

## US Privacy Notice: myON Reader

Welcome, **Garland, Rowlett, and Sachse, Texas community members!** Renaissance Learning, Inc. and its subsidiaries (“**Renaissance,**” “**We,**” “**Us,**” “**Our**”) are committed to the privacy and security of Your Data. We have created this Privacy Notice to inform You about Your data rights and the measures We take to protect Your Data and keep it private when You are using our Product in the United States.

### Definitions

Capitalized words have special meaning and are defined below.

“**Educators**” means Garland Independent School District, the sponsor of the Garland, Rowlett, and Sachse, Texas Literacy for Life Initiative.

“**Community Members,**” “**You,**” “**Your**” means individual community members (not including existing Garland ISD students) registering to participate in the Garland, Rowlett, and Sachse, Texas Literacy for Life Initiative.

“**Authorized User(s)**” means parents/legal guardians and the child or children they register.

“**Product**” means our software product, myON Reader, being provided to You in connection with your registration for the Garland, Rowlett, and Sachse, Texas Literacy for Life Initiative.

“**Data Protection Legislation**” means the Family Educational Rights and Privacy Act (“FERPA”), the Children’s Online Privacy Protection Act (“COPPA”) and any other applicable Texas education privacy laws and regulations specific to Your Data.

“**Your Data**” includes: (i) Authorized User rostering information; (ii) Authorized User information or content generated within the Product (ex, scores, assessments, assignments, essays, notes); (iii) Authorized User sign-on information; (iv) student information that You send to Us in connection with a research study request; (v) feedback Your teachers share with Us. Your Data includes both “personally identifiable information” and “personal information” as defined in the applicable Data Protection Legislation. Renaissance considers Your Data to include any information that can be used on its own or with other information to identify Your Authorized Users as individuals.

“**De-identified Data**” is data that has had any personally identifiable information removed to such a degree that there is no reasonable basis to believe that the remaining data can be used to identify an individual.

### Information We Collect

We gather the various types of information below:

- **Usage Information:** We keep track of activity in relation to how You and/or Your Authorized Users use the Product including traffic, location, logs and other communication data.
- **Device Information:** We log information about You and/or Your Authorized User’s computing device when they use the Product including the device’s unique device identifier, IP address, browser, operating system, and mobile network.
- **Information collected by Cookies and other similar technologies:** We use various technologies to collect aggregated user information which may include saving cookies to Authorized User’s computers.
- **Stored Information and Files:** The Product may access files, including metadata, stored on Authorized Users’ computing devices if You choose to send or provide to Us.

- **Information Input by You or Authorized Users:** We receive and store information You or Your Authorized Users input into the Product when registering for an account.
- **Information Generated from using the Product:** We store information generated by Authorized User's use of the Product.

## How We Use Information

We take Your privacy seriously. Truly. We are proud signatories to the [Student Privacy Pledge](#) which is a voluntary standard that is legally enforceable by the Federal Trade Commission. We won't use Your Data to do anything other than what We describe below. We use Your Data as follows:

- Provide You and Your Authorized Users with access to the Product
- Communicate with Authorized Users as necessary to meet Our obligations to You
- Provide marketing communications to Educators
- Provide Your contact information and Product use information to Educators (*solely in the event you have explicitly consented by opting-in to this sharing during Your registration process*).
- Provide You notices about Your account, including expiration and renewal notices
- Carry out Our obligations and enforce Our rights arising from Our Terms of Service and License Agreement
- Notify You of changes to any Product
- Estimate Your size and usage patterns
- Store information about Your preferences, allowing Us to customize Your services
- Maintain and improve performance or functionality of the Product
- Demonstrate the effectiveness of the Product
- To De-identify Your Data so that De-identified Data can be used as follows:
  - aggregate reporting and analytics purposes
  - general research and the development of new technologies
  - improving educational products
  - developing and improving educational sites, services and products
  - where applicable, to support any of the uses above or any other legitimate business purpose

## How We Share Information

The security and privacy of Your Data is Our number one priority. We are in the business of making sure You can leverage Your Data to help students. We are not in the business of selling data. We may share and disclose Your Data in the following limited circumstances:

- **Garland ISD:** we may share Your Data with Garland ISD (sponsors of the Garland, Rowlett, and Sachse, Texas Literacy for Life Initiative).
- **Vendors:** We may share Your Data with third party vendors, consultants and other service providers who We employ to perform tasks on Our behalf. These vendors are bound by contractual obligations to keep Your Data safe and honor Our privacy commitments to You. A list of Our hosting and data center vendors can be found [HERE](#).
- **Change of Control:** We are committed to protecting Your Data and honoring Our privacy commitments to You, even in the case We join forces with another organization. If a third-party purchases most of Our ownership interests or assets, or We merge with another organization, it is possible We would need to disclose Your Data to the other organization following the transaction in order to continue providing services to You. The new controlling organization will be subject to the same commitments as set forth in this Privacy Notice.
- **National Security or Law Enforcement:** Under certain circumstances, We may be required to disclose Your Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.
- **Protection:** We may disclose Your Data if We believe a disclosure is necessary to protect Us, You and/or Your Authorized Users including to protect the safety of a child and/or Our Product.
- **Research:** We may share De-Identified Data with educational institutions; applicable governmental departments or entities working under their authority, to support alignment studies and educational research.
- **Third Parties You Authorize:** We may share Your Data with third parties that You have authorized.



## Security

Your Data is stored on servers in the United States. The security of Your Data is of the utmost importance to Us. Please review Our [Information Security Overview](#) for more information about how We protect Your Data.

## Date Retention and Destruction

We retain Your Data until your child graduates high school. Your Data will be removed from Our primary data storage within 30 days and Our backups within 90 days.

If any applicable laws or regulations require Us to keep any of Your Data, We will only keep it for the period and purpose such law or regulation requires.

We do keep, combine and continue to use De-identified Data or anonymized data.

## Privacy Rights

Your Data is, and always will remain, Your property and under Your control. We won't delete, change or divulge any of Your Data except as described in this Privacy Notice.

If You would like us to correct an inaccuracy in Your Data, please contact us at [privacy@renaissance.com](mailto:privacy@renaissance.com). In order to validate Your request, we may partner with Garland ISD for verification purposes or require documentation confirming Your identity.

## Data Protection Legislation

Renaissance complies with all applicable Data Protection Legislation. Applicable Data Protection Legislation will control if there is a conflict with this Privacy Notice.

As a condition of using the Product, You are responsible for providing parental consent in connection with Your child's use of the Product as required by applicable Data Protection Legislation.

## Third Parties

The Product may operate with third-party software and/or services obtained separately by You and authorized by You and/or You may be able to access third-party websites and applications (collectively and individually, "Third Party Services"). While We configure Our Product to work with Third Party Services, We do not endorse and are not responsible for the privacy policies, functionality, or operation of Third Party Services.

## Updates

If it becomes necessary for Us to change this Privacy Notice, We will post the changes on Our website and do Our best to bring it to Your attention. If that happens, please make sure You review those changes. However, if any laws or regulations change, We will update this Privacy Notice so that We comply with such changes without prior notice. We won't make any material changes to how We use Your Data without notifying You.

## Contact Us

If You have any questions or concerns regarding this Privacy Notice, please send a detailed message to [privacy@renaissance.com](mailto:privacy@renaissance.com) or by mail to Renaissance Learning, Inc., Attn: "Privacy: Data Protection Officer", 6625 W 78<sup>th</sup> St, Suite 220, Bloomington, MN 55439.