

CATALINA FOOTHILLS UNIFIED SCHOOL DISTRICT #16

PRIVACY POLICY

We think it is important for you to know how we handle information communicated via the Internet. This Privacy Policy (“Privacy Policy”) outlines our practices and our sensitivity to each visitor’s right to privacy.

This Privacy Policy covers the use of the website www.cfsd16.org and the services provided on it by Catalina Foothills Unified School District #16 (“CFSD,” “we,” “our,” or “us”). Collectively, the website and the services provided on it are referred to herein as the “Site” unless otherwise indicated.

This Privacy Policy describes the way information, including personal information, is collected and used. This notice applies to all information collected by or submitted to or on the Site.

The content of this Site is for personal and educational use only.

This Privacy Policy does not apply to the practices of third parties that CFSD does not own or control, or individuals that CFSD does not employ, manage or supervise. By visiting this Site you (variously referred to herein as “you,” the “User,” or “your”) accept and agree to the terms of this Privacy Policy and expressly consent to our collection, storage and use of your personal information as described in this Privacy Policy.

Disclaimer. CFSD makes no representations or warranties regarding the website, its content or any services made available or accessed through the Site, or that the servers that make them available are free of viruses or other harmful components.

The Information We Collect:

Except as provided herein anyone can search the Site for information or services without providing personal information. Once your child registers or you register as a CFSD parent or guardian, you have chosen to provide us with personal information and therefore consent to the storage and transfer of your personal information to our servers.

Information we may collect:

- Email address, physical contact information and (depending on the service used) sometimes financial information, such as credit card or bank account numbers;
- Other information from your interaction with the Site including computer and connection information, statistics on page views, traffic to and from the Site, ad data, IP address and standard web log information;
- Additional information we ask you to submit to authenticate yourself or if we believe you are violating Site policies (for example, we may ask you to answer additional questions online to help verify your identity).

System-Generated Information. In addition to information actively provided by visitors to this Site CFSD may record information such as but not limited to the following types of information each time this Site is used:

- Internet address of the computer being used
- Web page(s) requested
- Network software access
- Referring web page
- Browser used
- Date, time and duration of activity
- Password(s) and account(s) accessed
- Volume of data transferred if applicable

CFSD uses this information to monitor, preserve and enhance the function and integrity of the system. Information is collected for analysis and statistical purposes, and may be used to help diagnose problems with the server and to carry out other administrative tasks, such as assessing what information is of most interest to visitors, determining technical design specifications and identifying system performance and/or problem areas.

Monitoring. In cases of suspected violations of CFSD policies, especially unauthorized access to student accounts, the system administrator may take such measures as are necessary including authorizing detailed session logging. This may involve capturing and retaining a complete keystroke log of an entire session.

Marketing:

We do not sell personally identifiable information for marketing purposes. We may combine your information with information we collect from others and use it to improve and personalize our services, content and advertising.

How We Use Your Information:

Our primary purpose in collecting personal information is to provide you with a safe, smooth and efficient experience. You agree that we may use your personal information to:

- Maintain and improve the CFSD website;
- Contact a User for customer support;
- Resolve disputes and troubleshoot problems;
- Protect against fraud and illegal activity;
- Customize, measure and improve the Site, content and advertising;
- Enforce CFSD's policies and this Privacy Policy.

Cookies:

Cookies are short pieces of information used by web browsers to remember information provided by the user, such as passwords and preferences from past visits. Additional information on cookies is available at the Cookie Central Website www.cookiecentral.com. Some web-based services require cookies for access. Any information that CFSD may store in cookies is used exclusively for internal purposes only.

[The CFSD website does not use cookies to track user information.]

Please be aware when in contact with third parties: you may inadvertently download cookies we do not control.

CFSD's Disclosure of Your Information:

To the extent permitted by applicable laws and regulations CFSD, if required to respond to a legal inquiry, or in its good faith belief that disclosure is necessary, in its sole discretion may release your personal information. CFSD in its sole discretion may disclose personal information to respond to legal requirements, enforce our policies, and respond to reasonable claims to protect anyone's rights, property, or safety. CFSD also reserves the right in its sole discretion to disclose collected information to investigate or defend itself against third party claims or allegations. Such information will be disclosed in accordance with applicable laws and regulations.

To the extent permitted by applicable laws and regulations CFSD, in its sole discretion, may share your personal information with:

- Service providers under contract who help with our operations, such as fraud investigators and Information Technology providers;
- Law enforcement or other governmental officials, in response to a verified request relating to a criminal investigation or alleged illegal activity or to report suspected illegal activity. In such events, we may disclose information relevant to the investigation or report, such as name, city, state, zip code, telephone number, email address, User ID history, IP address, fraud complaints, and CFSD use history;
- CFSD's legal counsel in the event of an investigation or to defend against User claims or third party claims or allegations.

Without limiting the above, we will not otherwise disclose your personal information to law enforcement, other government officials, or other third parties without a subpoena, court order or other legal procedure, except when we believe in good faith that the disclosure of information is necessary to prevent imminent physical harm, damage to property, violations of rights, or to report suspected illegal activity.

Security. Although every effort is made to secure network communications, CFSD cannot insure the privacy of on-line communications. Individuals using on-line services should also take steps to protect personal information, such as logging off PIV and

closing the web browser when finished using the Site. Failure to do so may result in personal information being viewed by someone else.

Using Information from CFSD; PIV:

PIV. CFSD is pleased to offer you student information via a web-based version of each student's grades/records called Parent Internet Viewer ("PIV").

Security and Confidentiality. CFSD affords the same degree of confidentiality to student information stored on PIV as is given to student records stored by CFSD in any other medium. We are committed to protecting the confidentiality of student information. Firewalls, passwords, encryption, and audit trails are further used to safeguard each student's information. We identify the records released and note the time and date of electronic access to them each time the student, parent, or guardian accesses PIV. We have taken steps to make all information received from on-line visitors as secure as possible against unauthorized access and use.

SSL. All personal information submitted to or gathered by the Site through on-line forms is handled through a secure server using SSL (Secure Socket Layer) technology. This information is encrypted while it is transferred over the Internet.

Our SSL web server uses authentication. For other than general information viewing, PIV must be accessed with an SSL-compatible browser or terminal.

You can tell when you are secure by looking at the location (URL) field. If the URL begins with https:// (instead of http://), the document comes from a secure server. This means each student's data cannot be read or deciphered by unauthorized individuals.

Passwords. User names and passwords provide two layers of authentication and are stored in an encrypted database that is isolated from the Internet. As a PIV user, your role in maintaining the security of the student's information is: 1) keeping your login ID and password confidential; and 2) keeping the information you view and/or download confidential.

Confidentiality. All information on PIV is strictly confidential. Its disclosure to unauthorized individuals is prohibited. If you receive a student's information or someone else's email in error immediately destroy it and notify CFSD by reply email at webmaster@cfsd16.org or by telephone number at (520) 209-7500.

PIV Account Protection:

Your password is the key to your child's student records. Do not disclose your CFSD password to anyone. If you share your password or your personal information with others, remember that you alone are responsible for all actions taken in the name of the student account. If you lose control of your password, you may lose substantial control over your personal information and/or the student's personal information, and you may

be subject to legally binding actions taken on your behalf. **Therefore, if your password has been compromised for any reason, you should immediately notify CFSD to obtain a new password.**

Downloading. Except as provided herein you may read and download information at this Site without identifying yourself or providing any personal information. However, please be aware that you may have to identify yourself and/or provide personal information by logging on to the PIV. Any personal information that you provide to us through email messages, surveys, or forms will only be used to respond properly to your request. Except as required by law and described herein, CFSD does not share, disclose, or sell email addresses or phone numbers to other organizations.

Response to electronic communication. CFSD will make its best effort to provide a timely response to electronic inquiries. In some cases, the teachers and/or other personnel responding to an email inquiry or other communication may not be immediately available to do so. Please allow at least three (3) business days for a response.

Closed Files:

We do not retain personal information from closed files except to comply with law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigations, enforce this Privacy Policy, or take other actions otherwise permitted by law.

No Spam, Spyware or Spoofing:

Our users and we do not tolerate spam.

To report CFSD-related spam or spoof emails to CFSD, please forward the email to webmaster@cfsd16.org. You may not use our communication tools to send spam or otherwise send content that would violate applicable laws of CFSD policies. We automatically scan and may manually filter messages to check for spam, viruses, phishing attacks and other malicious activity or illegal or prohibited content, but we do not permanently store messages sent through these tools.

Links to other sites:

Website Links. This Site contains links to other Internet websites that are not managed by CFSD and are not owned or controlled by CFSD. CFSD provides these links for informational purposes only. CFSD does not endorse and has not verified the accuracy of the information in or on those websites.

CFSD is not responsible for any privacy policies, content or practices of other websites, companies or organizations. If you disclose your information to others, you are subject to the privacy policies of these third parties as and where applicable.

Security:

Your information is stored on our servers. We treat data as an asset that must be protected and use various tools (encryption, passwords, etc.) to protect your personal information against unauthorized access and disclosure. However, third parties may unlawfully intercept or access transmissions or private communications, and other users may abuse or misuse your personal information that they collect from the Site. Therefore, although we work very hard to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private.

If you suspect that your personal information has become compromised in any way, please let us know immediately at webmaster@cfds16.org.

Third Parties:

Except as otherwise expressly included in this Privacy Policy, this document addresses only the use and disclosure of information CFSD holds for you and collects from you. If you disclose your information to others, through the Internet or otherwise, different rules may apply to their use or disclosure of the information you disclose to them. CFSD does not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. CFSD is not responsible for the privacy or security practices of other websites on the Internet, even those linked to or from the Site. CFSD encourages you to ask questions, investigate carefully and proceed cautiously before you disclose your personal information to others.

CFSD Privacy Policy Changes:

CFSD may review this Privacy Policy and in its sole discretion make revisions at any time. We will notify you of any changes by posting our updated Privacy Policy on the Site.

Your use of the Site constitutes your agreement with this Privacy Policy and any future revisions.

How to Contact us:

If you have questions about this Privacy Policy you may contact us at:
webmaster@cfds16.org

Effective date:

This privacy policy is effective April 18, 2012.