

## Privacy Notice for California Residents

Effective May 24, 2022

### **Privacy Policy for California Residents**

This privacy notice is for California Residents (the “California Policy”) and supplements the information contained in our main privacy policy. We have adopted this California Policy in accordance with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively “CCPA”), related regulations, and other California privacy laws. Any terms defined in CCPA have the same meaning when used in this California Policy. This California Policy explains the personal information we collect or process about California residents on our Website, how we use, share, and protect that personal information, and what your rights are with respect to your personal information that we gather and process. This policy only applies to consumers who both access our Website while located in California and who are California residents.

### **Personal Information We Collect and For What Purpose**

In the preceding 12 months, we have collected the following categories of personal information, including: identifiers and internet or other similar network activity. For examples of the precise data points we collect and the sources from which we collect this personal information, please see “Information We Collect About You and How We Collect It” in our main privacy policy. We collect personal information for the business and commercial purposes described in “How We Use Your Information” in our main privacy policy.

We do not collect sensitive personal information.

We only use or disclose your personal information in order to provide access to the Website, help ensure security and integrity, and to perform other essential business functions such as providing customer service and processing transactions.

We may also use or share de-identified information that is not reasonably likely to identify you for commercially legitimate business purposes.

### **Personal Information We Collect and Have Disclosed**

We may share your personal information with third parties as described in the “Disclosure of Your Information” in our main privacy policy. In the preceding 12 months, we have disclosed the following categories of personal information for business or commercial purposes to the following categories of recipients:

<b>Categories of Personal Information Disclosed for a Business Purpose</b>	<b>Categories of Third Parties</b>
<ul style="list-style-type: none"><li>• Identifiers like your name or email address.</li></ul>	<ul style="list-style-type: none"><li>• Essential information and technology providers</li></ul>

<ul style="list-style-type: none"> <li>• Internet or other similar network activity.</li> </ul>	<ul style="list-style-type: none"> <li>• Technology administrators and golf course managers</li> </ul>
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### **Personal Information We Collect and Have Sold**

We have not sold personal information or shared it for marketing purposes in the last twelve months.

### **Your Rights Under CCPA As A California Resident**

Under CCPA, California residents have specific rights regarding their personal information as described below. These rights are subject to certain exceptions. We explain how you may exercise these rights below.

*1. The Right to Disclosure of Information.* You have the right to request that we disclose certain information regarding our practices with respect to personal information. If you submit a valid and verifiable request and we confirm your identity and/or authority to make the request, we will disclose to you any of the following at your direction: (i) the categories of personal information we have collected about you in the last 12 months, (ii) the categories of sources for the personal information we have collected about you in the last 12 months, (iii) our business or commercial purpose for collecting that personal information, (iv) the categories of third parties with whom we share that personal information, and (v) the specific pieces of personal information we collected about you. In addition, if we sold your personal information or disclosed it to a third party for a business purpose, we will provide a list of the personal information types that each category of recipient purchased.

*2. Right to Deletion.* You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. If you submit a valid and verifiable request and we can confirm your identity and/or authority to make the request, we will determine if retaining the information is necessary for us or our service providers to:

- Complete a transaction for which we collected the personal information, provide a good or service that you requested, or take actions reasonably anticipated within the context of our ongoing business relationship with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.);

- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; and/or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

If none of the above retention conditions apply, we will delete your personal information from our records and direct our service providers to do the same.

*3. Right to Correct Inaccurate Personal Information.* As a California resident, you have the right to request a business that maintains inaccurate personal information about you to correct that inaccurate personal information, considering the nature of the personal information and the purposes of the processing of that personal information.

*5. Right to Opt-Out of the Sale of Your Personal Information.* As a California resident, you have the right to direct a business that sells your personal information to third parties not to sell your personal information. CCPA defines a “sale” as selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to another business or a third party for monetary or other valuable consideration. This right is referred to as “the right to opt-out.”

*6. Right Against Discrimination.* You may exercise your rights under the CCPA without discrimination. For example, unless the CCPA provides an exception, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **How To Exercise Your Rights Under the CCPA**

To submit general questions or requests regarding this privacy policy or our privacy practices, please contact us at:

Postal Mail: 221 Glen Mills Road, Glen Mills PA, 19342, Attn. Privacy

Email Privacy: [inquiries@glenmillsschools.org](mailto:inquiries@glenmillsschools.org)

Phone Number: 610-558-2142

To submit a verifiable request under the CCPA to access, delete, or correct your information, you may contact us above. Please note that you if you choose to make a CCPA request, we will require certain information in order to verify who you are, including your name, account information, address and residency, and telephone number. This information will be requested via the webform.

You may have an authorized agent, as defined by CCPA and/or related regulations, submit a request on your behalf. However, we may require proof of such agent's status as an authorized agent, including an executed permission by you, and verification of the agent's own identity. We also still will require information about you to fulfill the request.