

# Privacy Notice

**Effective Date:** 08/01/2026

**Last Updated:** 07/20/2026

## Who We Are

Giant Campus Academy (“we,” “us,” or “our”) is owned by Imagine Learning LLC. We are an online private academy for students in grades 9-12.

We take your privacy—and the privacy of every student—seriously. This notice explains how we collect, use, and protect personal information from students, parents, and organizational partners.

By using our websites, learning platforms, or services, you agree to the terms of this Privacy Notice. This Privacy Notice does not replace any other permissions we must get under the law, including parent or legal guardian permission required by COPPA.

## What Is Personal Data?

“Personal Data” (also called *personal information*) means any information that can identify you directly or indirectly.

This includes things like:

- Your name, address, email, or phone number
- Your student ID, username, or login information
- Grades, assignments, or test results
- Records about attendance, activities, or behavior
- Information about your learning needs or accommodations
- Photos, audio, or video connected to your school activities

If any other data can be connected back to you (like your device ID, IP address, or school enrollment record), we also treat that as Personal Data.

When data is stripped of details so that no one can identify you, we call it “De-identified Data” and we may use that safely for research, training, or improvement.

## Information We Collect

We collect and use sensitive information only as necessary to provide our services and support student learning, meet legal obligations, or support accommodations, and only

as permitted by law or contract. What we collect depends on your role (website visitor, student, parent, legal guardian, or organization).

**a. For Parents and Legal Guardians**

- Name and contact information (email, phone number, and address)
- Account username and password
- Payment details (securely processed through third parties)
- Survey or feedback responses (optional)

**b. For Students**

Students who are 17 years old or younger cannot create their own accounts. These accounts must be set up by a parent, guardian, or authorized organization.

We may collect:

- Name, grade level, and school enrollment
- Contact information such as home address, email address, and phone number
- Demographic information such as date of birth, gender, racial or ethnic origin, nationality, and language spoken
- Special indicators including English Language Learner (ELL), IEP/504 status, living situations (e.g., foster care, homelessness), and student disability information
- Username and password
- Learning progress, test results, grades, and attendance
- Assignments, teacher comments, and messages
- Optional details like learning accommodation requests or extracurricular participation (including NCAA eligibility)
- Audio, video, or writing submissions made through courses
- Academic performance, scores, and grades
- Standardized test scores or transcripts
- Student-generated work

**c. From Marketing Websites**

When you visit our website (without logging into classes), we may collect:

- IP address and browser information
- Name and contact details entered in forms
- Data from cookies or website analytics tools

#### **d. From Other Sources**

We may receive information from:

- Schools, partners, or third-party education systems you work with.
- Social media or other online platforms when you engage with our pages.  
Any information we receive from these sources is handled the same way as data we collect directly.

### **How We Use Information**

We use your information to:

- Provide and manage learning services
- Communicate with students, parents, legal guardians, and organizations that are authorized to receive your information.
- Track grades, attendance, and NCAA eligibility
- Improve our courses, websites, and learning tools
- Protect accounts and prevent misuse for security and safety
- Follow legal and accreditation requirements

We **do not sell** your personal information.

### **Sharing Information**

We only share your information when necessary to operate our programs, or as required or permitted by law.

We may share information with:

- Teachers, advisors, and administrators who support student learning
- Parents or guardians of enrolled students
- Partner schools or organizations that manage or fund student enrollment

- NCAA or accrediting bodies (for eligibility and reporting)
- Service providers (such as hosting or analytics companies) under strict privacy contracts
- Bankruptcy proceedings
- Government authorities and law enforcement, if legally required or permissible
- Corporate affiliates, parents, and/or subsidiaries
- A successor or acquiring company if we are sold or join with another company, and that company must follow this Privacy Notice
- Others for compliance or legal reasons, or
- Others with your express consent.

We may share **de-identified or aggregated data** that cannot be linked to individual users.

## **Artificial Intelligence (AI)**

We use AI tools responsibly to improve learning and support teachers.

Examples include:

- Personalized lesson support
- Writing feedback tools
- Summaries of student progress

We do not use Personal Data to train our own AI models or allow third-party AI providers to use Personal Data for training. Only de-identified or anonymous data may be used for improvement.

## **Protecting Children's Privacy**

We follow all federal and state laws that protect children's data, including **COPPA** (Children's Online Privacy Protection Act) and, when applicable, **FERPA** (Family Educational Rights and Privacy Act).

- Children under 13 cannot use our services without verified parent or legal guardian consent.

- Parents and legal guardians can view their child's information at any time by logging into their account or contacting us
- Parents and legal guardians can request to edit or delete their child's Personal Data by contacting us
- We do not show or share children's information publicly without written consent from their parent or legal guardian. For example, with this consent, we may spotlight a student's story or testimonial on our website.

## **Data Protection and Security**

We use strong security systems to protect your data, including:

- Encryption during transfer and storage
- Secure servers located in the United States
- Password-protected accounts
- Regular monitoring for system threats
- Employee training in data privacy and security

If a data breach ever occurs, we will follow all legal requirements to notify affected users and take corrective action.

## **Cookies and Tracking**

Our websites and learning platforms use limited tracking technologies to ensure a safe and effective educational experience. Information collected through student learning platforms is not used for commercial marketing or advertising.

### **a. Types of Cookies and Tools We Use**

We use:

- **Essential cookies** to keep users logged in and maintain secure connections
- **Performance cookies** to measure and improve site performance
- **Preference cookies** to remember things like display settings

We do not use cookies or tracking tools for behavioral advertising, commercial marketing, or profiling on our educational platforms that students use for learning.

However, on our public marketing websites, we may use cookies and tracking technology for commercial marketing, advertising, and promotional purposes, including personalized ads, social media campaigns, and measurement of marketing effectiveness.

These marketing tools help us share information about our programs, events, and services that may be of interest to parents, legal guardians, and partner organizations. Any data collected through marketing sites is handled according to this Privacy Notice.

## **b. Managing Cookies and Controls**

You can adjust or disable cookies through your browser or device settings.

If you disable cookies, some features (like saving login details) may not work properly.

## **Communications**

We may contact you by email, phone, or text message about your account, learning activities, or our programs.

### **a. Text Messages**

- If you are 13 or older or have parent or guardian consent, you may receive text messages from us about classes, enrollment, or school updates. Some places require you to be older by law. If you live in one of those places, you must meet the higher age requirements. If you are younger, your parent or guardian must give permission,
- You can opt out at any time by replying “STOP” or contacting us at [privacy@imaginelearning.com](mailto:privacy@imaginelearning.com).
- We never share or sell phone numbers for marketing.

### **b. Email Messages**

- We may send emails for informational and marketing purposes, including updates, reminders, or news about our services to customers or individuals who have chosen to receive them.
- You can opt out of marketing emails by clicking “unsubscribe” at the bottom of any email.
- We may still send important service-related messages about your enrollment, account, or school activities.

## **How Long We Keep Information**

We keep information only as long as needed for:

- Providing educational services

- Meeting legal, regulatory, or accreditation requirements
- Maintaining secure backup systems

After that, data will be deleted, de-identified, and/or anonymized.

## Your Privacy Rights

We respect your rights to understand and control how your personal data is used. Depending on where you live, you may have certain rights under privacy laws such as the California Consumer Privacy Act (CCPA/CPRA), the Virginia Consumer Data Protection Act (VCDPA), the Colorado Privacy Act (CPA), the Connecticut Data Privacy Act (CTDPA), the Utah Consumer Privacy Act (UCPA), or the European Union General Data Protection Regulation (GDPR).

These rights apply to parents, students, school representatives, and other individuals who interact with our services or websites.

### a. Your Privacy Rights and Choices

Depending on your location, you may have the following rights:

- **Right to Know and Access:** You can request information about what personal data we collect, how we use it, and who we share it with. You can also ask for a copy of your data in a portable format.
- **Right to Correction:** You can ask us to correct or update any inaccurate or incomplete information we hold about you.
- **Right to Deletion:** You can request that we delete your personal data, unless we need to keep it for legal, educational, or contractual reasons.
- **Right to Limit Use and Sharing:** You may request that we limit how your data is used or shared for non-essential purposes, such as marketing.
- **Right to Opt-Out of Sale or Targeted Advertising:** We do not sell personal data or engage in targeted advertising on student platforms. However, visitors to our marketing websites may opt out of tracking used for commercial advertising by adjusting cookie settings.
- **Right to Non-Discrimination:** We will never deny services, charge different prices, or provide lower-quality experiences because you exercise your privacy rights.

- **Right to Data Portability (GDPR):** If you are in the European Union or another region that recognizes this right, you can ask to receive your personal data in a structured, commonly used format.
- **Right to Object or Restrict Processing (GDPR):** You may object to our use of your data or ask us to limit certain types of processing (for example, for direct marketing).
- **Right to Withdraw Consent:** If you have given us consent (for example, for marketing emails or cookies), you can withdraw it at any time.
- **Right to Appeal:** If we deny your request under any state or international law, you have the right to appeal our decision.

## **b. How to Exercise Your Rights**

You or your authorized representative can exercise your rights by contacting us through one of the following methods:

- **Email:** [privacy@imaginelearning.com](mailto:privacy@imaginelearning.com)
- **Mail:** Privacy Office, 100 S. Mill Ave., 1700, Tempe, AZ 85281

Please include your full name, contact information, and the specific request you are making.

We may need to verify your identity before processing your request to protect your privacy. Verification may include confirming information you've provided (such as your email or student ID) or requesting a form of identification (like a government ID).

If you authorize someone else (like a parent, guardian, or legal agent) to act on your behalf, they must provide proof of their authority such as court documentation.

We will respond to most verified requests within 30 to 45 days (or as required by law). If we need more time, we'll explain why and let you know when to expect a full response.

## **c. Users outside the United States**

- **Consent to Transfer:** Our services are based in the United States. If you live outside the U.S., please know that any information we collect will be sent to and handled in the U.S. By using our services or sharing your information, you agree to this transfer and storage. Privacy laws in the U.S. may be different and less strict than those in your country.
- **Legal bases for processing:** We process your Personal Data on the following legal bases:

- To provide our services: We need to process your information to fulfill the contract for our services or take steps you ask for before using them.
- To run our websites.
- To send marketing messages.
- To create anonymous data for analytics.
- For compliance, fraud prevention, and safety: These activities are based on our legitimate interests. Before we process your information for these reasons, we consider how it might affect your rights. We do not use your information if your privacy interests outweigh our legitimate interests (unless you give consent or the law allows it).
- To follow the law: Sometimes we must process your information to meet legal obligations.
- With your consent: If we rely on your consent, you can withdraw it anytime using the method provided when we ask for it.

• **File a Complaint:** If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

## Updates to This Notice

We may update this Privacy Notice from time to time. Major changes will be posted on our website with a new effective date. Continued use of our services means you accept the updated version.

## Contact Us

If you have questions or requests about your privacy, contact us at:

### Giant Campus Academy

Privacy Office

Email: [privacy@imaginelearning.com](mailto:privacy@imaginelearning.com)

Mail: 100 S. Mill Ave., #1700, Tempe, AZ 85281