

## EDFUEL TALENT PLAYBOOK (aka TALENT HUB) PRIVACY NOTICE

**Effective: January 19, 2024**

**Last updated: May 8, 2025**

This privacy notice for EdFuel ("we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

- Visit our website at <https://playbook.edfuel.org>, or any website of ours that links to this privacy notice

For purposes of this privacy notice, "personal information" means any information relating to an identified or identifiable natural person. The term does not include information that has been anonymized or de-identified, or that is otherwise exempt from applicable data protection law.

**Questions or concerns?** Reading this privacy notice will help you understand the personal information we collect from and about you, how we use and share your personal information, and your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [playbook@edfuel.org](mailto:playbook@edfuel.org).

Individuals with disabilities may access this Policy in an alternative format by contacting [playbook@edfuel.org](mailto:playbook@edfuel.org).

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### 1. WHAT INFORMATION DO WE COLLECT?

#### Personal information you disclose to us

***In Short:*** We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you create an EdFuel Talent Playbook (aka Talent Hub) account, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Names
- Email addresses
- Usernames
- Passwords
- Contact preferences
- Contact or authentication data
- Organization information
- Organizational benchmarks (e.g., job titles, retention rates, etc.)
- Any other information you choose to provide to us

**Sensitive Information.** When necessary and as permitted by applicable law, we process the following categories of sensitive information:

- Demographic information

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

### **Information automatically collected**

***In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, general location information derived from IP address, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our Cookie Notice [here](#).

The personal information we collect automatically includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- *Location Data.* We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

## 2. HOW DO WE PROCESS YOUR INFORMATION?

***In Short:** We process your information to do things like provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other lawful purposes.*

**We process your personal information for a variety of reasons, depending on how you interact with our Services, including:**

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can do things like create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service, or to otherwise communicate with you.

- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To protect and operate our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them thereby improving your experience.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.
- **To comply with our legal obligations.** We may process your information to comply with our legal obligations, respond to legal requests, and exercise, establish, or defend our legal rights.

In addition, we may also use, disclose, or otherwise process your personal information for such purposes as you may authorize at the time you submit the information or as otherwise compatible with the above purposes or your reasonable expectations.

### **3. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

***In Short:** We may share information in specific situations described in this section and/or with the following categories of third parties.*

**Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors, or agents (“**third parties**”) who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third party service providers, which are designed to help safeguard your personal information. This means that they are contractually obligated not to do anything with your personal information unless we have instructed them to do it. They have also agreed that they will not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

- Cloud Computing Services
- Communication & Collaboration Tools

- Data Analytics Services
- Data Storage Service Providers
- Performance Monitoring Tools
- Product Engineering & Design Tools
- Testing Tools
- User Account Registration & Authentication Services
- Website Hosting Service Providers
- Other authorized contractors and subcontractors of EdFuel

We may also need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Legal Requirements.** We may share or transfer your personal information with other third parties, as required by law or regulation, court order, or subpoena, or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) enforce our Terms of Use or to protect the security or integrity of the Services; and/or (c) exercise or protect the rights, property, or personal safety of the EdFuel or others.

#### 4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

***In Short:** We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice [here](#).

#### 5. HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as to adhere to tax, accounting, or other legal requirements). In specific circumstances, we may also retain your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **6. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. Such processes may include, but are not limited to, SSL encryption and multi-factor authentication safeguards for EdFuel personnel and authorized contractors with administrative access to the Talent Playbook (aka Talent Hub) portal. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

We may provide links to other websites and services for your convenience, which are not subject to this privacy notice. The operators of the linked websites and services may have posted their own privacy notices that you should review to learn more about their privacy practices. If you decide to access any of the third-party websites linked to our websites, you do so entirely at your own risk and subject to the terms and conditions of use for such third-party websites.

## **7. DO WE COLLECT INFORMATION FROM MINORS?**

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly collect or solicit data from, or market to children under 18 years of age. By using the Services, you represent that you are at least 18. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [playbook@edfuel.org](mailto:playbook@edfuel.org).

## **8. WHAT ARE YOUR PRIVACY CHOICES?**

***In Short:** You may review, change, or terminate your account at any time.*

**Withdrawing your consent:** If we are relying on your consent to process your personal information, you have the ability to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "[HOW](#)

[CAN YOU CONTACT US ABOUT THIS NOTICE?](#)" below or updating your preferences as described below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

### **Account Information**

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account; or
- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. For further information, please see our Cookie Notice [here](#).

Based on the applicable laws of your jurisdiction of residence, you may have additional privacy choices, such as to request access to the personal information we collect from you, change that information, or request to delete it. To request to review, update, or delete your personal information, please email us: [playbook@edfuel.org](mailto:playbook@edfuel.org). If you have questions or comments about your privacy choices, you may email us: [playbook@edfuel.org](mailto:playbook@edfuel.org).

## **9. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

We do not sell, or share for behavioral or targeted advertising purposes, the personal information we collect or receive in connection with your use of the Services. Accordingly, we do not honor the GPC or other universal opt out signals.

## **10. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

***In Short:** If you are a resident of California, Colorado, Connecticut, Delaware, Iowa, Nebraska, New Hampshire, New Jersey, Texas, Montana, Oregon, Utah, or Virginia, state law recognizes specific rights regarding access to your personal information in some circumstances.*

We do not collect or process “sensitive personal information” (as defined by the California Consumer Privacy Act) for the purpose of inferring characteristics about individuals.

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

### **How do we use and share your personal information?**

Learn about how we use your personal information in the section, “[HOW DO WE PROCESS YOUR INFORMATION?](#)”

### **Will your information be shared with anyone else?**

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about who we disclose personal information to in the section, “[WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?](#)”

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be “selling” of your personal information.

We have disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months:

- Category B. Personal information as defined in the California Customer Records law
- Category C. Characteristics of protected classifications under state or federal law

The categories of third parties to whom we disclosed personal information for a business or commercial purpose can be found under “[WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?](#)”

We do not sell, or share for behavioral or targeted advertising purposes, the personal information we collect or receive in connection with your use of the Services.

### **Your privacy rights and choices**



Depending on your state of residence, you may have specific legal rights regarding your personal information. This section describes the legal rights that may be available to some individuals and explains how to use them.

#### Right to request deletion of the data — Request to delete

If you are a resident of certain states, you can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

#### Right to be informed — Request to know and access

Depending on the circumstances, if you are a resident of certain states, you may request that we disclose:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the categories of sources from which personal information is collected;
- the business or commercial purpose for collecting, sharing, or selling personal information;
- the categories of third parties to whom the personal information was disclosed; and
- the specific pieces of personal information we collected about you.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

#### Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you make a privacy rights request.

#### Right to request correction of the data — Request to correct

If you are a resident of certain states, you may request correction of your personal data if it is incorrect.

#### Right to data portability — Request a transferrable copy of your personal information

You may request we transfer your personal information to other persons or entities, or to obtain a copy of the personal data you previously shared with us, in a portable and, if technically feasible, readily usable format

#### Making a data subject request

To make a data subject request, you can contact us via email at [playbook@edfuel.org](mailto:playbook@edfuel.org). If you have a complaint about how we handle your data, we would like to hear from you. You can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf.

### Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

For requests to know or delete information about a child under the age of 13, we accept requests for information regarding minors under the age of 13 if we can determine that such requests were submitted by a parent or guardian.

### Responding to requests

Within 10 days of receiving a request to delete, to correct, or to know, we will confirm receipt of the request and provide information about how we will process the request. Within forty-five (45) days of receipt of a request, we will inform you in writing of any action taken or not taken in response to the request, including a written explanation of the reasons for the decisions. If we require more time to respond, we will inform you of an extension within forty-five (45) days of our receipt of your request, together with the reasons for the delay.

If we decline to take action regarding your request, we will explain the basis for the denial, provide or delete any personal information that is not subject to the denial, and refrain from using the personal information retained for any purpose other than permitted by the denial. If you wish to appeal our decision, please email us at [playbook@edfuel.org](mailto:playbook@edfuel.org).

## **11. DO WE MAKE UPDATES TO THIS NOTICE?**

***In Short:*** Yes, we will update this notice on occasion.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are handling your personal information.

## **12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may email us at [playbook@edfuel.org](mailto:playbook@edfuel.org) or contact us by mail at:

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