

## Privacy Policy

Renaissance Learning, UK Ltd. (“Renaissance”) considers the privacy and security of visitors to our website to be of paramount importance. We have developed this privacy policy to inform you of our policies and procedures regarding the collection, use, and disclosure of personally identifiable information and non-personal information we receive from users of [www.renlearn.co.uk](http://www.renlearn.co.uk) or related Renaissance websites where this Privacy Policy appears (collectively, the “Website”).

### Note to Parents of Students who use Renaissance’s Products

When you access or use the Website, we may collect two types of information: (1) personally identifiable information; and (2) information that is not personally identifiable. Personally identifiable information includes information that identifies you personally, alone or in combination with other information available to us. Examples of personally identifiable information may include an individual’s name, address, telephone number, email address, or school.

As part of the standard operation of the Website, you may submit personally identifiable information. For example, when you create an account, you may provide personally identifiable information. In addition, should you attempt to communicate with Renaissance via the Website, email, or phone, you may provide us with personally identifiable information and we may keep your message, email address, contact information, and other personally identifiable information. At your option, you may provide additional personally identifiable information about yourself. When you visit the Website, however, you are not required to create an account with the Website or provide any personally identifiable information.

As part of the standard operation of the Website, we also collect non-personal information from you, including your browser type, operating system, IP address and the domain name from which you accessed the Website. In addition, we may collect information about your browsing behaviour, such as the date and time you visit the Website, the areas or pages of the Website that you visit, the amount of time you spend viewing the Website, the number of times you return to the Website, the referring web page, pages visited, location, your mobile carrier, device and application ID’s and other click-stream data.

We use a variety of third-party service providers to help provide the Website and to help us understand the use of the Website. These third-party service providers may use cookies, web beacons or similar technologies to collect information sent by your browser as part of a web page request, such as your IP address.

### Information Use

Renaissance does not rent or sell personally identifiable information and non-personally identifiable information to other companies. Instead, we use information collected via the Website in the following ways:

- Contact you when necessary;
- Respond to you regarding information you have requested;
- Communicate with you regarding Renaissance or the Website;
- Provide you with customized content and advertising for various products or services;

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- Administer the Website, monitor its usage, and diagnose problems with it;
- Remember you when you return to the Website, so that you don't have to re-submit information and preferences;
- Contact you with information and promotional materials and offers from us as well as from our affiliates, partners and other third parties, if you have agreed to receive such communications;
- Conduct research to improve our content and services; and
- To protect the security or integrity of the Website and our business.

In addition to the examples above, Renaissance may use third-party storage or service-provider companies to perform some functions including the processing of data (non-exhaustive examples being Microsoft Azure and Amazon Web Services). Renaissance may also disclose information to protect our rights or property, to enforce our terms of use and legal notices, as required or permitted by law, or at the request of government regulators or other law enforcement officials and the courts (including the issuance of a valid subpoena). We shall have no duty to notify you of such compliance with the law.

Renaissance may sell, transfer, or otherwise share some or all of its assets, including your personally identifiable information, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

We have the right, but not the obligation, to: (1) retain your personally identifiable information for as long as your account is active or as needed to provide you services or access to or use of the websites; and (2) retain and use your personally identifiable information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements. **We have the right, but not the obligation, to retain your non-personal information whether your account is active, inactive, or deactivated.**

## Do Not Track

Certain browsers have settings that allow you to turn on a "Do Not Track" ("DNT") feature. The Website supports DNT by stopping the collection of information that allows us to tailor content based on your recent visits to the Website and third parties (e.g., Partner) websites. When you enable DNT on your browser, we stop the collection of unique browser cookies that links your browser to visits to this Website and across other websites. If you enable DNT on your browser, however, certain features of the Website may not function properly.

We may from time to time use third-party service providers to track and analyse usage of the Website. The third-party service providers access and use cookie and log information in combination with personally identifiable information, such as name, IP address and email addresses, to assist in tracking the Website. These third-party service providers are granted access to the information via the Website.

Subject to the usage of the third-party service providers discussed above, we do not intentionally or knowingly allow other parties to collect personally identifiable information about your online activities over time and across different websites, when you visit the Website, or use any of the services offered on the Website. We do not, however, have control over third parties' activities, including if a third party accesses information based on your visit to the Website.

## Cookies

Like many websites, we may use “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s storage device for record-keeping purposes. We use cookies for two purposes: First, we utilize persistent cookies to save your login information for future logins to the Website. Second, we utilize session ID cookies to enable certain features of the Website, to better understand how you interact with the Website and to monitor aggregate usage by users and web traffic routing on the Website. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Website and then close your browser. Third-party advertisers on the Website may also place or read cookies on your browser. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all portions of the Website.

## Web Beacons

We also use “web beacons,” “pixel tags,” “clear GIFs” or similar means (individually or collectively “Web Beacons”) on our Website. A Web Beacon is an electronic image, often a single pixel, embedded on web pages. Web Beacons are ordinarily not visible to users. Web Beacons allow us to count the number of users who have visited certain pages of the Website, to deliver branded services, and to generate statistics about how our Website is used.

## Email Lists

Renaissance maintains email lists to keep interested parties informed about our company, events, products, support, and more. We do not sell the addresses on our list, but we may make information available to specific business partners, sponsors, or service providers.

Users may voluntarily request to join our mailing lists by signing up or opting in through a form on our Website. To be removed from a Renaissance email and/or mailing list, email [UKprivacyofficer@renlearn.co.uk](mailto:UKprivacyofficer@renlearn.co.uk) with REMOVE ME in the subject line.

## Accessing, Changing or Deleting Your Information

If your personally identifiable information changes or you desire to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete, Renaissance will take reasonable steps to permit the correction, amendment, or deletion of your information. To do so, please send an email message to [UKprivacyofficer@renlearn.co.uk](mailto:UKprivacyofficer@renlearn.co.uk) and putting the word “UPDATE” in the subject line of the message. If you desire to delete your account, please go to your account and follow the instructions to delete that account.

EU Individuals have the right to access their personal information. Upon request, Renaissance will grant individuals access to personal information that it holds about them provided there is no information about third parties. In such cases, Renaissance will redact such third party information.

## Security

Your personally identifiable information will generally be stored in databases maintained by Renaissance or our service providers such as Microsoft and Amazon and in some circumstances, such service providers will directly capture your information. Most of these databases are stored on servers located in the United



States. Renaissance may use third-party storage or service-provider companies to store your personally identifiable information, some of which may be outside of the United States.

We have taken certain physical, electronic, contractual and administrative steps to protect the confidentiality, security, and integrity of your personally identifiable information. However, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee its absolute security. It is your responsibility to maintain the confidentiality of your Website account information.

### **International Transfer**

If you are located outside the United States and choose to provide information to us, Renaissance transfers information to the United States and processes it there. In some circumstances, you will be logged directly into servers located in the United States which belong to or are operated by Renaissance's affiliate and/or its third party service providers. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

### **EU – U.S. Privacy Shield**

Renaissance's parent company, Renaissance Inc, participates in and complies with the EU-U.S. Privacy Shield Framework (the "Framework"). Renaissance Inc has certified that it adheres to the Privacy Shield Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Framework, visit <https://www.privacyshield.gov/>. To view Renaissance Inc's certification, visit the U.S. Department of Commerce's Privacy Shield List.

Renaissance Inc is responsible for the processing of personal data it receives, under the Framework. For personal data transferred from the EU, if Renaissance Inc transfers your personal data to a third party, Renaissance Inc will ensure that the third party is contractually obligated to process your data only for limited, specific purposes consistent with this Policy. Renaissance Inc will also ensure that the third party will apply the same level of protection to that data as the EU-U.S. Privacy Shield Principles and will notify Renaissance if it makes a determination that it can no longer meet this obligation. Renaissance Inc also complies with the Privacy Shield Principles for the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Framework, Renaissance Inc is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Renaissance Inc may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the EU-U.S. Privacy Shield, Renaissance strives to resolve all complaints about privacy and the collection or use of customer information. If you have questions about our parent company's participation in the Privacy Shield program or have a complaint, please send an email to [privacy.officer@renaissance.com](mailto:privacy.officer@renaissance.com). If you have any unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider JAMS or contact the UK's Information Commissioner's Office: <https://ico.org.uk/for-the-public>.



Under certain conditions, more fully described on the Privacy Shield website at <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

### **Links to Other Websites and Services**

Users visiting our website may find links to websites owned and operated by other organizations. Please note that when you click on one of these links, you are moving to another website. While we reviewed the linked sites at the time of the posting of the link, and only provide a link if we believe the content of a site is appropriate and of interest to visitors to our Website, the content of those linked sites is the responsibility of the organization actually owning and/or operating the site. Renaissance is not responsible for, and has no control over, the content or privacy policy of any linked site. We encourage you to read the privacy statements of any linked site as its privacy policy may differ from Renaissance's.

### **Changes to Website and Privacy Policy**

We constantly update the features of the Website to better serve you and all our customers, so this policy may also be revised from time to time. Renaissance may modify this policy without advance notice and any modifications are effective when they are posted here. By using the Website, you indicate your understanding and acceptance of the terms of the policy posted at the time of your use. If you have any questions, please contact us at your convenience.

If you have any questions about this Privacy Policy, the practices of the Website, or dealings with the Website or with Renaissance, please send us an email at [privacy.officer@renaissance.com](mailto:privacy.officer@renaissance.com) or contact us by mail at 2911 Peach Street, Wisconsin Rapids, Wisconsin 54494, United States. Alternatively, please send us an email at [UKprivacyofficer@renlearn.co.uk](mailto:UKprivacyofficer@renlearn.co.uk) or contact us by mail at 32 Harbour Exchange Square, London E14 9GE.