide access to them in compliance with FERPA and applicable state laws, and we will require third parties that contract with us and have access to education records to do the same. We will not use or seek permission to use a student’s PII for purposes unrelated to providing or improving their education where required by law to do so.

What information we collect about students

As described above, we collect personal information from students and/or their parents to help manage a student’s educational goals in conjunction with the student’s participating school and teachers.

How information is collected

We may collect information about students directly from students or parents, as well as automatically through a student’s use of our Services. We will not require a student to disclose

more information than is reasonably necessary to use our services. We do provide parents with a link to our privacy practices upon their registration of their child's enrollment in our Services.

Information we collect directly

In order to engage and perform our services, we collect a student's age, name, gender, birthdate, ethnicity (optional), home address, email, participating school name, and parental/guardian email address during the registration process which may include but is not limited to academic records (courses completed, grades and transcript records).

Information that is collected on a voluntary basis

We collect PII information about students on a voluntary basis when they have registered with a participating school to enroll in our services; direct enrollment in our services; requests for additional information from us or our services; posting a message to a message board; requesting help from us including our online instructors; and engaging in an online chat with online instructors or other students where applicable.

Information we collect automatically

We collect information about a child's activities, while the Services are active. We may also automatically collect the following information through cookies and other technologies: domain name; your browser type, and operating system type, name and model; pages or screens you view; links you click; your IP address; the length of time you visit our Services; and the referring URL, or the webpage that led you to our Site; device name and model; version; the timestamp and length of time that you use the Services; and the geolocation of your mobile device.

Other Information We Collect About Children. We collect information about children's activities on our Site and in our Services, we do not share this information with third parties, other than our service providers. Before we analyze or use any activity data for our own commercial purposes, we de-identify and/or aggregate such information.

How We Use Children's Information

We use personal information collected from children for the following purposes:

- To provide our Services;
- To respond to customer service and technical support issues and requests; and
- To better understand how users access and use our Service, both on an aggregated and individualized basis; to respond to user desires and preferences; to improve our Services and to develop additional products and services; and for other research and analytical purposes.

Unique Identifiers. We collect and use unique identifiers, such as IP addresses, as necessary to operate our Site, or Services, including to maintain or analyze their functioning; perform network communications; authenticate users or personalize content; and protect the security or integrity of users and our Site, and Services.

Aggregate or De-Identified Information. We may use aggregate or de-identified information about children for research, analysis, marketing, and similar purposes. When we do so, we strip out names, contact information, and other personal identifiers.

How We Disclose Children's Information

We do not sell children's personal information, and a child may not make his or her personal information public through our Services. In general, we may disclose the personal information that we collect about children to provide our Services, to comply with the law, and to protect Pathway Preparatory Academy and other users of our Services. For example, we may share children's personal information as follows:

- **Parents.** We may disclose a child's information to his/her parents.
- **Affiliates.** We may disclose information we collect about a child to our affiliates or subsidiaries for research, marketing or other purposes consistent with this Policy.
- **Service Providers.** We may disclose information we collect about a child to vendors, service providers, contractors, agents or other entities who perform functions on our behalf. To the extent our service providers assist us in providing our services to you, these vendors are provided the minimum amount of data required to perform the tasks for which they have been engaged, consistent with legal requirements, such as FERPA. As we issue log in credentials associated with your personal information, we may associate these personal accounts with a student's education records in order to allow parents, online instructors, and/or participating schools to track a student's attendance, school work, and testing in order to abide by state and/or federal educational standards and regulations.
- **Participating Schools.** We may disclose registration and enrollment information you have provided to your participating school or to third parties as required by state or federal law or requested by your participating school. In turn, we may disclose information to participating schools to support students with respect to such matters as testing, academic progress, and attendance, etc.
- **Business Transfers.** We may transfer information we collect about a child to another entity if we are acquired by or merged with another company, if substantially all of our assets are transferred to another company or as part of a bankruptcy proceeding.

- **In Response to Legal Process.** We may disclose information we collect about a child in order to comply with the law, a judicial proceeding, court order or other legal process, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We also may disclose information we collect about a child where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy or as evidence in litigation in which we are involved.
- **Aggregate/De-identified.** We may disclose aggregate or de-identified information that we collect about children through our Services, for advertising, research and analytical services; however, we will strip out names, contact information and other personal identifiers before we do so.

Instances where we Contact You

As we respond to customers who request information from us and answer related questions, we may call you at the telephone number you leave for us to provide the requested information. As a matter of practice and policy, we do not call people by generating random or sequential telephone numbers or employ the services of auto dialers. Where appropriate, we may use pre-recorded messages when allowed by state law to ensure that customers receive the requested information. Customers do not have to consent to receive calls in order to receive our services.

International guests

If you are accessing this Platform from outside of the United States, you consent to the transfer of your information to the United States, and the processing, use, and sharing of your information in accordance with this Privacy Policy. Regardless of where your information is collected or transferred, the information will be treated in accordance with this Privacy Policy.

Your Rights to Review, Delete, and Control Our Use of Children's Personal Information

Parents have a right to review the information we have collected about their children, respectively, and to delete it, and to tell us to stop using it. To exercise these rights, you may contact us at support@pathwayprep.org. You will be required to authenticate yourself as the child's parent to receive information about that child. Please note that copies of information may remain in cached or archived form on our systems after you request us to delete it.

Protecting Your Information

We take the security of your Personal Information very seriously, and have implemented policies and procedures, including technical measures, that are designed to help safeguard it. Please remember that you play a valuable part in security as well. Your password to access our Service, which you select at registration, should never be shared with anyone and should be changed frequently. While we strive to use best practices to protect your Personal Information, the Internet and computer technology is not 100% secure and we cannot absolutely ensure the security of any Personal Information that you provide to us.

California Residents

California residents may choose to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes or choose to opt out of such disclosure. To make a request or to opt out at any time, please contact us at support@pathwayprep.org or the other contact information provided below. Our policy is not to disclose Personal Information collected online to a third party for direct marketing without your approval.

Payments

Pathway Preparatory Academy requires wire transfer for all Services provided herein. All wire transfers shall be made to our bank as follows:

Bank Account Information

Pathway Preparatory Academy, Inc.

Name of the Bank: Bank of America

Account Number: 3251 1838 9291

(wires) Routing Number: 121000358 (paper & electronic)/026009593

SWIFT Number: BOFAUS6S

In the event Pathway Preparatory Academy may use third party electronic payment processing providers for payment services (e.g. card acceptance, merchant settlement, and related services) ("Payment Services") for payments related to the Service. By making use of some or all of these Payment Services on the Service, you agree to be bound by the third-party's terms and conditions as well as its privacy policy and hereby consent and authorize us to delegate the authorizations and share the information you provide to us with our third party electronic payment processing provider(s) to the extent required to provide the Payment Services to you.

Third Party Websites

You should carefully review security/privacy policies of any third-party sites accessible from the Site. Other sites accessible through the Site have their own policies and data collection, use, and disclosure practices. Please consult each site's policies and practice. Pathway Preparatory Academy is not responsible for the policies or practices of third parties. The information practices of those websites linked from the Site are not covered by this Privacy Policy. These other sites may send their own cookies to users, collect data, or solicit personal information.

How to Opt-out

If you choose to stop receiving emails including email promotional materials from Pathway Preparatory Academy, please follow the unsubscribe instructions within each email communication or send an email to support@pathwayprep.org. Pathway Preparatory Academy will not provide or share any mailing lists or other information about you to another company or service for promotional purposes. Any service related emails (to confirm a purchase, etc.) generally do not offer an option to unsubscribe as they are necessary to provide the service you requested.

Contact Pathway Preparatory Academy

The Service is owned, operated, and maintained by:

Pathway Preparatory Academy, Inc.

6160 Warren Parkway, Suite 100

Frisco, Texas 75034

Phone: (792) 418-2921

Changes to this COPPA and General Privacy Policy

This COPPA Policy and General Privacy Policy (collectively “[Privacy Policy](#)”) is current as of the Effective Date set forth above. We may change this Privacy Policy from time to time, so please be sure to check back periodically. We will post any changes to this Privacy Policy on our Site and in our Services. If we make any changes to this Privacy Policy that materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Site and in our Services.

