



## **Privacy Policy**

### **Purpose**

We are committed to safeguarding sensitive customer information. In order to better serve your needs now and in the future, we may ask you to provide us with certain information. We understand that you may have concerns about our use of this information which includes personal, educational and/or financial information that identifies you (“personal information”). We agree that you have a right to know why and how we will utilize the personal information provided to us. This Privacy Policy has been adopted to explain and govern the use and handling of your personal information.

### **Applicability**

This Privacy Policy governs our use of the nonpublic personal information that you provide to us. It does not cover information we have obtained from any other source, such as information obtained from a public record or from another person or entity.

### **Types of Information**

Depending upon which of our services you are utilizing, the types of personal information that we may collect include:

- Information we receive from you on applications, forms and in other communications to us, whether in writing, in person, by telephone or any other means;
- Information about your transactions with us, our affiliated companies, or others;
- Information we receive from a consumer-reporting agency; and
- Information received from the use of our internet site using Google Analytics

Some pages on this site may use “cookies” —small files that the site places on your hard drive for identification purposes. A cookie file can contain information such as a user ID to track the pages visited, but the only personal information a cookie can contain is information you supply yourself. These files are used for site registration and customization for the next time you visit us.

Some parts of the site may also use cookies to track user traffic patterns. CAP Tulsa does this in order to determine the usefulness of our Web site information to our users and to see how effective our navigational structure is in helping users reach that information. Please note that cookies cannot read data off of your hard drive. Your Web browser may allow you to be notified when you are receiving a cookie, giving you the choice to accept it or not. If you prefer not to receive cookies while browsing our Web site, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser, but by not accepting cookies, some pages may not fully function and you may not be able to access certain information on our site.

### **Use of Information**

CAP Tulsa follows all federal and state laws applicable to the information you provide including the Family Educational Rights and Privacy Act (“FERPA”) which governs our treatment of student education records.

The information we request from you will be used and disclosed in association with the services provided to you, the payment for such services, and CAP Tulsa business operations including quality control efforts and customer analysis. We will not release your information to nonaffiliated parties except as necessary for us to provide the product or service you have requested of us.

With your prior consent and in an effort to provide more comprehensive services to you, we may also provide your personal information to companies under contract or otherwise affiliated with CAP Tulsa. Such affiliated companies have

agreed to protect your confidentiality and may include financial service providers, community-based non-profit organizations, education organizations, school officials, clinics, and state agencies such as the Oklahoma State Department of Education or the Oklahoma State Department of Health. Without your prior consent, the amount of personal information disclosed to affiliated companies will be limited to that necessary for purposes of providing services, payment activities and business operations. We may provide , de-identified data about you in combination with groups of data about our other customers who are also de-identified and because you cannot be identified, we will not seek your consent.

### **Confidentiality and Security**

We will use our best efforts to ensure that unauthorized parties do not have access to any of your information. We restrict access of your personal information to those individuals and companies described above. We will train and oversee our employees and agents to ensure that your information will be handled responsibly and in accordance with this Privacy Policy. We currently maintain physical, electronic, and procedural safeguards that comply with federal and state regulations to guard your personal information. We do not contact immigration authorities for any reason, even if you do not have documentation to be in this country.

### **Notification of Rights under FERPA**

FERPA affords parents and students over 18 years of age certain rights with respect to the student's educational records. These include:

1. The right to inspect and review the student's education records. Parents should submit to CAP Tulsa a written request that identifies the records they wish to inspect. CAP Tulsa will notify the parent of the time and place where the records may be inspected.
2. The right to request the amendment of the student's education records that the parent believes are inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA. CAP Tulsa retains the right not to amend the record as requested. If CAP Tulsa decides not to amend the record as requested, CAP Tulsa will notify the parent of the decision and advise them of their right to a hearing regarding their request for amendment.
3. The right to consent to disclosures of personal information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent. One exception that permits disclosure of personal information without consent is disclosure to school officials with legitimate educational interests. A school official is a person employed by CAP Tulsa as an administrator, supervisor, instructor, or support staff member including, health and medical staff; a person serving on the CAP Tulsa Board; a person or company with whom CAP Tulsa has contracted as its agent to provide a service instead of using its own employees or officials; or a parent or student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.

### **Former Customers**

Our Privacy Policy will continue to apply to you and your personal information, which we may maintain for an indefinite period after the customer relationship has ceased.

### **Amendments to Privacy Policy**

CAP Tulsa reserves the right to change the terms of this Privacy Policy and will provide a revised copy upon request either by hand delivery, U.S. Mail or by posting the revised Privacy Policy on the CAP Tulsa website at <http://www.captulsa.org>.

### **Right to Request Confidential Communication**

You may ask CAP Tulsa to talk with you about your educational records in a certain way. For example, you can ask CAP Tulsa to only call you at home. CAP Tulsa will try to meet all reasonable requests.

### **Right to Request a Paper Copy of this Notice:**

A paper copy of this notice may be requested by mail at or in person at CAP Tulsa, 4606 South Garnett Road, Tulsa, Oklahoma, 74146.

An electronic copy of this Privacy Policy may be found at [www.captulsa.org](http://www.captulsa.org).

To invoke any of these rights, send a written request to:

CAP Tulsa  
Legal Department  
4606 South Garnett Road  
Tulsa, OK 74146.

For more information, contact your family support specialist, school leader or site support assistant at CAP Tulsa's Early Childhood Education Program.