



## SparkED.net, LLC Privacy Policy

Last Updated: March 3, 2025

This Privacy Policy for SparkED.net, LLC (“we”, “us”, or “our”), describes how and why we might access, collect, store, use, and/or share (“process”) your personal information when you use our services (“Services”), including when you:

- Visit our Learning Management System, [www.sparked.gogetempowered.com](http://www.sparked.gogetempowered.com)
- Use SparkED.net online & virtual instructor-led training and professional development services for sex educators, including training courses, resources, assessments and other tools.
- Engage with us in other related ways, including any sales, marketing or training events.

Questions or concerns? Reading this Privacy Policy will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our services. If you still have questions or concerns, please contact us at [Info@SparkED.net](mailto:Info@SparkED.net).

**1. What personal information do we process?** Personal information you disclose to us. When you visit, use or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. We collect personal information that you voluntarily provide to us when you register for Services.

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

**Sensitive information:** We do not process sensitive information.

**Payment Data.** We may collect data necessary to process your payment if you choose to make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is handled and stored by Stripe. You may find their privacy notice links here: <https://stripe.com/legal/privacy-center>

**2. How do we process your information?** We process your information, 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 purposes with your consent. We process your information only when we have a valid legal reason to do so.

**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 manager user accounts.** We may process your information so you can 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 services.
- **To fulfill and manage your orders.** We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.

**3. When and with Whom do we share your Personal Information?** We may share information in specific situations and with specific third parties.

We may 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.

**4. How long do we keep your information?** 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 is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us to keep your personal information for longer than eighty four (84) months past the start of the idle period of the user's account.

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.

**5. How do we keep your information safe?** We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable organizational and technical measures to protect the security of any personal information we process. However, despite our safeguards

and efforts to secure your information, no electronic transmission over the internet or information storage technology can be guaranteed 100% secure, so we cannot promise our 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.

- 6. Do we collect information from minors?** We do not knowingly collect data or market to children under 18 years of age.

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. 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 [Info@SparkED.net](mailto:Info@SparkED.net).

- 7. What are your privacy rights?** You may review, change, or terminate your account at any time, depending on your state of residence. Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us at [Info@SparkED.net](mailto:Info@SparkED.net).

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable laws allow, will it affect the processing of your personal information conducted in reliance on the 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

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

If you have any questions or comments about your privacy rights, you may email us at [Info@SparkED.net](mailto:Info@SparkED.net).

- 8. Controls for Do-Not-Track features.** Most 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.

California law requires us to let you know how we respond to web browser DNT signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time.

**9. Do United States Residents have specific privacy rights?**

If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we may maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law.

**Categories of Personal Information We Collect**

We have collected the following categories of personal information with the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name.	YES
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information.	YES
C. Protected classification	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data.	NO

characteristics under state or federal law		
D. Commercial information	Transaction information, purchase history, financial details, and payment information.	YES
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements.	NO
G. Geolocation data	Device location	NO
H. Audio, electronic, sensor, or similar information	Images and audio, video or call recordings created in connection with our business activities.	YES
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us.	NO
J. Education information	Student records and directory information	NO
K. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.	NO
L. Sensitive personal information		NO

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.

We will use and retain the collected personal information as needed to provide the Services or for:

- Category A – As long as the user has an account with us
- Category B – As long as the user has an account with us
- Category D - As long as the user has an account with us
- Category H – 6 months

**Your Rights.** You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- **Right to know** whether or not we are processing your personal data
- **Right to access** your personal data
- **Right to correct** inaccuracies in your personal data

- **Right to obtain a copy** of your personal data you previously shared with us
- **Rights to non-discrimination** for exercising your rights
- **Right to opt out** of the processing of your personal data if it is used for targeted advertising (or sharing as defined under California’s privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects (“profiling”)

Depending upon the state where you live, you may also have the following rights:

- Right to access the categories of personal data being processed (as permitted by applicable law, including Minnesota’s privacy law)
- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including California’s and Delaware’s privacy law)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including Minnesota’s and Oregon’s privacy law)
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including California’s privacy law)
- Right to opt out of collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including Florida’s privacy law)

**How do you exercise your rights?** The easiest way to exercise your rights is by contacting us requesting a data subject access request at [Info@SparkED.net](mailto:Info@SparkED.net). We will consider and act upon any request in accordance with applicable data protection laws.

Under certain US state data protection laws, 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 in accordance with applicable laws.

**Request Verification.** 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. We will only use personal information provided in your request to verify your identity or authority to make the request. 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.

If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

**Appeals.** Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at [Info@SparkED.net](mailto:Info@SparkED.net). We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.

**California “Shine The Light” Law.** California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us at [Info@SparkED.net](mailto:Info@SparkED.net).

- 10. Do we make updates to this notice?** Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated “Revised” date at the top of this Privacy Notice. 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 protecting your information.

- 11. How can you contact us about this notice?** If you have any questions or comments about this notice, you may email us at [Info@SparkED.net](mailto:Info@SparkED.net) or contact us by post at:

SparkED.net, LLC  
3029 26<sup>th</sup> Ave. West  
Seattle, WA 98199

- 12. How can you review, update, or delete the data we collect from you?**

You have the right to request access to the personal information we collect from you, details about how we processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please submit a request to [Info@SparkED.net](mailto:Info@SparkED.net)