

## Privacy Policy

*Last updated: February 10, 2023*

This Privacy Policy governs the privacy practices for Families First of Minnesota, a Minnesota nonprofit corporation (“we,” “our,” or “us”). This Privacy Policy applies to information you provide to us when you create your user account, access our Content (defined below), or purchase our Products (defined below) by accessing our website and/or our online platform (collectively our “Platform”). This Privacy Policy specifies:

- What personal information do we collect about you through our Platform?
- How is this information used and with whom it may be shared?
- What choices are available to you regarding the use of your data?
- What are our security practices to protect the misuse of your information?
- How can you correct any inaccuracies in the information?

### Information We Provide and Collect

We are the owners of the information, educational materials and other content (collectively “Content”) we provide through our Platform. This Privacy Policy specifies our rights to the information provided by you and/or collected through our Platform. Your information includes the information you provide in setting up your user account when you purchase our books, guides, courses or other materials (collectively our “Products”). We only have access to and/or collect information that you voluntarily provide us via our Platform, any email you send us, your user account, or other direct contact from you. We do not require you to set up a user account to access our website; however, an account is necessary to access our online platform and acquire our Products. For purposes of this Privacy Policy, “Personal Information” will include all personally identifiable information that is specific to you (e.g. name, address, phone number, email address, etc.). Except as specifically noted herein, we do not provide any Personal Information to any unaffiliated third party.

We may collect information about you through your use of our Platform with software application tools and data files, such as cookies, web log files, IP addresses, device state information, unique device identifiers, device hardware and OS information, and information relating to your login of your user account (“Usage Information”). You may be able to control such Usage Information through the control settings on your device. You may be required to permit such Usage Information to log into your user account or to purchase our Products.

We may collect and process information through our Platform about the location of your device using GPS or other location technologies, such as sensor data from your mobile device providing information about nearby Wi-Fi access points and cellular network towers (“Location Information”). We use Location Information solely as necessary to analyze and improve our Platform and Products.

## Use and Disclosure of Your Information

We use your Personal Information as necessary to maintain your user account for the purpose of performing our services. In addition, we may use either Personal Information or Usage Information, we collect, or you provide to us, in order to:

- Respond to any questions you ask or to respond to the reason you contacted us. We do not share your Personal Information with any unaffiliated third party, unless necessary to respond to your request.
- Enhance, improve, and develop new services and products and for overall customer support.
- To process your order and/or deliver the Products you purchase through our Platform.
- Monitor usage and interaction statistics on our Platform, and/or through responses to our communications.
- Enhance, improve, and offer new products, services, and overall customer support.
- Perform data analytics for our internal business purposes.
- Allow us to respond quickly and efficiently to your questions and your requests for information.
- Communicate with you (via email, text, phone or mail) either directly or indirectly through our marketing service provider to send you special offers, or marketing information related to our products and services.
- Communicate with you to request feedback or to notify you of changes to our terms, conditions, and Privacy Policy.
- Track use of our Platform, investigate suspicious activity, and enforce our terms and policies, to measure and improve the operation and security of our Platform, and your Personal Information.
- Assess and improve our Products.
- Allow us to disclose your information to the extent permitted or required by law.

We use the Usage Information to perform data analytics, analyze and evaluate the features and functionality of our Platform and Products. We may also use Usage Information to process automatic crash reporting which collects reports of crashes, other technical issues, and information relating to how our Platform and Products are functioning.

We may use Location Information to customize Products or information specific to your region. You have the ability to control access to Location Information through the control settings on your device.

This information may also be provided to certain third party service providers as necessary to provide our Platform and Products, and related functionality and offer other services and products. Third party service providers, in addition to any of our data sources, may include software development, application and data hosting, wireless network services providers, payment processors, and any digital analytics or marketing services (collectively "Third-Party Providers"). We are responsible for assuring that these Third-Party Providers comply with the terms of this Privacy Policy.

Except for our Third-Party Providers, we will not share Personal Information, Usage Information, or Location Information with an unaffiliated third party without your prior authorization, unless doing so is necessary (1) to enforce this Privacy Policy, to comply with law, regulation or other legal processes or to protect the rights, property or safety of us or others, (2) to comply with a valid order or process from a public authority, (3) to protect against misuse or unauthorized use of our Platform, or your user account, (4) to detect or prevent criminal activity or fraud, or (5) in the event that we or substantially all of our assets are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, in which case such information may be one of the transferred assets.

## Your Rights

You may opt out of any future contact from us at any time. Depending on where you live, you may have certain legal rights under applicable law. For example, you may have the following rights:

- **Right to Access** – means you can ask us for a copy of any Personal Information we have about you, if any.
- **Right to Correct** – means you may ask us to change and/or correct any Personal Information we have about you.
- **Right to Delete** – means you may ask us to delete any Personal Information we have about you and we will be happy to do so unless we are required to retain such information by law or regulation or we have a right to retain subject to a user agreement for our internal business purposes.
- **Right to Transfer** – means you may request a copy of your Personal Information, in a commonly used and machine readable format, be provided to you or to a third party you specify.
- **Right to Limit** – means you have the right at any time to unsubscribe to any marketing communication from us and we will promptly honor such request.

We may update our Privacy Policy from time to time. We encourage you to review our Privacy Policy frequently to stay informed regarding how we collect, use, share and

process Personal Information. You may contact us at any time about any of these rights or any concern or question you have about our use of your Personal Information.

## **Security**

We take precautions to protect your Personal Information, including reasonable physical, administrative, and technical safeguards. When you submit Personal Information via our Platform, your Personal Information is transmitted using secure sockets layer (SSL) encryption technology. We restrict access to your Personal Information to our authorized personnel and/or Third Party Providers as appropriate and necessary to provide our Platform, Products and/or maintain your user account.

We keep your Personal Information if it is necessary to process your requests, operate our business, and provide our Platform and Products, or as long as we are legally required to do so. For as long as we have your Personal Information, we will continue to protect the privacy and security of such Personal Information consistent with this Privacy Policy. However, no website, database or system is completely secure or “hacker proof.” You are also responsible for taking reasonable steps to protect your Personal Information against unauthorized disclosure or misuse. You are also responsible for protecting the security of your user account credentials and for any use of your user account.

## **Children’s Online Privacy Protection Act**

In compliance with the Children’s Online Privacy Protection Act, 15 U.S.C. § 6501.06 and 16 C.F.R. §§ 312.1 – 312.12, we do not knowingly collect information from children under the age of 13, nor does our Platform or our Products target children under the age of 13. By using our Platform, Products, and/or creating any user account, you represent that you are not younger than 13. Please contact us as noted below if you know or suspect that we have collected information from children under the age of 13 and we will take prompt measures to remove such information.

## **Contact Us**

If you have any questions, comments, or concerns about this Privacy Policy, please contact us via email at [Training@FamiliesFirstMN.org](mailto:Training@FamiliesFirstMN.org). All emails should include your first name, last name, email address, and the nature of your request.