SMS PRIVACY POLICY

This SMS Privacy Policy was last updated on April 1, 2025.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY CONTINUING TO ACCESS THE DETROIT COLLEGE ACCESS NETWORK'S, SMS SERVICE, YOU AGREE TO THE TERMS IN THIS SMS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS IN THIS SMS PRIVACY POLICY, DO NOT PROVIDE US WITH YOUR PERSONAL DATA.

Detroit College Access Network (also referred to as "DCAN", "we," "our," "us") is a collaborative network between local schools, organizations, and the community. DCAN serves as the citywide coordinating body for the college access and enrollment strategies in Detroit.

This SMS Privacy Policy governs the collection, storage, and use of your personal data when you access our SMS service and review our service offerings, (collectively "Services"). This policy provides you with details about the personal data we collect from you, how we use it, and the rights you have to control the personal data we maintain about you.

This policy is addressed to our SMS Service users located in the state of Michigan.

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1. What Information Do We Collect?

When you access our SMS Service, we collect only the information and personal data you have agreed to provide to us that is necessary to identify your needs and to provide you with better service. Depending on the jurisdiction, information about you may be called "personal information," "personally identifiable information," or just "personal data." In this Privacy Policy, we call it both personal data and personal information in an effort to match the jurisdictional preferences.

Through your use of our SMS Services, we may request personal data including, but not limited to:

- Name;
- Contact information including phone number;
- Date of birth:
- Current education status;
- Demographic information including postal code, preferences and interests;
- Text of the text messages you send to us; and
- Other information relevant to the Services we provide.

If you become a registered user through our Service, we will collect the above information.

2. What Do We Do With the Personal Information We Collect?

You will be asked to provide personal data in certain fields when using our Services. The personal data we collect is used only for the purpose we state at the time of collection or for purposes contained below. For example, our uses may include, but are not limited to, the follow

- To provide support or other services. We may use your personal data to provide you with support or other services
 that you have requested. We may also use your personal information to respond directly to your requests for
 information, including registrations for newsletters, webinars, advising or other specific requests.
- To provide information based on your needs and respond to your requests. We may use your personal data to provide you with notices of responses to requests you make.
- To communicate with you about our events. We may communicate with you about events hosted or cosponsored by us or one of our business associates. This may include information about the event's content, event logistics, payment, updates, and additional information related to the event. Information you provide when registering for, or participating in, a conference managed or co-sponsored by parties, other than or in addition to the information obtained via our SMS Service may be shared with those parties, and the treatment of such information is subject to the privacy policies of those parties, not us. DCAN and its conference co-sponsors may contact you after the event about the event, subsequent iterations of the event and/or related events. Please note that our event organizers, co-sponsors, exhibitors, and other third parties may directly request your personal information at their conference booths or online presentations. Providing your information to them is optional, and you should review their privacy policies to address your particular needs and concerns about how they will treat your personal information.
- *To update you on our benefits, programs, and opportunities*. We may communicate with you regarding our benefits, programs, and opportunities that may be available to you.
- To engage with third parties. We may share your personal data with third parties in connection with services that these individuals or entities perform on our behalf. These third parties are restricted from using your data in any way other than to provide services for us or for the collaboration in which they and DCAN are contractually engaged (for example, hosting a DCAN database or engaging in data processing on our behalf, or sending you information that you requested). We carefully select these third parties, and they are contractually obligated to keep your data secure. From time to time, and with your consent, we may also share your information with third parties that might provide content, products, or services of interest to you.
- To protect our content and services. We may use your personal data to prevent potentially illegal activities and to enforce our terms and conditions. We also use a variety of technological systems to detect and address anomalous activity and to screen content to prevent abuse, such as spam. These efforts may, on occasion, result in a temporary or permanent suspension or termination of some functions for some users. By using our Services, you acknowledge and agree that we may access, retain, and disclose the personal data we collect and maintain about you if required to do so by applicable law of the relevant jurisdiction or in a good faith belief that such access, retention, or disclosure is reasonably necessary to: (a) comply with legal process (e.g. a subpoena or court order) or law; (b) enforce our Terms of Service, this SMS Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; (d) respond to your requests for service; and/or (e) protect the rights, property or personal safety of DCAN, its agents, affiliates, users, and/or the public. This includes exchanging information with other companies and organizations for fraud protection, compliance with applicable law, spam/malware prevention, and similar purposes.
- To get feedback or input from you. In order to deliver the Services of most interest to our users, from time to
 time, we may ask members, users and volunteers to provide us with their input and feedback (for example through
 surveys, usability studies, focus groups).
- To protect our information assets as well as your own personal data. Our information security program protects the confidentiality, integrity, and availability of our information assets by following a risk management approach based on policies, standards, guidelines, and procedures to meet security objectives while supporting business and operational goals.

To the extent that we collect certain demographic information about you, we may use this information in our market research, but we will do so only after we "anonymize" or "pseudonymize" the data, i.e., remove information that would confirm your identity. We will not use your personal data, however, to send commercial or marketing messages to you unless we have a legal basis for doing so, such as your consent or a contract with us for which, in either case, you will have the ability to opt out of by sending an email to info@detroitcan.org.

3. Who Can Use the Information We Collect and How?

If we do provide your personal data to third parties or allow third parties to collect personal data from you on our behalf, it is because we have contracted with that third party to provide some part of the information or service that you have requested and received their contractual assurances that they will protect your personal data in accordance with all applicable laws. Other than those who act on our behalf and except as explained in this SMS Policy, personal data you provide to us will not be transferred to unrelated third parties, unless we have a legal basis to do so. However, please note that personal data provided to us is subject to disclosure pursuant to judicial or other government subpoenas, warrants or orders. We will only provide this information after approximately two weeks following receipt of a valid subpoena or other legal process in a civil case.

4. How Do We Protect the Personal Information We Collect?

Security of Personal Data

We are committed to protecting the security of your personal data. Depending on the circumstances, we may hold your information in hard copy and/or electronic form. For each medium, we use technologies and procedures to protect personal data. We review our strategies and update as necessary to meet our business needs, changes in technology, and regulatory requirements. We take our security obligations seriously and so should you. While we are responsible for maintaining the security of our SMS Service and our other Services, you must also access and use our Services in a manner that is responsible and secure. We adhere to internationally recognized security standards and industry best practices, and we periodically audit and assess our information security management system. In addition, we maintain policies, procedures, and training to address data protection, confidentiality, and security, and we regularly update and review the compliance status of these measures.

Storage and Transfer of Personal Data

The personal data we collect is stored and processed in the United States. We take steps to ensure that the data we collect under this SMS Privacy Policy is processed and maintained in accordance with applicable law.

We also collaborate with third parties, such as cloud hosting services and suppliers located within the United States to serve the needs of our business, workforce, and customers. In some cases, we may need to disclose or transfer your personal data to third parties in areas outside of your home state. When we do so, we take steps to ensure that personal data is processed, secured, and transferred according to applicable law.

If you would like to know more about our data transfer practices, please contact info@detroitcan.org.

Retention of Personal Data

We retain your personal data only for as long as necessary to provide the Services you have requested, or for other business purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. We are required by law to keep some types of information for certain periods of time (e.g., statute of limitations). If your personal data is no longer necessary for the legal or business purposes for which it is processed, we will generally destroy or anonymize that information.

5. What Are Your Rights Regarding Your Personal Data?

We respect your right to access and control your personal data. You have choices about the data we collect. When you are asked to provide personal data that is not necessary for the purposes of providing you with our Services, you may decline. However, if you choose not to provide data that is necessary to provide a particular service or product, you may not have access to certain features of our SMS Services.

Please note that your privacy rights may be specific to the state in which you reside. In the list below, we identify the states where certain privacy rights differ or are absent and describe the difference or omission.

Access to personal data: You have the right to request access to your personal data. In these cases, we will comply, subject to any relevant legal requirements and exemptions, including identity verification procedures. Before providing data to you, we will ask for proof of identity and sufficient information about your interaction with us so that we can locate any relevant data. We may also charge you a fee for providing you with a copy of your data (except where this is not permissible under applicable law). This right is available in all states with consumer privacy laws currently in effect.

Sales: We do not share, sell, rent, or trade your personal information with third parties for commercial purposes or for monetary or other gain, and we do not share personal information for cross-context behavioral advertising or sell or share your personal information without your consent.

Marketing preferences: If you have provided us with your contact information, we may, subject to any applicable Spam Act or similar regulation, contact you via SMS text message or other telephone communications about our Services, or events that may be of interest to you, including newsletters.

Right to Non-Discrimination: We will not discriminate against you for exercising your consumer rights under applicable privacy laws. SMS text communications you receive from us will provide you with opt-out instruction allowing you to opt-out of receiving future messages or to change your contact preferences. SMS text communications may also include a link to directly update and manage your preferences.

6. How Do You Correct and Update Your Personal Data?

We aim to keep all personal data that we hold accurate, complete, and up to date. While we will use our best efforts to do so, we encourage you to tell us if you change your contact details. If you believe that the information we hold about you is incorrect, incomplete, or out-of-date, please contact info@detroitcan.org.

You can change or correct your personal data at any time. Just send an email with your old information and your corrections to info@detroitcan.org with "Correction" in the subject line.

7. Who Is Our Intended Audience?

We understand the importance of protecting the privacy of all individuals, especially the very young. Our services are intended for United States audiences at least of the age of 18, or individuals at least of the age of 13 that have their parents' permission to use our Services. Our Services are not directed to children under the age of 13, and you may not use our Services if you are under the age of 13.

8. What Happens When We Update Our Privacy Policy?

We may on occasion update our SMS Privacy Policy. Your acceptance of any minor changes to this SMS Privacy Policy is indicated by your continued use of our Services. If we make any material changes to our SMS Privacy Policy, we will post a notice about the change at a prominent location on our website. We encourage you to periodically review our Services and this SMS Privacy Policy for any changes.

9. What If You Have Questions?

If you have questions or concerns regarding this SMS Privacy Policy, you should first contact us via email at info@detroitcan.org.

SMS Terms of Service

Use of the DCAN SMS text message-based services (the "Service") is subject to the following Terms of Service. These terms constitute a legal agreement (the "Agreement"). Please read them carefully.

- 1. To opt-in to SMS services the opt-in just text "START" to 1-313-708-9501 to sign up to receive Notifications from DCAN.
- 2. You can cancel the Service at any time. Just text "STOP" to 1-313-708-9501. After you send the SMS message "STOP" to us, we will send you an SMS message to confirm that you have been unsubscribed. After this, you will no longer receive SMS messages from us. If you want to join again, just sign up as you did the first time, and we will start sending SMS messages to you again.
- 3. If at any time you forget what keywords are supported, just text "HELP" to 1-313-708-9501. After you send the SMS message "HELP" to us, we will respond with instructions on how to use our Service as well as how to unsubscribe.
- 4. We are able to deliver messages to the major mobile phone carriers operating in the State of Michigan.

 Carriers are not liable for delayed or undelivered messages
- 5. As always, message and data rates may apply for any messages sent to you from us and to us from you, and DCAN is not liable for the cost of any such messages. You will receive recurring messages. If you have any questions about your text plan or data plan, it is best to contact your wireless provider. For all questions about the Service provided by this short code, you can send an email to info@detroitcan.org.
- 6. You understand that anyone with access to your mobile phone may be able to view the messages you receive when using the Service, and you agree that DCAN will not be liable to you if this occurs.
- 7. You understand that you are not required to consent to the Service to receive any other services from DCAN.
- 8. By agreeing to these Terms of Service and providing us with your mobile phone number when you opt in to the Service, you authorize DCAN to contact you by text message at your mobile phone number using an automatic telephone dialing system or device, or any other computer assisted technology as applicable.
- 9. If you have any questions regarding privacy, please read our SMS Privacy Policy.