

# **BIELMAR INC.**

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## **ADIRONDACK SCHOOL PORTRAITS**

18 Warren Street, Glens Falls, NY 12801 Telephone 518-792-7919

[www.adirondackschoolportraits.com](http://www.adirondackschoolportraits.com)

### **STUDENT/STAFF DATA PRIVACY POLICY**

- Bielmar Inc./Adirondack School Portraits does not use student or children’s personal information for advertising purposes, including targeted advertising.
- Bielmar Inc./Adirondack School Portraits does not use rent or sell student data.
- Bielmar Inc./Adirondack School Portraits operates our technology and services with our users’ protection and privacy in mind, and we make every effort to be transparent in our data collection and use practices.
- Bielmar Inc./Adirondack School Portraits uses industry standard protocol to ensure that student data is encrypted and transmitted securely from end to end and at rest.
- Bielmar Inc./Adirondack School Portraits limits the data collected from students or children to only that which is necessary to meet the educational purposes of the school districts we serve.
- Districts and schools are able to request deletion of student personally identifiable information at any time.
- Bielmar Inc./Adirondack School Portraits operates at the direct control of our school and district customers with respect to our use and handling of their student records.

Privacy Questions? If you have questions or complaints regarding our privacy policy or practices, please contact us at [CUSTOMERSERVICE@BIELMAR.COM](mailto:CUSTOMERSERVICE@BIELMAR.COM)

## **Privacy Policy**

Last updated September 1st, 2020.

This privacy policy applies to BIELMAR INC. and its affiliates (“ADIRONDACK SCHOOL PORTRAITS”) owned and operated websites and mobile applications (which we collectively refer to as “Services”). By accessing or using our Services, you agree to the terms of this Privacy Policy.

### **Definitions**

For purposes of this policy, we will use the following definitions:

Personally identifiable information (PII) is information that can identify a user of the Services, including his or her e-mail, name, and address.

De-identified information is information from which personally identifiable components have been removed and a reasonable determination made that an individual is not identifiable.

Student Records are records that are directly related to a student and maintained by BIELMAR INC. dba ADIRONDACK SCHOOL PORTRAITS on behalf of a school or district client.

## **What Type Of Information Do We Collect And Why?**

### **From Schools and School Districts:**

Whether engaging with BIELMAR INC. dba ADIRONDACK SCHOOL PORTRAITS through an "Order for Services Contract" or an ongoing oral agreement, schools or districts are required to appoint an administrator ("Administrator"), who is authorized by the school or the district to be responsible for submission and receipt of the Students Records.

### **Information Collected Automatically**

We do not track users across unaffiliated sites and services, however, when you use the Internet, unaffiliated parties such as ad networks, web analytics companies and social networking platforms may collect information about your online activities over time and across our and other websites. This information may be used to provide advertisements for products and services that may interest you, and those companies may use cookies, clear GIFs and other tracking technologies.

### **How Long We Retain Personal Information:**

Districts, schools and home schools may request deletion of student personally identifiable information by us at any time. Once that information is deleted, it is deleted from our servers. If information is not requested to be deleted by Districts, schools and homeschools we retain such information for a limited period of two years after expiration.

If your jurisdiction requires the deletion of student data within a shorter time period, Districts, schools and home schools are required to contact us for assistance at [CUSTOMERSERVICE@BIELMAR.COM](mailto:CUSTOMERSERVICE@BIELMAR.COM)

### **How We Share Your Information**

We may provide Student Data Information as provided by Districts, schools and home schools to our partners, business affiliates, and third party service providers who work for BIELMAR INC. dba ADIRONDACK SCHOOL PORTRAITS and operate some of its functionalities. These may include yearbook publishers, hosting, streaming, credit card processing services and companies that provide marketing emails on our behalf.

These third parties service providers are bound to practice commercially reasonable security measures and to use your Personally Identifiable Information solely as it pertains to the provision of their services. They do not have the independent right to share your Personally Identifiable Information or use it for any unrelated purposes.

We reserve the right to disclose personally identifiable information if we are required to do so by law, or if we believe that disclosure is necessary to protect our rights, protect your safety or others' safety, investigate fraud, and/or comply with a judicial proceeding, court order, subpoena, or legal process.

We also reserve the right to transfer your Personally Identifiable Information in case of a corporate restructuring (such as a merger, acquisition or other disposition of our business), as long as the receiving entity adopts this Privacy Policy regarding your information.

### **Security**

BIELMAR INC. dba ADIRONDACK SCHOOL PORTRAITS strives to maintain security policies and procedures that are designed to protect your information.

Our servers are located in a secured, locked, and monitored environment to prevent unauthorized entry or theft, and are protected by a firewall. The servers are located in a data center in the United States and backed up daily

We apply a Secure Sockets Layer (SSL or HTTPS) encrypting technology to encrypt data in transit between the server and the browser remains encrypted.

Governance policies and access controls are in place to ensure that the information of each district, school, or other subscriber is separated.

Only limited BIELMAR INC. dba ADIRONDACK SCHOOL PORTRAITS personnel have access to the database, and personnel only access it when necessary to provide services. Personnel with access to Student Records undergo periodic privacy training.

While we strive to maintain industry-standard privacy and security practices, it should be noted that no industry system is fail proof, and we are not responsible for security incidents not reasonably foreseeable or reasonably within our control. In the event of unauthorized access to Personally Identifiable Information, we will notify the affected subscriber(s) in accordance with applicable law, and as appropriate, coordinate with the subscriber to support notification of affected individuals, students, and families.

<p><b>Categories of Personal information we may collect.</b></p>	<ul style="list-style-type: none"> <li>• Identifiers such as a real name, unique personal identifier, online identifier, Internet Protocol address, email address, billing address, and phone number. Your name, address, phone number and billing information may also considered personal information under subdivision (e) of California Business and Professions Code Section 1798.80</li> <li>• Internet or other electronic network activity information regarding your interaction with BIELMAR INC. dba ADIRONDACK SCHOOL PORTRAITS.</li> <li>• Geolocation information in the form of your country</li> <li>• Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).</li> </ul>
<p><b>Categories of sources from which the Personal Information is collected</b></p>	<ul style="list-style-type: none"> <li>• We collect Student Data Information directly from the School District, School, or Home school customer.</li> </ul>
<p><b>Business or commercial purpose for collecting Personal Information</b></p>	<p>We collect your Student Data Information to provide the services and for the following business purposes:</p> <ul style="list-style-type: none"> <li>• Performing services in accordance with our contract with the School District, School, Home school and the terms of use including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, and processing payments.</li> <li>• Sending you product communications.</li> </ul>
<p><b>Categories of third parties with whom we share Personal Information</b></p>	<p>We share personal information with service providers who support us in delivering the Services as described above.</p>
<p><b>Specific pieces of Personal Information we may have collected</b></p>	<p>Administrators, educators and parents: full name, email address, phone number, school, school address (or home if parents), classes associated with the account, IP address</p> <p>Students: full name, school and classes associated with the account, graduation year/grade, IP address</p> <p>Connecting with BIELMAR INC. dba ADIRONDACK SCHOOL PORTRAITS: name, email address, other contact information, IP address</p> <p>Website visitors: IP address, pseudonymous end user identifiers</p>

## Changes To Our Privacy Policy

Changes to this policy or any of the pages linked in this policy may be required in order to address changing technology and threats, changing laws, or as we release new or amended services. Should we make material changes to this Privacy Policy, we will provide notice and request your consent. In the event of any non-material changes, we will provide prominent notice as required by law. Posting the modified privacy policy on our Services and providing notice as stated above will give effect to the revised Privacy Policy Your continued use of the Services constitutes your acceptance of any revised Privacy Policy. If you do not agree to the revised Privacy Policy, please refrain from using the Services and/or leave this website(s) or app(s).

## Contact Information

If you have any questions or concerns about this Privacy Policy, please contact us by either:

- Email at [customerservice@bielmar.com](mailto:customerservice@bielmar.com)
- Mail at: Bielmar Inc. DBA Adirondack School Portraits  
Attn: Joseph Marcelletti Sr., President  
18 Warren Street  
Glens Falls, NY 12801
- Phone number: 518-792-7919