

Australia | New Zealand Privacy Notice: Renaissance Products

Welcome, Educators! Renaissance Learning Australia Pty Ltd is committed to the privacy and security of Personal Information. We have created this Privacy Notice to inform You about Your data rights and the measures We take to protect Personal Information and keep it private when You are using Our Products in Australia or New Zealand.

Definitions

Capitalized words have special meaning and are defined below.

“Educators,” “You,” “Your” means the school or institution contracting with Renaissance for use of the Renaissance Products. Educators, you are responsible for obtaining any student or parental related consents on behalf of the students using Renaissance products. Renaissance processes Personal Information on your behalf.

“Renaissance,” “We,” “Us,” “Our” means Renaissance Learning Australia Pty Ltd. Renaissance processes Personal Information according to Your instructions in order to fulfill the services that We are providing to You.

“Authorized User(s),” “Data Subjects” means Your faculty, staff (including administrators and teachers), students accounted for in Your quote. Authorized Users are also known as **“Data Subjects.”** Data Subjects have rights around the use, collection, transfer, disclosure, and retention of their Personal Information which they may raise to You to address.

“Products” means the commercial educational online software products being provided to You under Your Terms of Service & License Agreement. Our products include: Accelerated Reader, Accelerated Math, Star Assessments, Star Reading, Star Early Literacy, Star Math, Freckle, myON, myIGDIs and Schoolzilla.

“Data Protection Legislation” means (i) the Australian Privacy Act; (ii) the New Zealand Privacy Act of 2020; and (iii) all applicable laws and regulations relating to processing Personal Information and privacy, including, where applicable, guidance and codes of practice issued by the Information Commissioner or Privacy Commissioner’s Office.

“Personal Information” has the definition provided in the Australian Privacy Act and New Zealand Privacy Act of 2020. Any information that can identify Your Authorized Users either directly or indirectly, is considered Personal Information.

“Your Data” Examples of the types of data We collect in connection with Our Products include: (i) Authorized User rostering information; (ii) Authorized User information or content generated within the Products (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.

“Anonymized Data” is data that does not itself identify any individual and that is unlikely to allow any individual to be identified through its combination with other data.

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 Products 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 Products 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 Users’ computers.

- **Stored Information and Files:** The Products 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 Products. The specific data elements that are stored by each Product can be found [HERE](#).
- **Information Generated from using the Products:** We store information generated by Authorized Users' use of the Products. The specific data elements that are stored by each Product can be found [HERE](#).

How We Use Information

We take Your privacy seriously. Truly. We won't use Personal Information to do anything other than what We describe below. We use Personal Information as follows:

- Provide You and Your Authorized Users with access to the Products
- Communicate with Authorized Users as necessary to meet Our obligations to You
- Provide marketing communications to Educators
- 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 Products
- 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 Products
- Demonstrate the effectiveness of the Products
- To anonymize Personal Information so that Anonymized 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 privacy of Personal Information 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 Personal Information in the following limited circumstances:

- **Parent Company:** We may share Personal Information with Our parent company, Renaissance Learning, Inc., for the purposes of fulfilling Our services to You.
- **Vendors:** We may share Personal Information 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 Personal Information 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 Personal Information 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 Personal Information 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 Personal Information in response to valid requests by public authorities, including to meet national security or law enforcement requirements.
- **Research:** We may share Personal Information with **Governmental Departments, Ministries or Research Agencies or entities working under their authority** to support alignment studies and educational research. In such an event, We will conduct a privacy impact assessment and only move forward in instances where participation in such research could be reasonably expected by Data Subjects and minimally invasive or where there is a compelling justification for the processing.
- **Protection:** We may disclose Personal Information 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 Products.
- **Anonymized Data:** We may share Anonymized Data.
- **Third Parties You Authorize:** We may share Personal Information with third parties that You have authorized.

Security

The security of Personal Information is of the utmost importance to Us. Please review Our [Information Security Overview](#) for more information about how We protect Personal Information.

Data Storage Location

- **myON Product:** Personal Information is stored on servers in Singapore. Personal Information is **accessible from the United States**.
- **All other Renaissance Products:** Personal Information is stored on servers in the **United States**.

Data Retention and Destruction

We would hate to lose You as a customer, but if You decide not to renew or You terminate Your Terms of Service and License Agreement with Us, We will remove Personal Information from the Products.

Contractual Customers: When Your Terms of Service and License Agreement is up for renewal, We provide You with a 60 day grace period prior to scheduling Personal Information for removal. If You are using Our Freckle Product, You have the option to transfer to Our Freckle Product Free-Version prior to having Personal Information removed. We provide these options to ensure We will be able to restore access to Personal Information should there be a lapse in time between Your contractual end date and Your renewal processing. Following the 60 day grace period, Personal Information will be removed from Our primary data storage within 30 days and Our backups within 90 days.

Freckle Product Free-Version: If You are using the Free-Version of Our Freckle product, We will remove accounts that have been consistently inactive for a period of 13 months. Prior to scheduling Personal Information for removal, We will send an email to notify You. If You do not wish for Your account to be removed, please respond within 15 days. If We do not hear back from You within that time period, Personal Information will be scheduled for deletion and will be removed from Our primary data storage within 30 days and Our backups within 90 days.

If any applicable Data Protection Legislation requires Us to keep any Personal Information, We will only keep it for the period and purpose such law or regulation requires.

We do keep, combine and continue to use Anonymized Data across all of Our Products.

Privacy Rights

We are only authorized to process Personal Information per Your documented instructions as agreed upon when accepting Our Terms of Service & License Agreement, Data Protection Addendum, and this Privacy Notice. We won't delete, change or divulge any of Personal Information except as agreed upon.

We celebrate You and Your Authorized Users' data rights! We will notify You of any requests We receive from Data Subjects in a timely manner. We will take any reasonable supporting action required by You in Your response to a Data Subject. You are responsible for the content of Your Data. You can retrieve an Authorized User's Personal Information using the Products' dashboard(s). If You receive a request from a Data Subject to change or delete their Personal Information, You can make the changes to the source data within Your systems. The Products refresh Your Data on a regular basis.

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 Products, You are responsible for informing Your Authorized Users about this Privacy Notice and obtaining any applicable parental consents as required by applicable Data Protection Legislation.

Third Parties

Effective Date: 15 December 2020

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The Products 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 Products 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 Personal Information 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 or by mail to Renaissance Learning, Inc., Attn: “Privacy: Data Protection Officer”, 6625 W 78th St, Suite 220, Bloomington, MN 55439.