SCHOOLCITY INC. PRIVACY POLICY

EFFECTIVE: October 01, 2017

This Privacy Policy governs the manner in which SchoolCity Inc. collects, uses, maintains, discloses and protects the information collected from customers ("Users") of the SchoolCity web applications ("Site"). This Privacy Policy applies to the Site and all products and services offered by SchoolCity Inc.

INFORMATION WE COLLECT

SchoolCity Inc. collects the information associated with your User account in order to provide User access to the Site, improve the design, content and performance of our Site, to personalize user experience, and to analyze site usage and the popularity of our Web pages.

1. Direct Information

    a. Information about students, teachers and schools is provided to SchoolCity Inc. by districts from the district's records, via rosters, and used for authentication purposes. The information may include name, student ID, school and district name, unique identifiers that link these records to other records in the district's database system as well as teachers' names and titles and the name of the teacher's school. Districts may also provide information about a student's grade level, the student's username, password and email address, a statewide student identifier and information about the school that the student attends, or student demographic/program information such as EL and Special Education status.

    b. We maintain records for each student account of assignments that have been given (and results that have been submitted) and records of any online assessments taken by the students for the duration of the Contractual Agreement.

2. Interaction Data

    a. We also log certain technical information about all users' interactions with our Site that could be linked with users (including students). This includes the IP addresses that we get when users connect to our Site, information that is sent by web browsers automatically when they connect to our Site (such as the type of web browser, the operating system used, and the time zone set on the user's computer), the timing and frequency of how users interact with different content and different areas of our Site, the amount of time spent on the Site in session, the number of times users return to the website, the referring web page, pages visited, and the domain name from which users accessed the Site.

    b. Our web servers may generate log files that contain data linked to individual Users, such as IP address, browser type, operating system, ISP domain name, referring/ exit page, date/time stamp, session outcome, and how users interact with different content and areas of our site. This information is used to authenticate users into the Site.

3. Authentication Data

a. The Site requires user authentication. Authentication may be based on the existence of an entry in the Customer's LDAP directory or on the presence of application-specific credentials stored in the Site database.

b. The purpose of authentication is to control access to protected data and restrict actions that may be performed. Once a user has been authenticated, a unique internal user ID is stored only as long as the user session is valid, is based on internal database record keys and is not related in any way to any other identification owned by or assigned to the user.

c. The stored internal user ID may be used to track a user's actions while logged in to the application to ensure that users only visit data they are allowed to see, to track an error occurring during that user's session, when an authenticated user may be logged in a log tracking session activities, or to provide a customized user interface.

d. A user's password is not stored in session or in cookies. Once the user has logged off, all user information stored outside of the authentication source is deleted.

USING YOUR INFORMATION

1. SchoolCity Inc. uses the information described above to provide contractual services to the Customer.

2. We may from time to time use the email addresses associated with Customer Staff User accounts to send them information and updates pertaining to the Site. It may also be used to respond to their inquiries, questions, and/or other requests.

3. We may occasionally, and with your permission, use de-identified data for research and development purposes.

SHARING YOUR INFORMATION

SchoolCity Inc. does not share your information collect in any way not described by this Privacy Policy.

1. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above.

2. We may share de-identified, non-essay student responses to test items with item provider partners for the purpose of improving their offerings

3. We may provide data back to other systems with which the district has a data sharing agreement, such as a gradebook or data warehouse system.

4. When a school district is the primary account holder, we share information with third parties as instructed by the school district, and it is the school district's responsibility to make such requests in a manner that is consistent with their internal policies and the law.

5. We do not share any personal information with third parties for advertising, marketing or other purposes. There is no third-party advertising on SchoolCity Site.

Any data requests regarding Customer data are directed to District designees for further instructions, unless expressly prohibited by law or judicial order. We will notify the District or data requests regulated by legislation, and provide the District with a copy of such court order or lawfully issued subpoena prior to releasing the requested Data or information, unless expressly prohibited by law or judicial order.

- where required by law or in response to legal process (for example, in response to a court order or a subpoena)

- if we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or to investigate and act upon violations of our terms of use.

RETAINING YOUR INFORMATION

SchoolCIty Inc. retains data for the duration of the contract with the school district. Upon contract expiration, data is retained for an additional 60 days, unless otherwise requested by the district. After 60 days, according to internal policy, all data is permanently deleted. Any data exchanged with third party service providers will be deleted or transferred, per District request when they are no longer needed, or at contract expiration.

DISSEMINATING YOUR INFORMATION

We do not sell, trade, or rent Users personal identification information to others.

COMPLIANCE WITH FAMILY EDUCATION RIGHTS AND PRIVACY ACT (FERPA)

Protecting the privacy of the very young is especially important. To the extent that Customer Data includes FERPA records, SchoolCity Inc. will be considered a 'School Official' and will comply with FERPA. SchoolCity Inc. uses student data as described above to provide contractual services, does not disclose information without the districts permission, unless as described above, and acknowledges that all student information belongs to the district.

HOW WE PROTECT YOUR INFORMATION

We treat the security of your data with the utmost care and strive to protect the confidentiality, security and integrity of the personal information we collect from children and adults. We have put in place physical, electronic and administrative procedures to safeguard and help prevent unauthorized access to, and maintain the security of your data.

1. To protect your information we use technical safeguards like encryption, firewalls, authentication, secure software development, and other security technologies to prevent access to the data from unauthorized parties.

2. We adopt appropriate data collection, storage and processing practices, and security measures to protect against unauthorized access, alteration, disclosure or destruction of personally identifiable information, transaction information and data collected and

stored on the Site.

3. All connections between users and our Site are secured via encryption communication technology (SSL/TLS), and passwords are salted and hashed.

4. We use highly rated application-hosting providers and perform frequent diagnostics, operating system updates, and network security monitoring. Our engineering team is committed to creating and maintaining systems that protect personal information.

5. Only authorized Site employees who need to access user information in order to perform their job (data team, customer service, etc) are granted access to student information as pertinent to conduct their specific service responsibilities.

While we have taken all steps to protect the personal information we collect, and we work to keep our systems in line with industry standards, no system is 100% fail proof and secure. Should we believe that the security of your personal information has been compromised, we will notify you as soon as possible, and you hereby consent to our use of email as a means of such written notification. If you suspect unauthorized access to an account due to unauthorized access to account credentials, we must be informed immediately.

THIRD PARTY SERVICE PROVIDERS

We use third-party service providers to provide a variety of services on the Site or directly to Customer Staff Users, such as assisting us with providing customer support, hosting the Site, providing us with analytics about how people use our Site, assisting us with marketing the Site to school districts and teachers, sending and tracking responses to email, providing a framework for the delivery of assessment questions and helping us identify and track bugs and errors in the Site. Our service providers have agreed to confidentiality and data security provisions consistent with this Privacy Policy. Our student-service facing service providers receive only authentication information for Student User accounts via SchoolCity Inc. tokens.

Any data exchanged with third party service providers will be deleted or transferred, per District request when they are no longer needed, or at contract expiration.

COOKIES

SchoolCity Inc. uses "cookies" to collect session information about individual Users' visit in order to provide contractual services.

Our Site only uses session cookies. When an authenticated user logs off, cookies are emptied. If users use Sign in with Google as an authentication method, then we store the cookie with user identification information including email id, and this cookie is set to expire 24 hours if the user does not log in to the application again within the 24 hour timeframe. Cookies are not used with other login methods (direct login, Clever, Classlink, LDAP.) Sensitive information, including user credentials, is not stored in cookies. We do not track our users across third party websites, nor do we use targeted advertising.

NOTE: A cookie is a text file that lives on the client user's computer. Cookies are either stored in memory (session cookies) or placed on users' hard disk (persistent cookies). A persistent cookie

can keep information in the user's browser to a long lifespan until deleted. Users may determine how their browser handles cookies, and may disable cookies being stored. However, by disabling cookies certain Site features and functionality may no longer work properly, or function at all. For more information on how to manage cookies, visit http://www.aboutcookies.org.

By using our Site you agree to our use of these information collection technologies.

NOTICE OF PRIVACY POLICY CHANGES

SchoolCity Inc. reserves the right to modify our Privacy Policy from time to time in our sole discretion. For example, we may amend our Privacy Policy in order to address new developments in federal and state consumer privacy laws, or to conform to changing industry practices. If we make changes to our Privacy Policy, we will announce and post such changes on the on the main page of our Site, and the updated date at the bottom of this page for the general public. If you are a Customer, we will also notify you of the changes via email and may ask you to consent to and accept the changes at the time of your next account login on the Site. By continuing to use the SchoolCity Inc. after such notice and consent, you are bound by our Privacy Policy as modified.

We encourage Users to review the updates to this page to stay informed about how we are protecting the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

CONTACTING US

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at:

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