



PRIVACY POLICY

Last Updated: March 16, 2021.

This Privacy Policy (the “**Privacy Policy**” or the “**Policy**”) describes the principles and practices that apply to the collection, use, disclosure and protection of personal information (defined below) that Holberton, Inc and our affiliates, subsidiaries and partners. (“**Holberton**”, “**we**” or “**us**”) collects from or through our website www.holberton.us (“**Website**”) our social media, or social media accounts related to us, from individuals (“**user**” or “**you**”).

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1. WHAT INFORMATION WE COLLECT AND HOW

For the purpose of this Policy, “personal information” or “information” means information that identifies you or could reasonably be associated or linked, directly or indirectly, to you.



We may collect different categories of personal information depending on how you use our Website or interact with us.

> Information provided directly by you

When you fill out and submit our contact form, we may keep a record of your contact information such as email address; first name; last name; personal information present in an attachment (if any), as well as our correspondence. The purpose is to be able to answer your request(s) in an efficient manner and ensure a smooth communication between you and our teams.

> Information collected automatically during your visit to the Website

We collect information that is automatically provided by your browser in order to facilitate your navigation on the Website and improve our services. This may include:

- device information (type of device, operating system version, unique device identifier, browser type and version, mobile network information);
- log information (IP address, smart phone identifier, screen resolution, and referring domain);
- location information.

> Cookies, tags, analytics information

- We may send some cookies to your computer. This allows us to uniquely identify your browser and lets us help you log in faster and enhance your navigation through the Website. Cookies also help us understand what information is of interest to you and improve your navigation and our services. For more information regarding our use of cookies, please refer to [our Cookie Policy \[insert link\]](#).
- Our Website may also use tags (also known as clear gifs, pixel tags or Web beacons), to monitor the traffic patterns of users from one page within our Website to another, to deliver or communicate with cookies, to understand whether you have come to our Website from an online advertisement displayed on a third-party website, and to improve Website performance. We also may allow our service providers to use tags to analyze visitor traffic and actions on our Website and to help us understand which pages are more attractive to Users, or which emails have been opened by recipients. This helps us measure the effectiveness of our content and other offerings.
- We may also use Google Analytics, Facebook Ads conversion tracking (Facebook pixel) and Google Ads conversion tracking that collect information through cookies and your usage data, in order to analyze visitors behavior and demographics. For more information:
 - About Google Analytics: please visit www.google.com/policies/privacy/partners/.
 - About Facebook Ads: please visit <https://www.facebook.com/privacy/explanation>.

> Information collected through third parties

Your interaction with external social networks and platforms such as Twitter, LinkedIn or Facebook through their respective “Tweet” or “Like” buttons and social widgets may also cause such third parties to pass certain information about your use of their service(s) to us. This information may include cookies and usage data.



2. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for several business or commercial purposes, among which: :

- > **Perform services that are related to our business and our relationship with you.** This includes:
 - Communicating with you and answering your requests submitted on our Website or by email;
 - Managing any information that we may collect from you;
 - Giving you information about our services, activities and changes in policies;
 - Undertaking activities to verify the quality or safety of a service or our Website.

- > **Analyze and improve our services,** such as:
 - Conducting analytics that will allow us to count ad impressions, verify the positioning and quality of our ad impressions, and audit compliance with our standards;
 - Measuring interest and engagement in our Services and short-term, transient use, such as contextual customization of ads;
 - Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity and prosecuting those responsible for that activity;
 - Verifying your identity and preventing fraud;
 - Debugging to identify and repair errors that may impair existing intended functionality;
 - Undertaking internal research for technological development and demonstration;
 - Improving, upgrading or enhancing our Website's features;
 - Developing new products or services.

- > **Conduct other legitimate purposes,** including:
 - Cooperating with law enforcement and protecting our rights (including free speech), interests, safety or property and those of our customers, service providers and other third parties;
 - Complying with and enforcing applicable legal and regulatory obligations, and responding to governmental requests;
 - Enforcing our policies, terms and conditions, or other agreements;
 - Defending against or pursuing claims, disputes, or litigation – in court or elsewhere;
 - Carrying out any other purpose readily apparent to you or described to you at the time the personal information is collected.

3. WITH WHOM WE SHARE YOUR PERSONAL INFORMATION

We try to share your personal information with as few third parties as possible. We may need to disclose your personal information for one of the legitimate purposes disclosed in previous section "[How we use your personal information](#)" as follows:

- > Vendors, consultants and other service providers who need access to such personal information to perform services on our behalf;

- > Business partners with whom we jointly offer products or services;



> Our affiliates and subsidiaries;

> Advertising partners to set tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day). We may also combine and share such information and other information (such as demographic information) with third party advertising partners. These advertising partners may use this information together with similar information collected from other websites for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. If you prefer not to share your personal information with third party advertising partners, you may follow the instructions below;

> Government or law enforcement officials or private parties as we, in our reasonable discretion, believe necessary or appropriate to respond to and defend against legal claims, respond to legal process (including a facially valid subpoena, warrant, court order or other legal process), or otherwise as required by law. Please note that we may not be able to notify you of a request for the disclosure of your information as described above, because doing so might be prohibited by law, or because doing so would jeopardize an investigation into illegal or fraudulent activity, or because we do not have your contact information.

> In connection with, or during negotiations of, any merger, sale of company assets, financing or transfer of all or a portion of our business to another company;

> With your consent or at your direction;

> We may also share aggregated or de-identified information, which cannot reasonably be used to identify you. This aggregated information is used for industry analysis, demographic profiling, and other purposes.

4. CHILDREN'S INFORMATION

Our Service is generally not directed at children under the age of 16 and we do not knowingly collect or solicit personal information (as defined by the U.S. Children's Privacy Protection Act, or "COPPA") from anyone under the age of 13 in a manner not permitted by COPPA. If you are a parent or guardian and you believe we have collected information from your child in a manner not permitted by law, please contact us through privacy@holbertonschool.com. We will remove the data to the extent required by applicable law.

5. DATA RETENTION

Our retention periods for personal information are based on business needs and legal requirements. We retain personal information for as long as is necessary for the processing purpose(s) for which the personal information was collected and any other permissible, related purpose.

6. INTERNATIONAL TRANSFERS

We are based in the U.S. and the information we collect is governed by U.S. law. If you are accessing the Service from outside of the U.S., please be aware that information collected through the Service may be



transferred to, processed, stored, and used in the U.S. and other jurisdictions. Data protection laws in the U.S. and other jurisdictions may be different from those of your country of residence. Your use of the Website or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in the U.S. and other jurisdictions as set out in this Policy.

7. CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the policy we will reflect the 'last modified' date at the top of this Privacy Policy.

8. LINKS TO OTHER WEBSITES AND SERVICES

The Services may, from time to time, contain links to and from websites, platforms, and other services not operated or controlled by us. If you follow a link to any of these locations, please note that these locations have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those locations.

9. CONTACT FOR MORE INFORMATION

If you have any questions, please contact us by sending us an email at privacy@holbertonschool.com.

10. ADDITIONAL DISCLOSURES FOR CALIFORNIA RESIDENTS

California Consumer Privacy Act or "CCPA" (California Civil Code Section 1798.100 et seq) grants specific rights to consumers who reside in California.

1. *Personal Information Collected, Disclosed, or Sold*

In the past 12 months:

> We have collected information listed under the section "[What information we collect and How](#)" of this Policy, for the purposes detailed under section "[How we use your personal information](#)".

> We have disclosed the personal information to a limited number of third parties. For more information about such disclosure, please refer to the section "[With whom we share your personal information](#)" of this Policy.

2. *Your Rights*

California residents have the right to request:



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- More information about the categories and specific pieces of personal information we have collected, sold and disclosed for a business purpose in the last 12 months, and
 - Deletion of their personal information.

You may make these requests by calling +1 (415) 358 0819 or sending an email at privacy@holbertonschool.com. We may request that you provide additional information regarding yourself in order to verify your identity.

3. *Authorized agent*

If you would like to use an authorized agent registered with the California Secretary of State to exercise your rights, we may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to submit requests on your behalf.

4. *Right to Opt-Out*

To the extent Holberton sells your personal information as the term “sell” is defined under the California Consumer Privacy Act, you have the right to opt-out of the sale of your personal information by us to third parties at any time. You may submit a request to opt-out by clicking Do Not Sell My Personal Information. You may also submit a request to opt-out by contacting us at privacy@holbertonschool.com.

5. *Right to Non-Discrimination*

You will not receive discriminatory treatment for exercising your rights under the CCPA.

6. *Shine the Light*

Residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties’ own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information.

To exercise a request, please write us at the email or postal address set out in “Contact Us” above and specify that you are making a “California Shine the Light Request.” We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.