



## SEA PRIVACY POLICY

*(Applicable to all employees, contractors, systems and platforms involved in sending SMS/MMS)*

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# Privacy Policy

**Effective Date:** 12/01/2025 - **Version:** 1.1

String Ensemble Academy (“SEA”, “we”, “our”, “the Academy”) is committed to protecting the privacy of students, parents, guardians, and users who access our website, digital portal, booking system, and communication channels (“Portal”). This Privacy Policy explains how we collect, use, store, and protect personal information.

By using the Portal or providing your personal information, you consent to the practices described in this Privacy Policy.

## 1. Information We Collect

We may collect the following types of information:

### 1.1 Personal Information

- Student name, age, date of birth
- Parent/guardian name and contact details
- Phone number, email address
- Home address
- Emergency contacts

### 1.2 Educational Information

- Program enrollment
- Class schedules
- Attendance records
- Teacher notes as required for instruction

### 1.3 Payment & Transaction Information

- Payment details (processed through secure third-party systems)
- Billing history
- Subscription or tuition records

SEA does **not** store full credit card numbers or bank credentials.

### 1.4 Technical & Usage Information

Collected automatically by WIX and integrated tools:

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1001 South Mac Dill Avenue, Suite 200, Tampa, Florida 33629  
[www.stringensembleacademy.com](http://www.stringensembleacademy.com) | [info@stringensembleacademy.com](mailto:info@stringensembleacademy.com) | (813) 358-1403

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- IP address
- Device/browser type
- Pages visited
- Cookies and tracking technologies
- Login activity

### 1.5 Communications Logs

- Emails
- SMS/MMS (10DLC compliant)
- Portal notifications
- Customer support interactions

## 2. How We Use Your Information

We may use collected information to:

- Process registrations and bookings
- Deliver classes, lessons, and educational services
- Communicate schedules, updates, and billing
- Provide customer support
- Maintain student safety and emergency contact capabilities
- Manage accounts within the Portal
- Process payments
- Improve website and portal performance
- Comply with legal requirements

SEA does **not** sell personal data.

## 3. Legal Basis (U.S. & Florida Compliance)

We collect information under:

- Consent provided during enrollment or booking
- Legitimate educational interests
- Operational necessity for Academy functions
- Legal obligations or safety requirements

For minors, consent is provided by a parent or legal guardian.

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### 4. Sharing of Information

Personal information may be shared only with:

#### 4.1 Service Providers (Third Parties)

- **WIX** (hosting and CRM)
- Payment processors (Stripe, PayPal, WIX Payments, etc.)
- Communication services (Zoom Phone, SMS platforms, email tools)
- Scheduling systems
- Security or monitoring tools

These providers use data solely to support SEA operations.

#### 4.2 Legal Requirements

Information may be disclosed when necessary to:

- Comply with state or federal law
- Respond to lawful requests
- Protect student safety
- Prevent fraud or unauthorized use

SEA never sells or trades personal information.

### 5. SMS, Email & Communication Consent

By submitting your contact information:

- You consent to receiving **operational messages** (schedule updates, billing alerts, lesson reminders)
- Marketing messages are optional and require opt-in
- You may **opt-out of SMS** at any time by replying **STOP**
- SEA's messaging complies with **10DLC regulations**
- Email communications include unsubscribe options

Operational messages may remain necessary for enrolled students.

### 6. Cookies & Tracking Technologies

Our Portal uses:

- Essential cookies (for login and security)

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- Functional cookies
- Analytics (WIX Analytics, Google Analytics if enabled)
- Session logs

You may control cookies through browser settings or WIX cookie banner.

## 7. Data Storage & Security

SEA uses industry-standard protections, including:

- WIX SSL encryption
- Access-controlled CRM
- Encrypted databases
- Secure payment processing
- Limited administrative access

We take reasonable measures to prevent:

- unauthorized access
- data loss
- misuse of personal information

## 8. Children's Privacy

SEA collects student information only with **parent or guardian consent**.

We follow best practices aligned with:

- **COPPA expectations** (for minors under 13)
- Educational privacy standards similar to **FERPA** (not legally required, but applied as best practice)

Children cannot create accounts on their own.

## 9. Your Rights

Parents/students may request at any time:

- Access to personal data
- Correction of inaccurate information
- Removal of data (subject to legal/operational limits)

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- Change of consents (SMS, marketing, etc.)
- A copy of stored information

Requests may be submitted through the Portal or via email.

### 10. Data Retention

SEA retains personal information only as long as needed for:

- Educational and administrative purposes
- Legal, accounting, or reporting obligations

SMS consent records are retained for **minimum 24 months** per 10DLC standards.

### 11. Third-Party Links

Our Portal may link to external sites.

SEA is not responsible for their privacy practices.

### 12. Updates to This Privacy Policy

SEA may update this Privacy Policy periodically.

Updates will be posted in the Portal with a revised **Effective Date**.

Continued use of the Portal indicates acceptance of updated terms.

### 13. Contact Information

For privacy questions, data requests, or concerns:

#### String Ensemble Academy (SEA)

Address: 1001 S Mac Dill Ave, Suite 200, Tampa, FL 33629

Email: [info@stringensembleacademy.com](mailto:info@stringensembleacademy.com)

Phone: (813) 358 1403

Portal: [www.stringensembleacademy.com](http://www.stringensembleacademy.com)

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### **14. Acceptance of Privacy Policy**

Using the portal, submitting personal data, or opting in to communication services constitutes acceptance of this policy. All personnel must read, understand and follow this policy before sending any SMS.

**Signed by:** *Omar Rafael Pucciarelli / COO*

**Date:** 12/01/2025

This Agreement shall be governed by and construed in accordance with the laws of the State of Florida.

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# Policies and Procedures

## Communication, Scheduling & SMS Consent

*(This form has to be returned to SEA signed after 1<sup>st</sup> class is taken)*

As part of enrollment at String Ensemble Academy (“SEA”), all students, parents, or legal guardians agree to the following communication and scheduling policies:

### 1. Communication & SMS Consent

By providing a mobile phone number during enrollment, you authorize SEA to send service-related SMS messages, including class reminders, schedule updates, booking confirmations, cancellations, account notifications, and other essential information related to your lessons. SEA will never send promotional or marketing SMS content.

You may opt out at any time by replying STOP, or request help by replying HELP or emailing [info@stringensembleacademy.com](mailto:info@stringensembleacademy.com).

### 2. Accuracy of Contact Information

Students and parents are responsible for maintaining accurate contact information in the SEA Portal. SEA is not responsible for missed communications due to outdated or incorrect phone numbers or email addresses.

### 3. Scheduling & Attendance

All scheduling, cancellations, and rescheduling must be managed through the SEA Booking Portal.

Students agree to review their schedule regularly and attend lessons on time.

If a student cannot attend an in-person lesson, SEA may offer an online option when possible.

### 4. Conduct & Respectful Communication

Comments within the SEA Portal are visible to the assigned teacher and authorized SEA staff. Students and parents agree to use the comment section respectfully and for constructive purposes only. For sensitive matters, communication must be directed to SEA administration.

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### 5. Acknowledgment & Agreement

By signing this document, the student or parent/guardian acknowledges having read, understood, and agreed to all SEA Policies and Procedures, including the Communication & SMS Policy, Attendance Policy, Portal Use Guidelines, and all general academy rules.

Signature of Parent/Guardian: \_\_\_\_\_

Date: \_\_\_\_\_

Printed Name of Student/Parent/Guardian: \_\_\_\_\_

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