

ONLINE PRIVACY POLICY AGREEMENT

Riley School of Irish Music

Effective: **June 15, 2024**

The Riley School Of Irish Music ("Riley School") values its users' privacy. This Privacy Policy ("Policy") will help you understand how we collect and use personal information from those who visit our website or make use of our online facilities and services, and what we will and will not do with the information we collect. Our Policy has been designed and created to assure those affiliated with Riley School of our commitment and realization of our obligation not only to meet, but to exceed, most existing privacy standards.

We reserve the right to make changes to this Policy at any time. If you want to make sure that you are up to date with the latest changes, we advise you to frequently view this document. If at any point in time Riley School decides to make use of any personally identifiable information on file, in a manner significantly different from that which was stated when this information was initially collected, the user or users will be promptly notified by email. Users at that time will have the option as to whether to permit the use of their information in this separate manner.

This Policy applies to The Riley School Of Irish Music, and it governs any and all data collection and usage by us. Through the use of **rileyirishmusic.com**, you are therefore consenting to the data collection procedures expressed in this Policy.

Please note that this Policy does not govern the collection and use of information by companies that Riley School does not control, nor by individuals not employed or managed by us. If you visit a website that we mention or link to, be sure to review its privacy policy before providing the site with information. It is highly recommended and suggested that you review the privacy policies and statements of any website you choose to use or frequent to better understand the way in which websites gather, make use of and share the information collected.

Specifically, this Policy will inform you of the following:

- What personally identifiable information is collected from you through our website;
- Why we collect personally identifiable information and the legal basis for such collection;
- How we use the collected information and with whom it may be shared;
- What choices are available to you regarding the use of your data;
- The security procedures in place to protect against the misuse of your information.

Information We Collect

As a visitor to our website, unless you use our payment gateway, or become an administrative user of our site, we never collect any personal information.

It is always up to you whether to disclose personally identifiable information to us, although if you elect not to do so, you will need to print our registration form and register for classes with a check by regular mail. If you do elect to use our payment gateway, this website collects the voluntarily provided information which may include your name and/or email address used when you register for the classes

you have requested, send us a donation or become a Community Steward.

Please rest assured that this site will only collect personal information that you knowingly and willingly provide to us when using our payment gateway. This information will be securely forwarded to PayPal, which will then process your transaction. We do not store this information after your transaction is complete. At the point we need to access the personal information you provided, to communicate with you or process your registration, we retrieve it from PayPal through our merchant account. The PayPal privacy policy is available at:

<https://www.paypal.com/va/legalhub/privacy-full>

If you become an administrative user of our website, your account (created only by the webmaster) will contain your name, email address and a user name. When you login, we will use a cookie to manage your authentication and you will have the option to persist your cookie to make future logins easier. None of our cookies contain any personal information.

It is the intent of this site to use personal information only for the purpose for which it was requested, and any additional uses specifically provided for in this Policy.

Why We Collect Information and For How Long

We are collecting your data for several reasons:

- To provide you with the services and products you have requested
- To fulfill our legitimate interest in improving our services and products
- To send you email newsletters containing information we think you may like when we have your consent to do so

The data we collect from you will be stored for no longer than necessary. The length of time we retain said information will be determined based upon the following criteria: the length of time your personal information remains relevant; the length of time it is reasonable to keep records to demonstrate that we have fulfilled our duties and obligations; any limitation periods within which claims might be made; any retention periods prescribed by law or recommended by regulators, professional bodies or associations; the type of contract we have with you, the existence of your consent, and our legitimate interest in keeping such information as stated in this Policy.

Use of Information Collected

Riley School does not now, nor will it in the future, sell, rent or lease any of its customer/student lists and/or names to any third parties.

Riley School may collect and may make use of personal information to assist in the operation and protection of our website and to ensure delivery of the services you need and request.

In addition, when you register for a class, become a Community Steward or send us a donation, you become a member of the Riley School Community. We add the email address provided to us in your PayPal transaction to our newsletter mailing list. Throughout the school year we send weekly newsletters to our community to inform you of the week's activities at school or let you know about any upcoming activities such as house concerts or workshops you may wish to attend. We may send an occasional email at other times if there is an event of interest to Riley School we think you may enjoy. We use

MailChimp to manage our newsletters, and you may choose whether and/or where to continue receiving these emails by using the links at the bottom of those emails. MailChimp's privacy policy is available at:

<https://mailchimp.com/about/security/>

Riley School uses various third-party social media features, including but not limited to Facebook, and other interactive programs. These may collect your IP address and require cookies to work properly. These services are governed by the privacy policies of the providers and are not within Riley School's control.

Disclosure of Information

Riley School may not use or disclose the information provided by you except under the following circumstances:

- As necessary to provide services or products you have ordered
- In other ways described in this Policy or to which you have otherwise consented
- In the aggregate with other information in such a way so that your identity cannot reasonably be determined
- As required by law, or in response to a subpoena or search warrant
- To outside auditors who have agreed to keep the information confidential
- As necessary to maintain, safeguard and preserve all the rights and property of Riley School

Non-Marketing Purposes

Riley School greatly respects your privacy. We do maintain and reserve the right to contact you if needed for non-marketing purposes (such as bug alerts, security breaches, account issues, and/or changes in Riley School products and services). In certain circumstances, we may use our website, newspapers, or other public means to post a notice.

Children under the age of 13

Riley School's website is not directed to, and does not knowingly collect personal identifiable information from, children under the age of thirteen (13). If it is determined that such information has been inadvertently collected on anyone under the age of thirteen (13), we will immediately take the necessary steps to ensure that such information is deleted from our records, or in the alternative, that verifiable parental consent is obtained for the use and storage of such information. Anyone under the age of thirteen (13) must seek and obtain parent or guardian permission to use our payment gateway on this website.

Links to Other Websites

Our website does contain links to affiliate and other websites. Riley School does not claim nor accept responsibility for any privacy policies, practices and/or procedures of other such websites. Therefore, we encourage all users and visitors to be aware when they leave our website and to read the privacy statements of every website that collects personally identifiable information. This Privacy Policy Agreement applies only and solely to the information collected by our website.

Unsubscribe or Opt-Out

All users and visitors to our website have the option to discontinue receiving communications from us by way of email or newsletters. To discontinue or unsubscribe from our website please send an email that you wish to unsubscribe to **info@rileyirishmusic.com**. If you wish to unsubscribe or opt-out from any third-party websites, you must go to that specific website to unsubscribe or opt-out. Riley School will continue to adhere to this Policy with respect to any personal information previously collected.

Notice to European Union Users

Riley School Of Irish Music's operations are located primarily in the United States. If you provide information to us, the information will be transferred out of the European Union (EU) and sent to the United States. (The adequacy decision on the EU-US Privacy became operational on August 1, 2016. This framework protects the fundamental rights of anyone in the EU whose personal data is transferred to the United States for commercial purposes. It allows the free transfer of data to companies that are certified in the US under the Privacy Shield.) By providing personal information to us, you are consenting to its storage and use as described in this Policy.

Security

Riley School takes precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline. Wherever we collect sensitive information (e.g. name and/or email address), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the webpage.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only Riley School affiliated individuals who need the information to perform a specific job (for example, managing classes and classrooms, or maintaining our email lists) are granted access to personally identifiable information. The computers and servers in which we store personally identifiable information are kept in a secure environment. This is all done to prevent any loss, misuse, unauthorized access, disclosure or modification of the user's personal information under our control.

We also use Secure Socket Layer (SSL) for administrator authentication to build users' trust and confidence in the internet and website use by providing simple and secure access and communication of personal information.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet that are beyond our control, and (b) the security, integrity, and privacy of any and all information and data exchanged between you and us through this site cannot be guaranteed.

Right to Deletion

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records

Please note that we may not be able to comply with requests to delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with the law
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity
- Debug to identify and repair errors that impair existing intended functionality
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law
- Comply with the California Electronic Communications Privacy Act
- Engage in public or peer-reviewed scientific, historical or statistical research in the public interest that adheres to all other applicable ethics and privacy considerations
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us
- Comply with an existing legal obligation
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information

Acceptance of Terms

By using our website, you are hereby accepting the terms and conditions stipulated within this Privacy Policy Agreement. If you are not in agreement with our terms and conditions, then you should refrain from further use of our website. In addition, your continued use of our website following the posting of any updates or changes to our terms and conditions shall mean that you agree and accept such changes.

How to Contact Us

If you have any questions or concerns regarding the Privacy Policy Agreement related to our website, please feel free to contact us at the following email, telephone number or mailing address.

Email:	info@rileyirishmusic.com
Telephone Number:	(513) 549-3780
Mailing Address:	Riley School Of Irish Music PO Box 9502 Cincinnati, Ohio 45209-9502