Website Privacy Notice

Introduction

Hawthorn Academy cares about your privacy. Through our website, we collect information needed to provide a quality educational experience for our students. We safeguard the data we collect and do not monetize or improperly share it.

We are providing this Website Privacy Notice in compliance with Utah Code § 63A-19-402.5.

We are committed to protecting your privacy. This Notice explains how we handle your information when you use our website. We want you to understand how your data may be collected, used, and secured.

Who We Are and How to Reach Us

Hawthorn Academy is a Utah public charter school with campuses in South Jordan (K-6) and West Jordan (K-9). As a service to our staff, students, parents, and other stakeholders, we have a website to provide users with a variety of detailed information about our school, including but not limited to information about our curriculum, programs, people, and resources. We operate this website.

If you have any questions or concerns about our website, please reach out to us:

• West Campus Phone: (801) 282-9066

• South Campus Phone: (801) 260-3040

Email: koliver@hawthornacademy.org

What Information We Collect

Below describes information that we collect through our website:

- Any user of our website may voluntarily submit their name, email address, phone number, and questions or comments through our "Contact Us" webpage.
- Any user of our website may voluntarily schedule a tour of our campuses through the "Schedule A Tour" link on our website wherein they provide their name, email, and student's grade and lottery application status.
- Individuals wishing to volunteer at the school may sign up for volunteer opportunities through the "HOPE (PTO)" webpage on our website. Signing up requires individuals to provide their name, email, and phone number.
- Parents/guardians may make library book requests through our "Library" webpage. To make a request, parents/guardians must provide their name and email as well as their student's campus, lunch number, and teacher's name.
- Our website provides parents/guardians with access to a password-protected online carpool
 app through which enrolled families may choose to participate in carpool groups.
 Parents/guardians who choose to use this resource are asked to provide their name, phone
 number, and address, a.m. or p.m. preference, number of seatbelts available, number of
 students riding, and custom notes.

- Our website provides an online payment system operated by Core Business Technologies
 through which parents/guardians and employees may input payment information to pay for
 meals served at the school. This can be accessed through our "Lunch Program" webpage.
 This same online payment system can be used to pay for school fees, donations, fines, and
 school events and activities. Core Business Technologies is PCI ASV certified.
- Yearbooks may be purchased through our website by submitting payment information through a third-party website called *Link by Entourage Yearbooks*.
- Parents/guardians may complete and submit a lottery application through our website. The
 lottery application asks for such information as parent/guardian name, phone number(s),
 address, email address as well as student identifying information (e.g., name, DOB, grade,
 and student ID#).
- Our website uses cookies, but the cookies do not include any personally identifiable information, however.

How We Use Your Information

We use your information for the following purposes:

- We use information submitted by users of our website to accomplish the purposes for which
 the information was submitted, such as to answer questions, respond to comments,
 schedule tours, provide volunteer opportunities, supply library books, and facilitate carpool
 networking for participating families of enrolled students.
- Online payment information submitted through Core Business Technologies' platform is used to pay for student and employee meals served at the school as well to receive payments for school fees, donations, fines, and school events and activities. The online payment information is hosted and stored by Core Business Technologies, whose Privacy Policy is available on our website. The school only has limited access to the online payment information submitted to Core Business Technologies, including basic payor information (name and contact information), associated student name and ID, and limited payment information such as payment date, payment amount, payment type, and item(s) paid for. We do not have access to payors' full credit card numbers.
- We use information submitted via our lottery applications to enroll students whose applications have been processed and accepted.

Disclosure Practices

We care about your privacy and take it very seriously. We only share your information when necessary. When student personally identifiable information is involved, we only share such information in accordance with the Family Educational Rights and Privacy Act ("FERPA") and Utah student data privacy laws. This means that we do not disclose student personally identifiable information outside of the school unless we first obtain parent/guardian consent or an exception to the prior consent requirement applies. Exceptions to the prior consent rule include disclosures such as to a person or entity to whom the school has outsourced a service or function that a school employee would typically perform (e.g., the school's accountant, bookkeeper, or related services provider), to an individual who needs to know in cases of health and safety emergencies (e.g., a police officer or an EMT), or in connection with an audit or evaluation of federally or state supported education programs.

Access and Corrections

You have the right to access and correct your information. If you would like to access, correct, or delete any information submitted or otherwise collected through our website, please contact the school using the contact information provided on page 1 of this Notice.

Keeping your Information Secure

We prioritize the safety of your data and have taken adequate measures to protect it. We have implemented a variety of security measures designed to safeguard your data and prevent unauthorized access to your data. Our website is secured with hypertext transfer protocol secure ("HTTPS"), which encrypts all communication between your browser and our website server. This is particularly important when you transmit sensitive data through our website. HTTPS also allows your browser to verify that it is communicating with our actual website and not some other entity or person on the internet that is impersonating our website.

We limit and restrict the disclosure of your data in accordance with applicable law. In addition, if personally identifiable data needs to be shared with a third-party service provider who performs services on our behalf, we ensure that such parties are bound contractually to keep the data confidential and use it only for the purpose for which we disclose it to them.

Note on Records Classification

Personally identifiable information is not a classification of records under Utah's Government Records Access and Management Act ("GRAMA") in Utah Code § 63G-2-101 et seq. Access to government records is governed by GRAMA.

At-Risk Government Employees

If you are an at-risk government employee and believe we have personal information about you that should be classified as a private record under GRAMA, please contact the school's Record Officer using the contact information provided on page 1 of this Notice. The Record Officer will, consistent with Utah Code § 63G-2-303(2)(c), provide you with an at-risk government employee application by which you may provide notice to the school of your status as an at-risk government employee and request that the school classify as private any records or parts of records in its possession that contain your personal information.

Complaints

If you have data privacy concerns with respect to our website, please contact the school using the contact information provided on page 1 of this Notice. You may also file a complaint with Utah's Data Privacy Ombudsperson, whose contact information can be found at the Utah Office of Data Privacy's website (https://privacy.utah.gov/office-of-data-privacy/).