

Privacy Policy

This Privacy Policy explains how K12 *Insight*, LLC (“K12 *Insight*”) handles data collected during the normal course of our business (sales, marketing, and support), as well as how we process data from our customers through our software and services. “Clients” are individuals or organizations with whom we have a valid, current signed agreement.

K12 *Insight* complies with applicable state and federal laws regulating the collection and use of personal information and educational records. For example, we comply with the Children’s Online Privacy Protection Act, the Family Educational Rights and Privacy Act, the Consumer Privacy Bill of Rights, the California Online Privacy Protection Act, and the various privacy bill of rights enacted by states where our Clients are located. Please note, that we reserve the right to terminate our services for any use that violates our Privacy Policy.

1. OUR SOLUTION, SOFTWARE AND SERVICES

K12 *Insight* software solutions are provided in an Application Service Provider (“ASP”) model and accessed using industry-standard web browsers via the web or a mobile device, or using a mobile app on a mobile device. Many of our Clients use our software solutions on a Self-Service basis, whereby the customer or its authorized staff are solely responsible for the data they input to our system and the data our systems collect from their stakeholders. Such use of our solution is referred to in this document as “Self-Service”.

In some instances, we may manage a project on behalf of our Clients, which we refer to as our “Consulting Service”.

In a Consulting Service, or in the process of providing technical support to our Self-Service Clients, we may receive information from Clients or generate reports that are exchanged with Clients via email, using appropriate file formats.

When performing services requested by our Clients, our software may send emails to our Clients’ stakeholders, which may contain personalized content, links, email addresses, or web links.

2. ADDITIONAL DATA WE COLLECT?

When registering for our services, we generally request the following information: including, but not limited to, name and contact information, company name, name of business representative, title of business representatives, company address, telephone number, email address, username and password, and billing information which may

include credit card numbers. Clients also provide us with information regarding the services they have ordered.

From our website, www.k12insight.com (“Website”), we collect information related to visitors, including their IP address, device type, and where available, the domain name, visited pages, surveys, landing pages of our Clients and interest areas, referring URLs, and other publicly available information. We analyze and use this information to help improve our Website and services, and to customize the content of our pages for a returning visitor using Website “Cookies” (a small piece of data stored on a visitor’s device while browsing to remember you and your preferences without re-entering such information when browsing web pages).

No personal data is collected when browsing our Website, unless you provide it to us when requesting us to contact you or before downloading content from our Website.

Clients manage and control (or, in case of Consulting Service, direct K12 *Insight* staff to manage) all information input into the K12 *Insight* software systems or generated on behalf of Clients in connection with the Services (“Data”). Depending on how the Client chooses to use (or, in case of Consulting Service, direct K12 *Insight* staff to use) the software, Data may include personal information. Such personal information may include, first and last name, student ID number, grade level, ethnicity, address, phone number, and email, or any combination of the same, and Let’s Talk! dialogue information, which contains questions, comments, concerns, suggestions, compliments, and similar communications by any stakeholder in a school system.

Clients manage all Data, as well as their users who create, manage, distribute, or report the Data.

3. USE OF CUSTOMER DATA

K12 *Insight* treats all Data entered by Clients (or, in case of Consulting Service, entered by K12 *Insight* staff under Client’s direction) or its stakeholders, as property of the Client. We regard all Data as highly confidential. All Data is safeguarded using industry best security practices that prevent unlawful disclosure.

We do not sell or make publicly available any specific identifiable information about our Website’s visitors, prospects, Clients or their stakeholders, or any of the Data input by Clients when using our services; however, if we are compelled by a valid court order or legal process, or to establish or exercise our legal rights or defend against legal claims, we may disclose such information. K12 *Insight* will never share or transfer Data to a third-party without the written permission of our Client.

We may share information to the extent necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of service, or as otherwise

required by law. However, electronic communications made through the Let's Talk! Service may be deemed an "electronic communication" by K12 *Insight*. As such, K12 *Insight* reserves the right to protect Information that it believes is protected from compelled disclosure pursuant to the Electronic Communications Privacy Act, 18 U.S.C. § 2510, et seq., ("ECPA") and the Stored Communications Act, 18 U.S.C. § 2701, et seq., ("SCA"), in addition to protections afforded by state law. The protections provided under the SCA and ECPA enable K12 *Insight* to prevent governmental authorities from seeking compelled disclosure of certain electronic communications.

We maintain a database of our Client's information that is used only for internal business functions, such as technical support, marketing activities, billing, and to notify Clients of changes or enhancements to the services. We may use Data to improve the performance of our Website and services by analyzing user behavior, including frequency of use, troubleshooting technical problems, resolving disputes and to address complaints, and to verify compliance with our Terms of Service. K12 *Insight* may process Data for the purpose of providing the required services to Clients. We may also anonymize and aggregate the Data and use such anonymized and aggregated data for our own business purposes and benchmarks.

K12 *Insight*, its staff and authorized consultants, all of whom follow this Privacy Policy and are bound to protect Client Data in the manner indicated here, may access Data solely to provide Client support or with services requested by Client. Other than to provide technical support upon request or to process Data as part of a Consulting Service, K12 *Insight* employees and consultants do not actively access and view Data. We may share Information with our affiliated/commonly owned companies, or during any real or potential acquisition or merger of our company by or with another. We will notify you if your information becomes subject to a different Privacy Policy.

K12 *Insight* has built software features that may be used to modify and delete Data, allow for anonymity, and allow for other features in order to help Clients comply with certain privacy-related regulations and laws. Therefore, you may share or otherwise use your user's information in the manner you elect when using our services. For example, you are given the opportunity to either hide or make available to survey participants certain client contact information in connection with a survey.

Clients must ensure that they, and their individual users, follow all applicable laws when sending emails to their stakeholders, collecting personal information, preventing unsolicited emails from being sent, and deleting personal information when no longer required. K12 *Insight* is not responsible for your improper disclosure or use of any information obtained from the Services.

4. CHANGING INFORMATION COLLECTED.

Client's information may be viewed and modified in our active database in real-time, at any time. The changed information may remain in archives and records for some

period of time. Once survey responses have been submitted, the survey participant will not be able to access his or her participant information. Client's survey participants may contact you, and you, in turn, will be able to view the service participant's collected information and, where appropriate, work with us in modifying such information.

We will permanently delete all personally identifiable information in a Client's account that is explicitly identified by the Client to be deleted, within 90-days of receiving such written notice. K12 *Insight* reserves the right to delete any and all Data that is older than 5 years from its database at any time, with 30 days written notice to the Client, or within 90-days after discontinuing support for an active service term. Client is solely obligated to back-up and download all necessary Data relating to the Services. K12 *Insight* shall not have any liability for the deletion of any Data from its database in accordance with these terms. Client shall be responsible for notifying K12 *Insight* if it desires to follow a different deletion practice.

5. HOW INFORMATION IS PROTECTED.

All Self-Service Client Data collected using our software is stored in a single, secure data center. Our data centers provide data security and physical security that meets or exceed prevailing industry standards. Data from Consulting Services reside in secure and encrypted file formats on our servers and on our staff's secured computers.

Our services have substantial and elaborate security measures in place to protect your information. Unique usernames and passwords must be entered each time a person logs on. Our Websites are hosted in a secure server environment that uses a firewall and other technology to prevent access from outside intruders, in line with prevailing industry standards. Internally, we use security-logs, train our employees, and limit access to K12 *Insight* personnel who need to know the information to deliver the Services. When transmitting sensitive information, we use encryption technology. All of our technology and processes are not, however, guarantees of absolute security. Clients must actively protect their information by maintaining the confidentiality of all usernames and passwords and by adequately installing the appropriate anti-virus programs and security measures on their own systems. You must immediately notify K12 *Insight* if any information security breach is suspected.

Contact us at privacy@k12insight.com.

6. CHANGES TO OUR PRIVACY POLICY.

As we are constantly improving the Services and expanding our business, K12 *Insight* reserves the right to modify this Privacy Policy from time to time to reflect such improvements. In the event we make such changes, we will announce the changes and post the new policy at <https://www.k12insight.com/privacy>. We will also provide advance notice of any material changes to this Privacy Policy, to permit you a

reasonable chance to review and consent to the same. Information collected after the new policy is posted will be used in conformance with the new policy. We may use information according our new Privacy Policies, but in such event, we will take reasonable measures to notify Clients of the changes and obtain their consent to use the information in line with the new policy.