Northside Tutoring Privacy Policy

RCF Capital LLC dba Northside Tutoring

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This Privacy Policy explains how RCF Capital LLC, a Georgia limited liability company doing business as Northside Tutoring ("Northside," "we," "us," or "our"), collects, uses, shares, protects, and deletes personal information. It covers our website at www.northsidetutoring.com, the Northside client portal, our tutoring, test-preparation, cohort, Sprint, and Northside Pathways services, and our text-messaging program.

Families who enroll also sign the Northside Family Enrollment Agreement, and tutors sign the Northside Tutor Engagement Agreement. Those agreements describe the same practices in contract form. If this Policy and a signed agreement differ, the more protective term for the family or student applies.

Our commitments in brief

- The physical and emotional safety of every student comes first.
- We never sell personal information, and we never use a student's information for targeted advertising.
- We record online sessions for student safety, supervision, and quality. We tell you how long we keep recordings and when we delete them.
- We use a student's sessions to help develop learning technology only if a parent chooses to allow it, and only after removing information that identifies the student.
- Marketing text messages are optional and are never a condition of buying our services.

1. Information we collect

Information you give us. When you contact us, enroll, use the portal, or join our text program, we collect:

- Parent or guardian name, email, mobile phone, and home address (the address is needed for in-home sessions).
- Student name, grade, school, goals, schedule, and learning preferences.
- Academic information you share, such as grades, test scores, report cards, school assignments, and admissions materials.
- Learning, attention, or health information you choose to share so we can match and support your student, such as a learning difference or accommodation. We treat this as sensitive information.

- Billing records. Card payments are processed by Stripe; Northside does not receive or store full card numbers.
- Your electronic signature record: the account name and email that selected "I Agree," the date and time, and the agreement version.
- Your choices about media and testimonials, technology development, and marketing texts.

Session recordings and communications. We record online sessions, including video, audio, screen sharing, chat, and automatically generated transcripts. We keep messages sent through the portal and texts and calls on Northside-provided phone channels, and calls with Northside staff may be recorded. Tutors also write session notes about progress.

Information collected automatically. When you visit our website or portal, we collect your IP address, browser type, operating system, referring pages, pages visited, and visit dates and times, using cookies and similar tools (see Section 9).

Text-messaging information. If you join our text program, we collect your phone number, the content of messages, their dates and times, and a record of your consent and any opt-out.

Tutors and tutor applicants. For tutors, we collect application materials, credentials, contact and payment details, background-check results (through a separate disclosure and authorization), session recordings, and portal activity. Tutor information is used to vet, assign, pay, supervise, and support tutors, and is protected and retained under this Policy and the Tutor Engagement Agreement.

2. How we use information

We use personal information to:

- Match students with tutors, schedule sessions, and deliver our services.
- Supervise sessions and keep students and tutors safe, including reviewing recordings when a concern is raised.
- Train, coach, and evaluate tutors, and check the quality of instruction.
- Track progress, prepare reports for parents, and improve our programs.
- Process payments, keep records, and provide customer support.
- Send service messages, such as scheduling reminders, session changes, and account notices.
- Send marketing emails, and marketing texts if you opted in to them.
- Understand how our website is used and keep it secure.
- Meet legal obligations, enforce our agreements, and report suspected abuse or neglect of a child.

Technology development is your choice. Northside is affiliated with The Learning Company, which builds adaptive learning technology. With a parent's separate, optional consent, we may use a student's session transcripts and written work to help develop that technology. Before any such use, we remove or mask names, contact details, school names, and other information that directly identifies a student or family. Video and audio recordings, which show a student's face or voice, are used for technology development only if a parent gives a second, separate consent for them. Saying no to either choice does not affect your services in any way, and you may withdraw consent at any time for future use.

We do not use personal information for targeted advertising to students, and we do not make decisions about a student based solely on automated processing.

3. How we share information

We never sell personal information and never share it for anyone else's marketing. We share it only as follows:

- **Your assigned tutor** receives the student and family information needed to teach, including relevant academic and learning information.
- **Service providers** help us operate, under contracts that limit their use of the information to the services they perform for us. They include our payment processor (Stripe), video-session and recording platforms, our client portal and messaging providers, email providers (such as ActiveCampaign), cloud storage, and customer-support tools.
- **The Learning Company**, our affiliate, receives information only for technology development you have chosen to allow (Section 2), and only after identifying information is removed or masked. It may not use that information to contact or market to you.
- **Child safety and legal requirements.** We disclose information to law enforcement, child-protective services, or other authorities when we suspect abuse or neglect of a child, when required by law or legal process, or to protect someone's safety.
- **Business transfers.** If Northside merges, is acquired, or sells all or part of its business, information may transfer to the new owner, which must honor this Policy for information collected under it. We will notify you before your information becomes subject to a different policy.
- **With your permission**, such as testimonials or media you have agreed may be used in marketing (Family Enrollment Agreement, Section 13). We never publish a student's full name, school, or contact information without separate written permission.

4. Children's privacy

We serve students of every age, including children under 13. We follow the federal Children's Online Privacy Protection Act (COPPA) and the FTC's COPPA Rule for children under 13.

- **Parent consent first.** A parent or guardian enrolls the child, signs the Family Enrollment Agreement from their own portal account, and pays by card, cash, or check before any session takes place. We collect a child's information only after that consent.
- **What we collect from a child** in online sessions includes the child's voice, image, chat messages, and work, as described in Section 1. We collect only what is reasonably needed for the session.
- **Separate consent for other uses.** Using a child's information for technology development requires separate, optional consent (Section 2). Consenting to tutoring does not include it, and a child's participation is never conditioned on it.
- **No direct contact.** Tutors communicate with any student under 18 only through Northside channels a parent can see.

- **Parent rights.** A parent may review the personal information we hold about their child, ask us to delete it, and refuse further collection or use, by contacting us at the address in Section 10. If a parent refuses further collection, we may not be able to continue online sessions for that child.
- **Retention.** We keep a child's information only as long as the schedule in Section 6 allows, and we keep a written information-security program and data-retention policy.

Students 13 to 17. The same safety rules, consent choices, and retention schedule apply. Parents of students under 18 may make the requests described in Section 8 on the student's behalf.

Our website is intended for parents, adult students, and tutors. Children should not submit information through the website. If we learn that a child under 13 did so without a parent's consent, we will delete it.

5. Text messaging

Northside sends two kinds of texts, and you choose each one separately.

Type	What it covers	How you join
Service texts	Scheduling reminders, session changes, tutor messages through Northside channels, and account notices	Providing your number at enrollment for your family's services
Marketing texts	Promotions, events, new programs, and offers	A separate, unchecked opt-in box. Consent is not a condition of any purchase.

- **Opting out.** Reply STOP (or QUIT, END, CANCEL, UNSUBSCRIBE, REVOKE, or OPT OUT) to any message. You may also opt out by emailing or calling us, or by any other reasonable means. We will confirm by text and process your request promptly, and within 10 business days at most.
- **Help.** Reply HELP for help, or contact us using Section 10.
- **Frequency.** Message frequency varies with your services and choices.
- **Cost.** Message and data rates may apply. Carriers are not liable for delayed or undelivered messages.
- **Your mobile information** is never shared with third parties or affiliates for their marketing or promotional purposes. Opt-in data and consent records are never shared with anyone except the providers that deliver our messages.

Opting out of marketing texts does not stop service texts. If you want to stop service texts too, tell us, and we will arrange another way to reach you about your sessions.

6. How long we keep information

We keep personal information only as long as needed for the purposes in this Policy, then delete it or remove what identifies it. This schedule is our data-retention policy.

Information	How long we keep it
Online session recordings (video, audio, screen)	2 years after the student's last session or membership date
Transcripts, chat, portal messages, texts, call recordings, and session notes	2 years after the student's last session or membership date
Records connected to a safety concern, complaint, or legal claim	Until the matter is resolved and any related claim can no longer be brought, or longer if the law requires
Enrollment, billing, and tax records	7 years after the transaction
Signed agreements and electronic-signature records	7 years after the relationship ends
Text-messaging consent and opt-out records	5 years after the last message
Inquiries from families who do not enroll	2 years after the last contact
Tutor files, including background-check results	3 years after the tutor's last project, or as required by law
Tutor applicants not engaged	1 year after the application
Website analytics data	26 months

De-identified information. Information that no longer identifies a person, such as a masked transcript used with consent for technology development, may be kept longer. We do not attempt to re-identify it, and we require anyone who receives it to agree to the same.

We delete information sooner when you ask, unless we must keep it for a safety matter, legal obligation, or claim (Section 8).

7. How we protect information

We maintain a written information-security program sized to our business and the sensitivity of student information. It includes:

- Encryption of information in transit, and at rest where our providers support it.
- Access limited to staff and tutors who need it for their role, with individual logins.
- Recordings and messages kept on Northside-approved platforms, not on tutors' personal devices.
- Security and confidentiality commitments from service providers.
- Annual review of the program and of this Policy.

No method of transmission or storage is completely secure. If a breach affects your personal information, we will notify you as required by Georgia law and other applicable law, without unreasonable delay. Please keep your portal login private, and tell us right away if you think someone else has used it.

8. Your rights and choices

You may ask us to:

- **Access** the personal information we hold about you or your child, including session recordings and messages.
- **Correct** information that is inaccurate.
- **Delete** your or your child's information. We will delete it except where we must keep it for a safety matter, a legal obligation, tax or financial records, or a pending claim, and we will tell you what we kept and why.
- **Withdraw consent** to technology development, media and testimonial use, or marketing texts, at any time, for future use.
- **Opt out of marketing emails** using the unsubscribe link in any email.

How to ask. Email info@northsidetutoring.com, call (470) 779-8999, or write to the address in Section 10. We will confirm your identity, usually through your portal account or a reply from the email on file, and respond within 30 days. A parent or guardian may make requests for a student under 18. We will not treat you differently for exercising any of these rights.

State privacy rights. If you live in a state that gives you additional privacy rights, such as rights to know, delete, correct, or appeal a decision, we will honor them. If we deny a request, you may appeal by replying to our decision, and we will respond within 45 days.

9. Cookies and analytics

Our website uses cookies and similar tools to keep you signed in, remember preferences, measure traffic, and understand which pages are useful. You can block or delete cookies in your browser settings; some portal features may not work without them. We do not use cookies or analytics to profile or advertise to students, and the portal does not run advertising trackers.

10. Changes and contact

Changes. We will post any update to this Policy on our website with a new effective date and version. For a material change, especially to how we use or share student information, we will notify enrolled families by email at least 30 days before it takes effect, and we will ask for new consent where the law requires it.

Contact us with any question or request about privacy:

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