

# PRIVACY POLICY

Effective date: June 18, 2019

CLPS, LLC. ("CLPS," "us", "we", or "our") operates the [www.clpsconsultants.com](http://www.clpsconsultants.com) website and related applications including the CLPS Suite of Emergency Management Software Solutions, TAP App Security, TAP App Student, and TAP App Wellness mobile applications (collectively, the "Services").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Services and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

**BY INSTALLING, USING, REGISTERING TO OR OTHERWISE ACCESSING ANY SERVICES, YOU AGREE TO THIS PRIVACY POLICY AND GIVE AN EXPLICIT AND INFORMED CONSENT TO THE COLLECTION, USE AND PROCESSING OF YOUR PERSONAL DATA IN ACCORDANCE WITH THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT VISIT, INSTALL, USE, REGISTER TO OR OTHERWISE ACCESS ANY SERVICES.**

## **Definitions**

### **Service**

Services means the [www.clpsconsultants.com](http://www.clpsconsultants.com) website and related software solution and applications.

### **Personal Data**

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

### **Usage Data**

Usage Data is data collected automatically either generated by the use of the Services or from the Services infrastructure itself (for example, the duration of a page visit).

### **Cookies**

Cookies are small pieces of data stored on your device (computer or mobile device).

### **Data Controller**

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

### **Data Processors (or Service Providers)**

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

**Data Subject (or User)**

Data Subject is any living individual who is using our Services and is the subject of Personal Data.

**Information Collection And Use**

We collect several different types of information for various purposes to provide and improve our service to you.

**Types of Data Collected**

**Personal Data**

While using our Service, we may ask you to provide us with, or your school or employer may have provided us with, certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personal Data may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data
- Job Title or Role
- Class or school enrollment or attendance

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

**Usage Data**

We may also collect information that your browser sends whenever you visit our Services or when you access the Services by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Services that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Services by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

### **Tracking Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Services and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.
- **Advertising Cookies.** Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

### **Mobile Data**

We use mobile analytics software to allow us to better understand the functionality of our mobile application on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.

We may send you push notifications from time-to-time in order to update you about any events or promotions that we may be running. The mobile application may also ask for your permission to access your camera and your photos. If you no longer wish to receive these types of communications, or if you've initially agreed for the application to access your camera and photos and you would like to stop the app from accessing them, you may turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

We do not ask for, access or track any location-based (precise location) information from your mobile device at any time while downloading or using our Mobile Apps or Services.

### **Use of Data**

CLPS, LLC uses the collected data for various purposes, including, but not limited to:

- To provide and maintain our Service
- To provide and transmit data to emergency responders, safety, or school officials, or, if applicable, your employer

- To administer your account
- To notify you about changes to our Services
- To allow you to participate in interactive features of our Services when you choose to do so
- To provide customer support
- To provide you with access to particular tools or features
- To respond to your inquiries and send you administrative communications
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- Obtain your feedback on our sites and our offerings
- Conduct research and measurement activities
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

We may combine information that we collect about you with information from external sources. We may use this information to provide services to you such as personalized content.

To enhance our services, we may share your information with any member of our group of companies (this means our subsidiaries, parent and affiliated companies) as well as with third parties who provide services on our behalf to help with our business activities such as email service providers, data analyzers and business intelligence providers for the purpose of enhancing or maintaining the Software, our products and services. These companies are authorized to use your personal information only as necessary to provide these services to us.

### **Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)**

If you are from the European Economic Area (EEA), CLPS, LLC's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

CLPS, LLC may collect and process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing or collection is in our legitimate business interests and it's not overridden by your rights
- The processing or collection is in your vital interests and is not overridden by your rights
- To comply with the law
- The school where you are enrolled has provided your Personal Data, for the purposes of your safety and protection
- Your employer has provided your Personal Data, for the purposes of your safety and protection

## **Retention of Data**

CLPS, LLC will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

CLPS, LLC will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## **Transfer Of Data**

Your information, including Personal Data, may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

CLPS, LLC will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **Disclosure Of Data**

### **Disclosure for Law Enforcement**

Under certain circumstances, CLPS, LLC may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Legal Requirements**

CLPS, LLC may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of CLPS, LLC
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Services or the public
- To protect against legal liability

## **Security Of Data**

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

We have put in place technical, physical, and administrative safeguards to protect the Personal Information that we collect.

We take reasonable security measures to protect the security of your Personal Information. Despite our efforts to protect your Personal Information, there is always some risk that an unauthorized third party may find a way around our security systems or that transmissions of your information over the Internet may be intercepted.

The security of your Personal Information is important to us. When you enter Personal Information (including personal health information in various tools on our website), we encrypt the transmission of that information or use SSL connections (Secure Socket Layer) technology.

If you have any questions about the security of your personal information, you can contact us at [privacy@clpsconsultants.com](mailto:privacy@clpsconsultants.com).

## **Data Protection Officer**

CLPS has a “Data Protection Officer” who is responsible for matters relating to privacy and data protection. This Data Protection Officer may be reached at the following address:

CLPS, LLC  
ATTN: Data Protection Officer  
800 Corporate Drive  
Suite 700  
Fort Lauderdale, FL 33334  
[dataprotectionofficer@clpsconsultants.com](mailto:dataprotectionofficer@clpsconsultants.com)

## **"Do Not Track" Signals**

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **Your Data Protection Rights Under General Data Protection Regulation (GDPR)**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. CLPS, LLC aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

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

**The right to access, update or to delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

**The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.

**The right to object.** You have the right to object to our processing of your Personal Data.

**The right of restriction.** You have the right to request that we restrict the processing of your personal information.

**The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

**The right to withdraw consent.** You also have the right to withdraw your consent at any time where CLPS, LLC relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

### **Service Providers**

We may employ third party companies and individuals to facilitate our Services ("Service Providers"), to provide the Services on our behalf, to perform Service-related services or to assist us in analyzing how our Services are used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Service.

#### **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

#### **Sentry.io**

Sentry.io provides error-tracking for our Services under which it collects data to enable us to operate the Services effectively, and to provide you with the best experiences on our

website and our Services. For more information on the privacy practices of Sentry.io, please visit its privacy policy at web page: <https://sentry.io/privacy/>

### **Behavioral Remarketing**

CLPS, LLC uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

#### **Google AdWords**

Google AdWords remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page:

<http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>

### **Links To Other Sites**

Our Services may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **CHILDREN'S PRIVACY POLICY**

We are committed to protecting the privacy of children who use our Services. This section of our Privacy Policy explains our information collection, disclosure, and parental consent practices with respect to information provided by or on behalf of children under the age of 13 ("child" or "children"), and uses terms that are defined in our general Privacy Policy. This policy is in accordance with the U.S. Children's Online Privacy Protection Act ("COPPA"), and outlines our practices in the United States regarding children's personal information.

If you have questions or concerns about our privacy practices, please contact us at [privacy@clpsconsultants.com](mailto:privacy@clpsconsultants.com).

### **THE INFORMATION WE COLLECT FROM CHILDREN, HOW WE USE IT, AND HOW AND WHEN WE COMMUNICATE WITH PARENTS**

We offer our Services to users of all ages and our Services are not targeted specifically to children. However, our Services are provided to protect the safety and security of students,



employees and guests of schools, government facilities, or employers, and as such we may collect information from children for that purpose. Below we summarize potential instances of collection and outline how and when we will provide parental notice and/or seek parental consent. In any instance that we collect personal information from a child, we will retain that information only so long as reasonably necessary to fulfill the activity request or allow the child to continue to participate in the activity, and ensure the security of our users and our services, or as required by law. In the event we discover we have collected information from a child in a manner inconsistent with COPPA's requirements, we will either delete the information or immediately seek the parent's consent for that collection.

Personal Data we may collect from, about or concerning children may include, but are not limited to the following:

- Email address
- First name and last name
- Phone number
- Cookies and Usage Data
- Class or school enrollment or attendance

**About the collection of parent email address:** Consistent with the requirements of COPPA, when so required, we will ask for a parent or guardian email address before we collect any personal information from the child. If you believe your child is participating in an activity that collects personal information and you or another parent/guardian have NOT received an email providing notice or seeking your consent, please feel free to contact us at [privacy@clpsconsultants.com](mailto:privacy@clpsconsultants.com). We will not use parent emails provided for parental consent purposes to market to the parent, unless the parent has expressly opted in to email marketing or has separately participated in an activity that allows for such email contact.

**About Verifiable Parental Consent:**

**Email Consent.** In the event we wish to collect personal information from a child, COPPA requires that we first seek a parent or guardian's consent by email, except as explained below in the case of *school based activities*. In the email we will explain what information we are collecting, how we plan to use it, how the parent can provide consent, and how the parent can revoke consent. If we do not receive parental consent within a reasonable time, we will delete the parent contact information and any other information collected from the child in connection with that activity.

**Teacher consent in lieu of a parent.** With regard to *school-based activities*, COPPA allows teachers and school administrators to act in the stead of parents to provide consent for the collection of personal information from children. Schools should always notify parents about these activities. For more information on parental rights with respect to a child's educational record under the Family Educational Rights and Privacy Act (FERPA), please visit the [FERPA](#) site.

### **Email or Online Contact with a Child**

On occasion, in order to respond to a question or request from a child, we may need to ask for the child's online contact information, such as an email address or mobile number. We will delete this information immediately after responding to the question or request.

In connection with the Services, we may collect a child's online contact information, such as an email address or mobile number, in order to communicate with the child more than once. In such instances we will retain the child's online contact information to honor the request and for no other purpose such as marketing.

### **Push Notifications**

Push notifications are notifications on mobile and other devices that are typically associated with downloaded applications, and which can communicate to the device holder even when the application is not in use. Unless we have otherwise been given COPPA compliant consent from a teacher, school administrator or official, we will (i) require a child to provide a parent email address before the child can receive push notifications from our child-directed applications that collect a device identifier; (ii) provide the parent with notice of our contact with the child and will provide the parent the opportunity to prevent further notifications; and we will not associate the device identifier with other personal information without contacting the parent to get consent.

### **Geolocation Data**

If our Services collects geolocation information that is specific enough to equate to the collection of a street address, we will first seek parental consent via email, unless we have otherwise been given COPPA compliant consent from a teacher or school administrator or official.

### **Persistent Identifiers**

When children interact with us, certain information may automatically be collected, both to make our sites and applications more interesting and useful to children and for various purposes related to our business. Examples include the type of computer or mobile operating system, the child's IP address or mobile device identifier, the web browser, the frequency with which the child visits various parts of our sites or applications, and information regarding the online or mobile service provider. This information is collected using technologies such as cookies, flash cookies, web beacons, and other unique identifiers. This information may be collected by us or by a third party. This data is principally used for internal purposes only, in order to:

- provide children with access to features on our sites, applications and Services
- customize content and improve our sites and applications
- conduct research and analysis to address the performance of our sites and applications
- generate anonymous reporting for use by us

In the event we collect (or allow others to collect) such information from children on our sites and applications for other purposes, we will notify parents and obtain consent prior to such collection.

## **WHEN INFORMATION COLLECTED FROM CHILDREN IS AVAILABLE TO OTHERS; PARENTAL CHOICES AND CONTROLS**

At any time, parents can refuse to permit us to collect further personal information from their children in association with a particular account, and can request that we delete from our records the personal information we have collected in connection with that account. Please keep in mind that a request to delete records may lead to a termination of an account, membership, or other Services.

Parents may contact us to request access to, change, or delete their child's personal information by sending an email to us at [privacy@clpsconsultants.com](mailto:privacy@clpsconsultants.com). A valid request to delete personal information will be accommodated within a reasonable time.

Any other inquiries may be directed to:

CLPS, LLC  
ATTN: Privacy Officer  
800 Corporate Drive  
Suite 700  
Fort Lauderdale, FL 33334  
Email: [privacy@clpsconsultants.com](mailto:privacy@clpsconsultants.com)

In any correspondence such as e-mail or mail, please include the child's username, the name of the school or facility to which the account corresponds, and the parent's email address and telephone number. To protect children's privacy and security, we will take reasonable steps to help verify a parent's identity before granting access to any personal information.

## **CHANGES TO THIS PRIVACY POLICY**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

- By email: [privacy@clpsconsultants.com](mailto:privacy@clpsconsultants.com)
- By visiting this page on our website: <http://www.clpsconsultants.com/privacy>
- By mail: CLPS, LLC  
ATTN: Data Protection Officer  
800 Corporate Drive  
Suite 700  
Fort Lauderdale, FL 33334

----- **Effective January 1, 2020** -----

The foregoing section of this Privacy Policy is effective on January 1, 2020 and pertains to you if you are a resident of the State of California, or are otherwise subject to the California Consumer Privacy Act of 2018 (“CCPA”)

**Legal Basis for Processing Personal Data Under the CCPA**

If you reside in the State of California, or are otherwise subject to the CCPA, CLPS, LLC’s legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

CLPS, LLC may collect and process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing or collection is in our legitimate business interests and it's not overridden by your rights
- The processing or collection is in your vital interests and is not overridden by your rights
- To comply with the law
- The school where you are enrolled has provided your Personal Data, for the purposes of your safety and protection
- Your employer has provided your Personal Data, for the purposes of your safety and protection