

SHADY HILL SCHOOL PRIVACY POLICY

Shady Hill School (“Shady Hill” or the “School”) values your privacy. We have created this Privacy Policy to help you understand the School’s privacy practices for www.shs.org/, the School’s main website, including how and why we collect information on our website and how we protect your privacy in doing so. By interacting with Shady Hill through our website and services, you consent to the use of information that is collected or submitted as described in this Privacy Policy.

If you have any questions about Shady Hill or this Privacy Policy please feel free to contact us by sending an email to cio@shs.org.

ABOUT THE INFORMATION WE COLLECT

Shady Hill strives to limit the data collected to that which is required to safeguard the School and our community, maximize students’ educational experience, communicate with our community, and keep our community connected. We also collect data to manage our business effectively. We endeavor to only collect data that we believe is reasonably necessary to achieve the purpose for which the information is collected.

The data you provide to us and the information we need to process varies depending on your relationship to the School and the School-related activities in which you are involved. You may choose to provide personal data directly to us, such as your name, mailing address, email address, phone number, date of birth, credit/debit card number, or other information, as specified below, for purposes of:

- Subscribing to School communications.
- Applying to, enrolling in, and attending the School and School-sponsored activities and programs (which, in addition to the information described above, may include providing us with biographical information, family information, education history, qualifications, and other information).
- Accessing our family portal.
- Complying with a financial obligation to Shady Hill, such as paying tuition.
- Maintaining alumni connections with the community.
- Making a donation to Shady Hill.
- Registering to attend or volunteer at School-sponsored events and

activities.

- Responding to a job posting, applying to, and working at School (which, in addition to the information described above, may include providing us with biographical information, employment history, qualifications and credentials, and other information).
- Renting or requesting permission to use Shady Hill's facilities.
- Submitting an inquiry, question, or request.

Our systems may also collect data automatically about your browser or mobile device. This information may include an IP address, browser type or mobile device information, or geolocation, as well as how our site is being used, the pages visited, and the search terms entered.

If you choose not to provide information, we may be limited in our ability to provide you with the requested information or services.

HOW WE USE YOUR INFORMATION

We may use personal data for the following purposes, consistent with your engagement with the School:

- To provide information about our programs and services.
- To evaluate applicants for admission to Shady Hill.
- To enter into an enrollment contract with the School.
- To communicate with our students and their families about all student-related matters and to otherwise support our students while enrolled at the School.
- To help connect our community members with each other.
- To track individual and aggregate data as required by applicable law.
- To communicate school news, events, and fundraising opportunities.
- To solicit volunteers and donations.
- To process payment for a donation or financial obligation to Shady Hill.
- To evaluate candidates for employment at Shady Hill.
- To respond to an inquiry, question, or request submitted to the School.
- For other reasons, with your consent.

We may use non-personal data for systems administration and security purposes, as well as to analyze trends, track users' movement, gather broad demographic information for aggregate use to help us improve the site and deliver customized, personalized content. We may use geographic, demographic, and interest-based

reports of our website visitors to create custom audience lists. This data is used in aggregate and does not contain personally identifiable information. We do not link IP addresses to any personal information.

Sharing Your Information

In order to pursue our mission and support our educational goals, we partner with other companies to provide services on our behalf. We only provide those companies the information needed to deliver the service, and we prohibit them from using that data for any purpose other than providing the service(s) purchased. Although we strive to ensure that all of our partners and service providers uphold the same privacy standards to which we subscribe, please be aware that when you use an external site or service, the privacy policy and data processing disclosures for that site or service govern. Please email us at cio@shs.org with any questions about our third party service providers.

Please note that we may use or disclose personal data if we reasonably believe that it is necessary to protect the rights and safety of the School, our community, or others; to prevent fraud or abuse; and to comply with a law enforcement investigation, a legal proceeding or court order, or as otherwise required by law.

Cookies And Interest-Based Advertising

Cookies and similar technology may be used to enhance your experience of our site. Cookies are pieces of information that we transfer to your computer or mobile device through your Web browser to enable our systems to recognize your browser and to provide features such as remembering your customized settings for viewing our site and saving your password. You may control how cookies are used through the preferences on your web browser.

In addition, we may use remarketing technology and services to help analyze how our website is used. These technologies and services use cookies to collect information such as how often users visit the site, what pages they visit, and what other sites they used prior to coming to this site. The information collected by these technologies and services will be disclosed to, or collected directly by, third party service providers.

By visiting Shady Hill's website, you consent to the use of cookies and similar technologies in accordance with this Privacy Policy.

COMMUNICATIONS FROM SHADY HILL

If at any time you wish to adjust or limit the ways in which Shady Hill contacts you, you may contact us at communications@shs.org or, if you have a School account, you can manage your communication preferences in the School's portal under the Notifications setting.

ACCESSING, UPDATING, AND RETAINING INFORMATION

You may request that we modify, hide, or delete personal information that you have provided to us by emailing us at [INSERT CONTACT]. We retain personal information only as long as it is necessary to fulfill the purpose for which that information was collected, for the time period required by law, or as long as is necessary for our legitimate business purposes.

EUROPEAN UNION RESIDENTS

Shady Hill processes data only (1) with your consent; (2) to perform a contract between you and the School; (3) to comply with a legal obligation; (4) where it is necessary to protect someone's life; (5) to perform a task in the public interest; or (6) where Shady Hill has a legitimate interest to do so, balancing this interest against your interests and fundamental rights. If you reside in an European Union member state, you may exercise your Personal Data rights under GDPR by emailing us at cio@shs.org. Specifically you may have the following rights subject to the exceptions allowed by law:

- To access your information.
- To rectify or update your information.
- To erase your information, subject to our need to retain certain information for legal or other purposes.
- To receive a copy of your information.
- To object to or restrict processing of your information.

INFORMATION PROTECTION

We maintain administrative, technical, and physical safeguards to protect your personal information. When we collect or transmit sensitive data, such as a credit

or debit card number, we use industry standard methods to protect that information. Credit and debit card information is used solely for the purpose of completing a specific transaction and such information is either not retained in our database or in the case of recurring gifts, the card number is “tokenized.”

We also protect account information by storing it on a secure portion of our site that is only accessible by authorized individuals. Unfortunately, no website, database, or system is completely secure. While the School strives to protect your information, we cannot guarantee security. You are also responsible for taking reasonable steps to protect your personal information against unauthorized disclosure or misuse.

OTHER WEBSITES

Our site may contain links to other websites not associated with the School, which we believe our users may find interesting or informative. The School is not responsible for the content or accuracy of information on other sites; including a link to other sites should not be construed as an endorsement by the School to that site. If you visit one of these sites, you should review the privacy policy on that site. If you visit our website through a link or a banner advertisement on another site, the site you linked from may collect information about you. Shady Hill has no control over what information, if any, third party sites may collect or do with such information. Please refer to the privacy policies on those sites to see how they collect and use this information.

SOCIAL MEDIA

Shady Hill engages with its community on multiple social media platforms (e.g. Facebook, Twitter, and Instagram). If you connect or engage with us on one of our social media platforms, we may use other social media tools to interact with you. We also use metrics to analyze the performance of our marketing efforts on social media websites and users’ responses to those marketing efforts. This Privacy Policy, as well as the privacy policies of those social media platforms, governs these interactions.

CHANGES TO THIS POLICY

This Privacy Policy may be amended from time to time without prior notice by posting a revised Privacy Policy to this site. Alternatively, we may provide supplemental privacy notices on specific occasions when we are collecting or

processing personal data about you. Those supplemental notices should be read together with this Privacy Policy.

CONTACT US

If you have questions about this Privacy Policy, you may contact us in the following ways:

Email: **cio@shs.org**

Address: Chief Information Officer, Shady Hill School, 178 Coolidge Hill,
Cambridge, MA 02138

Effective: February 14, 2020

Last Updated: February 14, 2020