



Privacy Policy

I. Introduction

SURGE Christian Academy ("Company" or "We") respects your privacy and we are committed to protecting it through our compliance with this policy.

This policy has been updated in accordance with the General Data Protection Directive ("GDPR"), which takes effect January 1st, 2019.

This policy describes the types of information we may collect from you or that you may provide when you visit the website: www.surgechristianacademy.org, as well as our practices for collecting, using, maintaining, protecting and disclosing that information. SURGE Christian Academy is based in the United States, and as such all of the information collected from our Website is collected, used, processed, and maintained within the United States.

This policy is intended for our website information usage only. SURGE Christian Academy assessment data and student records are collected, used, processed, and stored under separate agreements with:

- 1) SURGE Christian Academy Member Affiliates, or
- 2) U.S. based third-party processors with whom we contract.

For more information on how student assessment records are collected, stored, and used, please contact: surgechristianacademy@gmail.com

This website privacy policy applies to information we collect:

- On this website.
- In e-mail, text and other electronic messages between you and these Website.
- When you interact with our affiliated companies, registration sites, or Website, if those applications or advertising include links to this policy (as they may be governed by their own privacy policies)
- When you interact with our advertising and applications on third-party Website and services, if those applications or advertising include links to this policy (as they may be governed by their own privacy policies).
- Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. By accessing or using these Website, you agree to this privacy policy. Your continued use of these Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

II. Important Note Regarding Children under the Age of 13 (COPPA Notice)

Our website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our Website or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13 that was not provided by a parent or legal guardian, please contact us at: surgechristianacademy@gmail.com

III. Information We Collect About You

We collect several types of information from and about users of our Website. This includes information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, social media profile or any other identifier by which you may be contacted online or offline ("personal information");
- That is about you but individually does not identify you, such as IP address; and/or
- About your internet connection, the equipment you use to access our Website and usage details.

IV. How We Collect Your Information

- Information You Provide to Us.

The information we collect on or through our website may include:

- Information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, registering for an assessment, posting material or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- Records and copies of your correspondence (including e-mail addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.

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You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the website, or transmitted to other users of the Website or third parties (collectively, "User Contributions"). Your User Contributions could be collected by other, un-affiliated third parties, and you understand that such User Contributions are posted at your own risk.

- Information We Collect Through Automatic Data Collection Technologies. As you navigate through and interact with our Website, we may use automatic data collection technologies such as cookies and web beacons to collect certain information about your equipment, browsing actions and patterns, including:
 - Details of your visits to our Website, including traffic data, location data, logs and other communication data and the resources that you access and use on the Website.
 - Information about your computer and internet connection, including your IP address, operating system and browser type.

We may use these technologies to collect information about your online activities over time and across third-party Website or other online services (behavioral tracking).

Email surgechristianacademy@gmail.com for information on how you can opt out of behavioral tracking on our Website.

The information we collect in this manner does not include personal information, and is used to help us improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.
- Third-party Use of Cookies [and Other Tracking Technologies. Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies and other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different Website and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

V. How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

1) With your consent, 2) In order to effect the proper administration of our Website, or 3) For the fulfillment of a service that you have requested:

- To present our Website and their contents to you.
- To provide you with information, products or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We do not sell your information to any direct marketing associations, third-party affiliates, or any other party.

We may use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please email surgechristianacademy@gmail.com to unsubscribe from our emails.

VI. Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction, to contracted third-parties in order to improve our services and Website.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To contractors and service providers that we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To affiliated third parties to provide their products or services to you if you have requested their services through us. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information with your consent.
- Financial information is processed and handled by third-party payment service providers. We do not collect, use, retain, or store, your financial information except insofar as to provide paid services to you that you request.

We may also disclose your personal information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Membership Terms and Conditions, and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of SURGE Christian Academy, our customers or others.

VII. Choices about How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent.
- Promotional Offers from the Company. If you do not wish to have your e-mail address/contact information used by the Company to promote our own or third parties' products or services, you can opt-out by sending us an e-mail stating your request to surgechristianacademy@gmail.com . If we have sent you a promotional e-mail, you may send us a return e-mail asking to be omitted from future e-mail distributions. This opt-out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.

VIII. Accessing and Correcting Your Information

You can review your personal information by logging into the Website and visiting your account profile page.

You may also send us an e-mail at surgechristianacademy@gmail.com to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Website users.

California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to surgechristianacademy@gmail.com or write us at: SURGE Christian Academy, 21810 US Highway 19 North Clearwater, FL. 33765.

IX. Rights of Residents of the European Union

Under the terms of the GDPR, EU Residents have enhanced rights to protect their personal information. While we strive to afford the same level of protections to all users, EU residents should be specifically advised of the following rights:

- the right to access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to object to processing;
- the right to data portability;
- the right to complain to a supervisory authority; and
- the right to withdraw consent.

For more information, either about these rights or about how to assert your rights under this policy, please click here or send an email to surgechristianacademy@gmail.com and we will attend to your concern promptly.

X. Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

XI. Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by e-mail to the e-mail address specified in your account and/or through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the policy. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

XII. Rights of Residents of the European Union

As a Data Subject as defined by the GDPR, you have the right to obtain confirmation as to whether or not your personal data is being processed, and, if it is, to access that personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

You also have:

- the right to request rectification of personal data
- the right to request erasure of personal data when:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - you withdraw consent and where there is no other legal ground for the processing;
 - you object to the processing for direct marketing purposes;
 - the personal data have been unlawfully processed;
 - the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- the right to restriction of processing of personal data, or to object to such processing, when;
 - you contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data;
 - the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
 - we no longer need the personal data for the purposes of the processing, but you require us to retain it for the establishment, exercise or defense of legal claims;

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- you have objected to processing, pending the verification whether the our legitimate grounds override your data concerns.
- the right to lodge a complaint with a supervisory authority;
- the right to request information as to the source of your data, where you did not provide the personal data;
- the right to inquire into the existence of automated decision-making, including profiling, and meaningful information about the logic involved.

You shall have the right to receive your personal data in a structured, commonly used and machine-readable format and have you the right to transmit those data to another controller without hindrance from us (or have us transmit that data with your permission).

XIII. Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

SURGE Christian Academy
21810 US Highway 19 North
Clearwater, Florida 33765
Tel: (727) 223-4524
Email: surgechristianacademy@gmail.com

PRIVACY POLICY ADDENDUM

USE OF INFORMATION

SURGE Christian Academy uses personal contact information supplied to us by users to communicate more effectively with those users. We will never sell or share your personal information to any persons or organizations except when required by law for the investigation of illegal or criminal activities, the exercise of legal rights or in defense against any legal claims, or otherwise.

Personally identifiable information that you provide by email or web forms will be used only for such purposes as are described at the point of collection. Information submitted by users to SURGE Christian Academy may be used in the following ways:

- To improve the content of our website
- To gather application and enrollment information for Admission purposes
- To contact users via e-mail to promote School activities and events

E-mail and postal mail addresses may be used to notify current enrolled or prospective parents of activities or events sponsored by SURGE Christian Academy, or for surveys concerning the school.

PAYMENTS

All online payments are submitted through our secure payment gateway. We never store your payment information and we do not share your payment information for any reason.

DATA TRACKING

This website uses the Google AdWords remarketing service to advertise on third party websites (including Google) to visitors to our site. This process places cookies on visitors' web browsers in order to serve ads and provide visitors with information based on past visits to our website.

PLEASE NOTE: the use of cookies does not give us any access to your computer or personal information. You can opt out of receiving ads based on your interests through Google and other websites at:

<https://www.google.com/settings/ads>