Privacy Policy
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Introduction

Trinity Preparatory School of Florida and its affiliated organizations (collectively, "Trinity Prep," "we," "us," and "our") recognize the importance of protecting the privacy of the personal information you provide to us. Accordingly, we have developed this Privacy Policy (the "Policy") so that you can make educated and informed decisions about the personal information that you entrust to us when you interact with us through our website at www.trinityprep.org and related subdomains, online forms, password-protected community portals, online-giving pages, social media, email exchanges, mobile apps, text messages, and other online services on which this Policy is posted (the "Service"), and understand how we collect, use, disclose, and otherwise manage this information.

Your use of the Service is conditioned upon your agreement with this Policy and our Terms of Use. If there are any terms in this Policy or in our Terms of Use to which you do not agree, you must discontinue your use of the Service. Before using the Service, please read this Policy carefully as it contains important information on who we are and how and why we collect, store, use, and disclose your personal information. This Policy also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

This Policy does not cover information collected offline, information collected through enrolled-family school systems such as the MyTPS Portal (the central hub for Trinity Prep students, faculty, and parents, powered by Veracross, the school's comprehensive information system) and Canvas (the learning

management system through which Trinity students and families access full library resources and online subscriptions), which are collected and handled in accordance with our handbook or other policies, or information collected through third-party services that have their own privacy notices (see the Linked Sites section below).

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY USING THE SERVICE, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO THE TERMS OF THIS PRIVACY POLICY. If you do not agree with this Policy or do not want your personal information used by Trinity Prep as provided in this Policy, do not use the Service or provide personal information to us.

This Policy is written in the English language. We do not guarantee the accuracy of any translated versions of this Policy. To the extent that any translated versions of this Policy conflict with the English language version, the English language version of this Policy shall control.

Children and Individuals Under the Age of Thirteen

Protecting the privacy of our students and their families is a top priority. Access to the Service is intended for parents, guardians, prospective families, alumni, employees, and the community. Public admissions, giving, employment, and general-contact forms are intended for adults. Parents and guardians may provide information about their children for school-related purposes.

Children under 13 should not submit personal information directly through public website features unless Trinity Prep has established an authorized process for that feature. Before enabling online collection directly from children under 13, we provide applicable notices and obtain required parental permissions or confirm that another legally permitted authorization applies.

School-authorized educational accounts and services are subject to applicable student/family notices and school policies. Permissions for educational use do not authorize unrelated advertising or commercial use.

Parents or guardians may contact tpsf-cookieadmin@trinityprep.org or helpdesk@trinityprep.org to ask about their child's information or request review, correction, deletion, or withdrawal of consent, subject to applicable law and school-record obligations. If we learn that information was collected directly from a child without required authorization, we will take appropriate steps to stop the collection and delete or otherwise address the information as required by law.

We do not run advertising or session-recording technologies within student-facing password-protected areas including accounts and platforms that Trinity Prep authorizes and provides for educational purposes. Personal information that is collected through enrolled-family and student-facing school systems-including Google Workspace for Education, Canvas or other learning management systems (LMS), Veracross, and the MyTPS Portal is collected and handled in accordance with our handbook and other applicable school policies as well as applicable law.

If you are a parent or guardian and believe we have collected personal information from a child under the age of thirteen through the public Service, please contact us at tpsf-cookieadmin@trinityprep.org or helpdesk@trinityprep.org.

Google Workspace for Education - Security and Privacy

Trinity Prep may provide to its students a Google Workspace for Education account, as well as access to other online services intended for the purposes of doing scholarly work. These accounts provide students with access to Google Workspace for Education's suite of products and other programs for the purposes of educational work and collaboration. Student accounts remain active for one school year after graduation and are decommissioned on July 31 of the following year. Gmail for consumers and Google Workspace users runs on the same infrastructure, which helps Google deliver high performance, reliability, and security to all of its users. However, Google Workspace offers additional security, administrative, and archiving controls for education customers. Google does not share personal information with companies, organizations, or individuals outside of Google unless one of the circumstances outlined in the Google Privacy Policy applies. To see specific Google policies as they relate to education, view Google's education site. Trinity Prep has technology measures and policies in place that protect students from harmful materials, including those that are obscene and pornographic. This means that student email is filtered. Mail containing harmful content from inappropriate sites will be blocked.

Collection of Personal Information

To provide the Service and conduct official school business, Trinity Prep collects personal information from you in the ways described herein.

"Personal information" means information that identifies, relates to, or is reasonably capable of being linked to an individual, as further defined by applicable law. Depending on context and applicable law, this includes device identifiers, IP addresses, and information obtained from public sources. Aggregated or de-identified information is treated as nonpersonal only where it cannot reasonably be linked to an individual and satisfies applicable legal requirements.

Information you provide to us directly

We collect personal information from you directly when you interact with the Service, contact us, submit an admissions inquiry or tour request, complete an admissions application, register for an event, make a donation or purchase, apply for employment, or use our community portals. Depending on the interaction, this may include:

- Admissions inquiries and tour requests: parent/guardian and student names, email, phone, address, student grade and current school, and any message you include.
- Admissions applications: information collected through our admissions portal operated by Veracross, including academic records, test scores, recommendations, essays, and, for international applicants, citizenship/immigration documentation needed for Form I-20 processing.
- Event registration: attendee names, contact details, and attendance needs such as dietary or accessibility needs.
- Online giving and payments: name, contact details, gift designation, and payment card billing information, which is entered directly into the systems of our payment processor. Trinity Prep does not receive or store full payment card numbers.
- Employment applications: Name, contact details, employment history, identity verification documents, and personal background information.

- Community portals: login credentials and directory information for parents, students, and employees.
- Correspondence: anything you send us by email, form, or the Service's feedback tool hosted by Finalsite.

Information collected automatically

When you use the Service, we and the third parties described below automatically collect certain information through cookies and similar technologies, which may include: IP address, approximate location derived from IP address, device and browser type, operating system, referring URL, pages viewed, time on page, clicks and scrolling behavior, the date and time of your visit, and unique identifiers stored in cookies or similar technologies. Depending on applicable law, some of this information may be considered personal information. To learn more, please see the Cookies and Tracking Technologies section of this Policy below.

Like most standard website servers, we use website statistic packages such as Google Analytics to analyze trends in how our website is accessed and utilized. Information monitored includes internet protocol (IP) addresses, geographic location of visitors (country, city), browser type, internet service providers (ISP), referring/exit pages, platform type, date/time stamp, time spent on pages, and keywords used to find our site via search engines. At least some of this information is pseudonymous or aggregated where configured and not directly linked to individual users. We may use it to identify trends in our visitors and make decisions about how to make it easier for people to find and navigate our website.

Non-Personal Information

Even if you do not register with or provide any personal information to Trinity Prep, we collect non-personal information about your use of the Service. "Non-personal information" means information that we cannot use to identify or contact you, such as aggregate statistics, domain names, and page-request counts used to compile aggregate usage statistics. These statistics contain no personal details and are used internally to evaluate and improve the Service. We may also acquire non-personal information about our users from external sources. If you do not want us to collect such information, please do not use the Service.

Categories of Personal Information and Purpose for Collection

Trinity Prep collects the following categories of personal information:

Category	Examples
Contact Information	name, email address, mailing address and phone number
Billing/Donation Information	payment information and gift designation
Authentication Information	username and password that you use to access community portals
Admissions Information	student grade, current school, academic records, test scores, recommendations, essays, and, for

	international applicants, immigration documentation
Online Behavior Information	online activity, preferences, and time spent viewing features
Web access Information	IP address or device/network information

We use a third-party payment processor to collect payment card billing details in order to process donations, purchases, and event registrations. All online transactions are encrypted using Secure Sockets Layer (SSL)/Transport Layer Security (TLS) technology. Credit card billing details are used exclusively to process the payment and are not stored or retained by Trinity Prep after the transaction is complete. Please review the processor's respective Terms of Service and Privacy Statement for details on its use and storage of that information.

If you are a job applicant, employee, owner, director, officer, or contractor of Trinity Prep (individually referenced in this Policy as "employee" and collectively referenced as "employees"), we may also collect identity verification, educational, professional, and employment-related information, which may include certain sensitive personal information.

Purpose for Collection and Processing of Personal Information

Trinity Prep collects and processes the personal information from you that is reasonably necessary to the purposes of our information processing activities and retains such information only as long as required to fulfill such purposes, including to:

- Conduct official school business
- Respond to inquiries, schedule visits, and administer admissions
- Process donations, purchases, and event registrations
- Operate password-protected community portals and directories
- Communicate about school programs, events, and news (with an opt-out for non-transactional email)
- Respond to customer service requests, feedback, and communications
- Administer accounts, including login verification
- Send you a newsletter or other requested communications
- Measure and improve the Service and our admissions outreach, including advertising measurement and, with your consent, interest-based advertising
- Conduct research and analysis
- Maintain security, prevent fraud and abuse, and comply with legal obligations

Where applicable, if Trinity Prep intends to further process your personal information for a purpose other than that for which the personal information was initially collected, Trinity Prep shall, prior to such processing, provide you with any relevant information on such additional purpose, and, to the extent required by applicable law, obtain your consent for this. To the extent you provide consent to Trinity Prep for any purpose, you may withdraw such consent at any time by contacting us at helpdesk@trinityprep.org.

The personal information which we collect may be required for us to provide the Service to you. If you decline to provide us with requested personal information, we may be unable to provide some or all of the Service to you.

Trinity Prep does not use your personal information to train large language models or generative AI systems.

Disclosure of Personal Information

We disclose personal information for the purposes and to the recipients described in this Policy. We do not sell personal information for money, and we do not share student education records for commercial purposes. We also do not engage in automated decision-making or profiling that produces legal or similarly significant effects about individuals. However, when you consent to advertising or analytics cookies, we share certain device and browsing information with advertising and analytics partners, which under some state laws may be treated as "sharing" for targeted advertising. If you do not consent to advertising or analytics cookies, we will not collect or share your information in this manner.

We may share or disclose your personal information for the following limited purposes:

- Service Providers. We may share information with vendors and suppliers (collectively, "Service Providers") who perform services and functions on our behalf, including our website platform (Finalsite), security/content delivery network (Cloudflare), admissions portal, payment processor, email/communications provider, analytics providers (e.g., Google, Crazy Egg), and our advertising agency (Swish). Where a provider processes information on our behalf, we require contractual restrictions appropriate to its services, including restrictions on permitted use, confidentiality, security, and retention. Some recipients, including certain advertising platforms and payment providers, may also process information for their own purposes as described in this Policy and their applicable notices.

- Advertising and Analytics Partners. We may share device and browsing information with advertising and analytics partners (such as Google and Meta) through cookies and pixels when you consent to advertising or analytics cookies. Under some state laws, this may be treated as "sharing" for targeted advertising, from which you may opt out through Cookie Settings.

- Affiliated Organizations. We may share personal information with affiliated organizations, such as Trinity Parents Organization (TPO), Patrons of the Arts, and Boosters Club, for school-related purposes.

- Aggregate Information. We may share non-identifying information, such as aggregate statistics or usage information, with third parties. Any aggregated information shared in this way will not contain any personal information.

- Legal and Safety Disclosure. We may transfer and disclose information, including your personal information, to third parties to comply with a legal obligation; when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our agreements, terms of use, or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of Trinity Prep, our students, staff, visitors to the Service, or the public.

- Successors. If the school undergoes a reorganization, merger, or transfer of assets, we may transfer personal information to the successor. In such a case, unless prohibited by applicable

law, your information would remain subject to the privacy policy applicable at the time of such transfer, unless you discontinue use of the Service.

Retention of Personal Information

We retain your personal information for only as long as necessary to fulfill the purposes outlined in this Policy, including for the purposes of satisfying any legal, accreditation, audit, accounting, or reporting requirements, unless a longer retention period is required or permitted by law.

To determine the appropriate retention period for personal information, we consider:

- the amount, nature, and sensitivity of the information;
- the potential risk of harm from unauthorized use or disclosure of the information;
- the purposes for which we obtained the information and whether we can achieve those purposes through other means;
- whether the information is needed to provide and improve the Service and respond to your inquiries;
- the need to maintain appropriate business and accounting records;
- compliance with our legal, regulatory, accreditation, and contractual obligations; and
- our rights to establish, exercise, or defend legal claims.

When personal information is no longer needed for the purposes described in this Policy or an applicable legal retention requirement, we delete it or render it appropriately de-identified. Information retained for legal holds, security, or backup recovery is access-restricted and is not used for unrelated purposes. Backup copies are removed according to documented retention cycles, subject to applicable law.

Cookies and Tracking Technologies

A “cookie” is a small text file created by a web server that can be stored on a user’s device for use either during a particular browsing session (a “session” cookie) or a future browsing session (a “persistent” cookie). This file may include information about your IP address, browser type, internet service provider (ISP), URLs of any referring or exited webpages, operating system, and/or date and time stamps.
Our website uses cookies, web beacons, tracking pixels, browser local storage (HTML local storage objects), and similar tracking technologies (collectively, “Cookies”) to ensure essential site functionality, measure site performance, analyze visitor behavior, and support our admissions and community outreach efforts. Only Strictly Necessary & Security Cookies are used before you provide express consent through our cookie banner; all other Cookies described below are activated only after you provide such consent. You may accept, reject, or customize Cookies through the banner shown on your first visit and at any time via Cookie Settings in the Service footer. Disabling Cookies may alter Service functionality or access to certain features; withdrawing consent is as easy as giving it.

We categorize the Cookies utilized on our public website into the following categories:

- **Strictly Necessary & Security Cookies:** These Cookies are required for the fundamental operation and security of our website, including security, load balancing, bot protection, session management, and storing your cookie preferences (such as Cloudflare threat-detection and network security tools, including the _cfuvid identifier used to distinguish trusted web traffic).

They manage essential network requests, protect against automated traffic, and maintain site stability. They cannot be turned off in our systems.

- **Functional Cookies:** These Cookies remember preferences and enable embedded content (e.g., video players, calendars), including local storage set by embedded media players (such as the dashjs_video_bitrate and dashjs_audio_bitrate entries used to store playback quality settings).

- **Performance & Analytics Cookies:** These Cookies collect information about how visitors navigate and interact with our website, allowing us to measure and improve site performance. These tools include:

    - **Google Analytics:** Google Analytics 4 monitors aggregated metrics such as IP addresses, approximate geographic location, browser type, device specifications, referring/exit pages, and time spent on specific pages, and uses identifiers such as the _ga and _ga_# cookies to distinguish users and calculate visits and sessions. Your web browser automatically sends certain information to Google, such as the web address of the page that you are visiting and your IP address. Google may also set cookies on your browser or read cookies that are already there. If you would like further information on how Google uses data when you use our website, visit Google's privacy site.
    - **User Interaction & Session Analytics:** Tools (such as Crazy Egg) that collect aggregated, pseudonymous interaction data—including page clicks, scroll patterns, and heatmaps—to help us optimize site navigation and user experience.
    - **Web Fonts & Related Pixels:** Third-party web-font and content-delivery services (such as Adobe Typekit) may set session pixels (such as p.gif) to deliver fonts and measure related performance.

- **Marketing & Targeting Cookies:** Placed by third-party advertising networks, these Cookies track browsing activity across public pages (such as Admissions and Events) to build pseudonymous interest profiles. This enables us to measure the effectiveness of our admissions or advertising campaigns and deliver relevant information about Trinity Prep to prospective families on external platforms, including showing Trinity Prep advertisements to people who have visited the Service on Facebook, Instagram, Google, and partner sites. These technologies include the Meta/Facebook Pixel (such as the _fbp cookie and the lastExternalReferrer and lastExternalReferrerTime local storage entries used to detect how you reached the site), Google Ads and Google conversion tools (such as the _gcl_au cookie, the _gcl_ls local storage entry, and Google conversion pixels), and DoubleClick (such as the test_cookie used to check whether your browser supports cookies). These providers may combine information collected here with information they hold about you.

Student Privacy & Educational Systems

Trinity Prep maintains a strict boundary between public marketing efforts and educational platforms. Third-party marketing pixels, retargeting cookies, and commercial behavioral trackers are not deployed within password-protected student portals, learning management systems, or Google Workspace for Education accounts used by active students. These educational platforms include the MyTPS Portal, the central hub for Trinity Prep students, faculty, and parents, which is powered by Veracross, the school's comprehensive information system, and Canvas, the learning management system through which Trinity students and families access full library resources and online subscriptions.

Managing Your Information

If you have any questions about how your information is managed you may contact us at tpsf-cookieadmin@trinityprep.org or helpdesk@trinityprep.org. Depending on your location and applicable law, you may have rights to request access, correction, deletion, or a portable copy of personal information; to withdraw consent; and to opt out of certain sales, targeted advertising, or profiling. These rights are subject to applicable exceptions. Submit requests to tpsf-cookieadmin@trinityprep.org or helpdesk@trinityprep.org. We may verify your identity or an authorized agent's authority using information proportionate to the request. We will explain a denial and provide an appeal process where required by law. We do not charge for requests except where applicable law permits a fee, and we will explain any permitted fee in advance. We will not unlawfully discriminate against you for exercising a privacy right.

Where applicable law requires recognition of an opt-out preference signal, such as Global Privacy Control, we treat the signal as an opt-out for the browser or device and any account to which we can appropriately apply it. Cookie Settings explains the choices available on this Service.

Also, you may take the following steps to manage your information:

- **Managing Cookies:** You can control or reset your cookie preferences at any time through your web browser settings or via Cookie Settings in the Service footer. Withdrawing consent for cookies on the Service is as easy as giving it. Also, most browsers allow you to block third-party cookies, clear existing cookies, or receive a notification before a cookie is saved. Please note that disabling certain functional or security cookies may impact your user experience or cause portions of the website to function incorrectly.

- **Access, correction, and deletion:** You may request access to, correction of, or deletion of your personal information by contacting us as described in the How to Contact Us section below. We will verify your identity and respond within the timeframe required by applicable law. Upon your request, we will delete your personal information from our active databases and, where feasible, from our back-up media; however, you should be aware that it is not technologically possible to remove every record of the information you have provided from our servers, and we may retain information where required or permitted by law.

- **Marketing email:** You may opt out of non-transactional email by using the unsubscribe link included in these communications or by contacting us at marketing@trinityprep.com.

- **Opting Out of Targeted Advertising.** You can control how ad networks use your data for targeted communications using the following options:
    - **Platform Ad Settings:** Adjust your privacy and advertisement preferences directly within your social media and search provider accounts (e.g., via Google Ad Preferences or Meta Privacy Settings).
    - **Industry Opt-Out Organizations:** Opt out of participating ad networks through self-regulatory industry tools, such as the Digital Advertising Alliance (DAA) Consumer Choice Page or the Network Advertising Initiative (NAI) Opt-Out Tool.

Linked Sites and Embedded Content

The Service may contain links to, and embed content from, third-party owned or operated websites, including without limitation athletic leagues, educational resources, partner tools, video platforms, and social media websites (each a "Linked Site"). When you click on a link to a Linked Site, you will leave the Service, and another entity may collect personal information or pseudonymous/aggregated where configured data from you. This Policy and the practices that we follow under this Policy do not apply to Linked Sites. We are not responsible for the content, accuracy, or opinions expressed on any Linked Site or for the privacy practices or security standards used by third parties on such Linked Sites. We encourage you to review the privacy terms of any Linked Site you visit.

Community Portals, Email Privacy, and Anti-Spam Policy

Parents, students, and employees are provided access to password-protected areas of the Service that contain internal community information, such as directories and faculty/staff contact details. Directory information and email addresses published on any part of the Service are for official school communications only. Using this information for private, commercial, or political mailings, or distributing it to outside parties, is strictly prohibited.
Non-secured Communications. Posts to discussion forums, discussion boards, comments to blogs, and Alumni Class Notes are viewable by other users. When these areas are not in a password-protected area, they may be viewable by the general public. Please be aware of this when posting personal information to these areas.

User Contributions

Some features of the Service may now or in the future allow you to provide content, such as written comments, to be published or displayed on public areas of the Service ("User Contributions"). Be careful about giving out information in public areas of the Service. The information you share in public areas may be viewed by any user of the Service. We cannot control the actions of other users of the Service with whom you may choose to share your User Contributions.

Security of Your Information

The security of your personal information is important to us. We use administrative, technical, and physical safeguards appropriate to the sensitivity of the information, including encryption in transit (SSL/TLS), access controls, and vendor security reviews. Whenever users submit personal information (such as contact or credit card information) via online forms, registration, or online purchases, upon submission that information is encrypted. Servers that store personally identifiable information are in a secure environment. Under no circumstances are credit card numbers permanently stored on our website servers. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Trinity Prep cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your personal information.

The security of your account relies on your protection of your login information. You are responsible for maintaining the security of your login information, including your password, and for all activities that occur under your account. You may not share your password with anyone. We will never ask you to send your password or other sensitive information to us in an email. Any email or other communication purporting to be from us requesting your password or asking you to provide sensitive account information via email should be treated as unauthorized and suspicious and should be reported to us

immediately. If you believe someone else has obtained access to your password, please change it immediately and report it to us at helpdesk@trinityprep.org.

If a breach of security involving unsecured personally identifiable information occurs, we will notify you as required by Florida law and other applicable breach-notification laws.

If you believe you have identified a security vulnerability in the Service, please report it to us at helpdesk@trinityprep.org. We appreciate responsible disclosure and will review reports promptly. Please do not access, modify, or delete data belonging to others or disrupt the Service when investigating or reporting a potential vulnerability.

If you believe any personal information you have submitted to us is unsecure or have any other privacy concerns, please notify us immediately at helpdesk@trinityprep.org.

Newsletters and Emails

At registration and at various times during your use of the Service, you may be given the option of opting in to receive informational or promotional newsletters via email from Trinity Prep. If you receive email communications from us, we may use certain tools to capture data related to when you open our message and when you click on any links or banners it contains, which we use to enhance our communications. When you provide your email address or sign up for one of our mailing lists, you may at any time choose to opt out of receiving additional informational or promotional communications by following the unsubscribe directions included at the bottom of the communication or by contacting us at marketing@trinityprep.org.

If you provide us with feedback or contact us for support or to ask us questions, we will collect your name, contact details, and other information needed to respond to your feedback, request for support, or question.

Personal information sent to Trinity Prep by email or other correspondence remains subject to this Policy or the applicable supplemental notice. Ordinary email may not provide the same protections as an approved secure submission system. Do not send payment-card numbers, government identifiers, medical records, or similarly sensitive information through ordinary email unless we specifically direct you to an approved secure process.

Unsolicited ideas or suggestions do not create a separate confidentiality obligation concerning the idea or suggestion itself. This does not remove privacy protections applicable to personal information contained in the communication.

Research and Measurement Activities

From time to time, Trinity Prep may conduct online surveys and ask you to enter personal information for research and measurement purposes (as further described in the “Categories of Personal Information and Purpose for Collection” section). Online surveys conducted by or on behalf of Trinity Prep may contain a link to this Policy.

International Visitors

Trinity Prep is a U.S.-based organization, and the Service is operated from, and information is processed in, the United States. If you access the Service from outside the United States, your information will be transferred to the United States, where the privacy laws may not be as comprehensive as, or equivalent to, those in the country where you reside or are a citizen. By using the Service, or by providing us with any personal information, you consent to the collection, processing, maintenance, and transfer of such data in and to the United States.

Changes to Our Privacy Policy

We reserve the right to change or modify this Policy at any time, and any nonmaterial changes are effective upon being posted unless we advise otherwise. If we make any material changes to this Policy, we will provide prominent notice on the Service before the change becomes effective. We encourage you to frequently review this page for the latest information on our privacy practices. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used.

Reasonable Fees

Subject to applicable law, Trinity Prep may charge a reasonable fee for the administrative costs of any request that is manifestly unfounded or excessive.

How to Contact Us

If you have any questions about this Policy, you may contact us by using the “Contact Us” link on our Service, by email at tpsf-cookieadmin@trinityprep.org or helpdesk@trinityprep.org, 407.671.4140, or by mail at:

Trinity Preparatory School of Florida
Attn: Privacy Officer
5700 Trinity Prep Lane
Winter Park, FL 32792