



EduSkills Privacy and Security Statement

EduSkills, LLC (EDS) provides educational software services and solutions under the EduSkills name and is committed to safeguarding the privacy and security of school district and students information. We believe the personal information of our service users, and especially of students, is private, and we treat it confidentially. We have developed this privacy statement for our EduSkills products and services, because we believe it is important for you to understand how we treat information you provide to us, or that we collect or maintain on your behalf.

For our EduSkills solutions:

- We will not ask for or collect personal information unless necessary to deliver our service or respond to a client's request;
- We will not use or share personal information with anyone except to deliver our services, comply with the law, protect our rights or the safety of our users, or as otherwise directed by our clients and users;
- We do not sell, trade, lease or loan student personal information to any third party for any reason, including for marketing or advertising; and
- We use industry standard measures to help protect personal information against unauthorized access and use.

School Services Privacy/Security Statement

Our EduSkills School Services Privacy Statement applies to our EduSkills products and services licensed by our educational school districts. This Statement applies to information we collect from, or collect or maintain on behalf of, our school district clients using these services, including the personal information of school employees, parents/guardians, students, etc. We will not sell, trade, lease or loan such student personal information we host or access through our services to any unauthorized third party for any reason, including for marketing or advertising.

We operate as a school service provider, meaning that our customer agreement is with an educational agency or institution ("customer") and not with an individual educator, parent, student or other individual ("user"). As such, we collect and maintain both customer and user personal information, including student personally identifiable information from education records, only acting as authorized by our customer agency/institution to deliver services to and on behalf of the agency/institution. In this role, we are deemed by the school to perform a service or function for which the school would otherwise use its employees.

Student personally identifiable information we obtain from our customer educational agency/institution continues to be the property of, and maintained under the direct control of, the agency/institution. We enable our customer agency/institution to exercise direct control over this student personal information. By using our product(s) or service(s), you agree to the terms of this Privacy Statement.

We collect and maintain only the information that is necessary to provide the Services to and on behalf of our customer agency/institution, or as otherwise shared with us by the agency/institution. We use this personal information to verify and provide access to your account, to correspond with you, to deliver our products and services, to resolve problems in service delivery, and as otherwise requested or directed by the agency/institution. We may as necessary also use this personal information to ensure legal or regulatory compliance, to protect the safety of individuals or the security of the service, to take

precautions against liability, and as otherwise required or permitted by law. We neither claim nor assert any other rights or licenses to use student personally identifiable information.

More specifically, our services may collect, maintain and/or access the following types of personal information:

- Parent and school staff contact information such as names, language preferences, etc.
- Student information such as name, unique identifier, birth date, etc.
- Account login credentials and session information such as usernames, passwords, email address, etc.

Some of our services may as needed also use other technologies to collect non-identifiable information about service usage such as language preference, Internet Protocol (IP) address, session time and length, and types of platforms used to access our services. This data allows us to simplify login, personalize service delivery, understand usage, and improve service delivery. We use aggregate or anonymous information for other purposes such as to evaluate, develop, improve and market our services.

We do not sell, trade, lease or loan the personal information we collect or maintain to any third party for any reason, including that we do not sell or otherwise share student personal information with direct marketers, advertisers, or data brokers.

We do not knowingly share or disclose student personal information with any other third parties other than as needed to deliver and improve the service, as permitted or required by law or government authorities to ensure legal or regulatory compliance. Access to personal information is limited to our employees and our service providers as needed to deliver the service, to the school customer, and to other third party organizations if enabled by, and as determined by, the school district.

We maintain a comprehensive set of security practices that are reasonably designed in accordance with commercial best practices to protect the security, privacy, confidentiality, and integrity of student information against risks – such as unauthorized access or use, or unintended or inappropriate disclosure – through the use of administrative, technological, and physical safeguards appropriate to the sensitivity of the information. Data is located in datacenter facilities, within the USA, using industry standard access control protections.

We limit internal access to student personal information to only those EduSkills employees with a need to access the information to deliver the service. We use reasonable efforts to assist our customers in identifying any known security breach in their systems or processes, but we make no claims or warranties to our customer or to any user for any inability, failure or mistake in connection with such assistance.

We attempt to keep your information complete, current and accurate. The agency/institution on behalf of whom we are collecting or maintaining student personal information has the right to review, correct, have deleted, and/or refuse to permit further collection or use of the information. In general, we will retain personal information only as necessary to support the authorized purpose, comply with our legal obligations and agreements.

If we are involved in a merger, acquisition, or sale of all or a portion of our assets, including in the case of our bankruptcy, you will be notified via email of any change in ownership. In such a case, a successor entity will adhere to the terms of this privacy statement with regard to the previously collected student personal information.

We reserve the right at our discretion to change, modify, add or remove portions of this Privacy Statement from time to time. We will note any such changes by updating the publication date of this Privacy Statement. If we make significant changes, we will also provide notice to our customer agency/institution by sending an email to the account administrator.

If you are the administrator of an educational agency/institution client account and have any questions about this statement or if you believe we are not handling your information in accordance with our privacy statement, please contact us per the information below.

If you are otherwise a user of one of our school services, we encourage you to first contact your educational agency/institution with any questions or concerns regarding this privacy statement or our handling of personal information.

Privacy/Security Plan Activation

EduSkills is committed to protecting the privacy of visitors to and users of our Website and applications. The following implementation will help you understand how we use and protect personal data. We may change our policy at any time without giving you notice, so please check back for updates.

Scope

This Privacy Plan Implementation (PPI) applies to all Personally Identifiable Information (PII) received by EduSkills from its customers, employees, and website visitors (each which may be individually referred to herein as "you" or "your") in any format including electronic, paper, or verbal. For purposes of this Policy, "PII" means any information collected by EduSkills that identifies or could be used by EduSkills to identify an individual.

Privacy Principles

This PPI sets forth the privacy principles EduSkills follows with respect to PII. EduSkills respects the privacy of our customers, employees, and website visitor. We believe it is important to understand the type of personal information we collect and how that information is used. We recognize the need for appropriate safeguards and management of the PII provided to us.

How personal information is Collected

Web Visitors: EduSkills collects PII about a website visitor only when the visitor chooses to provide such information. Any personal data provided will only be used in accordance with this privacy policy. By supplying PII to EduSkills, a visitor can request information from EduSkills, including about the company's services .

Website / Cookies and other Tracking Technologies: In order to improve the content and format of our site, EduSkills uses website tracking software to automatically capture technical information. This may include, but is not limited to, user domain, the type of Internet browser being used, which Web pages is visited, and the amount of time spent on our site.

EduSkills use cookies and similar technologies to analyze trends, administer the website, track users' movements around the website. The cookie cannot be read by a site other than ours. No cookie will contain information that will allow anyone to contact you via telephone, e-mail, or any other means. You can monitor our use of cookies on your computer by setting your Web browser to inform you when cookies are set, or you can prevent the cookies from being set entirely. Please understand that if you disable the use of cookies on your computer, you may be unable to access certain portions or services on our websites.

Clients: EduSkills collects PII such as name, address, email address, etc. from client districts of EduSkills who are contracted for our services. The information may be collected through our Electronic Downloads, Website, or by members of our client support team.

Use of Your Personal Information

We use your PII to provide you with the services, which EduSkills is contractually obligated to provide to you, or to assist you in completing a transaction, or communicate with you about our products or services. We do not sell or rent your PII to third parties.

We may disclose PII if we are required to do so by law or we in good faith believe that such action is necessary to (1) comply with the law or with legal process; (2) protect and defend our rights and property; (3) protect against misuse or unauthorized use of our website; or (4) protect the personal safety or property of our users or the public (among other things, this means that if you provide false information or attempt to pose as someone else, information about you may be disclosed as part of any investigation into your actions).

Other than as stated in this Privacy Policy, we will endeavor not to release your PII to unknown or unaffiliated third parties, and we will not cross-reference your PII with that of any other customer or entity.

Access

As to EDS website visitors, EDS employees or clients, EduSkills will take reasonable steps to provide that PII is accurate, complete, and current, to its intended use. We provide individuals with reasonable access to the PII that they provide to us, as well as the ability to review and correct such information. Access to our site is requested through our clients that use our services. EduSkills will only retain PII as long as is necessary to comply with our legal obligations, resolve disputes, and as applicable to agreements with our customers.

To protect user privacy and security, we also take reasonable steps to verify user identity, before granting access to PII. In addition, we may limit or deny access to PII where providing such access would be unreasonably burdensome or expensive in the circumstances.

Security

To prevent unauthorized access or disclosure, to maintain data accuracy, and to allow only the appropriate use of PII, we utilize physical, technical, and administrative controls and procedures to safeguard the information we collect.

EduSkills utilizes a variety of physical and logical access controls, firewalls, intrusion detection/prevention systems, network and database monitoring, anti-virus, and backup systems. We use encrypted sessions when collecting or transferring sensitive data through our websites.

We limit access to your PII and data to those persons who have a specific business purpose for maintaining and processing such information. EduSkills's employees who have been granted secure physical access to PII are made aware of their responsibilities to protect the confidentiality, integrity, and availability of that information and have been provided training and instruction on how to do so.

Cloud Services

EduSkills utilizes a cloud-based server environment that has the following benefits for our clients:

- Tier3 Disaster Hardened Data Center (note:F5 tornado protection rated)
- Secure client-specific database libraries
- Eliminates systems administration by the client
- Operating systems installs, updates and PTF's
- Application update management and support
- 24/7 system monitoring
- UPS and generator power backup protect against major outages
- Multi-path internet connectivity
- Secure Internet VPN connectivity with Sonicwall
- Managed Sonicwall VPN tunnel to client
- Advanced system and application security provided via security officer
- Automatic file backups
- Offsite storage media rotation and retention
- Performance and file utilization monitoring
- Perform roll-back and recovery procedures
- Quick deployment of the latest technologies
- Enhances the school district's business continuance and operations focus
- Streamlines the change control process
- And more!

Data Integrity

As to its own employees, EduSkills will take reasonable steps to provide that PII is accurate, complete, and current, to its intended use. EduSkills will only use PII in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual.

Enforcement and Verification

EduSkills will conduct periodic assessments to validate its continued adherence to this Privacy Policy. Where EduSkills has knowledge that PII is used in a manner contrary to this Privacy Policy. EduSkills will take reasonable steps to prevent or stop the use or disclosure. EduSkills holds its employees and agents accountable for maintaining the trust that our customers place in our company.

Dispute Resolution

EduSkills will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of PII in accordance with the principles contained in this Policy. We encourage you to raise any complaints you may have with regard to this Privacy/Security Policy and/or our activation of this Policy.

EduSkills Contact:

President: J. Taylor Tribble, PhD
EduSkills LLC
10400 Vineyard Blvd. Suite F
Oklahoma City, OK 73120
Phone: 405-879-9898 ext. 326