PRIVACY POLICY
Last Updated: March 2024

NAF is a national organization through which education, business, and community leaders work together to ensure high school students are college, career, and future ready. Since 1980 NAF has been partnering with high schools to enhance systems and outcomes at a low cost by implementing NAF Academies, which are small learning communities usually established within traditional high schools.

This Privacy Policy is meant to help you understand how NAF (or "we") handle personal information. This Privacy Policy explains:

- What information we collect.
- How we use that information.
- How we share that information.
- How to contact us if you have questions or want to discuss your rights and choices with respect to personal information.

By accessing or using any portion of the NAF Website or NAF Web-based Services (as those terms are defined below), you are acknowledging that you have read, understand, and accept this Privacy Policy and agree to be bound by this Privacy Policy and our Terms of Use (https://naf.org/terms-and-conditions).

NAF may change this Privacy Policy from time to time. If such changes are material, a notice of the changes will be posted along with the revised Privacy Policy. We encourage you to visit this page for the latest on our privacy practices.

GENERAL PRIVACY PRINCIPLES

Whether you are browsing the NAF Website, donating to NAF, or using the NAF Web-based Services, you are subject to the General Privacy Principles. The General Privacy Principles describe our general approach to information security, collection, usage, and sharing. Please click here for the General Privacy Principles.

POLICIES SPECIFIC TO NAF OFFERINGS

NAF WEBSITE

The NAF Website is at www.naf.org. You can visit most pages on the NAF Website without having to log in or otherwise identify yourself. See below to learn more about how NAF collects, uses, and shares information collected on the NAF Website.

NAF DONORS

By donating to NAF, you are joining a movement to improve education and workforce development, close the skills gap, and break the cycle of poverty. Please click here to learn more about how NAF collects, uses, and shares information about our donors.

NAF WEB-BASED SERVICES

To pursue the shared goals of graduating future-ready youth, NAF offers its clients tools ("NAF Web-based Services") that are on web-based platforms, including the ones described below.
Please click here for general information about how NAF collects, uses, and shares information via the NAF Web-based Services.

Our information collection and usage practices vary by NAF Web-based Service. To review the privacy provisions specific to the NAF Web-based Service that is applicable to you, please click on the relevant link below or visit our At-A-Glance Summary.

NAF Web-based Service	Description
NAFTrack CERTIFIED HIRING	NAFTrack is an online system created by education and business leaders to assess college and career readiness. NAF uses a multi-method approach to assess students on a broad range of skills. Student performance is measured through career-related coursework, a qualifying internship, and high school graduation.
ASH	ASH is an online platform for active NAF network schools or members to record, access, and assess NAF Academy development and operations. This platform also provides schools with access to NAF Academy data (including contact information) and resources.
NAF Special Pilots	NAF explores new and enhanced services through a pilot process. Pilot programs may include a variety of learning management systems, like Canvas, on which curriculum, instruction, assessment, performance data and resources are accessed and managed.

GENERAL PRIVACY PRINCIPLES

INFORMATION SECURITY

NAF takes reasonable steps to help protect your personal information in an effort to prevent unauthorized access, use, or disclosure. We employ a variety of physical, administrative, and technological safeguards designed to protect personal information against loss, misuse, and unauthorized access or disclosure.

Despite these measures, NAF cannot fully eliminate security risks associated with personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. Any information you submit is at your own risk.

If you have any questions data security, you can contact us at the contact information set forth below.

INFORMATION COLLECTION

We collect information about you to provide you with access to the NAF Website, the NAF Web-based Services, and/or the support you request. The type of information we collect can vary depending on how you access and use our services (see "Policies Specific to NAF Offerings"). Additionally, you can choose to voluntarily provide information to us.

Cookies

We, or our service providers, may use "cookies" and "web beacons" to track and gather certain information when you use the NAF Website and/or the NAF Web-based Services. A cookie is a small text file that contains information and is either stored temporarily in your browser (a session cookie) or placed on your computer's hard drive for a longer, predetermined length of time (a persistent cookie). The cookie is then sent back to the website on your subsequent visits. A web beacon is a small graphic file linked to our servers that allows us to track your use of the site(s). The information gathered by cookies and web beacons is typically non-personally identifiable information like your IP address, operating system, browser type, pages viewed, how much time you spend on a page or at NAF overall, links you clicked, activity information (for example, course assignments you have completed), and suspected geographic location. Cookies and web beacons allow NAF to personalize your experience. We believe the use of cookies and web beacons will improve your experience.

By using the Website and/or the NAF Web-based Services, you are giving your consent to our and our service providers' use of cookies to track and gather information. **If you do not consent, you must discontinue your use of the Website and/or the NAF Web-based Services or configure your browser to reject cookies (see next paragraph).** Web beacons are generally used in conjunction with cookies, so if your browser is set to reject cookies, or if you delete cookies, web beacons will not be able to track your activity as you navigate between websites.

You may have activated your Web browser's "do not track" signal or another mechanism through which you exercised your preference regarding the collection of personally identifiable information about your online activities over time and across third-party websites or online services. We will honor your preferences and prevent storage of tracking data on your computer while you are on the Website. **However, as certain NAF Web-based Services (ASH and NAFTrack require users to log into registered accounts, cookies must be enabled for users to benefit from the full services of these platforms.**

Children

We do not knowingly collect information from children under the age of 13 unless and until NAF has received consent and authorization to collect information from or on behalf of such students. Please contact us at support@naf.org if you believe we have inadvertently collected personal information from a child under 13 without proper consent. This will allow us to delete such information as soon as possible.

USE OF INFORMATION

We process the data we collect about you to provide, maintain, secure and improve the NAF Website and the NAF Web-based Services, develop new services, improve programming, and protecting NAF and our users.

We also process the data we collect about you to provide you with relevant information about the NAF Website and NAF Web-based Services, and to assist you in using the service if required.

We use de-identified information to perform research for the purposes of improving secondary education and career preparation and analyzing trends. We also use such de-identified information to promote NAF, the NAF Web-based Services, and to develop new NAF Academies.

We use the data we collect to maintain NAF as a safe and secure platform for all our users, including appropriate enforcement of NAF policies, as well as compliance with the law and applicable regulations.

NAF and its third-party service providers use technologies discussed above, such as cookies and web beacons, to collect information. This information can be used by NAF and third-party service providers on behalf of NAF to analyze and track usage of the service, determine the popularity of certain content, and better understand how you use the service.

SHARING OF INFORMATION

NAF does not share your information unless one of the following conditions applies:
- With your consent.
- Publicity or research purposes.
  - We may disclose aggregate or de-identified information that is not associated with an identifiable individual for research or to enhance and promote our products and services. For example, we may share aggregated or de-identified information with a research firm or individual academic researchers to explore how our services are being used and how such data can be used to enhance our functionalities and further help our clients, students, and improve secondary education and career preparation generally. We also may share such aggregated or de-identified information with potential clients to demonstrate the benefits of NAF services.

- For external handling and processing.
  - o NAF provides personal and non-personal information to our partners, trusted organizations, vendors, and other affiliated organizations so that they may assist us with administering the NAF Website, providing NAF Web-based Services, or facilitating donations. Some of these contractors and affiliated organizations may be located outside the United States. Our providers handle and process data in accordance with our instructions, this Privacy Policy, and any other appropriate confidentiality, security or other requirements we deem necessary in order to comply with NAF's obligations. By using NAF, you agree to allow these companies to process your data on our behalf, regardless of where they are located. We regularly update a list of our partners, service providers, and sub-processors, and this list is available upon request.
- To respond to legal requests.
- To prevent harm to the rights, property, or safety of NAF, School Clients, End Users, or the public.
- In accordance with the provisions below regarding the NAF Website, donors, and NAF Web-based Services.

We are not responsible for the privacy practices of any third party. We encourage you to be aware when you leave the NAF Website and/or the NAF Web-based Service platforms, and to read the privacy statements of each entity and website that collects personal information.

YOUR RIGHTS AND CHOICES

If you would like to access, modify, correct, or delete your personal information, please contact us. When you contact us, you may be required to provide us details to verify your identity.

We may not accommodate a request to change or delete information if we believe the change would violate any law or legal requirement, cause the information to be incorrect, or if we are unable to verify your identity. Also, if you are an End User (i.e., student or teacher) of a School Client and the data at issue is controlled by the School Client (i.e., your school), we may not be at liberty to accommodate a request to change or delete information; however, you may contact your school to discuss your options. [NAF Web-based Services, subsection School Client Policies]

NAF is a not for profit 501(c)(3) organization. If NAF engages in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

CONTACT US

NAF welcomes your comments or questions regarding this Privacy Policy. Please e-mail us at support@naf.org or contact us at the following address or phone number:

169 Madison Ave., Suite 2797
New York, NY 10016
(212) 635-2400

NAF WEBSITE

Below, we provide privacy disclosures specific to the NAF Website. These provisions are in addition to the General Privacy Principles.

INFORMATION COLLECTION

When using the NAF Website, you may provide your personal information, including your email address if you elect to subscribe to our mailing list.

USE OF INFORMATION

When you provide information to NAF via the NAF Website, we use the information to deliver you the content and services you have requested, such as sending you our newsletter or responding to your inquiries. We may also use your information to send you e-mails or other communications concerning NAF and our initiatives.

We use information about your visits to the NAF Website or your responses to our online mailings to serve you targeted messaging based on your browsing history and interests. We and our third-party partners use this information to share notices about jobs or career building opportunities relevant to your interests via online newsletters or email messages, as well as to provide advertising-related services such as reporting, attribution, analytics and market research.

SHARING OF INFORMATION

We may retain other companies and individuals as service providers to perform functions on our behalf – for example, data analysis firms, customer support specialists, web-hosting companies, telemarketing companies and fulfillment companies (e.g., companies that coordinate mailings). These third parties may be provided with access to your personal information [for use in providing relevant services], or may collect information about you and your use of the NAF Website on their own.

YOUR RIGHTS AND CHOICES

If you no longer wish to subscribe to NAF's online mailings or would like to change your e-mail preferences, you may do so at any time by clicking the "unsubscribe" or the "update your preferences" link at the bottom of any e-mail you receive from NAF. Please be advised that sometimes these requests may take time to process.

NAF DONORS

Below, we provide privacy disclosures relevant to donors to NAF. These provisions are in addition to the General Privacy Principles.

INFORMATION COLLECTION

When you register for an event or make a donation, you may provide us with your personal information, including your name, phone number, physical address, e-mail address, and payment information, such as credit card number and expiration date.

Further, when you make a donation to NAF, we may direct you to a third-party website that will collect your name, mailing address, email address, and your payment information, which may include your credit card information. For information about the third-party site's privacy policies and terms of use, please review that site.

USE OF INFORMATION

When donors provide information to NAF, we use the information to process the donation or event registration and to acknowledge receipt of your donation for tax purposes. We may also use your information to send you e-mails or other communications concerning NAF and our initiatives, and to solicit feedback from our donors.

SHARING OF INFORMATION

We may engage other companies and individuals as our service providers to perform functions on our behalf – for example, online payment providers, fraud-screening services, web-hosting companies, and fulfillment companies (e.g., companies that coordinate mailings). These third parties may be provided with access to our donors' personal information for use in providing services to NAF and may collect information about our donors on their own.

YOUR RIGHTS AND CHOICES

NAF's online donation form has an "opt-out" mechanism for those users who wish to make donations or register for an event, but do not want to receive any additional information or other material from NAF.

NAF WEB-BASED SERVICES – Overview

This section provides privacy disclosures regarding the NAF Web-based Services. The subsections below provide more specific information regarding NAFTrack and ASH and NAF Pilot programs. These provisions are in addition to the General Privacy Principles.

SCHOOL CLIENT POLICIES

NAF collects and uses personal information in order to provide services to our client schools and related entities ("School Clients"). If you are a student or alumnus of a School Client, or an employee at a School Client, or an academy advisory board member for a School Client, you may have access to the NAF Web-based Services as an End User. These End User accounts have varying levels of permissions as approved by the School Client.

This Privacy Policy describes in general terms how NAF handles personal information when we provide access to you, as an End User, on behalf of a School Client. However, School Clients may negotiate specific terms related to privacy. **If you are accessing NAF Web-based Services as a student, teacher, or employee of a School Client, please check with your school or district regarding any privacy provisions that are specific to your school.**

INFORMATION COLLECTION

We collect information about NAF students and alumni to help us operate the NAF Academies and NAF Web-based Services. The types of information NAF collects include, but are not limited to:

- Personal and demographic information like your name, date of birth, email, phone number, where you went to high school, and whether you graduated
- NAF courses you have taken, including any assignments, assessments, grades, or course completion statuses that were entered into our platforms
- What internships or jobs you have applied to, whether you were hired, and any performance assessments your supervisor completed in our platforms
- Whether or not you achieved NAFTrack Certification
- Your responses to our most recent student or alumni surveys, which may include questions regarding where you are planning to go to college, where you are currently employed, your career interests, and what types of jobs or internships you would like to hear about from NAF
- Your login history and how you have interacted with the NAF Website, emails, social media, and related NAF Web-based Services

USE OF INFORMATION

We use student and alumni information to support the operation of the NAF Academies and NAF Web-based Services. These uses may include, but are not limited to:

- Evaluating your performance on classroom activities and internships
- Tracking your academic history and employment history

SHARING OF INFORMATION

The people and entities that may have access to your information include, but are not limited to:

- When you are in high school, your personal information may be accessed by teachers, other school administrators, internship supervisors, and NAF employees
- When you are no longer in high school, your personal information may be accessed only by NAF staff and any companies or organizations that are permitted to access your information with your consent

NAF WEB-BASED SERVICES – NAFTrack

NAFTrack is an online system created by education and business leaders to assess college and career readiness. NAF uses a multi-method approach to assess students on a broad range of skills. Student performance is measured through career-related coursework, a qualifying internship, and high school graduation.

INFORMATION COLLECTION

When you are a NAF student, you, your teachers, other school administrators, and internship supervisors may submit personal information to the NAFTrack online system. This personal information may include your name, school identification number, date of birth, demographic data, and may relate to your performance as a student, including information regarding:

- Course enrollment, completion, and performance
- Internship enrollment, completion, performance, and assessment results
- Graduation status
- College and career readiness as measured by NAFTrack Certification

USE OF INFORMATION

The personal information on the NAFTrack online system may be used to evaluate your performance as a student with regard to academic proficiency, project execution, and internship performance.

SHARING OF INFORMATION

The personal information on the NAFTrack online system may be viewed by individuals who have a legitimate educational interest in reviewing the information. This includes your teachers, other school administrators, internship supervisors, and NAF employees.

NOTE

NAF does not use or share personal information collected through NAFTrack for behavioral targeting of advertisements.

NAF WEB-BASED SERVICES – Academy Support Hub (ASH)

ASH is an online platform for active NAF network schools or members to record, access, and assess NAF Academy development and operations. This platform also provides schools with access to NAF Academy data and resources.

INFORMATION COLLECTION

When you are a student at a NAF Academy, your teachers, other school administrators, and NAF populate personal information to the ASH platform, such as student names, identification numbers, grade levels, other demographic data, work-based learning evidence, and post- graduation information.

When you are an employee or advisory board member of a school/district hosting a NAF Academy, you or your school/district employer or partner may submit personal information to the ASH platform, such as name, contact information, employer, or job title.

USE OF INFORMATION

When you are a student at a NAF Academy, the personal information on ASH may be used to assess and record NAF Academy quality or student learning milestones, like graduation.

When you are an employee of School Client, the personal information on ASH may be used to help facilitate NAF Academy operations. For example, your contact information stored on ASH may enable NAF staff to contact you in your capacity as a teacher at a school to discuss the evidence to support NAF Academy self-assessment reports.

SHARING OF INFORMATION

When you are a student at a NAF Academy, the personal information on ASH may be viewed by individuals who have a legitimate educational interest in reviewing the information. This includes your teachers, other school administrators, and NAF employees. This access to information enables these individuals to assess and record NAF Academy operations and/or to track your academic and employment performance.

When you are an employee of a School Client, the personal information on ASH may be viewed by your employer and/or NAF to help facilitate NAF Academy operations. For example, your contact information stored on ASH may enable NAF staff to contact you in your capacity as a teacher at a school to discuss the evidence to support NAF Academy self-assessment reports.

NOTE

NAF does not use or share personal information collected through ASH for behavioral targeting of advertisements.

NAF explores new and enhanced services through a pilot process. Pilot programs may include the introduction of new platforms, including learning management systems, like Canvas, on which curriculum, instruction, assessment, performance data and resources are accessed and managed.

INFORMATION COLLECTION

When you are a student at a NAF Academy, you, your teachers, other school administrators, and NAF employees may submit personal information to a platform, such as a learning management system. This personal information may include your name, school identification number, date of birth, demographic data, and may relate to your performance as a student, including information regarding course enrollment, course completion and performance, and assessment results.

USE OF INFORMATION

When you are a student at a NAF Academy, the personal information on platforms, like a learning management system, may be used to evaluate your performance on course assignments and assessments.

SHARING OF INFORMATION

When you are a student at a NAF Academy, the personal information on platforms, like a learning management system, may be viewed by individuals who have a legitimate educational interest in reviewing the information. This includes your teachers, other school administrators, and NAF staff.

NOTE

Unless otherwise noted, NAF does not use or share personal information collected through its pilot programs for behavioral targeting of advertisements

At-A-Glance Summary – NAF Web-based Services

Service	Description	Information Collected	Information Use	Information Sharing
NAFTrack	NAFTrack is an online system created by education and business leaders to assess college and career readiness. NAF uses a multi-method approach to assess students on a broad range of skills. Student performance is measured through career-related coursework, a qualifying internship, and high school graduation.	Demographics plus information relating to your performance as a student, including: • Course enrollment, completion, and performance • Internship enrollment, completion, performance, and assessment results • Graduation status • College and career readiness as measured by NAFTrack Certification	To evaluate your performance as a student with regard to academic proficiency, project execution, and internship performance.	• Your teachers • Other school administrators • Internship supervisors • NAF staff
Academy Support Hub	ASH is an online platform for active NAF Network schools (or members) to record, access, and assess NAF Academy development and operations. This platform	For NAF Academy students, demographics plus information relating to: • Work-based learning evidence • Post-graduation information	For NAF Academy students, to assess and record NAF Academy quality or student learning milestones, like graduation.	For NAF Academy students, by your teachers, other school administrators, and NAF staff.

Service	Description	Information Collected	Information Use	Information Sharing
	also provides schools with access to NAF academy data (including contact information) and resources.	For school employees, information such as: • Contact information • Employer • Job title	For school employees, to help facilitate NAF Academy operations.	For school employees, by your employer and NAF.
NAF Special Pilots	NAF explores new and enhanced services through a pilot process. Pilot programs may include Learning Management Systems, like Canvas, on which curriculum, instruction, assessment, performance data and resources are accessed and managed.	Demographics plus information relating to your performance as a student, including: • Course enrollment • Course completion and performance • Assessment results	To evaluate your performance on course assignments and assessments.	• Teachers • Other school administrators • NAF staff

The title row of this table reads: **At-A-Glance Summary – NAF Web-based Services**