

Palmer Hamilton Privacy Policies

Effective Date:

Last Updated on: November 29, 2021

GENERAL PRIVACY POLICY

1. GENERAL

At Palmer Hamilton LLC (“us,” or “we,”), we take the security and privacy of user data seriously. We are committed to complying with the privacy laws that apply to our website (www.palmerhamilton.com and phab-lab.com), and your use of the products, and services offered through our website. This Privacy Policy can be found at www.palmerhamilton.com. If you are a resident of California, please read the Additional Information for California Residents at the end of this policy.

2. DATA WE COLLECT

When you access our websites we may collect Personal Data, Device Data and/or Usage Data (as defined below).

Personal Data

For the general purposes of authentication, and compliance with applicable laws, we collect information that is used to identify individual Users (the “Personal Data”). Personal Data does not include Data that has been aggregated or made anonymous such that it can no longer be reasonably associated with a specific person or device.

Device Data

Like most web-based services, we (or our Service Providers) may automatically receive and log information from your browser or your device when you use our Website (“Device Data”). Examples of Device Data we may automatically receive and log when you use the Platform include web browser type, your device’s operating system, and your device’s geolocation, among others.

We take measures to ensure that our Website and our Service Providers only collect the minimum amount of Device Data needed to deliver the Website in a seamless way, help us improve our products, and deliver high-quality customer support. The Device Data we collect is analyzed and may be aggregated and combined with similar aggregate Device Data of other users the Website, as well as associated with the Personal Data of individual Users. If you access any of our websites on different devices, we may link the information we collect from those different devices to help us provide a consistent Website experience across your different devices.

Usage Data

User interactions with our Websites generate data we refer to as “Usage Data”. We also may track mouse clicks and taps, mouse movement, webpages entered and exited, the number of pages visited by a User, and the duration and dates of visits.

Usage Data will be used for educational and product development purposes only.

3. HOW WE USE DATA

Personal Data

We and our third-party vendors ("Service Providers") use Personal Data to: (i) provide and maintain the Website, (ii) comply with applicable laws, and (iii) promote our products, systems, and tools. Examples of how we may use Personal Data include:

- To authenticate a user's identity;
- To customize the features that we make available to you;
- To respond to inquiries, send service notices and provide customer support;
- To communicate regarding a payment, and provide related customer service;
- For regulatory purposes and compliance with industry standards;
- To send communications about new features and products;
- To determine if a student is under 13 for the purposes of COPPA compliance;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Users is among the assets transferred.

Device Data

We use other Device Data to improve the product, deliver a consistent and enjoyable experience, debug, provide customer support, and for aggregate analysis.

Usage Data

We use Usage Data to test and improve our products and services as well as our Websites. We also use de-identified aggregate Usage Data to develop new products, improve or modify our Websites, conduct analysis and develop business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of, our business.

Cookies and similar technologies

We and our Service Providers use cookies and local storage to help provide you with a better, faster, and safer experience. Cookies are small files that websites place on your computer as you browse the web. Local storage is an industry-standard technology that allows a website or application to store information locally on your computer or mobile device.

Here are some of the ways that we and our Service Providers use these technologies: to log you into the Website, save your preferences, personalize your experience, and protect against abuse. You may set your browser to reject cookies; however, this may affect some functions of the Websites.

As a general matter, we consciously avoid Personal, Device and Usage Data in cookies and local storage. While we use these technologies to help identify user sessions, the information contained is only meaningful to the Platform itself.

4. HOW WE SHARE DATA

We do not disclose, share, rent, or sell any User Information to any third parties for commercial uses, such as targeted advertising. We only disclose or share User Information with bona fide Service Providers for purposes related to or arising out of the ordinary course of creation, development, operation, service, and maintenance of our Websites. Such bona fide Service Providers shall only use such User Information for such purposes and not to sell such User Information under any circumstances. Service Providers who do help us operate our Websites must adhere to privacy and security obligations in a manner consistent with the Company's policies and practices. Below is a list of our Service Providers with whom we may share User Information and the services they generally provide.

Service Provider	Purpose of data sharing
JetRails	Cloud hosting and data warehousing
Google Analytics	Tracking and reporting
Mailchimp	Marketing
Zendesk Chat	Chats
WPENGINE	Website host

6. SECURITY

Palmer Hamilton secures User Information both in transit and at rest via encryption. We use modern cryptographic algorithms like AES256 with strict user access control and multi-factor authentication.

7. DATA RETENTION

We retain User Information to provide the Website to you and our other Users and to provide a useful user experience. However, we do not retain User Information longer than is necessary to do so. There may be some instances where we retain non-personal data in a depersonalized or aggregated form.

Following the termination of an agreement we may have with a School, a School may request that we delete and/or de-identify certain Personal Data related to its Students and Educators, and we will do so, unless the School or applicable regulations require the retention of such data, in which case the records shall be de-identified upon the expiration of the retention period.

Please note that the requested deletion will be as comprehensive as possible but is always subject to issues outside of our control, including applicable regulations and laws, your actions and the actions of third parties. We may also need to retain a copy of certain information for legal compliance purposes, including, without limitation, to avoid identity theft or fraud.

8. NOTICE OF CHANGES

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make material changes to this Privacy Policy, we will provide notification via the emails associated with the profiles of our Users or, as applicable, users of our website who provided email addresses as part of their Personal Data. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

9. CONTACTING US

If you have any questions or comments about this notice, the ways in which Palmer Hamilton collects and uses your information, your choices and rights regarding such use, or wish to exercise your rights under law, please do not hesitate to contact us at:

Phone: 800-788-1028
 Website: <https://palmerhamilton.com/contact/>
 Email: info@palmerhamilton.com
 Postal Address: Palmer Hamilton, 143 S Jackson Street, Elkhorn, WI 53121

CALIFORNIA PRIVACY POLICY

This California Privacy Policy supplements the information contained in the General Privacy Policy and applies solely to all Users who reside in the State of California. The data concerning the information we gather and how we use it should be the same in both the General Privacy Policy and the California Privacy Policy; but to the extent that they are inconsistent, then Users who reside in the State of California should rely upon this California Privacy Policy.

Palmer Hamilton is adopting this California Privacy Policy to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Policy.

Where noted in this California Privacy Policy, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication (“B2B Personal Information”) from some its requirements.

C1. INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“Personal Information”).

In particular, we collected the following categories of Personal Information from consumers within the last twelve (12) months:

Category	Examples	Collected
Identifiers	Real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	Yes
Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, education, employment. Some Personal Information included in this category may overlap with other categories.	Yes
Commercial information	Records of projects purchased by each Independent Study User.	No
Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	Yes

Category	Examples	Collected
Professional or employment-related information.	Current or past job history or performance evaluations.	No
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No

We obtain the categories of Personal Information listed above from the categories of sources described in Section 2 of the General Privacy Policy (Data We Collect).

We may use or disclose the Personal Information we collect for one or more of the following purposes set forth in Paragraph 3 of the General Privacy Policy (How We Use Data).

C2. SHARING PERSONAL INFORMATION

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information business purposes:

We disclose your Personal Information for a business purpose to the service providers set forth in Section 4 of the General Privacy Policy (How We Share Data).

We do not sell Personal Information, and in the preceding twelve (12) months we have not sold any Personal Information.

C3. YOUR RIGHTS AND CHOICES

The CCPA provides consumers (California residents) with specific rights regarding their Personal Information. This section describes California residents' CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past twelve (12) months (the "right to know"). Once we receive your request and confirm your identity (see "Exercising Your Rights to Know or Delete"), we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that Personal Information.
- If we disclosed your Personal Information for a business purpose, a list of disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
- The specific pieces of Personal Information we collected about you.

We do not provide a right to know disclosure for B2B Personal Information.

Right to Delete

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 (the “right to delete”). See “Exercising Your Rights to Know or Delete” to submit a deletion request. Certain information may be exempt from such requests. For example, we may retain certain information for legal compliance and to secure our services. We may need certain information in order to provide the services to you; if you ask us to delete it, you may no longer be able to use the Platform.

We do not provide these deletion rights for B2B personal information.

Exercising Your Rights to Know or Delete

You can submit a right to know or right to delete request described above at <https://palmerhamilton.com/contact/> or by sending an e-mail to : info@palmerhamilton.com

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. To designate an authorized agent please send a written request to Palmer Hamilton at 143 S Jackson Street, Elkhorn, WI 53121.

You may only submit a request to know twice within a 12-month period. We will take reasonable steps to verify your identity before responding to a request.

Requests by a User to know or delete must be verified through your password protected account.

We will only use Personal Information provided in the request to verify the requestor’s identity or authority to make it.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact info@palmerhamilton.com

C4. Non-Discrimination

The CCPA further provides you with the right not to be discriminated against (as provided in applicable law) for exercising your rights.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information’s value and contain written terms that describe the program’s material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

California’s “Shine the Light” law gives residents of California the right under certain circumstances to request information from us regarding the manner in which we share certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.