GLOBAL SCHOLARS PRIVACY POLICY

Date Last Updated: March 2022

This Privacy Policy explains how the Global Scholars program operated by Global Cities, Inc. (“we” or “us”), including the Global Scholars online education platform (“Site”), collects, uses, and discloses information from website visitors (“you” or “your”) and the Global Scholars participating site locations. The Site is maintained by Global Cities, Inc.’s service provider, PowerSchool Group LLC (“PowerSchool”), which maintains its own privacy policy located at: https://www.powerschool.com/privacy/

The Privacy Policy does not apply to information collected through third-party websites or services that you may access through the Site.

We are committed to protecting and respecting your privacy. By visiting and/or using this Site, you have agreed to this Privacy Policy.

Information We Collect

We collect your Personal Information. “Personal Information” includes any information that we collect about you that, alone or in combination with other information, can be used to identify you, such as a personal identifier (e.g., name or email address), an identification number, online identifiers, or inferences about your preferences. For the purpose of this Privacy Policy, Personal Information also includes “Personal Data,” as defined under GDPR. Personal Information does not include publicly available information or information that is de-identified or aggregated so that it cannot be used to identify individuals who use the Services.

Use of Site. Global Scholars may collect and process Personal Information, including but not limited to, participant first and last name, parent’s name, student username, school name, IP addresses, and participant city. We also collect content of the participant’s discussion board postings. Please note that participating schools are advised to ensure that participants do not post personal information content, and the discussion board is monitored by Global Scholars staff in order to remove references to Personal Information if these are included in error by participants contrary to advice and policy provided to participating schools.

Automatically Collected Information. Global Scholars collects usage data about devices you use to access the Site, such as device manufacturer, operating system, domain name and IP address, from all website visitors (“Automatically Collected Information”). We use Automatically Collected Information internally to help us improve your experience with the Site as well as to record internet protocol (“IP”) addresses, browser types, internet service provider (“ISP”), and product usage.
Aggregated Information. To assist us with the uses described in this Privacy Policy, information that we or our designated service providers have collected about you through this Site, including your use of this Site, may be aggregated, analyzed or enhanced with personal or other information about you that we have from other sources.

Children’s Privacy and Parental Consent

In accordance with the Children’s Online Privacy Protection Act (“COPPA”) and other applicable children’s data protection laws, we (i) limit the collection of personal information from children under 13 to only that which is necessary to participate in Global Scholars programing available through the Site; and (ii) obtain parental or guardian consent prior to the collection of any children’s data. Children may not use the Site or participate in the Global Scholars program unless we have obtained verified consent from a parent or guardian. We may require a school or after-school program to obtain parental consent on our behalf. Parents or guardians who sign the parental consent form agree and consent to our collection, processing, disclosure, transfer, and storage of their child’s Personal Information.

Information Used and Disclosed to Third Parties

We use the information we have about you to enable you to participate in the Global Scholars Program (including use of the Site), respond to your inquiries, enforce any TOU for the Site and its Privacy Policy, enhance our services to you, compile aggregate statistics, improve this Site and the Global Scholars program, and through outreach efforts, promote this Site and the Global Scholars program to others. We may also use your information to provide information about this Site, its services, and about us. We may use Site Contributions and other information from or about you to help evaluate and improve the Global Scholars program. Site Contributions may also be edited and used for or in promotional materials and for other purposes, and used and disclosed on this Site and elsewhere consistent with this Privacy Policy. We do not share or sell your Personal Information with or to any third party not affiliated with Global Scholars for direct marketing purposes. We will only share your Personal Information at your direction, with your consent, or in the following circumstances:

Processing By Affiliates and Third Parties. We may share your personal information and other information with third parties who perform services on our behalf and to respond to your request or inquiry. We may also share personal information or other information related to your use of this Site or participation in the Global Scholars program with teachers, participants’ parents, and other educators or third party consultants affiliated with the Global Scholars program. Information disclosed to third parties may include aggregated and/or de-identified information derived from your Personal Information. Such aggregated and/or de-identified information cannot reasonably be used to identify you.

Automatically Collected Information. We may disclose automatically collected information (e.g., IP addresses, browser types, product usage) obtained from your use of the Site to our service providers who provide services to us.

Legal Obligations. We may disclose your Personal Information if we believe in good faith that such disclosure is necessary to satisfy our legal obligations. This may include: (i) to comply with the law or in response to a subpoena, court order, government request, or other legal process; (ii) to produce relevant documents or information in connection with litigation, arbitration, mediation,
adjudication, government or internal investigations, or other legal or administrative proceedings; (iii) to protect the interests, rights, safety, or property of us, or any of our members, subsidiaries, affiliates, employees, users, customers, suppliers, or others; (iv) to monitor compliance with and enforce the TOU for this Site; (v) to operate the systems that ensures the Site functions properly; or (vi) if we believe in good faith that a disclosure is necessary.

Business Transactions. In the event that Global Scholars goes through a business transition, such as a merger, acquisition by another company, reorganization, or sale of a portion of its assets, your Personal Information may be transferred in connection with the proposed transaction. We will provide you with the option to opt out of the transfer of your Personal Information to the successor entity if that entity has not committed to comply with this Privacy Policy or a Privacy Policy that is, in all material respects, as protective of your Personal Information as this Privacy Policy.

Cookies and Other Tracking Technologies

We utilize cookies to help us keep our Site secure, measure the performance of our Site and understand how visitors interact with them, and count numbers of visitors. A cookie is a small text file placed on your computer. Cookies help us understand how our Site are being used and improve your user experience. We may also use cookies or other electronic tools to collect and compile statistical and other information about your use of this Site and the services provided on this Site. This information may include, but is not limited to, information about the IP address of your computer, browser type, operating system, the state or country from which you accessed this Site, the web pages visited, the date and the time of a visit, and the websites you visited immediately before and after visiting this Site. The information collected may be used for various reasons, including research, analysis, to enhance your experience of this Site (such as enabling log-in), to improve the Global Scholars program, and to compile aggregate and unattributed information about usage of this Site and other websites.

To assist us with the various uses and purposes described in this Privacy Policy, your information, including information collected by the cookies or similar electronic mechanisms, may be aggregated, analyzed, or linked to other information we have about you (including information from other online and offline sources). For example, we may use third parties to collect information about use of this Site, such as pages viewed, to provide us reports about use of this Site.

At any time, you may control how we use cookies and other similar technologies on our Site. Most browsers are set to accept cookies by default, but you can control and manage the use of cookies on your browser or device by deleting them from your browser history when you leave our site. If you do not wish to receive cookies, you may set your browser to reject cookies or alert you when a cookie is dropped on your computer. You can limit how cookies interact with your device or browser by enabling ad tracking functionality on both android and iOS devices. If you use a device to access our Site, your device identification may be collected and used for purposes similar to other cookies. Most mobile devices allow you to disable the ability for geo-location information to be collected from your mobile device. The help function on most browsers and mobile devices contains instructions on how to set your browser to notify you before accepting cookies, disable cookies entirely, or disable the collection of geo-location data. Please be advised, if you disable certain cookies, some of the features of our Site may not function properly or be available to you, such as those which require identification.
Web Beacons. Web beacons are tiny graphic image files embedded in a web page or email that allow website operators to check whether you have viewed a particular web page or email communication. We use the information collected by web beacons to statistically monitor how many people are using our Site.

“Do Not Track” signals. Some web browsers have “Do Not Track” or similar features that allow you to tell each website you visit that you do not want your activities on that website tracked. Currently, our Site does not respond to “Do Not Track” signals and will continue to collect information about you even if your browser’s “Do Not Track” functionality is activated. Please note that your selection of the “Do Not Track” option provided by your browser may not have any effect on our collection of cookie information.

Data Security

We maintain administrative, physical, and technical safeguards aimed to protect against unauthorized use, disclosure, alteration, or destruction of the Personal Information we collect and maintain. However, no data transmission over the internet is ever 100% secure. As a result, while we strive to protect your information, we cannot guarantee or warrant the security of any information you transmit to our websites.

Third-Party Websites

Please note that the use of the Site may contain links to third-party websites, such as websites operated solely by PowerSchool. We are not responsible for any personal information you may provide while on such websites or the privacy practices or content of other websites. Any information provided on such sites is governed by the privacy policies of the third-party sites. Any information provided on such websites is governed by the privacy policies of the third-party websites and not this Privacy Policy. We strongly encourage you to review and understand the privacy policies of any third-party website before providing your Personal Information.

Rights With Respect To Your Personal Information

Depending on jurisdiction, you may have the right to access, correct, delete, or restrict use of your child’s Personal Information covered by this Privacy Policy. Depending on the jurisdiction, you may also have the right to request that we refrain from processing your child’s Personal Information. Please note that if you exercise such rights this may affect our ability to provide our products and services to your child. To honor any requests, we will verify your identity by asking you or your authorized agent to provide information necessary to verify your identity. We will only use the Personal Information provided in the verification process for identity verification purposes. Please note that Global Scholars does not sell your child’s Personal Information.

European Economic Area (“EEA”) and the United Kingdom (“UK”): If you are a resident of the EEA or the UK, you have the rights under the General Data Protection Regulation (“GDPR” or “UK GDPR”). We rely on the following legal bases to process your child’s Personal Information: (i) valid consent provided by you; (ii) as necessary for the performance of a contract; (iii) compliance with a legal or regulatory obligation; and (iv) to fulfill our legitimate interest, unless your fundamental rights and freedoms override those interests. If you are a resident of the EEA or UK and have
submitted Personal Information to us, you have the right to (i) the deletion of your child’s data; (ii) object to and restrict the processing; (iii) access to your child’s data upon request; (iv) portability of your child’s data; and (v) rectification or correction of your child’s data.

Brazil: If you are a resident of Brazil, you have certain protections and rights under the Brazilian General Data Protection Law ("LGPD"). We rely on the following legal bases to process your child’s Personal Information: (i) valid consent provided by you; (ii) as necessary to fulfill a contract; (iii) to fulfill our legitimate interest, unless your fundamental rights and liberties outweigh those interests; or (iv) to comply with a regulatory or legal obligations. If you are a resident of Brazil, you have the right to obtain the following regarding your child’s Personal Information: (i) confirmation of processing; (ii) access to data upon request; (iii) correction of inaccurate data; (iv) deletion of unnecessary of excessive data or data; (v) transfer of data; (vi) which entities with whom data has been shared; and (vii) block the processing of data.

To honor any requests, we will verify your identity by asking you or your authorized agent to provide information necessary to verify your identity. We will only use the Personal Information provided in the verification process for identity verification purposes. Please note that if you exercise such rights, this may affect our ability to provide our products and services to your child. While we will make reasonable efforts to accommodate your request, we also reserve the right to impose certain restrictions and requirements on such requests, if allowed or required by applicable law. Please note that it may take some time to process your request, consistent with applicable law. For inquiries about your child’s personal information, please contact us through one of the methods listed below. For website visitors in the EEA, UK, or Brazil, the data controller processing your child’s Personal Information is Global Scholars.

Withdrawal of Consent

Where you have given us valid consent to collect, use, and process your child’s Personal Information in certain ways, we will rely on your consent. In instances in which we have based our processing of your child’s Personal Information on your consent, you have the right to withdraw your consent. Please note that when you withdraw consent, we might not be able to provide your child with services under the Site. To withdraw such consent, please contact us through the methods listed below. Please note that in certain situations, we may continue to process your child’s Personal Information after you have withdrawn consent and requested that we delete your child’s Personal Information, if we have a legal basis to do so. For example, we may retain certain information if we need to do so to comply with a legal obligation or if it is necessary to do so to pursue our legitimate interest in keeping the Services safe and secure.

Data Transfer

We are headquartered in the United States and maintain service providers in the United States and in other countries. Please be advised that the United States and other countries may not offer the same privacy protections as the law of your jurisdiction; and (ii) the processing of your information in these countries. If you visit our Site, or contact us from outside of the United States, please be advised that (i) any Personal Information you provide to us or that we automatically collect will be transferred to the United States; and by using our Site or submitting Personal Information, you explicitly authorize its transfer to and subsequent processing in the United States and other countries in which we operate the Global Scholars program in accordance with this Privacy Policy. When required by applicable law, we
utilize consent to facilitate the transfer of Personal Information from EEA or UK data subjects, and may also transfer Personal Information subject to applicable derogations under GDPR Article 49.

Data Retention

We retain information we collect as long as it is necessary and relevant to fulfill the purposes outlined in this privacy policy. Subject to applicable law, we retain personal information to resolve disputes, enforce our Terms of Use, or other actions permitted by law.

Notification of Changes

We may change this Privacy Policy from time to time. If we make a material change to the way we intend to use your Personal Information, we will notify you by modifying the date updated at the beginning of this Privacy Policy. We encourage you to review the Privacy Policy whenever you access the Services or otherwise interact with us to stay information about our privacy practices.

Questions or Complaints Regarding this Privacy Policy

If you have questions regarding this Privacy Policy, please contact us at through the channels listed below. Please include “Privacy” in the subject line of your inquiry. Additionally, if you have complaints about Global Scholars' processing of your personal information, you may have the right to lodge a complaint with the applicable supervisory authority where you reside.

By mail:
Global Cities, Inc.
156 West 56th Street, Suite 1004
New York, NY 10019

By email:
privacy@globalcities.org