



PRIVACY POLICY

FOR PAID COURSES PROVIDED BY SPARK THE
FIRE GRANTWRITING CLASSES

Spark the Fire Grantwriting Classes is administered and solely owned by Allison Jones Shirk.

Spark the Fire Privacy Policy

Last Updated: December 29, 2022

About this Privacy Policy

This Privacy Policy was developed to assist you in understanding how Spark the Fire Grantwriting Classes (SPARK THE FIRE) collects, uses and safeguards information we obtain and hold about you.

By using our websites, learning management system and other on-line properties (our "Sites"), you expressly consent to our use of your information collected through those sites for the purposes described in this Privacy Policy. You acknowledge that communications to, from, and through our Sites are not confidential. You agree that by submitting communications through our Sites, no confidential, fiduciary, contractually-implied or other relationship is created between you and SPARK THE FIRE other than as specifically set out in and pursuant to this Privacy Policy or other terms posted to those sites.

Links to Other Sites

This Privacy Policy does not apply to third party applications or software that integrates with our services through our Sites, or any other third party products, services or websites. Please be aware that once you leave our Sites and enter another website our Privacy Policy is no longer in effect. We are not responsible for the privacy practices employed by these sites, nor the information or content contained therein. Please read over the rules and policies of these sites before proceeding.

User Generated Content

Some of our Sites and services may enable users to submit their own content for courses, assignments, contests, blogs, videos, chat functions, and other functions. Unless otherwise indicated, please remember that any information you submit or post as user-generated content to the services becomes public information. Please do not disclose your personal, financial, or other information in such submissions or posts. We cannot prevent others from using such information in a manner that may violate this Privacy Policy, the law, or your personal privacy and safety. We are not responsible for the results of such postings.

Accessing our Sites from Outside the U.S.

If you are accessing our Sites from outside of the United States ("U.S."), including from the European Economic Area and Switzerland (collectively the "EEA/CH") or other foreign countries, and you use our Sites or provide us with personal information via our Sites or through your communications with SPARK THE FIRE representatives, your information will be handled in accordance with this Privacy Policy. By using our Sites or giving us your personal information, you acknowledge that your information will be transferred to, and processed on servers located in, the U.S. and potentially other jurisdictions that may not have the same level of data protection as your jurisdiction. However, you agree and consent to our collection, transfer, and processing of your information in accordance with this Privacy Policy. SPARK THE FIRE may transfer your information within other SPARK THE FIRE units and affiliates and/or the third parties as outlined above in Sharing Information with Third Parties. In addition, we may transfer your information outside your jurisdiction if the transfer is necessary to establish, exercise, or defend legal claims, as well as if the transfer is necessary to protect your vital interests.

Privacy Policy Updates

Because technology and the rules regarding data management and privacy continue to change, we may update this Privacy Policy from time to time. Updates, including the date of revision, will be posted to this page.

Children's Online Privacy Protection

Our Sites are not intended for use by any individuals under 13 years of age. If you are a minor between the ages of 13 and 18, you may use our Sites only in conjunction with your parent, legal guardian, or other responsible adult. Any other use by minors is strictly prohibited.

What We Collect and Why

As an educational institution, SPARK THE FIRE maintains records for our past, present, and prospective students. SPARK THE FIRE also has business relationships with community, educational and workplace partners and, as such, maintains records for the individuals we work with through those partnerships. Information, including personal information, is collected by SPARK THE FIRE in a variety of ways at different points in an individual's interaction with the institution for many different purposes. The following sections describe in more detail the types of information we hold, and how we may collect and use that information.

Types of Information We Hold

SPARK THE FIRE collects various types of information. Categories and examples of which include:

- Your contact information (e.g. name, personal or work mailing address, email address, phone number, employer and job title) and other types of personal information, including sensitive personal information, used to process requests and applications relating to admission, scholarships, employment, partnerships, internships or other SPARK THE FIRE programs and services (e.g. birth date, age, gender, sex, state or federal ID numbers, race, marital status, military status, parental and dependent information, educational history, employment history, professional certifications, passport and visa information, medical history information, insurance, tax and income information)
- Records of your communications with SPARK THE FIRE (e.g. your IP address, login/logout dates, email open dates, email clicks, web traffic, contact preferences, student contact history, chat communications and information from feedback surveys)
- Technical information about your visit to or use of our Sites, (e.g. site analytics, browser information, referring URL's, pages accessed, time and date accessed, operating system used, Google Analytics ID, other tracking data, session count, user count, and device type)
- Marketing information such as prospective student and partner leads, current interests and preferences (contact preferences, settings, etc.), your likeness and photo
- Records pertaining to your time at SPARK THE FIRE and your continuing affiliations with SPARK THE FIRE (e.g. records of student work submitted through our learning management system and other academic records, financial aid records, , records of participation in academic organizations, disciplinary records, employment records and alumni and donor records)

The above list is not exhaustive, but we hope it will help you better understand the general types of information we collect. The exact information we collect, store and process about you will depend on your relationship with us. Not all types of information are collected on all individuals.

How We Collect Your Information

We generally collect information two ways, (1) when you voluntarily provide it to us, and (2) automatically when you visit or use our Sites.

Voluntary Collection

You voluntarily provide information to us when you choose to use the webforms, electronic applications, chat functions and other online communication tools available through our Sites, and when you choose to disclose information through your interactions with our student advisors, admission and financial aid personnel and other authorized SPARK THE FIRE representatives conducting university business.

Automatic Collection through Cookies and Other Technologies

We automatically collect information through use of cookies, web beacons and other tracking technologies that are part of our Sites. Cookies are small data files that are transferred to your computer or mobile device that allow us to recognize you and to pass information about your visit to different portions of our Sites. Most internet browsers accept cookies by default. Cookies used by SPARK THE FIRE on our Sites may include:

- Strictly necessary cookies required for the operation of our Sites.
- Performance and functionality cookies that enhance the performance and functionality of our Sites and services, enable us to remember you and personalize content.
- Analytics and advertising cookies that allow us to understand the effectiveness of our marketing and make our advertising more relevant to you and your interests.

Web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) are electronic files (code) that permit us, for example, to count users who have visited certain pages and for other related website statistics (for example, understanding the popularity of certain website content).

Tracking technologies like cookies and web beacons may be set by us, or by third parties, like Google, Facebook, or Amazon. We and these third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Sites. The information collected may be associated with your personal information, or may include personal information, about your online activities over time and across different websites and other online services. We and these third parties may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control third-party tracking technologies or how they may be used. To understand how third-parties use tracking technologies, and your choices about how they use and disclose your information, you should review their respective privacy policies. You can find more information about how Google Analytics collects and processes data at www.google.com/policies/privacy/partners/. You can find more information about how to opt out of Google, Facebook, Amazon and other third-party vendor use of cookies by visiting these web pages:

- the [Network Advertising Initiative opt-out page](#)
- the [Digital Advertising Alliance's opt-out page](#)

- the **YourOnlineChoices** page for your location

When you interact with any SPARK THE FIRE page or account on a social media platform, such as Facebook, Twitter, Instagram, LinkedIn, YouTube, or Pinterest, when you use a third-party platform's social login to our properties, or when you use webforms on those platforms, we may collect the public information that you make available on those platforms in accordance with those platforms' respective policies. In addition, we sometimes collect personal information about you from third party sources such as our service providers and partners that have obtained your personal information through their own data collection practices (for example, if you sign up directly with that third party for their service). Some third parties that provide information to us may also share your information with other parties. Please be sure to read these parties' respective privacy policies to understand their data collection practices, including how they may use the information they collect from you and your options to manage the data that is shared by them.

Aggregate Information

To the extent permitted by applicable law, we may use, process, transfer and store information about individuals in an anonymous (or pseudonymous) and aggregated manner. We may combine personal information with other information collected online and offline, including information from third party sources. We may also use information in other ways with consent. By using our Sites and services, you agree that we are licensed to collect, use, share and store anonymized (or pseudonymized) aggregated data collected through our Sites and services for benchmarking, analytics, research, reporting, machine learning and other business purposes.

Automated Decisions

To the extent permitted by applicable law, we may collect data in an automated manner and make automated decisions, including machine learning algorithms, about individual users of SPARK THE FIRE educational programs, our Sites and services in order to provide or optimize our offerings, for security and analytics purposes and for other lawful purposes.

How We Use the Information We Collect

Broadly speaking, your personal information will be used by us for the purpose of contacting you regarding information that you have requested, in conjunction with aggregated information and cookies, and/or for improving our education and other services, our marketing, and our Sites. We may store your information for the purpose of communicating with you about the educational programs and services offered and send you updates if and when they become available. We also use the information we collect for purposes of administering our educational programs and conducting other company business, to provide services to our students, partners and employees, and to make other products and services available to individuals within the SPARK THE FIRE community. Occasionally, we may also use the information we collect to notify you about important changes to our Sites or services, new services, educational programs and related offers we think you will find valuable.

Some more specific examples of how we may use your information include:

- Providing services to our students such as evaluating applications for enrollment, scholarships, completing course registrations, enrolling you in academic groups or other programs, collecting tuition payments, facilitating your requests for IT support, to carry out your requests to affiliate with our community or workplace partners and to deliver our online training and educational programs.

- Providing services to our alumni such as mailing alumni news, information, invitations, and surveys, sending donation and engagement solicitations, reviewing web traffic and click-throughs on email to provide engagement statistics.
- Providing you with service or safety alerts or announcements.
- Evaluating applications for employment and providing employee onboarding and other employment related services such as payroll services, benefits enrollment, technical support, and employee training.
- Marketing uses such as targeted advertising via social media and other digital channels, audience classification and creation, sharing social content, tracking leads for analytics and communications purposes, conducting market research, surveys, and similar inquiries to help us understand trends and needs of our users, and offering newsletters, articles, event invitations and other information that we believe may interest you.
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of personal information, our website or data systems, investigating or resolving inquiries initiated by current or prospective students, to meet our legal obligations, to serve the public interest or public health, and for other lawful purposes.

Legitimate Interests for Processing Personal Information

Most of SPARK THE FIRE's collection and processing of personal information will fall under one or more of the following categories, depending on your relationship (past and present) with SPARK THE FIRE:

- Processing is necessary for the purposes of the legitimate interests pursued by SPARK THE FIRE, such as providing, improving and customizing our educational offerings, administering our operations, maintaining relationships with and fostering connections among SPARK THE FIRE community members, exploring ways to develop and grow our operations, enhancing protection against fraud and security risks, offering attendance at events and other engagement opportunities, understanding how our online platforms are used, etc.
- Processing is necessary for the performance of a contract to which you are party or in order to carry out your requests of us.
- Processing is necessary for compliance with a legal obligation to which SPARK THE FIRE is subject.
- You have given your consent to the processing of your personal information for one or more specific purposes.

There are some instances where the collection and processing of personal information will be pursuant to other lawful bases.

Sharing Information with Third Parties

SPARK THE FIRE does not sell personal information to outside parties for their commercial use. However, we may share information with third-parties, including our service providers, partners and affiliates, as follows:

Service Providers

We sometimes use third-party service providers to perform services on our behalf. We may share your personal information with such third-party service providers to allow them to perform the duties for which they have been retained, subject to confidentiality and use obligations consistent with this Privacy Policy. These service providers are used for things like:

- Payment and donation processing
- Marketing and analytics
- Processing employment applications
- Processing admission applications
- Alumni outreach and engagement
- Event registration and coordination
- Course registration and coordination
- Course evaluations and assessments
- Research insights and analytics
- Human Resources administration

Affiliates

We may share your personal information with affiliated legal entities and among SPARK THE FIRE units and departments for purposes and uses that are consistent with this Privacy Policy.

Partners

We may share your personal information with our workplace, community and educational partners for the purposes of administering programs and services, such as:

- Cross-registration for courses with other institutions
- Online education offerings through online platforms
- Partner sponsored trainings and events
- Joint research arrangements with other universities or entities
- Events with clubs and special interest groups
- Partner-sponsored tuition reimbursement or discount programs

Directory Information

We also may share student directory information as permitted by applicable law. More information about student rights with respect to directory information can be found in our **[FERPA Student Right to Privacy Policy](#)**.

How We Protect Your Personal Information

To protect personal information from unauthorized access, use and disclosure, SPARK THE FIRE maintains an information security program and employs reasonable and appropriate physical, administrative and technical safeguards. SPARK THE FIRE performs periodic risk assessments of its information security program and prioritizes remediation of identified security vulnerabilities. However, we cannot guarantee that unauthorized access, use or loss will never occur.

Legally Compelled Disclosure

We may release personal information about you that we possess (e.g. to legal or government regulatory authorities or third parties) when we believe release is appropriate to comply with, the law; to enforce or apply our Privacy Policy and/or other agreements; or to protect the rights, property or safety of us, users of our Sites or others.

You may also have the right to withdraw your consent to our processing of your personal data if our processing is solely based on your consent. You can do this by discontinuing use of our services, including closing all of your online accounts with us. If you withdraw your consent to the use or sharing of your personal data for the purposes set forth in this Privacy Policy, you may not have access to all (or any) of our services, and we might not be able to provide you all

(or any) of our services. Please note that, in certain cases, we may continue to process your personal data after you have withdrawn consent and requested that we delete your personal data as required under applicable law or as needed to resolve disputes or protect our legal rights or if we have a legal basis to do so.

Data Retention & Privacy Requests

As an educational institution, SPARK THE FIRE has certain legal obligations to maintain some data. At SPARK THE FIRE, we also believe in maintaining a lifelong relationship with our SPARK THE FIRE community members. As such, unless we are otherwise required by applicable law, or your request that we do so, we typically will maintain a record for you.

Opt-out and Preferences

SPARK THE FIRE offers several ways for SPARK THE FIRE applicants, students, alumni, and employees to manage their **communication preferences** for emails and texts.

Data Privacy Requests

If opt-out and preferences do not satisfy your concerns, you can complete our **Data Privacy Request Form** to verify your identity and make your request.

For other privacy related inquiries, please contact us:

- By email at: **allison@sparkthefiregrantwriting.com**
- By mail at:
Spark the Fire Grantwriting Classes
PO Box 2124
Vashon, WA 98070