

## OneGoal Solutions Privacy Policy

Updated and Effective: 12/04/2023

This Solutions Privacy Policy applies to data that OneGoal gathers and has gathered to date in connection with providing solutions and programs to schools, districts and students, including but not limited to the OneGoal Classroom Model, the OneGoal Leadership Network, and the OneGoal Diagnostic Partnership (collectively as “OneGoal Solutions.”) This policy refers to OneGoal using the pronouns “we”, “us” and “our”; it refers to education institutions such as schools and districts (“Partners”), their educators and their students (the “Fellows”) collectively as “you” and “your” and as “Users”.

This Solutions Privacy Policy is designed to inform recipients and Users of the OneGoal Solutions about how we may collect, use, and disclose Personal Information we obtain in connection with the OneGoal Solutions, as well your choices about how your Personal Information may be used, and your access and other rights to your Personal Information. When we refer to “Personal Information,” we mean information that identifies, describes, or relates to an identified or identifiable individual, or information that is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

We have a separate privacy policy applicable to data we obtain through the OneGoal website we make available at *OneGoalGraduation.org* and the related subdomains, sites, applications, widgets, and other online services offered by OneGoal (our “Website”). You can review that policy [here](#).

By accessing or using OneGoal Solutions, you acknowledge that you have read, understood, and accept this Privacy Policy.

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### 1. Personal Information We Collect:

In certain OneGoal Solutions, our staff and Partner-designated program directors may interact with Fellows and other school faculty directly or indirectly in a classroom, through an education system, or via other third-party platforms. Implementation of the OneGoal Solutions relies on the import of certain student and educator data into OneGoal systems, which we may receive directly from Partners and Fellows, as applicable.

OneGoal holds seriously our responsibility to safeguard student and teacher data and Personal Information and will use it only in furtherance of the shared educational goals of our Partners. OneGoal does not sell or rent data, nor do we use it for any commercial purposes. Our use of student and teacher data is always subject to our agreement with our Partners and is in compliance with all applicable laws.

### *OneGoal Classroom-Based Model*

<b>Personal Information We Collect: Minimally Required Information</b>
<p>For Educators:</p> <ul style="list-style-type: none"> <li>● First and last name</li> <li>● Email address</li> </ul> <p>For Fellows:</p> <ul style="list-style-type: none"> <li>● First and last name</li> <li>● Fellow ID</li> <li>● School name</li> <li>● Date of birth</li> <li>● Email address</li> <li>● GPA               <ul style="list-style-type: none"> <li>○ For Year 1 Fellows: 4th Semester (end of sophomore year) GPA</li> <li>○ For Year 2 Fellows: 6th Semester (end of junior year) GPA</li> </ul> </li> <li>● Standardized test scores               <ul style="list-style-type: none"> <li>○ For Year 1 Fellows: 10th grade PLAN or PSAT scores (if available)</li> <li>○ For Year 2 Fellows: Official ACT or SAT scores (if available)</li> </ul> </li> </ul>
<b>Personal Information We May Collect: Optional Information</b>
<p>For Fellows:</p> <ul style="list-style-type: none"> <li>● Demographic Information:               <ul style="list-style-type: none"> <li>○ Race, gender, socioeconomic status, first-generation post-secondary-going status, Fellow’s preferred language, English as a Second Language status, high school graduation year</li> </ul> </li> <li>● Contact Information:</li> </ul>

- Cell phone number; parent/guardian name, email address, and phone number
- Participation + Usage:
  - Frequency of student logins, frequency of student connections with teachers, attendance records, course activity and progress, barriers to enrollment, Information about interests and challenges that could affect post-secondary institution attendance, post-program personal e-mail address (if opting in for additional support in Y3 via consent)
- Outcomes:
  - semester-by-semester GPA, standardized test scores, formative quiz and assignment results, summative assessments, FAFSA completion status, post-secondary lists, post-secondary application status, personal statements, financial aid award letters, high school graduation status, post-secondary enrollment status, fellow retention, and persistence progress
- Feedback:
  - Anonymous opt-in surveys on program experience

**In accordance with our agreement with our Partners, parents of Fellows or Fellows age 18+ or who have enrolled in a higher education institution have the option to agree via a signed FERPA consent to our ongoing use and further collection of Personal Information from the Fellow to provide additional supports directly to the Fellow and related to the Fellows' post-secondary school experience. In these cases, the Personal Information collected may include some or all of the above as well as additional information provided by the Fellows in connection with our post-secondary support services, such as our mentoring sessions. We refer to Personal Information collected, maintained, and used for these direct-to-Fellow services, provided with the direct consent of the Fellow or their parent or legal guardian as "Fellow Directed Data." If you are an education institution, you acknowledge that data we receive from Fellows after graduation from secondary school and who have provided a FERPA consent constitutes Fellow Directed Data.**

### *OneGoal Leadership Network*

#### **Personal Information We Collect: Minimally Required Information**

For Educators:

- First and last name
- Email address
- Role/Title
- Phone Numbers

For Partners, aggregate level data on student progress indicators:

- Completion of FAFSA
- Enrollment in dual credit class + college credits earned
- Advanced coursework exam pass rates
- High school graduation rates/9th Grade On-Track
- Composite CCRI state metric
- Completion of career interest designations
- CTE pathway participation and completion
- Participation in career exploration or career development experience
- Industry credentials completed
- Number of post-secondary applications submitted
- Quality enrollment
- post-secondary plan completion

**Personal Information We May Collect: Optional Information**

For Partners:

Via National Student Clearinghouse (“NSC”), aggregated school-level data only on a district level and only from districts who already have a partnership with NSC:

- Demographic Information:
  - Gender identity, race/ethnicity, socioeconomic status, ELL status
- Outcomes:
  - Total number of graduated students
  - Total number of students enrolled in 2 or 4-year institution
  - Total number of students persisting for one year in post-secondary pathway
  - Total number of students who completed their 2 or 4-year credentialing program
  - Total number of students who enrolled in an out-of-state institution in the semester immediately following high school
  - Total number of students who enrolled in an in-state institution in the semester immediately following high school
  - Total number of students who enrolled in a public institution in the semester immediately following high school
  - Total number of students who enrolled in a private institution in the semester immediately following high school
  - Total number of students who enrolled full-time immediately following high school
  - Total number of students enrolled part-time immediately following high school
  - Total number of students enrolled in a bachelors program immediately following high school

For Fellows (via an anonymous, opt-in survey), self-report data on:

- Student Gender identity, race/ethnicity, grade level
- Student Perceptions of post-secondary culture

### *OneGoal Diagnostic Partnership*

#### **Personal Information We Collect: Minimally Required Information**

For Educators:

- First and last name
- Email address
- Role/Title
- Phone Numbers

For Partners, aggregate student-level data on:

- Grade levels
- Gender
- Race/ethnicity

#### **Personal Information We May Collect: Optional Information**

From Educators:

- Role information
- Self-report information on knowledge of post-secondary systems
- Self-report information on perceptions of the partnership

For Fellows (via an anonymous, opt-in survey), self-report data on:

- Student gender identity, race/ethnicity, grade level
- Student perceptions of post-secondary culture, including Partner's preparation for students' post-secondary education goals

### *Children's Data Privacy*

OneGoal Solutions are not intended for use with Fellows under age 13. We do not knowingly collect Personal Information from or about individuals under age 13. Should we learn that we have inadvertently collected Personal Information of a child, we will take steps to delete it promptly.

### *Student Data Privacy*

In accordance with our agreements with our Partners, we design our privacy program to align with the applicable requirements of the Family Educational Rights and Privacy Act ("FERPA") and state law. Where required by law or contract we retain Personal Information other than Fellow Directed Data under the direct control of our Partners; we retain Fellow Directed Data in accordance with the instructions of the parents of Fellows or Fellows age



18+ or who have enrolled in a higher education institution, as provided in the applicable FERPA waiver and applicable law.

## **2. How We Use and Disclose Your Personal Information:**

We may use and disclose Personal Information to provide the applicable OneGoal Solution we have agreed to provide in an agreement with a particular Partner. In general, these purposes include:

- Providing Users with access to the OneGoal Solutions, including creating, maintaining, and administering User accounts and authenticating Users;
- Maintaining and administering the OneGoal Solutions to diagnose issues and to protect the security of the OneGoal Solutions;
- Communicating with Educators (and in the case of certain OneGoal Solutions, Fellows), including via email, text messages, or phone, as part of providing the OneGoal Solutions, to respond to requests, notify you about opportunities from us and from third-party providers, obtain your consent where consent is required, and to solicit feedback from you;
- Analyzing and reporting to our Partners about their Fellows' performance in connection with the applicable OneGoal Solutions that the Fellows participated in, including post-secondary educational outcomes;
- Provide direct-to-Fellow post-secondary support services in connection with a OneGoal Classroom-Based Model Solution that our agreement with a Partner states will continue after the Fellows' graduation from secondary school, provided the Fellow or the Fellow's parent or legal guardian has provided a FERPA waiver designed to comply with applicable law;

With respect to other legal and business requirements and triggers, we may use and disclose Personal Information, as applicable:

- In relation to a known or suspected violation of our terms of use, fraud prevention or other unlawful use, including to share Personal Information with entities assisting us in investigation and as may be required by applicable law;
- In connection with legal or regulatory obligations, including as may be necessary to protect our rights or the rights and safety of others, or as necessary in the event of a court order, regulatory inquiry or other lawful request. Unless legally prohibited or we believe that to do so would prejudice the prevention or detection of a crime, (a) if such a disclosure involves Personal Information that is not Fellow Directed Data, we will direct any such request to the Partner or notify the Partner before responding unless to



do so would prejudice the prevention or detection of a crime; or (b) if such a disclosure involves Personal Information that is Fellow Directed Data, we will direct any such request to the Fellow or the Fellow's legal representative before responding;

- In the event of a reorganization, merger, sale, assignment, bankruptcy, or similar business change we may transfer Personal Information to that re-organized entity or new owner or bankruptcy trustee after the sale or reorganization for them to use in accordance with this Privacy Policy, as updated from time to time.

OneGoal agrees that it will not:

- Share Personal Information for marketing purposes.
- Share Personal Information for purposes of lead generation.
- Share Personal Information for purposes of purposes of third party analytics.

### **3. Your Rights Regarding Your Personal Information**

Educators or Fellows who wish to review, correct, update, or request deletion of the Personal Information you or respective Partners have provided to us should contact the Partner, and we will work with the Partner as needed to address your request.

Fellows who wish to review, correct, update, or request deletion of Fellow Directed Data may do so by contacting us at [legal@onegoalgraduation.org](mailto:legal@onegoalgraduation.org) with your request. In your e-mail to OneGoal, please use the subject "Revoke Consent" and/or "Request Deletion" as applicable. Include the following information: "Permission is hereby revoked as of [Date] by [full legal name and birthdate] for OneGoal to share information of [full legal name and birthdate], a former student of [insert high school and Program Director Name]." Clearly identify the data you wish us to delete, if applicable. The message must also include the signature of the person with authority to revoke the consent under which we received the Fellow Directed Data.

### **4. Required Third-Party Service Providers:**

We partner with a variety of third parties to facilitate our delivery of OneGoal Solutions. Particularly with the OneGoal Classroom Model, OneGoal utilizes the Canvas Learning Management System, which gathers data about student usage and interactions in the online platform. The full listing of data gathered by the system is outlined in the [Canvas Data Portal](#), authored by Instructure, the software company that makes Canvas. [Instructure's documentation](#) states that these data are not accurate enough to be used for "high-stakes analysis involving examining single users," such as to detect academic dishonesty. Data in Instructure's system are managed in accordance with Instructure's [Product Privacy Notice](#).



OneGoal also uses other third-parties that provide certain features on our behalf, including but not limited to the Google Workplace for Education Fundamentals, the Mainstay engagement platform, and the Salesforce database and information system. These providers, along with other required third-parties, provide programmatic and operational services related to curriculum development, mentorship and support services, data hosting and analytics, content delivery, maintenance, email and text messaging management, security, and similar functions. These third-parties may require that we share Personal Information with them in order to deliver their services. Our contracts with these third-party contractors obligate them to use the Personal Information they receive only to provide the services we and they agreed upon and for no other purpose.

OneGoal conducts extensive security and privacy diligence reviews of all partners sending, receiving, and/or working with Personal Information.

OneGoal agrees that it will not and will contractually require its third parties and subcontractors not to use or re-disclose Personal Information provided by Partners except in compliance with laws applicable to the Partners, including state law and FERPA. Our third parties and subcontractors are also obligated to conform to standards on data retention and deletion of Personal Information as governed by our MOUs with Partners, data sharing agreements, and applicable laws. OneGoal agrees that it will not and will contractually require its third-party service providers and their subcontractors not to use or re-disclose Fellow Directed Data except in compliance with laws applicable to such data, including state law and FERPA.

OneGoal assumes responsibility and liability to you for (a) the compliance with applicable law and (b) the compliance with our contracts with Partners of third-party service providers, and such service providers' subcontractors, with which we share or authorize the sharing of Personal Information.

## **5. Optional Third-Party Services**

During the course of a OneGoal Classroom Model program, Fellows who have opted in to share Fellow Directed Data via completing the applicable FERPA consent will be provided a knowledge base of optional resources and third-party services for various post-secondary support services including mentorship, financial literacy training, etc. OneGoal makes these third-party services available to Fellows to engage with at their option in furtherance of their post-secondary pathways.

OneGoal does not own or control these third parties. The fact that we make a third-party service available to Fellows is not an endorsement of that service, nor does it suggest an



affiliation with that service. These third-party service providers that provide these optional services may collect Personal Information from you and may use it in accordance with their own privacy policies and practices. You are responsible for reading and understanding the privacy policies of providers of optional third-party services and their subcontractors.

## **6. Security**

We use physical, administrative, and technical safeguards to help protect the confidentiality, integrity, and availability of the Personal Information in our care. We host Personal Information in cloud-based environments that use firewalls, encryption, and other industry-standard technologies in an effort to prevent interference or access from outside intruders. The Internet, however, is not perfectly secure, and we disclaim responsibility for security breaches not reasonably within our control.

## **7. Data Retention**

OneGoal fulfills our contractual obligations for deletion based on our individual partnerships, following standard guidelines and best practices. We retain Personal Information for the duration of the term of our agreement with each Partner. After expiration or termination of each such agreement, we securely destroy the related personal data in our care within 60 days. In addition, at any time, Partners may request deletion of their Fellows' or educators' Personal Information. We will address such requests within 60 days.

We may retain certain Personal Information from Partners as necessary and as permitted under applicable law as necessary for our lawful business records to comply with our legal obligations, resolve disputes, and enforce our agreements. However, any such ongoing retention is typically limited to business contact information and shall not include Fellow Personal Information.

At the completion of the deletion process, OneGoal cannot and will no longer be able to support the partner or their students nor provide any OneGoal services.

Subject to our agreements with the Partners from which particular data was received, we retain and use de-identified, aggregated data for legally permissible purposes. For example, we aggregate and de-identify data to measure the success of the OneGoal Programs and to compare the data of students who did not go through the OneGoal Programs. This de-identified, aggregated data is solely used for internal efficacy analysis and programmatic improvement. OneGoal will not make any external publications or reports without first contacting and receiving prior written consent from related Partners, as applicable.



## **8. Updates to this Privacy Policy**

As the OneGoal Solutions, privacy law, and our system safeguards evolve, we may make changes to this Privacy Policy. You are responsible for checking our Website for the most recent version of this policy. The “last updated” note at the top of this policy indicates when it was last revised. Unless applicable law or an agreement between us and a Partner requires more stringent terms, in which case the most stringent requirement applies, all updates to this policy become effective when they are posted on our Website.

## **9. Contact Us**

If you have questions regarding this Privacy Policy or are requesting deletion of data in accordance with it, please contact us at:

Attn: Legal Department  
OneGoal  
180 N Wabash Ave #800,  
Chicago, IL 60601  
[legal@onegoalgraduation.org](mailto:legal@onegoalgraduation.org)

If you are a Fellow or educator and are asking about data we received from or in connection with services provided to a particular school, district or other Partner, please direct your request to that school, district or Partner.