Privacy Policy
Updated March 10, 2015

Starfish Retention Solutions is owned and operated by Hobsons, Inc. The following privacy policy applies to personal data collected at the www.starfishsolutions.com Web site, and data collected for the Starfish CONNECT™, Starfish EARLY ALERT™, Starfish ADVISING™ offerings (collectively, the “Services”). Starfish Retention Solutions, Inc. and its affiliates (collectively “Starfish”) are committed to protecting the privacy of its users. Because Starfish gathers certain types of information about the users of the Services, we believe you should fully understand the terms and conditions surrounding the use of the information we collect. The following discloses our information gathering and dissemination practices for the Services. If you are using any of the Services through an educational or other institution that is a customer of Starfish, this policy does not supersede the terms of any agreements between Starfish and any other party, nor does it affect the terms of any agreement between any user of the Services and their employer, their educational institution or any third party. Please make sure that you read the terms of any privacy policies that you enter into with parties other than Starfish, including your employer or educational institution, as those policies may also explain how your personal information is used by those parties.

Please review the following statement to understand how the information you provide to Starfish through the Services will be treated.

1. Information Starfish Collects

The Starfish Services work in tandem with an existing course management system and/or student information system. Therefore, certain personally identifiable information from these existing systems will be presented within the Starfish Service. This personally identifiable information consists of, but is not limited to, contact information, such as your name, city and state, and e-mail address as well as demographic information such as your age, gender and interests. This information better enables us to provide you with content relevant to your interests and provides us with aggregate data that Starfish uses to improve the Services. We may also ask you for information about your system or how you use Starfish products and services. Please see Section 5, below, for information on how to access or update this information.

Starfish gathers information about all users collectively, such as what areas users visit most frequently and what services users access most often. Starfish automatically logs the users’ domain name, IP addresses, browser type, language and other data which tracks users’ access to the Services. We analyze these logs for sales and marketing purposes as well as system performance monitoring. These logs are analyzed for the aggregate trends they reveal about our customers and how the customers use the Services, not for the behaviors of individual users.

2. Purposes of Data Collection
Starfish requests personal information including email address and telephone number for purposes such as student success, the provision of customer service and support, billing, network management, customer surveys, sales management, support, newsletter subscriptions, user group memberships, event registration and sponsorship, offers of related services, and other exchanges of information.

3. What Starfish Does with the Information It Collects

The personal information you supply to Starfish will not be given, sold, rented, loaned, or otherwise disclosed to any third parties outside of Starfish and its agents, except when we have your permission or under special circumstances, such as when we believe in good faith that disclosure is reasonably necessary to (i) comply with legal process, (ii) enforce the Terms of Use, (iii) respond to claims that any content provided by using the Services violates the rights of third parties, or (iv) protect the rights, property, or personal safety of Starfish, its users, or the public.

Starfish may use aggregated personal information to determine the demographic composition of our user base and to distribute statistics and general marketplace information and analysis about Starfish. This aggregate information does not identify specific users.

Certain non-personal information regarding users is recorded by the standard operation of the Internet servers hosting the Services. This information is primarily used to provide users of the Services with an enhanced online experience. Starfish may disclose aggregated user statistics in order to describe the Services to prospective partners, and other third parties, and for other lawful purposes.

Some features of the Services may be offered in conjunction with a partner company. In order to provide these features, it may be necessary for either you or us to share your personal information with this company. If you do not want your information to be shared, you can choose not to allow the transfer by not using that particular feature. Also, please be aware that advertisers or Web sites that are linked to the Services may collect personally identifiable information about you. The information practices of those Web sites linked to the Services are not covered by this Privacy Policy and Starfish is not responsible for the privacy practices or the content of such Web sites.

Starfish utilizes other companies to provide limited services on its behalf, including but not limited to customer support, Web analytics, coordination of mailings and event management. These companies are permitted to access only the information they require to perform those services. Starfish requires these companies to maintain the confidentiality of any personal information and prohibits them from using the information for any other purpose than the purpose for which it was collected.

4. Users Options: Opt-Out
Users may opt out of receiving future promotional electronic mailings from Starfish by following the unsubscribe procedures indicated in the mailing. Individual end users of Starfish software should contact their educational institution or other organization licensing the software for questions about access to the personal information collected by that institution. Please contact us at the address below if you have other questions about the information you receive from us or the information that we collect from you.

5. Access Your Information

Starfish offers users the ability to correct or change the information collected during registration. Users may change this information at any time and as often as necessary by choosing the “Profile” option or other similar functionality offered in the Services. To access or change your personal information, log in to your account through the Services. For data not available through such an account, please contact the system administrator at your institution or contact Starfish at the address listed below.

6. Security

All of your personal information is stored on servers at a location designed specifically to ensure that no unauthorized individuals have access to the server or its data.

7. European Union Data Protection

If you reside in the European Union, upon registration you will be indicating your explicit consent that the personal information you have provided may be transferred and stored in countries outside the EU, including the United States. If you fail to provide your consent, you will not be permitted to access the Services for which registration is required. Starfish complies with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Starfish has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Starfish’s certification, please visit http://www.export.gov/safeharbor/. In order to comply with the European Union’s Safe Harbor Principles, Starfish commits to the resolution of complaints about your privacy and our collection or use of your personal information. We have committed to resolve any complaints by European Union citizens relating to this policy, which cannot be resolved directly with our company, through the EU Safe Harbor Dispute Resolution Procedure administered by the Council of Better Business Bureaus, Inc.

If you have any questions regarding this policy, please contact:

Chris Kottke
Hobsons
3033 Wilson Blvd., Suite 500
Arlington, VA 22201
If you do not receive acknowledgement of your complaint or your complaint is not satisfactorily addressed by Starfish Retention Solutions, Inc., please visit the BBB EU SAFE HARBOR Web site at http://www.bbb.org/us/safe-harbor-complaints for more information and to file a complaint.

8. Starfish Privacy Policy Changes

If Starfish changes this privacy statement, we will post those changes at http://www.starfishsolutions.com/privacy-policy/, so that you will always know what information we gather, how we might use that information, and whether we will disclose it to anyone. By using the Services, you signify your assent to the Starfish Privacy Policy Statement. If you do not agree to this statement, please do not use the Services. Your continued use of the Services following the posting of changes to these terms will mean you accept those changes.

9. Contact Starfish, part of Hobsons

If you have any questions about this privacy statement, the information that we collect from you, or the Services, please contact us at privacypolicy@hobsons.com or write to:
Hobsons
3033 Wilson Blvd., Suite 500
Arlington, VA 22201
USA

In the event that you are concerned about how data you have provided Starfish through the Services has been used, please contact us at the address listed above. Starfish takes all concerns about privacy and use of data very seriously, and shall endeavor to reply to you within two business days to commence its investigation of your concerns.