



PRIVACY POLICY FOR *Teaching Strategies GOLD*® online

This Privacy Policy applies to *Teaching Strategies GOLD*®, located on the web site www.teachingstrategies.com (the "Site"). The Site is owned and operated by Teaching Strategies, Inc. ("Teaching Strategies"). Teaching Strategies makes available on the Site an online reporting and assessment system (the "Services") that can be used by teachers, school administrators, parents and other child care providers to track the progress of individual children and certain groups of children. Teaching Strategies is committed to ensuring the privacy and accuracy of the information collected on the Site. This Privacy Policy identifies the information that Teaching Strategies collects from users and visitors of the Site and describes how we will use the information we have collected.

WHAT INFORMATION DO WE COLLECT?

Member Data: In order to access the Services available on the Site, Teaching Strategies requires that you either purchase, or are the authorized representative of an organization that has purchased, a subscription to use the Services. If you have signed up for the Services on a trial basis, we will make the Services available to you at no charge for fourteen (14) days.

Before you can use the Services (whether on a trial basis or through a paid subscription) you also will need to register with us. To register, we require that you provide us with certain information that can be used to personally identify you ("Member Data"). The terms under which you have acquired the right to use the Services determines the Member Data we will collect from you.

- **Subscribers (Organizations and Individual Subscribers):** If you have purchased a subscription from Teaching Strategies to use the Service, you will need to provide us with your full name, the name of your organization, your mailing and e-mail address, telephone number and information regarding your method of payment (e.g. credit card number).
- **Group Members (Program and Site Administrators and Teachers):** If you are registering through a school, school district, child care center, Head Start program or other organization that has purchased a subscription from Teaching Strategies to use the Service, you will need to provide us with your full name and email address. If an administrator from your organization has pre-registered you to use the Service, the administrator will have provided us with this information.
- **Invited Guests (Parents and Others):** If you are registering to use the Service in response to an invitation from another registered member, you will need to provide us with your full name and email address.

As part of the registration process, you will need to select a user name and password that will allow you to use our Services and access the controlled areas of our Site. Do not disclose, share or allow any other

party to use your user name and password. If you become aware that your user name and/or password has been lost or stolen or is being misused, notify Teaching Strategies immediately.

Student Data: Once registered, certain subscribers will be able to use the Services to create portfolios ("Portfolios") for individual children. In connection with the development of such Portfolios, Teaching Strategies will collect certain information about the children ("Portfolio Data"). Some of this information can be used to personally identify the children. Teaching Strategies collects Portfolio Data only from registered subscribers. Teaching Strategies does not solicit or accept such information from individual students or any users who are under the age of 18.

Portfolio Data falls into one of three categories:

- **Child Data:** For each Portfolio created, Teaching Strategies will collect from the registered member creating the Portfolio the child's name or other similar designation (e.g. initials), birth date and gender. We refer to this information as "Child Data." Although you may use the child's full name when creating a Portfolio, to further protect the confidentiality of a child's information, you may want to select another means to identify the child. For example, you could use the child's initials, the child's first initial and last name or just the child's last name.
- **Developmental Data:** We also will collect information about the child's progress, notes about the child's activities, messages to other invited members on the child's team, photographs, scanned images of the child's work, audio recordings, video clips and notes to and from parents, guardians and teachers. We refer to this information as "Developmental Data."
- **Demographic Data:** Finally, we may collect some or all of the following data regarding a child: the child's primary language, race and ethnicity, whether the child has an Individual Education Plan, the program, if any, in which the child participates (e.g. Head Start, Pre-K, Title I, etc.) or other funding sources for the child and the child's age group and class. We refer to this data as "Demographic Data."

Feedback Data: We also offer visitors the opportunity to request additional information, provide comments, or send us feedback. Any visitor to our website may send us feedback, whether or not the visitor has registered as a subscriber. We retain all rights to any of the suggestions, recommendations or other ideas provided and may, in our sole discretion, use and implement any of the suggestions, recommendations or other ideas provided without compensation to you. All requests, comments, and feedback should be sent to us at implementation@teachingstrategies.com. Please include your name, organization name, and contact information.

Tracking Information: Teaching Strategies automatically tracks and collects certain anonymous information from all visitors to our Site, including (i) the pages you view on the Site, (ii) the websites you visit immediately before and immediately after visiting our Site, (iii) your IP address and (iv) the operating system, browser software and internet service provider you use. This information does not personally identify you. We also use the standard "cookie" feature of major browsers. A cookie is a small file placed on your computer's hard drive that allows us to learn about your visit to our Site. Cookies

help us learn which areas of our Site are useful and which areas need improvement. We do not use cookies to collect any personally identifiable information about you.

HOW DO WE USE THE INFORMATION WE COLLECT?

Member Data: We will use the Member Data you provide to register your membership, set up and maintain your account, determine the number of Portfolios, if any, you are authorized to create and which Portfolios you are authorized to access, update, view and/or modify. We will also use Member Data to notify you of updates to the Site and our services, and to contact you if we need more information. If you have purchased a subscription to use the Services, we will use the financial information you provide to bill you.

If you have registered to use the Services through your school, school district, child care center, Head Start program or other organization that has purchased a subscription from Teaching Strategies, the Member Data you provide will be accessible by the organization that purchased the subscription.

Portfolio Data: We will use Student Data to set up and maintain Portfolios and to grant other authorized users the right to access, update, view and/or modify such Portfolios. We use Student Data and Developmental Data to prepare student assessments, identify and recommend appropriate activities and customize student plans. We use Demographic Data to create aggregated non-personalized outcome group progress reports for subscribers. Only the Demographic Data provided by a subscriber's registered users will be used to create reports for such subscriber. We also may aggregate the Portfolio Data, with all personally identifying information about individual students, registered users, organizations and programs removed, to generate reports and conduct research. From time to time we may publish the results of the aggregated de-identified Portfolio Data. In no event will any such results permit the personal identification of students and their parents or identify in any way the site, program or organization.

If you have invited the parent or legal guardian of a child to view a child's Portfolio, we will make the Student Data and Developmental Data in the child's Portfolio available to such invited guest for their review. All invited guests must register with Teaching Strategies before being granted access to a Portfolio and the invited guest's access will be limited to the Portfolio such guest has been invited to view. An invited guest will not be able to modify or add to a Portfolio.

Additionally, if you have registered to use the Services through your school, school district, child care center, Head Start program or other organization that has purchased a subscription from Teaching Strategies, any Portfolio Data you provide will be accessible by the organizations through which you have registered to use the Services.

Feedback Data: We use the Feedback Data to respond to your inquiries or requests.

Tracking Information: We use the anonymous information we collect to administer our Site, improve our services, determine how the Site is being used, identify popular areas of the Site and analyze trends and

usage patterns. We may use your IP address to help diagnose problems with our server. This anonymous information cannot be used to personally identify you or a student.

We will not disclose any of the Member Data, Portfolio Data or Feedback Data we collect to any third parties except as described above and in the following limited circumstances:

- We will disclose the data we collect if required to do so by law or in the good-faith belief that disclosure is necessary (a) to obey the law or comply with legal process served on us or our affiliates; (b) to protect and defend our rights or property or the rights or property of other users of our website; or (c) to act in an emergency to protect the personal safety of users of our website or the public.
- If we sell our company or its assets, we may transfer the data we collect to the purchaser so that the purchaser can continue to provide services to you. The purchaser will be bound by this Privacy Policy.

DO WE COLLECT INFORMATION FROM CHILDREN?

We respect the sensitive nature of children's privacy online. The Services are intended for use by schools, school districts, program administrators, teachers, parents and legal guardians. They are not intended for use by persons under the age of 18. If we learn that a user is under 18 years of age, we will promptly delete any personally identifiable information provided by that user. If you are under the age of 18, please do not send us any information about yourself.

HOW DO YOU CORRECT INFORMATION YOU HAVE PROVIDED US?

If you wish to correct or change any of your Member Data you may do so by logging onto the Sites and updating or correcting the Member Data. You may change any of the Portfolio Data you have provided by logging onto the Services and modifying the applicable student Portfolio. Only the registered member who created the Portfolio and such member's program administrator will have the ability to modify the Portfolio Data for a Portfolio. If you need assistance modifying Portfolio Data, you may contact Teaching Strategies' support services line at 1-866-736-5913.

LINKS TO THIRD PARTY SITES AND LISTSERVS

The Site may contain links to other websites or refer you to other resources. We are not responsible for the privacy practices or the content of such websites or resources and you should refer to such websites and resources for information about how such sites and resources protect the information they collect.

The Site also makes available to registered users an email discussion group through which users may communicate with other users and exchange ideas. Please remember that any information disclosed in these areas becomes public information. We do not collect or store any of the information provided on or through this discussion group.

HOW SECURE IS OUR WEBSITE?

We use security measures standard in the industry, including Secure Sockets Layer (SSL) encryption and firewalls, to prevent unauthorized access, safeguard confidentiality and ensure the correct use of the Member Data (including e-commerce information) and Student Data you provide to us.

DISCLAIMER OF LIABILITY

The information contained herein reflects the Internet privacy policy and practices that Teaching Strategies has adopted for the Site. In legal terms, it shall not be construed as a contractual promise, and Teaching Strategies reserves the right to amend it at any time simply by posting such amendment on the Site. Any such amendment will become effective immediately upon posting on the Site. Neither Teaching Strategies nor any of its affiliates, employees or agents shall be held liable for any improper or incorrect use of the information described and/or contained in the Site and assumes no responsibility for anyone's use of the information.

QUESTIONS

If you have any questions or concerns about Teaching Strategies' information collection and use practices, please send us an email with your questions or concerns to implementation@teachingstrategies.com.