



The Compass School of Texas School

General Statement of Information Privacy

Scope

The The Compass School of Texas School (“THE COMPASS SCHOOL OF TEXAS”) provides education and related services. In the normal course of these activities, THE COMPASS SCHOOL OF TEXAS collects, maintains and discloses information associated with individuals, some of which may be confidential while some may be non-confidential. This General Statement of Information Privacy (this “Statement”) addresses a number of THE COMPASS SCHOOL OF TEXAS information handling practices that apply to individually identifiable personal information and outlines other practices that apply to individual information that is not necessarily confidential. These practices include both traditional paper-based information handling activities as well as information collected by THE COMPASS SCHOOL OF TEXAS through websites owned, controlled, or operated by THE COMPASS SCHOOL OF TEXAS under our domain: www.compasschooltx.org

This domain is known as the “THE COMPASS SCHOOL OF TEXAS School Site.” Some individually identifiable personal information handling practices may be subject to additional information privacy provisions as identified in later segments of this Statement. Information that is collected by THE COMPASS SCHOOL OF TEXAS in connection with its commercial transactions with individuals and legal entities may be subject to other contractual terms, agreements or regulations.

THE COMPASS SCHOOL OF TEXAS also contracts with third parties that may collect individually identifiable confidential and/or non-personal information. The following list of third-party sites, while not exhaustive, complete, or may be modified without notice, are used by THE COMPASS SCHOOL OF TEXAS:

- o FACTS Tuition Management

- o Google

- o Facebook

We do not control the content or privacy practices of third-party sites. Interaction with third-party sites is subject to that website's policies. We encourage you to review the privacy notices of those third party sites to understand their privacy practices.

By using the THE COMPASS SCHOOL OF TEXAS School Sites and third-party sites, User agrees to be bound by the following terms and conditions and privacy policy stated herein. Please be aware that this Statement may be amended periodically. THE COMPASS SCHOOL OF TEXAS will also post any changes to the Statement on this page and, if the changes are significant, will provide a more prominent notice.

Purpose and Format

This Statement has been organized into three sections as follows:

General Rules Regarding the Collection and Sharing of Individually Identifiable Information

1. Conformance with Legal and Professional Standards Regarding Personal information
2. Collection and Sharing of Individual Information that is Not Deemed Confidential
3. Contact "Opt-In" and "Opt-Out"
4. Third-Party Websites

Specific Privacy Supplements to the General Rules

- Student Records including Financial Information Collected for Financial Assistance Programs
- Transaction over the THE COMPASS SCHOOL OF TEXAS School Sites or third-party sites

Typical Practices Observed by THE COMPASS SCHOOL OF TEXAS in Meeting the General Rules and Specific Privacy Supplements

- Interactions with Individuals under Thirteen Years of Age

- Social Security Numbers and Other Government Issued Personal Identification Numbers
- Information Security and Destruction of Personal information
- Medical Information
- Credit Information
- Other Information Obtained from Third-Parties
- Web Server Login Information that THE COMPASS SCHOOL OF TEXAS may Gather
- Cookies and Login Security

Section 1-General Rules Regarding the Collection and Sharing of Individually Identifiable Information

The following are four general rules observed by THE COMPASS SCHOOL OF TEXAS regarding the collection, maintenance, use and sharing of individual information collected by THE COMPASS SCHOOL OF TEXAS through the THE COMPASS SCHOOL OF TEXAS School Sites and other means. In this Statement, all of the individually identifiable information that appears to a reasonable person to be confidential in the context and circumstances in which the information is known or used and which identifies an individual is collectively called, “personal information”.

1. Conformance with Legal and Professional Standards Regarding personal information

THE COMPASS SCHOOL OF TEXAS is committed to providing appropriate privacy and security of personal information provided to THE COMPASS SCHOOL OF TEXAS in the conduct of its activities. THE COMPASS SCHOOL OF TEXAS obtains, uses, stores, shares and disposes of personal information consistent with applicable federal and state laws.

In order to provide effective educational and other related services, THE COMPASS SCHOOL OF TEXAS collects, maintains, uses and shares Personal information internally with its divisions and departments, and externally with its subsidiaries and third-parties. Examples of Personal information THE COMPASS SCHOOL OF TEXAS obtains about individuals includes:

- Application Information: Personal information THE COMPASS SCHOOL OF TEXAS receives voluntarily from students and their parents, such as: application information that may include family financial information used to determine eligibility for financial aid.
- THE COMPASS SCHOOL OF TEXAS School Sites Information: Personal information THE COMPASS SCHOOL OF TEXAS collects or issues via the THE COMPASS SCHOOL OF TEXAS School Sites such as passwords.
- Internal THE COMPASS SCHOOL OF TEXAS Educational Records: Personal information THE COMPASS SCHOOL OF TEXAS collects or generates internally regarding certain aspects of student academic performance and disciplinary actions.

When circumstances arise for the need to share personal information, THE COMPASS SCHOOL OF TEXAS may share the personal information as follows:

- To our affiliates and amongst the THE COMPASS SCHOOL OF TEXAS School Sites;
- To contractors, service providers, and other third parties we use to support the business activities of THE COMPASS SCHOOL OF TEXAS and who disclose their commitment to keep personal information secure in their privacy policy statements disclosed on their websites
- To fulfill the purpose for which you provide it;
- As authorized or required by court order, government request or investigation, subpoena, or as otherwise permitted or required by law;
- As necessary to protect the rights, property, safety, or interests of THE COMPASS SCHOOL OF TEXAS or others;
- As permitted under this General Statement or other formally adopted THE COMPASS SCHOOL OF TEXAS privacy statements;
- As required in connection with educational and financial aid programs administered by third-parties and their agents in order to assist those third-parties in the delivery of their programs.
- As clearly stated by THE COMPASS SCHOOL OF TEXAS program materials or other notifications, such as notices on the THE COMPASS SCHOOL OF TEXAS School Sites, that the Personal information will be shared

and the user indicates the user's consent by providing the Personal information;

- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of THE COMPASS SCHOOL OF TEXAS's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by THE COMPASS SCHOOL OF TEXAS is among the assets transferred;
- For any other purpose disclosed by us when you provide the information;
- To enforce or apply our terms and other agreements, including for billing and collection purposes; or
- When consent is otherwise given.

2. Collection and Sharing of personal Information that is Not Deemed Confidential

In order to provide effective educational and other related services, various operations within THE COMPASS SCHOOL OF TEXAS involve the collection of web use information or other information that may be identifiable to individuals but is not formally private or confidential ("non-confidential personal information"). Examples of non-confidential personal information may include:

- IP addresses
- Participation in THE COMPASS SCHOOL OF TEXAS Programs: personal information THE COMPASS SCHOOL OF TEXAS collects regarding individual constituent participation in educational activities or other programs offered by THE COMPASS SCHOOL OF TEXAS.
- Directory Information: personal information THE COMPASS SCHOOL OF TEXAS maintains such as THE COMPASS SCHOOL OF TEXAS generated IDs, name, address, telephone number, date of birth, participation in activities offered by THE COMPASS SCHOOL OF TEXAS, degrees and awards received, most recent and previous educational institutions attended.
- Parent to Parent Information: personal information THE COMPASS SCHOOL OF TEXAS may collect and make available from parent to parent in

the form of student directories or the identity of parents who choose to cooperate together in education related activities or services.

- THE COMPASS SCHOOL OF TEXAS School Sites Information: personal information such as the IP Address (computer identity) of those who access the THE COMPASS SCHOOL OF TEXAS School Sites or the sequencing of Web pages visited as used to improve THE COMPASS SCHOOL OF TEXAS services.
- Cookie Enabled Information: personal information that may be obtained via THE COMPASS SCHOOL OF TEXAS School Sites cookies (computer use files) which are transferred to a user's hard drive to enable the THE COMPASS SCHOOL OF TEXAS School Sites to deliver personal services.
- When circumstances arise for the need to share personal information gathered from THE COMPASS SCHOOL OF TEXAS operations, in addition to being authorized to share non-confidential personal information in accordance with this General Statement as it relates to the sharing of personal information, THE COMPASS SCHOOL OF TEXAS may also share non-confidential personal information as otherwise authorized for good cause by THE COMPASS SCHOOL OF TEXAS management

3. Contact 'Opt-In' and 'Opt-Out'

In its effort to best provide services, THE COMPASS SCHOOL OF TEXAS may seek to better identify the groups that it serves and to contact persons in those groups regarding its services. As such, THE COMPASS SCHOOL OF TEXAS uses the THE COMPASS SCHOOL OF TEXAS School Sites or other information collection procedures that allow individuals to authorize THE COMPASS SCHOOL OF TEXAS to contact those users about its services. These authorizations may at times also involve the use of 'Opt-Out' elections that users may select in order to indicate their desire not to be contacted. In some cases, where THE COMPASS SCHOOL OF TEXAS is proactively seeking to establish contact, THE COMPASS SCHOOL OF TEXAS may use default 'Opt-In' provisions that do not require individuals to make an active option selection to receive further contact.

4. Third-Party Websites

In certain cases, the THE COMPASS SCHOOL OF TEXAS School Sites may link to third-party websites. In such cases, THE COMPASS SCHOOL OF TEXAS cannot be responsible for the user terms and privacy policies adopted by the third-party sites, and THE COMPASS SCHOOL OF TEXAS School Sites users are advised to check the terms of use and privacy policies provided by those third-party webs prior to providing any personal information. Individuals who

use the THE COMPASS SCHOOL OF TEXAS School Sites to access third-party websites do so at their own risk and THE COMPASS SCHOOL OF TEXAS is not responsible for the content or privacy practices of those websites or for any problems an individual experiences when they visit and use the third-party websites, including but not limited to any unauthorized use of personal information provided to the third-party website or for any transactions individuals may perform through those websites.

Section 2-Specific Privacy Supplements to the General Rules

In addition to the general rules described above, THE COMPASS SCHOOL OF TEXAS has adopted more specific privacy provisions regarding the collection and sharing of personal information associated with certain collection activities. Some of those special cases are noted below.

- Student Records including Financial Information Collected for Financial Assistance Programs:

THE COMPASS SCHOOL OF TEXAS generally seeks to protect the privacy of educational records. THE COMPASS SCHOOL OF TEXAS reserves the right to release personal information to qualified third-parties. Parents and students are allowed to:

1. inspect, review and obtain copies of their own education record,
2. request that others review the student's education record. Requests should be made in writing to the Division Head or his/her designee.
3. obtain copies of THE COMPASS SCHOOL OF TEXAS's policies and procedures concerning parent/student access to education records. Requests should be made at the appropriate campus or educational administrator site office.

- Credit Card transactions over the THE COMPASS SCHOOL OF TEXAS School Sites or other third-party sites: THE COMPASS SCHOOL OF TEXAS may initiate and expand sales of school supplies or THE COMPASS SCHOOL OF TEXAS related products and services over the THE COMPASS SCHOOL OF TEXAS School Sites or through other third party sites. THE COMPASS SCHOOL OF TEXAS does not share, trade or sell personal information of buyers for commercial or advertising purposes. For other commercial websites that may be linked to or from the THE COMPASS SCHOOL OF TEXAS School Sites, but are not operated by THE COMPASS SCHOOL OF TEXAS, web users are urged to check the applicable terms of use and privacy statements for those third-party websites.

Some forms of personal information may, at times, be received by THE COMPASS SCHOOL OF TEXAS but fall outside standard THE COMPASS SCHOOL OF TEXAS privacy protections if the personal information is received by THE COMPASS SCHOOL OF TEXAS inadvertently or outside the regular THE COMPASS SCHOOL OF TEXAS personal information collection processes. This may include personal information that is provided to THE COMPASS SCHOOL OF TEXAS in the absence of a request by THE COMPASS SCHOOL OF TEXAS for the personal information such as when the personal information is included with non-confidential material. This form of inadvertent personal information collection may occur in situations such as when an individual enrolls in a THE COMPASS SCHOOL OF TEXAS program and includes a Social Security Number on an application where no field exists to collect that information and where there was no intent on the part of THE COMPASS SCHOOL OF TEXAS to collect that information. In such cases, the application forms may not be handled with the presumption that confidential personal information exists on the forms.

Section 3-Typical Practices Observed by THE COMPASS SCHOOL OF TEXAS in Meeting the General Rules and Specific Privacy Supplements

Interactions with Individuals under Thirteen Years of Age

THE COMPASS SCHOOL OF TEXAS is committed to protecting the privacy and safety of our students. Accordingly, if a user of the THE COMPASS SCHOOL OF TEXAS School Sites is under the age of thirteen, such user is requested not to provide THE COMPASS SCHOOL OF TEXAS with personal information, and THE COMPASS SCHOOL OF TEXAS will not knowingly use any such information in its database or as part of other data collection activities. THE COMPASS SCHOOL OF TEXAS cautions users under the age of thirteen and their parents or guardians that the collection of individual Information voluntarily provided by such a user without the knowledge of THE COMPASS SCHOOL OF TEXAS via the THE COMPASS SCHOOL OF TEXAS School Sites or other electronic or paper methods will be treated by THE COMPASS SCHOOL OF TEXAS the same way as information given by an adult. In addition, such information may be subject to public access until THE COMPASS SCHOOL OF TEXAS becomes aware that the information provider is under the age of thirteen. These provisions do not apply to the regular school interactions or homework assignments of under thirteen THE COMPASS SCHOOL OF TEXAS learners participating in on-going THE COMPASS SCHOOL OF TEXAS educational activities.

Social Security Numbers and Other Government Issued Personal Identification Numbers

It is THE COMPASS SCHOOL OF TEXAS's general practice to avoid the collection of Social Security Numbers ("SSNs") and other government issued personal identification numbers unless those numbers are required for compliance with state and federal law and/or are needed for effective service delivery. For example, SSNs are required for various forms of financial aid assistance assessments. Persons interacting with THE COMPASS SCHOOL OF TEXAS should avoid providing SSNs and other government issued personal identifiers in general correspondence or email, but should instead provide such identification only via the specific forms for doing so in accordance with applications or THE COMPASS SCHOOL OF TEXAS School Sites forms specifically created by THE COMPASS SCHOOL OF TEXAS for collecting such information.

Information Security and Destruction of Personal Information

The security of personal information is a priority at THE COMPASS SCHOOL OF TEXAS. THE COMPASS SCHOOL OF TEXAS employs industry-standard information security practices consistent with the standards and practices adopted by other educational institutions, and by businesses which provide similar services. THE COMPASS SCHOOL OF TEXAS protects personal information by maintaining physical, electronic and procedural safeguards designed to secure your personal information from accidental loss and from unauthorized use, access, alteration, and disclosure. THE COMPASS SCHOOL OF TEXAS trains its employees in the proper handling of Personal information. When THE COMPASS SCHOOL OF TEXAS uses third-parties for services, THE COMPASS SCHOOL OF TEXAS requires these third-parties to protect the confidentiality of any personal information they receive. THE COMPASS SCHOOL OF TEXAS also disposes of personal information in accordance with applicable state and federal laws.

Medical Information

THE COMPASS SCHOOL OF TEXAS collects medical information regarding its students and may collect medical information at times for others such as THE COMPASS SCHOOL OF TEXAS employees. THE COMPASS SCHOOL OF TEXAS policies regarding the handling and safekeeping of medical information are intended to be consistent with applicable legal requirements for K-12 academic environments and with respect to employees generally.

Other Information Obtained from Third-Parties

In addition to credit reports and medical information, THE COMPASS SCHOOL OF TEXAS may obtain personal information from third-parties. THE COMPASS SCHOOL OF TEXAS maintains and shares personal information

received from third-parties in the same way it maintains and shares personal information received directly from individuals.

Web Server Login Information that THE COMPASS SCHOOL OF TEXAS May Gather

THE COMPASS SCHOOL OF TEXAS School Sites may generate logs that may contain information about computers or devices used by users to access the THE COMPASS SCHOOL OF TEXAS School Sites or which contain information about general activity on the THE COMPASS SCHOOL OF TEXAS School Sites, such as the following:

- Internet address of computer or device
- Type of browser used
- The operating system of the computer or device
- Web pages requested
- Referring Web pages
- Time spent on the THE COMPASS SCHOOL OF TEXAS School Sites

THE COMPASS SCHOOL OF TEXAS School Sites administrators may produce summary reports from these logs and share that information with THE COMPASS SCHOOL OF TEXAS personnel and/or third-party vendors responsible for THE COMPASS SCHOOL OF TEXAS School Sites content management. THE COMPASS SCHOOL OF TEXAS School Sites content managers typically use this information, in aggregate, to understand what pages are popular, how users are navigating to and within sites, and when THE COMPASS SCHOOL OF TEXAS School Sites are used most frequently. THE COMPASS SCHOOL OF TEXAS generally avoids the inclusion in server logs of personally identifiable information that could identify particular users. The previously stated General Rules Regarding the Collecting and Sharing of Personally Identifiable Information and other segments of Specific Privacy Supplements to the General Rules provide further information on when individual information may be shared.

Cookies and Login Security

Cookies are small pieces of data stored by a web browser on a user's computer. Cookies are often used to retain information about preferences and pages a user has visited. For example, when a user visits some sites on the Web, one might see a "Welcome Back" message. The first time one visits a THE COMPASS SCHOOL OF TEXAS School Sites, a cookie may be stored on the user's computer; and when the user returns, the cookie is read again. One can refuse to accept cookies, one can disable cookies, and one can remove cookies from one's hard drive.

Some sites require the use of cookies in order to access the site, such as THE COMPASS SCHOOL OF TEXAS School Sites requiring 'THE COMPASS SCHOOL OF TEXAS Secure Authentication'. THE COMPASS SCHOOL OF TEXAS School Sites sometimes use cookies with websites that require THE COMPASS SCHOOL OF TEXAS community members, such as students, staff and faculty, to log in with their THE COMPASS SCHOOL OF TEXAS provided NetID and password. THE COMPASS SCHOOL OF TEXAS School Sites users are normally required to enter their respective User ID and password when they request information about themselves or to ensure that they are an authorized THE COMPASS SCHOOL OF TEXAS School Sites user. These cookies are used so one will not have to repeatedly enter their user names and passwords when they go to different parts of the THE COMPASS SCHOOL OF TEXAS School Sites. When appropriate, THE COMPASS SCHOOL OF TEXAS administers the login process through a secure connection so that the user name and password are encrypted between the THE COMPASS SCHOOL OF TEXAS user Web browser and the THE COMPASS SCHOOL OF TEXAS School Sites.

THE COMPASS SCHOOL OF TEXAS School Sites may use transient or transactional cookies that facilitate the continuity of interactions during a particular visit. THE COMPASS SCHOOL OF TEXAS does not typically use permanent cookies and will not use other invasive tracking programs that monitor and track THE COMPASS SCHOOL OF TEXAS School Sites viewing habits unless:

- the use of permanent cookies adds value to the user otherwise not available;
- there is a comprehensive online statement at the particular THE COMPASS SCHOOL OF TEXAS School Sites where such permanent cookies or other invasive monitoring and tracking programs are utilized that discloses:
 - o all types of information collected at that site;
 - o THE COMPASS SCHOOL OF TEXAS's use of that information; and

- o how the collection and use of this information adds value to the user; and
- there is a link to this Statement from that particular THE COMPASS SCHOOL OF TEXAS School Sites where such permanent cookies or other monitoring and tracking programs are utilized.