

Imagine Learning Foundation's Privacy Policy

August 1, 2022

By visiting our website, you are accepting the practices described in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use this website.

The Imagine Learning Foundation (the "Foundation", "we", or "our") is committed to protecting the privacy of all individuals who access our website and with whom we do business. This Privacy Policy describes the Foundation's information gathering and dissemination practices. The privacy statement may change at any time; any changes will be posted on this page.

The following topics describe how the Foundation uses information voluntarily submitted to us by our members and other visitors to this site, <https://www.imaginelearningfoundation.org/en/us>. This Privacy Policy does not apply to third party websites you may visit through a link on our website. Similarly, the Foundation does not assume responsibility for any data sharing you may engage in on third party websites.

What Information We Collect

You do not need to give us any personal information to browse Foundation websites. As a general matter, when we do request your information, it is completely voluntary to provide it to us and is a combination of personal and business-related information.

Information we typically collect and store includes:

- Your name
- Your job title
- Your organization/company/related business name
- Your email address (can be either business or personal depending on what you provide us)
- Your phone number (can be either business or personal depending on what you provide us)
- Your mailing and billing address (can be either business or personal depending on what you provide us)
- Your Foundation's website username (typically the email address you provided)

In some circumstances, we may also ask you to provide the following information:

- Your demographic information
- Your resume/CV
- Your professional biography
- Your professional interest areas

We use a third party called ZoomGrants to process our grant applications. To apply for a grant you will need to create a website account with ZoomGrants. When you create a website account with ZoomGrants you must provide your name, an email address and password. You can access ZoomGrants' privacy policy at <https://admin.zoomgrants.com/terms/>.

While we may request information not outlined here, it is completely voluntary to provide it.

In addition, when you interact with the Foundation website, our servers may keep a log that does not identify you personally ("non-personal information") since we do not combine it with any identifying information. We use this data to ensure the security and performance of our websites and mitigate website and server issues. This data includes:

- Device information used for accessing the website such as device type, platform, IP address, geolocation information, unique device identifiers, browser type, browser language, and other transactional information; and
- Other "traffic data" such as time of access, date of access, error reports, pages accessed, and referring website addresses.

Other non-personal information we may collect includes:

- Usage information about what is accessed on the website including pages viewed and time spent on the website, and search terms and search results.

You can learn more about this in the [How We Use Cookies](#) section.

Children's Information

The Foundation website is not designed for or directed to children under the age of 16. We never knowingly collect personal information from anyone under the age of 16 without parental consent. If we learn that we have collected personal information from a child under 16 without parental consent, we will delete the information as soon as possible.

How We Collect Information

The following lists the most common ways in which we collect your identifying information:

- When you participate in surveys, panels, or research.
- When you register for and participate in our programs, activities, initiatives, and events,
- When you request information or assistance.
- When you make a donation to the Foundation.
- When you apply to participate in Foundation programs and initiatives.
- In conjunction with any other place on our websites where you knowingly enter personal information.

How We Use Your Information

In general, we use the personal information we collect from you to pursue our mission and to engage in the activity for which we collect it. Most commonly, we also use your personal and non-personal information in these specific ways:

- For editorial purposes.
- Responding to your inquiries.
- Communicating with you about your account or transactions with us.
- Sending you newsletters, mailings, and information about programs, initiatives, activities, for-sale items, and events by email or another medium;
- Event or program registration.
- Detecting, investigating, and preventing activities that may violate our policies or be illegal.
- Improving and personalizing our websites and communications.
- Performing statistical, demographic, and marketing analyses regarding website traffic and usage patterns.
- Managing our organization.

We may use your personal and non-personal information in other ways as stated in this privacy policy.

How We Share Your Information

We use third-party service providers, affiliates, and platforms to perform functions and provide services such as marketing, analytics, information technology, processing donations, etc. on our behalf. These entities have access to the personal information needed to perform their functions and are contractually obligated to maintain the confidentiality and security of any personal information we collect. They are restricted from using, selling, or distributing this data in any way other than to provide the requested services to the Foundation.

We will not sell personal information to anyone for monetary compensation. However, it is possible that we could share personal information that could be considered a 'sale' under the California Consumer Privacy Act, such as in connection with the sale of Foundation's equity or assets or a merger of Foundation with another company. Any sale or merger would be conditioned so that such information will continue to be covered by the then-applicable Privacy Policy or a policy at least as robust as such Privacy Policy.

Certain content provided through the Foundation may be hosted and served by third parties. In addition, this website includes some links to third party sites or content over which the Foundation has no control, and which are governed by the privacy policies and business practices of those third parties. We are not responsible for the data collection practices on those other sites. We advise you to carefully review those sites' privacy policies before submitting personal information there.

With your consent, the Foundation may publicly share some of the data we collect (e.g. your name, job title, organization affiliation, personal biography, etc.). If the Foundation were ever to share publicly any of your information, we request permission to do so beforehand.

How We Use Cookies

Like many other websites we set Cookies. "Cookies" are small pieces of information that are stored by the browser you used to access our website. These are invisible graphics on a web page or in an email that is programmed to collect information about your use of a website or email. Most browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. To learn more about browser cookies, including how to manage or delete them, look in the Tools, Help or similar section of your browser, or visit <http://www.allaboutcookies.org>.

Like most online services, when you visit our website, we automatically collect and store details of how you used our service, such as your activity on the Services, and the frequency and duration of your visits.

The Foundation specifically uses Google Analytics to understand how people use our website, the frequency and duration of your visits and to make them better. Google Analytics does not collect the IP address assigned to you when you access our website. You can access Google's privacy policy and learn how to opt-out at <https://policies.google.com/privacy> (<https://policies.google.com/privacy>).

How We Secure Your Data

We strive to protect the confidentiality, security, and integrity of the personal information we collect from you. We have put in place physical, electronic, and administrative procedures designed to safeguard and to help prevent unauthorized access to and maintain the security of personally identifiable information collected through our website.

All accounts are protected by passwords. Please keep these passwords secret to prevent unauthorized access to these accounts. If you think someone has gained unauthorized access to an account, please change your password and contact us immediately.

We take customary and reasonable measures designed to protect the confidentiality, security, and integrity of Personal Information collected on our Services, both during transmission and within our systems. Such protections include, but are not limited to:

- **Data encryption and storage:** Data is encrypted in transit (SSL/TLS) and at rest. Personal Information is stored and processed within the continental United States.
- **Access:** Access to Personal Information is restricted to a limited number of Imagine Learning employees who need such access to perform their job.
- **Incident Response Plan:** Imagine Learning maintains an incident response plan.
- **Firewalls:** Anti-virus software and firewalls are installed and configured to prevent malicious or unauthorized traffic.
- **Employee training:** Imagine Learning's designated privacy and data security officials oversee Imagine Learning employee security training and compliance. This training is taken by all Foundation staff.

Your Rights, Users In California and Outside the United States

Users in California

If you are a resident of the state of California, you have certain data protection rights. The Foundation aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Information. This section describes how we collect, use, and share Personal Information of California residents in operating our business and their rights with respect to that Personal Information. For purposes of this section, "Personal Information" has the meaning given in the California Consumer Privacy Act of 2018 ("CCPA") but does not include information exempted from the scope of the CCPA.

In certain circumstances, you have the following data protection rights:

- **Information:** You can request the following information about how we have collected and used your or, if applicable, your child's Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.

- The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or sharing Personal Information.
 - The categories of third parties with whom we share Personal Information.
 - Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third-party recipient.
 - Whether we've sold your Personal Information, and if so, the categories of Personal Information received by each category of third-party recipient.
- **Access:** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
 - **Deletion:** You can ask us to delete the Personal Information that we have collected from you. We will take reasonable measures to comply with a verifiable request, except when use of the Personal Information is necessary to comply with a legal obligation or for a legitimate business need permitted under the CCPA.
 - **Opt-out of sales:** We do not currently sell Personal Information. If we plan to sell Personal Information, you will be notified and you can opt-out.
 - **Nondiscrimination:** You are entitled to exercise the rights described above free from discrimination in the form of legally prohibited increases in the price or decreases in the quality of our Services.

You may exercise your California privacy rights described above as follows:

- Emailing privacy@imaginelearning.com
- Mailing Imagine Learning's Privacy Office at 8860 E. Chaparral Rd., Scottsdale, AZ 85250.

Users Outside the United States

The General Data Protection Regulation ("GDPR") is a European Regulation concerning the use and processing of personal information. We are committed to processing your information in compliance with the GDPR. For purposes of this section, "Personal Data" has the meaning given in Art. 4 of the GDPR but does not include information exempted from the scope of the GDPR.

The Foundation is operated in the United States. If you are located outside of the United States, please be aware that information we collect will be transferred to and processed in the United States. By providing us with any information, you fully understand and unambiguously consent to this transfer, processing, and storage of your information in the United States, a jurisdiction in which the privacy laws may not be as comprehensive as those in the country where you reside and/or are a citizen.

Processing Purpose	Legal Basis
To receive donations.	Processing is necessary to receive donations.
To operate the websites. To send marketing communications. To create anonymous data for analytics. For compliance, fraud prevention, and safety.	These processing activities constitute our legitimate interests. We consider and balance the potential impact on our rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where your data protection interests override these legitimate interests (unless we have your consent or are otherwise required or permitted to by law).
To comply with law.	Processing is necessary to comply with our legal obligations.
With your consent	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated at the time consent is requested.

You may ask us to take the following actions in relation to your Personal Data that we hold:

- **Access:** Provide you with information about our processing of your Personal Data and give you access to your Personal Information.
- **Correct:** Update or correct inaccuracies in your Personal Data.
- **Delete:** Delete your Personal Data.
- **Transfer:** Transfer a machine-readable copy of your Personal Data to you or a third party of your choice.

- **Restrict:** Restrict the processing of your personal information.
- **Object:** Object to our reliance on our legitimate interests as the legal basis of our processing your personal information, where that processing adversely impacts your legal rights.

You may send us these requests by contacting us at privacy@imaginelearning.com. We may request information from you to help us confirm your identity and process your request. Applicable law may require or permit us to reject part or all of your request. If we reject your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your Personal Data or response to your requests regarding your Personal Data, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Notice of Changes to This Policy

We may occasionally update this Privacy Policy. You can see when it was last updated by looking at the new effective date at the top of this page.

Our Privacy Policy was last reviewed on August 1, 2022.

For More Information

If you have any questions or comments regarding our Privacy Policy or our practices, please contact us at privacy@imaginelearning.com