

SeedMA.org Website Privacy Policy

Thank you for visiting the SeedMA website www.seedma.org. Your privacy is one of our top priorities. The following policies apply only to the use of this website and interacting with SeedMA.org, The Office of the Treasurer and Receiver General of Massachusetts and MEFA via Social Media.

Other websites operated by other entities have different policies. We strongly suggest that you read the privacy policies for any external website that you visit through a link appearing at this site. In particular, please note that although some of the social media pages used by the SeedMA Program might appear to be part of this website or at a webpage under SeedMA.org's control, some of these websites are actually hosted by third-party providers. Thus, when visiting third-party social media websites, you are subject to different privacy policies and terms of service. Please refer to the SeedMA Social Media Policy to review more detailed information on our use of specific social media websites and for links to the relevant terms of service and privacy policies for those websites.

Your privacy.

Your privacy with respect to the use of this website results from a partnership between the SeedMA Program, The Office of the Treasurer and Receiver General of Massachusetts, MEFA and you, the user. At this website, we attempt to protect your privacy to the maximum extent possible. However, because some of the information that we receive through this website is subject to the Massachusetts Public Records Law, Massachusetts General Laws Chapter 66, Section 10, we cannot ensure absolute privacy. Information that you provide to us through this website may be made available to members of the public under that law. This policy informs you of the information that we collect from you at this website, what we do with it, to whom it may be disseminated, and how you can access it. Based on this information, you can make an informed choice about your use of this website. The SeedMA Program's online registration process is within a secure environment.

Personally identifiable information.

We use the term "personally identifiable information" to mean any information that could reasonably be used, alone or in combination, to identify you, including your birth date. The SeedMA Program's online registration process will never ask for "personally identifiable information" outside of a secure environment. The online registration process and account creation process is within a secure environment.

Information voluntarily provided by you.

This website may collect voluntarily submitted information from you through the emails that you send through this website, forms completed at this website and any comments posted on social media pages hosted by this website. All such comments and emails sent by you to this website may contain personally identifiable information. The SeedMA Program ensures the safety of your information by providing secure environments for online applications to be completed and for required personally identifiable information which is used to complete the online registration process.

Information automatically collected and stored by this website.

In order for SeedMA.org to track and analyze usage, navigational and other statistical information of this website, we collect and store various information, such as:

- The Internet domain from which you access this site.
- Your IP address.
- The type of browser and operating system you use.
- The date and time you visited this site.
- The pages you viewed on this site.
- The address of the Website from which you linked.
 - How many "bytes" of information were transmitted to you.

This site also currently uses Google Analytics, a third-party, to track and analyze non-personally identifiable usage and volume statistical information through the use of cookies, anonymous identifiers or other technologies. We use this information to track the traffic, usability, performance, and effectiveness of our website and marketing campaigns. Please note that this is not personal information, only general summaries of the activities of our visitors and customers in aggregate. At this time, we will not attempt to match any personally identifiable information that you provide to us with your IP address, unless there are reasonable grounds to believe that doing so would provide information that is relevant and material to a criminal investigation.

We may also use third-parties to display advertisements on other websites based on your visits to our site as well as other websites. These third-parties may use cookies, pixel tags, and other technologies to measure the effectiveness of their ads and to serve tailored advertising content to you for products and services in which you might be interested. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this one. We may provide these third-party advertisers with information about your usage of our site, as well as aggregate or non-personal information about users of our site.

You can generally accept or decline the use of cookies through a functionality built into your web browser. If you want to learn more about cookies, or how to control or delete them, please visit <http://www.aboutcookies.org> for detailed guidance. In addition, certain third-party advertising networks, including Google, permit users to opt out of or customize preferences associated with your internet browsing. To learn more about this feature from Google, click [here](#).

Dissemination of your personally identifiable information.

We do not sell any personally identifiable information collected through this website. MEFA and/or the Office of the State Treasurer may share information that you submit through this website with the necessary agencies of the Commonwealth of Massachusetts as required for the facilitation of the SeedMA Program.

However, once you voluntarily submit personally identifiable information to us, its dissemination is governed by the Massachusetts Public Records Law, the Fair Informational Practices Act (Massachusetts General Laws Chapter 66A), the Standards for the Protection of Personal Information of Residents of the Commonwealth (201 CMR 17.00) and/or other applicable laws and regulations.

The Records Retention Law requires The SeedMA Program, The Office of the Treasurer and Receiver General of Massachusetts and MEFA to preserve records created or received by a state employee. Pursuant to this retention requirement, emails or messages sent to a SeedMA.org's email account, information submitted via SeedMA.org's website, and comments posted or messages received via an official SeedMA.org's webpage on a third-party website (such as an official agency profile on a social network) could be treated as state governmental records and may be permanently archived. Information that you submit voluntarily through third-party social media sites where such sites are associated with SeedMA.org, The Office of the Treasurer and Receiver General of Massachusetts and MEFA and when such information is publically available, including your name, city or town, and the substance of anything that you post, may be disseminated further by being posted online at this website or be publicly discussed by a member of the administration. In addition to social media postings, any emails or other communications you send us may be provided to a member of the public in response to a public records request. The information that you voluntarily submit through emails will be disclosed only to the SeedMA Program, The Office of the Treasurer and Receiver General of Massachusetts, MEFA's employees or officials, or other agencies of the Commonwealth of Massachusetts with a "need to know" for purposes of fulfilling their job responsibilities or performing necessary functions for the facilitation of the SeedMA Program. They will only use information to answer your questions, respond to any requests for assistance, and fulfill any legal obligations. Where appropriate, we may provide the information submitted by you via social media sites or email to the person that is responsible for or is the subject of your inquiry.

Your access and opportunity to correct.

The Public Records Law and the Fair Information Practices Act provide you certain rights to get information about you that is in our records. To learn more about the circumstances under which you can get and correct this information, please reference the [Massachusetts Law About Freedom of Information and Public Records](#).

Security.

Because this website does not encrypt incoming email or comments, you should not send information that you consider highly sensitive through this website. We use standard security measures to ensure that personally identifiable information sent via the social media pages or email is not lost, misused, altered, or unintentionally destroyed. We also use software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. Except for authorized law enforcement investigations, the SeedMA Program makes no attempts at this time to identify individual users of our website email submission features or our social media pages.

Special protections against misuses of personal identifying information.

The Commonwealth of Massachusetts has established regulations that enhance the privacy protection for Massachusetts residents. These regulations were defined by the Massachusetts Office of Consumer Affairs and Business Regulations, and are enforced by the Massachusetts Attorney General. The regulations (“201 CMR 17.00” - Standards for the Protection of Personal Information of Residents of the Commonwealth) limit the collection and dissemination of personally identifiable information, and greatly enhance the security and integrity of such data. The SeedMA Program, The Office of the Treasurer and Receiver General of Massachusetts, MEFA and this website are subject to 201 CMR 17.00 or other rules or regulations as required by M.G.L. c. 93H.

Policy changes.

We may change this policy at any time by posting the amended terms on this site. We will post material changes to this policy that take effect one day from our posting of changes. Unless stated otherwise, any information we collect under the current privacy policy will remain subject to the terms of this policy. After any changes take effect, all new information we collect, if any, will be subject to the new policy, however, we will not materially change our policies and practices to make them less protective of your information that we collected in the past without your opt-in.

Contact Information.

For questions about your privacy while using this website, please contact info@seedma.org.

DEFINITIONS:

“Cookies” are files that a website can place on your computer. A cookie file contains unique information that a website can use to track such things as your password, lists of web pages you have visited, and the date when you last looked at a specific web page, or to identify your session at a particular website. A file allows the website to recognize you

as you click through pages on the website and when you later revisit the site. A website can use cookies to "remember" your preferences, and to record your browsing behavior on the web. Although you can prevent websites from placing cookies on your computer by using your browser's preference menu, disabling cookies may affect your ability to view or interact with some websites

There are two types of cookies you should be aware of- "Session cookies," also called temporary cookies, are stored temporarily in the browser's memory and are deleted as soon as the session is ended by closing the browser, or if a user hasn't visited the server for certain period of time, the server would expire or invalidate the user session. "Persistent cookies," also called permanent cookies, are stored permanently on the computer's hard drive until they expire or are deleted. If they are deleted, they will be recreated the next time the user visits the site. Each website programs the length of time its persistent cookies will last.

"Internet Protocol Address" or "IP Address" is a series of numbers that identifies each computer and machine connected to the Internet. An IP address enables a server on a computer network to send you the file that you have requested on the Internet. The IP address disclosed to us may identify the computer from which you are accessing the Internet, or a server owned by your Internet Service Provider. Because it is machine-specific, rather than person-specific, an IP address is not generally considered, personally identifiable information.

"Social media site" refers to websites that facilitate user participation, networking, and collaboration through the submission of user-generated content. A "social media identity" is a specific user identity or account that has been registered on a third-party social media site. Social media in general includes tools such as: blogs, wikis and microblogging sites, such as TwitterTM; social networking sites, such as Facebook and LinkedInTM; video sharing sites, such as YouTubeTM; and bookmarking sites such as Del.icio.usTM. A typical social media site (whether hosted by SeedMA.org or a third party) combines text, images, and links to other websites including blogs, wikis, video, MP3 downloads and other media related to the topic and enables readers to leave comments in an interactive format.

The SeedMA Program SOCIAL MEDIA POLICY

To highlight our commitment to transparency, SeedMA.org has utilized several web based tools for outreach, education and information. These tools are not intended to replace the channels currently in place for press and constituent communication. (Press inquiries should be directed to callard@tre.state.ma.us, and questions regarding services should be directed to info@seedma.org.) Rather, these tools are meant to augment our ability to educate, empower, and inform.

Please note, that the Records Retention Law of the Commonwealth requires the SeedMA Program, The Office of the Treasurer and Receiver General of Massachusetts and MEFA to preserve records created or received by one of our employees. Pursuant to this retention requirement, comments posted or messages received via an official state agency page on a third-party website (such as an official agency profile on a social network) will be treated as state governmental records and may be permanently archived. Information that you submit voluntarily through third-party social media sites where such sites are associated with SeedMA.org and when such information is publically available, including your name, city or town, and the substance of anything that you post, may be disseminated further by being posted online at this website or be publicly discussed by a member of the administration.

The SeedMA Program on Facebook:

[SeedMA's Facebook page](#), is the official Facebook page of the SeedMA Program. SeedMA.org hopes to connect with families and students in Massachusetts in order to provide helpful and relevant information on saving for college and financial literacy, and provide updates about the SeedMA Program events and news. We encourage you to visit this page often and participate by reviewing and commenting on the content. Please review [our page](#) and Facebook's [Participation Policy](#) pages to learn more about how these pages are and are not used by MEFA.

Twitter™ :

To view the SeedMA Program's Twitter page, [click here](#). While people use Twitter in many different ways for both personal and professional reasons, as a matter of policy:

- The SeedMA use of Twitter is intended as a means to provide announcements, commentary and updates on current events or notices to any users who elect to watch or follow our Twitter feed.
- We generally follow people back who follow us, and we may comment on user posts to the Twitter site. If you would prefer that we do not follow you, please send us a direct message and we will comply with the request as soon as reasonably possible.
- Twitter is one of the many means we're using to connect the SeedMA Program and the community. We'll review and update Twitter as much as possible, just as we monitor and maintain many other channels of feedback, outreach and engagement including feedback from public meetings, email, letters, phone calls, and in-person visits.
- Unless you protect your updates, messages you post on Twitter which are received by SeedMA.org may be public records and may also be publicly available.
- The SeedMA Program may respond via Twitter to press inquiries, questions or complaints, or other customer matters. For instructions on appropriate methods

for contacting the SeedMA Program, please email us at info@seedma.org or call us at 800-449-6332(MEFA).

Also note that this micro-blog is hosted by Twitter and is governed by Twitter's separate website policies, including its [Privacy Policy](#) and [Terms of Service](#). These policies apply to your use of Twitter. For questions, please contact info@seedma.org.

Comments and suggestions on the content and design are welcome and should be emailed to info@seedma.org. If you are currently receiving e-communications and wish to unsubscribe, you may do so at any time by emailing info@seedma.org or clicking unsubscribe at the bottom of the emailed newsletter you received.

These electronic communications are distributed through Exact Target, Inc. and are governed by their separate website policies, including its [Privacy, Anti-Spam and Cookie Policies](#). These policies apply to your use receipt of these electronic communications. For questions, please contact info@seedma.org.

Contents and Linking

Although we make this website freely accessible, the materials available through this website are the property of the SeedMA Program, and are protected by copyright, trademark and other intellectual property laws. You are free to display and print for your personal, non-commercial use information you receive through this website, but you may not otherwise reproduce or modify any of the materials without our prior written consent. You may not distribute copies of materials found on this website in any form (including by email or other electronic means), without our prior written permission. Of course, you are free to encourage others to access the information themselves on this website and to tell them how to find it. Requests for permission to reproduce or distribute materials found on this website should be sent to info@seedma.org. We welcome you to link to our homepage and you are free to establish a hypertext link to the homepage of this site so long as the link does not state or imply any affiliation, connection, sponsorship, or approval of your site by the SeedMA Program, The Office of the Treasurer and Receiver General of Massachusetts or MEFA.

The SeedMA Program's TERMS OF COMMENT

The Terms of Comment provide guidelines in the facilitation of an ongoing dialogue between the public and the SeedMA Program. We encourage your comments, ideas and concerns and hope that you find the information helpful. SeedMA.org's social media platforms are moderated. Comments may be reviewed for compliance with our policies before posting. We recognize that the web is a 24/7 medium, and your comments are welcome at any time, however, the moderating and posting of comments will only occur during regular business hours Monday through Friday Eastern Standard Time. Comments submitted after hours or on weekends or holidays will be reviewed and posted as early as

7 | Posted and effective for new users on December 14, 2016; effective for current users on December 15, 2016.

possible; in most cases, this means the next business day. SeedMA.org's social media platforms serve you in the following ways:

- As a place for exchanging and publishing new ideas where we encourage conversations between and among the public and SeedMA.org.

SeedMA.org's social media channels do not act as a substitute channel for services or general information. Additionally, you may not use these channels for the following reasons but rather, use SeedMA's email at info@seedma.org or by calling 1(800) 449.6332 to reach a customer service representative.

SeedMA.org will not accept unsolicited proposals, or other business ideas or inquiries to these sites. These sites are not to be used for contracting or commercial business.

These sites may not be used for the submission of any claim, demand, informal or formal legal complaint, or any other form of legal and/or administrative notice or process, or for the exhaustion of any legal and/or administrative remedy or questions about your specific account.

These sites are not to be used to report criminal activity. If you have information for law enforcement, please contact your local police agency.

Comment Policy

We expect conversations to follow the rules of polite discourse and we ask that participants treat each other, as well as our employees, with respect. The following comments will not be posted and/or removed:

- Items from above if posted
- Profanity and vulgar or abusive language
- Threats of physical or bodily harm
- Offensive terms that target protected classes, such as ethnic, racial, sexual orientation, transgendered, or religious groups.
- Sensitive information (for example, information regarding your specific accounts)

For the benefit of robust discussion, we ask that comments remain "on-topic." This means that comments must relate to the topic that is being discussed within these sites. Comments will not be posted or will be removed that include:

- Off-topic comments (If you have off-topic comments that are relevant to SeedMA's program, please email them to info@seedma.org)
- Questions from the media (please email callard@tre.state.ma.us)
- Identical posts by the same user (please don't submit over and over expecting the post to show up faster) or multiple users (a group of people sending identical

messages or one person submitting under different aliases). In the case of identical posts, SeedMA.org may only post the first submission or remove subsequent submissions.

Privacy and Security Policies

With respect to content collected through these sites, the SeedMA Program follows its Privacy Policy as posted above. However, the technology supporting these sites is provided by the sites' providers and these sites are also subject to website policies of those providers including their Privacy Policies. Please be sure to reference each site's specific policies.

To protect your own privacy and the privacy of others, please do not include personally identifiable information, such as social security numbers, account numbers or birthdates in the body of your comments or posts. If you do voluntarily include personally identifiable information in your comments or posts, they may or may not be posted on these sites. If your comment is posted or remains posted, your name will not be redacted or removed. You have the option of posting comments anonymously, but if you opt not to, any information, including your login name, may be displayed on our site.

Intellectual Property

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