

# Welcome to FEGO Privacy Policy

Latest update: Aug 14, 2019

Your privacy is important to us. This privacy policy describes what data we collect, how we process the data for what purposes, and where we store them. This privacy policy does not apply to any third party products, services, and websites, they are governed by their own privacy policy.

FEGO, DBA ebytestechnologyinc (collectively "Company", "we" or "us") is a pure-play performance development platform for students, faculty in counseling psychology, or in general education and health sciences departments in higher education. FEGO is committed to protecting the privacy of individuals who use the company's 'software as a service'. The policy is applicable to individuals who register for themselves for our practicum 'time log' services or who register on behalf of their organizations as defined below ("Customers"), to use the 'performance management' services offered by FEGO for effective management of annual student evaluations, annual ARO data collections, practicum assessments, assessment of practicum sites by students and faculty evaluation based on various key performance areas, ('Performance'). All these services are administered by the customer (enterprise or higher education such as universities or colleges) for their members, employees, associates, students, faculty of their organizations for whom the Customer has ordered the Service, and to whom the Customer has supplied a user identification and password ('Users'), and individuals who register to perform various activities related to their roles such as employee, manager, student, faculty, director of training, practicum supervisor, and administrator. This privacy statement describes FEGO's privacy practices in relation to the use of the company's web sites and the related software and services offered by FEGO (the "Services").

## Location of Data

All our application servers, database servers, and other services are hosted by Google Cloud Platform. These are located within the USA.

## Use of information collected

FEGO collects information about the users as defined by the customer's data collection forms, uses data collected from FEGO users to perform the assessments, evaluations, 'performance management' services as intended by their organizations. We do not collect any information that is not mandated by your educational institution. We collect information from you, such as first and last name, gender, e-mail and mailing addresses, professional title, company name, and password when you create an account to log in to our services. While in some cases the Customer or User can keep certain information private, most information is public by default to other designated Users such as faculty or director of training inside the Customer's or User's organization using the FEGO software for the purposes of performance management or appraisal as set by the Customer Admin of FEGO. The information entered by students and faculty is made accessible for the director of training, practicum supervisors, faculty advisors, and any other person(s) assigned to the role by the customer administration. You have choices when it comes to the data you share. When FEGO requires you to provide personal data, you can decline. Many of our products require some personal data to provide you with a service. If you choose not to provide data required to provide you with a product or feature, you cannot use that product or feature. Where providing the data is optional, and you choose not to share personal data, features like personalization that use such data will not work for you. We use the data to provide our services, which includes updating, securing, and troubleshooting, as well as providing support. It also includes sharing data, when it is required to provide the service or carry out the transactions you request. Our processing of personal data for these purposes

includes both automated and manual (human) methods of processing. Our automated methods often are related to and supported by our manual methods.

For instance, if you fill out a “Contact Me” Web form, FEGO will use the information provided to contact you about your interest in the Services. FEGO may also use data about Customer’s primary contact for marketing purposes. FEGO may use information you provide on the primary contact to contact you to further discuss your interest in the services and to send you information regarding the FEGO. If you provide us feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email. When you participate in one of our surveys, we may collect additional profile information. We also collect other types of personal information and demographic information that you provide to us voluntarily.

### **Confidentiality & Security**

We limit access to personal information about you to employees who we believe reasonably need to come into contact with that information to provide products or services to you or in order to do their jobs. We have physical, electronic, and procedural safeguards that comply with federal regulations, and local laws applicable to protect personal information about you. All customer data is confidential and remains private. We do not share, sell or rent any of the personally identifiable information to any party, other than to respond to investigations by law enforcement authorities, court orders or legal process to investigate, prevent or take actions on illegal activities, fraud or potential threats to the physical safety of any person or as otherwise required by law. Any Personal Information that is provided to FEGO is stored securely and used and disclosed only in accordance with this Privacy Policy.

**THIRD-PARTY SERVICE PROVIDERS.** We may share your personal information with third-party service providers for the sole purpose of providing you with the Services that we offer you through our Site. For example, we may share data with service providers who host our websites or provide email services on our behalf.

### Student's information and FERPA

FEGO is accessed by using the unique user identification and password provided by the Administrator of FEGO for the school, college, university, or any type of educational institution ("Institution") to their authorized users like the students, faculty and staff, all passwords are encrypted. Only those authorized users can log in to the FEGO software to access their own 'performance 'information or the information of students or staff associated with them, as mandated by the Institution or Department. These information are collected in electronic forms in the format designed and provided by the institution. FERPA (Family Educational Rights and Privacy Act of 1974) is a US Federal law that pertains to the release of and access to educational records, and related rights of students, and various statutes regarding the disclosure of the information of the students. FEGO shall not share any educational records information or any other kind of information to anyone other than those already authorized to access such information by the Administrator ('Institution'). FEGO is not responsible or liable for that information transmitted by any 'authorized user' of the customer Institution of the software, with a clear intent to violate FERPA, by employing any or more than one methods such as printing of the documents, screen share or web conference tools, camera, and other technologies, Institution is solely responsible in those circumstances of breach outside the software. Again, FEGO is not responsible for the information the Customer or User discloses while using the service. FEGO recognizes this as an important compliance requirement from the ('Institutions'), More information on FERPA can be found at <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

## FEGO will

- not collect or use student personal data beyond that needed for authorized educational or school purposes;
- not sell or rent student personal data;
- not use or share student personal data for advertising or similar commercial purposes, such as behavioral targeting of advertisements to students;
- not build a personal profile of a student, other than for supporting authorized educational or school purposes or as authorized by the parent, guardian, or student of appropriate age; and
- require that our vendors with whom student personal data is shared to deliver the email notification service, if any, are obligated to implement these same commitments for student personal data.

## Children's information

FEGO is not a software used by children under 13, it is primarily targeted at the workforce in private and public sectors, college and university students, staff, and faculty. If you learn that a minor child has provided us with personal information without a parent's consent please let us know.

## Cookies & other technologies

FEGO uses "cookies" to store session information. A cookie is a small amount of data, which includes an anonymous identifier that is sent to your browser from our website's computers and stored on your computer's hard drive. FEGO will set and access its cookies on your computer. Cookies are required to use the service.

FEGO uses Google Analytics to collect generic information about visitors, devices, browsers, and usage patterns to improve the usability of the software. These data are not uniquely identifiable and mostly are of generic nature.

FEGO uses marketing campaign software to interact with the customers and prospects regularly with the email supplied by the primary contact of the organization, we guarantee that we shall not contact any other users in the organization except the primary contact. We may also use de-identified and/or aggregated data for our own use. We do not use information collected through the Products for advertising or marketing purposes. The user has a choice to opt-out of these regular communications and newsletters. We often share the customer case studies, eBooks, tips shared by other users, and best practices of student annual evaluations, practicum evaluations, and performance management practices.

Our Privacy Policy changes from time to time, we will keep you posted when it changes. It is also visible every time the user is logged in to the FEGO software. Please write to [cs@fego.us](mailto:cs@fego.us) for any inquiries or clarification on this policy.