



# FoolProof Programs Privacy Policy

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we may collect, use, protect or otherwise handle the Personally Identifiable Information in accordance with our website.

## **When do we collect information?**

We collect information from users when they register on our site to gain access to our educational program(s) or subscribe to our newsletter.

## **What personal information do we collect from the people that visit our website or program?**

There are a variety of users to different FoolProof programs. We require and store a minimum amount of personal data to make the programs work. Below we describe the needed personal information for each user group.

### **FoolProof Academy:**

Middle and high school students work through the program in a classroom setting, controlled by a teacher or school administrator. Students are identified only by a first name, last name and a self-chosen username/password combination. Teachers are required—in addition to the first name, last name and a self-chosen username/password combination—to also provide an email address and optionally a zip code.

### **FoolProof Solo:**

College-aged young people work through the program by themselves, or through a college professor or administrator in a classroom setting. Students are identified only by a first name, last name and a self-chosen username/password combination. College professors, and those users who work through the program by themselves, are required—in addition to the first name, last name and a self-chosen username/password combination—to also provide an email address and optionally a zip code.

### ***The FoolProof Foundation***

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**FoolProof for Parents:**

Children work through the program in a classroom setting, controlled by parent, grandparent or guardian. Children are identified only by a first name, last name and a self-chosen username/password combination. Parents or guardians are required—in addition to the first name, last name and a self-chosen username/password combination—to also provide an email address and optionally a zip code.

**FoolProofMe.com:**

On our FoolProofMe.com web portal, we offer the option to sign up for monthly consumer e-newsletters. To provide this voluntary service, we collect a user's email address, as well as first and last name. As stated and explained in more detail further along in this policy, we do not share or re-sell this information, ever. It is only used for email updates, as requested by the user. Unsubscribing is done easily through a link available in each email update.

**How do we use the information?**

FoolProof uses a database for saving student work so that the teacher/parent can review their progress and the results of the tests. A teacher can only review the student information for students in their classes. A parent can only review and correct the personal information for their child.

We may use teacher/instructor/parent information to follow up on correspondence initiated by the user (in-program question option, email or phone inquiries about the curriculum) or to reach out with program related questions, such as user experience. We will not contact students or children directly, unless in response to a student generated inquiry.

Deletion of information from the database will be under the control of the teacher/parent. When students have completed the course (or portion of the course), the teacher (or parent) will have the option of deleting the stored information.

Student data is only available to the associated teacher or parent user.

**Sponsored programs:**

When the used program is provided locally by a sponsor, we may share parent/teacher contact information with the sponsoring entity. A sponsoring entity may be a credit union, a university or college, church or other faith-based organization, a (youth) prison, an (educational) foundation, or corporate sponsor.

A sponsored program is clearly marked as such, so it is apparent to the (potential) user. If a user wishes to use an unsponsored version of our program, that is available to them as well, for free, through our [www.foolproofme.com](http://www.foolproofme.com) portal.

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A sponsoring entity will not receive any info about students, nor are they allowed to re-share contact info of parents or teachers. Faith-based organizations, prisons, and foundations who use the program with their “own” membership or population do have access to that data, since it is within their own “community.” FoolProof does nothing with this info, like sharing or re-selling, as stated above.

FoolProof only contracts with companies, both presently and in the future, who maintain Privacy Policies consistent with the requirements found within this Policy.

### **How do we protect the information?**

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make visits to our site as safe as possible.

We use regular Malware Scanning.

Personal information is contained within secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of that information. All sensitive information you supply is transmitted over an encrypted Secure Socket Layer (SSL) connection and passwords are always hashed using security-industry standard hashing algorithms before being stored in our databases.

### **How long do we retain individual student data?**

Student personal information is retained long enough for schools to be able to verify completion of FoolProof resources. Due to FoolProof being implemented throughout various times in a child’s educational career, FoolProof maintains individual student information for seven (7) years after the account has last been accessed prior to deletion from the system.

### **Do we use 'cookies'?**

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information.

We use session cookies to allow users to log into the program and use the program. Settings cookies are used to remember the user’s personal settings.

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Users can choose to have their computer warn each time a cookie is being sent, or choose to turn off all cookies.

For the usage and correct functioning of our programs accepting cookies is required.

### **Third-party disclosure**

We do not sell, trade, or otherwise transfer to outside parties Personally Identifiable Information as stored in our systems.

### **Third-party links**

We do not include or offer third-party products or services on our website.

### **Google**

We have not enabled Google AdSense on our site and will not do so in the future. We use Google Analytics to track and analyze (anonymous) usage data for statistical purposes and optimization of our sites and services.

### **California Online Privacy Protection Act**

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. - See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

### **According to CalOPPA, we agree to the following:**

- Users can visit our site anonymously.
- Once this privacy policy is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our website.
- Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.

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**At all times:**

Users will be notified of any Privacy Policy changes through a pop-up appearing upon accessing their account after changes have occurred. Users will be prompted to accept the Policy prior to using the program. User's personal information can be changed by logging into the account.

**How does our site handle Do Not Track signals?**

Our programs and systems honor Do Not Track settings.

**COPPA (Children Online Privacy Protection Act)**

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

Because the privacy of young members and other visitors to our website is of the utmost importance, we have adopted the following privacy policy, which conforms to the [Children's Online Privacy Protection Act of 1998](#):

We are aware of COPPA requirements, and we provide the FoolProof Academy program (see page 1) to schools and teachers under the *en loco parentis* principle. This simple everyday act removes children from the physical control of their parents, and shares some of that responsibility with teachers and administrators at schools, for instance making sure that the children's personal information is kept secure. As stated, the FoolProof Academy program only requires a minimum amount of personal student information to be shared (first and last name, and a self-chosen username/password combination only) to be able to use the program within a classroom, and it is up to a teacher/administrator to keep this information safe, and/or delete this from the system after students graduate or leave the school.

In our other program, Foolproof Solo, we do not anticipate usage by children under the age of 13, so there's no need for parental consent. If we do receive a membership application from which we can determine the age of the child, we will comply with COPPA requirements to obtain parental consent and/or notify the parent(s) or guardian(s) of the receipt of such information. Further, we will not proceed with the request of the membership application without parental consent. In our FoolProof for Parents, the parent signs up their own children, and is thus in control of their children's personal information (which will not be shared by FoolProof in any way or form).

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## **Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

**In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:**

We will notify the users via in-site notification within 1 business day.

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

## **CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

**We collect your email address in order to:**

Respond to inquiries, and/or other requests or questions (teacher/parent only). See above.

**To be in accordance with CANSPAM, we agree to the following:**

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

## **Contacting Us**

If there are any questions regarding this privacy policy, you may contact us using the information below.

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