WEB-BASED MEAL APPLICATIONS

Bentonville Schools offers web-based meal applications through Meal Magic. The web-based meal application may be accessed through our website or at https://www.familyportal.cloud. We understand the importance of privacy to the students and families whose information we may access. This policy describes our practices for the collection, use, and protection of information.

We may collect personally identifiable information about the Users, such as first and last name and e-mail and mailing addresses. We use such information only for the purposes of providing the web-based meal application services. We also collect User Information directly from you when you voluntarily provide it to us, such as information that you provide by filling in forms, including information provided at the time of registering to use our services. We also retain records and copies of your correspondence (including email addresses) if you contact us.

As you interact with the services through Meal Magic, automatic data collection technologies may be used to collect certain information about your equipment, browsing actions, and usage patterns. For example, Meal Magic collects information about your device and software, such as your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser and mobile device or your account, and other such information. Some of this information may constitute your personal information under applicable law, even though it may not directly identify you. Meal Magic uses this information to improve services and deliver a better and more personalized service.

The technologies for data collection may include:
- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of Meal Magic services. Unless you have adjusted your browser setting so that it will refuse cookies, the system will issue cookies when you direct your browser to Meal Magic.
- Other Technologies. Meal Magic websites and emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- Stored Information and Files. Meal Magic may access metadata and other information associated with other files stored on your device for use with the services or Meal Magic.

Except as set forth in this Privacy Policy, Meal Magic will not trade, share, rent, sell, or give away your personal information to third parties. For avoidance of doubt, Meal Magic does not rent or sell information for marketing purposes and will never share or sell User Information with third parties for marketing purposes. Meal Magic may disclose aggregated information about users, and information that does not identify any individual, without restriction. Access to web-based meal applications will be provided to Arkansas Department of Education Child Nutrition Unit during applicable reviews.

Meal Magic may disclose personal information as described in this Policy:

- to fulfill the purpose for which you provide it;
- to Meal Magic subsidiaries and affiliates;
- to contractors, service providers, and other third parties Meal Magic uses to support their business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which Meal Magic discloses it to them;
- for any other purpose disclosed by Meal Magic when you provide the information; or
- with your consent.
- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce or apply our terms of Services and other agreements, including for billing and collection purposes; or
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our company, our customers, or others.

If Meal Magic should sell, divest, or transfer business, User Information will not transfer unless the new owner intends to maintain and provide the Services as a going concern, and provided that the new owner has agreed to data privacy standards no less stringent than set forth in this Policy. In such case, Meal Magic will provide you with notice and an opportunity to opt-out of the transfer of personally identifiable User Information.

Bentonville Schools and Meal Magic will take appropriate security measures to protect against unauthorized access to, or unauthorized alteration, disclosure, or destruction of, users' information. Access to your personally identifying information is restricted to employees who need to know that information to operate, develop, or improve services, sites, and apps. Servers are protected by firewalls and are physically located in secure data facilities to further increase security. Secure Socket Layer (SSL) technology is used for mutual authentication, data encryption, and data integrity. While no computer is 100% safe from outside attacks, the steps we have taken to protect your personal information drastically reduces the likelihood of security problems to a level appropriate to the type of information involved.

Should Bentonville Schools terminate service with Meal Magic, Meal Magic may retain your data for up to 90 days for administrative purposes relating to the termination. After that, your data will be promptly deleted and removed from Meal Magic, unless Meal Magic has an independent legal obligation to preserve your data.

Bentonville Schools and Meal Magic shall comply in all respects with the Family Educational Rights and Privacy Act (FERPA) and all other state and federal laws applicable to the security and confidentiality of pupil records. Bentonville Schools and Meal Magic will designate and train responsible individuals on ensuring the security and confidentiality of pupil records, and Meal Magic will establish and validate that security protocols that are in use at their facilities or leased facilities meet or exceed the stated and expected security surrounding FERPA which include firewalls, intrusion detection, web-based security, and authentication protocols. In addition, Meal Magic will provide such information reasonably requested by you for you to verify Meal Magic's compliance with FERPA and such other state and federal laws applicable to the security and confidentiality of pupil records.

Online documents are legally binding. The Level 2 Electronic Digital Signatures Authentication System meets all requirements specified by the USDA, National Institute of Standards and Technology Guidance, the Arkansas Uniform Electronic Signatures ACT, A.C.A §25-31-101 et seq., the Arkansas Department of Education Child Nutrition Unit, and applicable Arkansas Division of Information Services State Security Guidance.