

# SAN MIGUEL ACADEMY OF NEWBURGH

newburghsanmiguel.org

## WEBSITE PRIVACY POLICY

Effective Date: March 2026 | Annual Review

AT A GLANCE	
Website	newburghsanmiguel.org
Organization	San Miguel Academy of Newburgh
Address	245 Renwick Street, Newburgh, NY 12550
Phone	(845) 561-2822
Email	admin@sanmiguelacademy.org
Effective	March 2026
Governs	Data collected through newburghsanmiguel.org
Applies to	All website visitors

### 1. Introduction

San Miguel Academy of Newburgh ("the Academy," "we," "our," or "us") respects your privacy and is committed to being transparent about how we handle information collected through our website, newburghsanmiguel.org (the "Site").

This Website Privacy Policy explains:

- What information we collect when you visit or interact with the Site
- How we use, share, and protect that information
- Your rights regarding your personal information
- How to contact us with questions or requests

#### **Important: Student & Family Records Are Governed by a Separate Policy**

This policy applies to data collected through the public website only. Student education records, enrollment data, and family information collected as part of enrollment are governed by our separate Institutional Data Compliance Policy (available on this site and from our administrative office), which addresses FERPA, NY Education Law § 2-d, and COPPA compliance.

## 2. Who We Are

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San Miguel Academy of Newburgh is an independent, tuition-free Catholic middle school (Grades 5–8) serving underserved boys and their families in the City of Newburgh, New York. We are a member of the Nativity Miguel Network of Schools. The Academy's 12-year Graduate Success Program provides ongoing academic and career support to alumni.

San Miguel Academy of Newburgh, 245 Renwick Street, Newburgh, NY 12550.

**Contact:** (845) 561-2822 | [admin@sanmiguelacademy.org](mailto:admin@sanmiguelacademy.org)

## 3. Information We Collect

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We collect two types of information through the Site: information you voluntarily provide to us, and information automatically collected when you browse the Site.

### 3.1 Information You Provide Voluntarily

The following features of the Site may ask you to provide personal information:

Feature	Information Collected	Purpose
<b>Contact / Inquiry Form</b>	Name, email address, phone number, message	Respond to general inquiries
<b>Enrollment Interest Form</b>	Name, child's name and grade, contact details	Follow up on enrollment inquiries
<b>Donation / Giving Form</b>	Name, billing address, email, payment card details*	Process charitable donations
<b>Event Registration</b>	Name, contact information, number of attendees	Manage event attendance
<b>Newsletter Sign-Up</b>	Name, email address	Send school updates and news
<b>Volunteer Interest Form</b>	Name, email, phone, availability, areas of interest	Connect interested volunteers with programs

\* **Payment card details:** Donation transactions are processed by a PCI-DSS-compliant third-party payment processor (e.g., Stripe, PayPal, or Network for Good). The Academy does not store, process, or transmit payment card numbers on its own systems.

### 3.2 Information Collected Automatically

When you visit the Site, certain information is automatically collected by our web hosting provider and analytics tools:

- IP address and approximate geographic location (city/region level)
- Browser type, version, and operating system
- Pages visited, time spent on each page, and navigation path through the Site
- Referring website (the site you visited before arriving at ours)
- Date and time of your visit

- Device type (desktop, tablet, mobile)

This information is collected in aggregate and is primarily used to understand how visitors use the Site and to improve its content and functionality. It is not used to identify individual visitors.

### 3.3 Cookies and Similar Technologies

The Site uses cookies — small text files placed on your device — and similar tracking technologies. We use the following categories of cookies:

Cookie Type	Examples	Purpose
<b>Strictly Necessary</b>	Session cookies, CSRF tokens	Enable basic site functions (forms, navigation). Cannot be disabled.
<b>Analytics</b>	Google Analytics (_ga, _gid)	Understand aggregate visitor behavior. No personal identification. IP addresses are anonymized.
<b>Functional</b>	Preference/language cookies	Remember your settings and preferences across visits.
<b>Third-Party Embeds</b>	YouTube, social media players	Enable embedded video or social content. Subject to those providers' own cookie policies.

#### Managing Cookies

You can control cookies through your browser settings. Disabling analytics or functional cookies will not prevent you from using the Site, but may limit some features. To opt out of Google Analytics across all websites, visit: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout)

## 4. How We Use Information

We use the information collected through the Site for the following purposes:

- To respond to your inquiries, questions, or requests submitted through contact forms
- To follow up on enrollment interest and connect prospective families with the admissions process
- To process and acknowledge charitable donations
- To send newsletters, event announcements, and updates to subscribers (you may unsubscribe at any time)
- To register volunteers and connect them with appropriate program staff
- To manage event registrations and communicate event details to attendees
- To analyze aggregate website traffic patterns and improve the Site's content, design, and performance
- To comply with applicable legal obligations

#### What We Do NOT Do

- We do not sell your personal information to any third party.
- We do not use website visitor data for behavioral advertising or ad targeting.
- We do not combine website data with student education records.

- We do not collect personal information from children under 13 through the public website.

## 5. How We Share Information

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We share personal information only in limited and controlled circumstances:

### 5.1 Service Providers

We use trusted third-party service providers to operate the Site and process certain data on our behalf. These providers are contractually prohibited from using your information for any purpose other than providing the service to us:

- Web hosting and content delivery (e.g., site infrastructure provider)
- Email delivery and newsletter services (e.g., Mailchimp, Constant Contact)
- Online donation processing (e.g., Stripe, PayPal, Network for Good)
- Website analytics (Google Analytics — with IP anonymization enabled)
- Event registration platforms

### 5.2 Nativity Miguel Network of Schools

As a member school, we may share aggregate, non-personally-identifiable data about our programs and outcomes with the Nativity Miguel Network for network-wide reporting and evaluation purposes.

### 5.3 Legal Requirements

We may disclose information if required to do so by law, court order, or valid legal process, or if we believe disclosure is necessary to protect the safety of any person or to address fraud or security issues.

### 5.4 Organizational Successors

If the Academy undergoes a significant organizational change, personal information collected through the Site may be transferred to a successor organization, subject to the same privacy commitments described in this Policy.

We do not share, sell, rent, or trade personal information with commercial third parties for their own marketing or advertising purposes.

## 6. Children's Privacy (COPPA Compliance)

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### **Federal Law: Children's Online Privacy Protection Act (COPPA)**

COPPA (15 U.S.C. §§ 6501–6506) restricts the online collection of personal information from children under the age of 13 without verifiable parental consent.

The Academy's public website is not directed at children under the age of 13, and we do not knowingly collect personal information from children under 13 through the Site.

- Contact forms, donation forms, newsletter sign-ups, and all other interactive features on the Site are intended for use by adults (parents, guardians, donors, volunteers, and community members).
- We do not permit children under 13 to create accounts or submit personal information through the public website.
- If we become aware that we have inadvertently collected personal information from a child under 13 through the Site, we will delete it promptly.

If you believe your child under 13 has submitted personal information through this Site, please contact us immediately at: [admin@sanmiguelacademy.org](mailto:admin@sanmiguelacademy.org) or (845) 561-2822.

Student platform accounts (Google Classroom, Google Workspace for Education, etc.) used by enrolled students are governed by our Institutional Data Compliance Policy, not by this Website Privacy Policy.

## 7. Third-Party Links and Embedded Content

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The Site may contain links to external websites (such as the Nativity Miguel Network, partner organizations, or social media platforms) and embedded content (such as YouTube videos or social media feeds). This Policy does not apply to those external sites or services.

- When you click a link to an external site, you leave our Site and are subject to that site's own privacy policy.
- Embedded third-party content (e.g., a YouTube video player) may place its own cookies on your device and collect data according to the third party's privacy policy, even if you do not interact with the embedded content.
- We encourage you to review the privacy policies of any external sites you visit.

Common third-party services whose privacy policies govern their data practices when used on or linked from our Site include: Google (Google Analytics, YouTube, Google Maps), Facebook/Meta, and any payment processor used for donations.

## 8. Data Security

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The Academy implements reasonable administrative, technical, and operational safeguards to protect personal information collected through the Site against unauthorized access, use, alteration, or disclosure. These measures include:

- HTTPS encryption for all pages of the Site (TLS 1.2 or higher)
- Password-protected access to website administrative tools, with multi-factor authentication where available
- Regular security updates and patches to the Site's content management system and plugins
- Use of PCI-DSS-compliant third-party processors for all donation transactions — we do not store payment card data
- Limited staff access to submitted form data, restricted to authorized personnel only
- Annual review of third-party service providers for continued security compliance

### NY SHIELD Act Compliance

The New York Stop Hacks and Improve Electronic Data Security (SHIELD) Act requires covered businesses to implement a data security program with reasonable safeguards. The measures above fulfill our obligations under the SHIELD Act for data collected through this website.

No method of data transmission over the Internet or electronic storage is 100% secure. While we strive to use commercially reasonable means to protect your information, we cannot guarantee absolute security. In the event of a data breach affecting your personal information, we will notify you as required by applicable law.

## 9. Data Retention

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We retain personal information collected through the Site only as long as necessary for the purposes for which it was collected, or as required by law:

Data Type	Retention Period
Contact / inquiry form submissions	2 years from last contact, or until request is resolved
Enrollment inquiry records	3 years from date of inquiry
Donation records	7 years (IRS and nonprofit compliance requirements)
Newsletter subscriber data	Until you unsubscribe + 1 year
Volunteer application data	2 years from last activity
Event registration data	1 year following the event
Website analytics (Google Analytics)	26 months (Google Analytics default; IP-anonymized)
Server / access logs	90 days (rolling), then deleted automatically

Donation records are retained for seven years in compliance with IRS requirements for 501(c)(3) nonprofit organizations and New York nonprofit law. All other records are securely deleted or anonymized when the retention period expires.

## 10. Your Privacy Rights

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Depending on your location and relationship with the Academy, you may have the following rights regarding personal information we hold about you:

### 10.1 Access and Portability

You may request a copy of the personal information we hold about you that was collected through this Site. We will respond within 30 days of a verified request.

### 10.2 Correction

If you believe any information we hold about you is inaccurate or incomplete, you may request that we correct it.

### 10.3 Deletion

You may request that we delete personal information we collected from you through the Site, subject to certain legal retention obligations (e.g., donation records required for tax purposes). We will acknowledge and process deletion requests within 30 days.

### 10.4 Opt-Out of Marketing Communications

Every marketing or newsletter email we send includes an unsubscribe link. You may also opt out by emailing us directly at [admin@sanmiguelacademy.org](mailto:admin@sanmiguelacademy.org). We will honor opt-out requests within 10 business days. Note: We may still send transactional communications (e.g., donation receipts) even if you opt out of marketing.

### 10.5 Do Not Track

Some browsers transmit a "Do Not Track" (DNT) signal. The Site currently does not respond to DNT signals in a standardized way, consistent with the lack of an established legal standard for DNT. You can limit tracking by adjusting your browser's cookie settings as described in Section 3.3.

### 10.6 New York Residents

New York residents have rights under the New York SHIELD Act and other state privacy laws, including the right to receive notice of a data breach affecting their personal information. In the event of a qualifying breach, we will notify affected New York residents as required by law.

### 10.7 California Residents (CalOPPA & CCPA)

If you are a California resident, you have the following additional rights under the California Consumer Privacy Act (CCPA) and California Online Privacy Protection Act (CalOPPA):

- The right to know what personal information we have collected, used, shared, or sold
- The right to delete personal information we have collected from you (subject to exceptions)
- The right to opt out of the sale of personal information — we do not sell personal information
- The right to non-discrimination for exercising your privacy rights

To exercise your California privacy rights, contact us using the information in Section 12. We will respond to verifiable requests within 45 days.

### 10.8 How to Submit a Request

#### Submit a Privacy Request

Email: [admin@sanmiguelacademy.org](mailto:admin@sanmiguelacademy.org) (Subject: "Privacy Request")

Mail: Privacy Compliance Officer, San Miguel Academy of Newburgh  
245 Renwick Street, Newburgh, NY 12550

Phone: (845) 561-2822

We may need to verify your identity before processing your request.  
We will confirm receipt within 5 business days and respond within 30 days.

## 11. Email Communications

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If you subscribe to our newsletter or otherwise provide your email address, we may send you updates about the Academy's programs, events, and mission. All marketing emails will:

- Clearly identify San Miguel Academy of Newburgh as the sender
- Include a clear and functional unsubscribe mechanism
- Honor unsubscribe requests within 10 business days, in compliance with the CAN-SPAM Act
- Not be sent using deceptive subject lines or misleading header information

We do not purchase email lists or send unsolicited bulk email (spam).

## 12. Contact Us

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If you have questions, concerns, or requests related to this Privacy Policy or the way we handle your personal information, please contact our Privacy Compliance Officer:

**Privacy Compliance Officer**  
San Miguel Academy of Newburgh  
245 Renwick Street | Newburgh, NY 12550  
Phone: (845) 561-2822  
Email: [admin@sanmiguelacademy.org](mailto:admin@sanmiguelacademy.org)  
*Subject line: "Website Privacy Policy Inquiry"*

## 13. Changes to This Policy

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We review this Website Privacy Policy at least once per year, and may update it to reflect changes in the law, our website, or our data practices. When we make material changes, we will:

- Update the "Effective Date" at the top of this Policy
- Post a notice on the Site's homepage for a minimum of 30 days
- Where practicable, notify subscribers by email at least 14 days before the changes take effect

Continued use of the Site after a change to this Policy takes effect constitutes your acceptance of the updated terms. We encourage you to review this Policy periodically.

Prior versions of this Policy are available upon request from the administrative office.

## 14. Legal and Regulatory Framework

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This Policy is designed to comply with the following laws and regulations, to the extent applicable:

Law / Regulation	Relevance to This Policy
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<b>COPPA (15 U.S.C. §§ 6501-6506)</b>	Prohibits collection of personal info from children under 13 without parental consent — governs Section 6
<b>CAN-SPAM Act (15 U.S.C. § 7701)</b>	Governs commercial email — unsubscribe rights, sender identification — governs Section 11
<b>NY SHIELD Act (N.Y. Gen. Bus. Law § 899-aa)</b>	Requires reasonable data security program and breach notification for NY residents — governs Section 8
<b>NY General Business Law § 899-aa</b>	NY data breach notification requirements — 30 days to notify affected NY residents
<b>FERPA (20 U.S.C. § 1232g)</b>	Student education record privacy — not applicable to website visitors; covered in Institutional Policy
<b>NY Education Law § 2-d</b>	Student data privacy — not applicable to public website visitors; covered in Institutional Policy
<b>CCPA (Cal. Civ. Code § 1798.100 et seq.)</b>	Rights for California residents — access, deletion, opt-out of sale — governs Section 10.7
<b>CalOPPA (Cal. Bus. &amp; Prof. Code § 22575)</b>	Requires privacy policy disclosure for websites collecting CA resident data — governs this entire Policy
<b>IRS 501(c)(3) / NY Nonprofit Law</b>	7-year retention of donation records for tax and charitable compliance — governs Section 9

**Note for Legal Counsel**

This policy is a good-faith effort to comply with applicable law as of March 2026. It should be reviewed by legal counsel familiar with New York nonprofit and education law prior to publication. If the website undergoes significant changes (new forms, payment processing, third-party integrations, or interactive student-facing features), this policy should be reviewed and updated before those changes go live.

Head of School / Principal  
Date: \_\_\_\_\_

Privacy Compliance Officer  
Date: \_\_\_\_\_