



## Get More Math Privacy Policy

Document Type:	Public
Version:	3.1
Date of version:	2/13/2019
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Approved by:	<i>David Miller</i>
Confidentiality level:	Public

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### 1. Purpose, scope and users

This documents details Get More Math’s Privacy Policy. The intended audience is Get More Math employees, contractors, customers, and anyone interested in Get More Math’s Privacy Policy

### 2. Reference documents

- Get More Math Information Security Policy

### 3. Privacy Policy (the following without numbering is to be posted on the website)

#### **Get More Math takes the privacy of our users with as much seriousness as we do the education of our students.**

This Privacy Policy (this “Policy”) describes the collection of Personal Information by Get More Math, a Delaware corporation (“Company,” “we,” or “us”) from users of our Web site at [www.getmoremath.com](http://www.getmoremath.com) (the “Website”), as well as all related applications, widgets, software, tools, and other services provided by us and on which a link to this Policy is displayed (collectively, together with the Website, our “Services”). This Policy also describes our use and disclosure of such information. By using our Services, you consent to the collection, use, and disclosure of Personal Information in accordance with this Policy. This Policy is incorporated by reference into our Terms and Conditions and subject to the provisions of the Terms and Conditions. For information regarding our practices with respect to information knowingly collected from children under 13, please read the section Notice to Schools and Parents of Children Under 13 Years of Age.

### Personal Information

“Personal information,” as used in this Policy, is information that specifically identifies an individual, such as an individual’s name, address, telephone number, or e-mail address. Personal information also includes information about an individual’s activities, such as information about his or her activity on our Services (such as the individual’s performance, scores, and lesson progress), and demographic information, such as gender, geographic area, and preferences, when any of this information is linked to Personal Information that identifies that individual.

Personal information does not include “aggregate” or other non-personally identifiable information.

Aggregate information is information that we collect about a group or category of products, services, or users that is not personally identifiable or from which individual identities are removed. We may use and disclose aggregate information, and other non-personally identifiable information, for various purposes.

## **Collection of Information**

### **Collection of Voluntarily-Provided Information**

We collect Personal Information that our users provide to us in a variety of ways on our Services. These include the following: E-mail Newsletters. We may offer e-mail newsletters from time to time on our Services. If you sign up to receive a newsletter from us, we collect your e-mail address. User Accounts and Profiles. Our Services give you the ability to register for a Services account and to create and update a user profile. We collect the Personal Information that you provide to us in the course of registering for an account or creating or updating a user profile, which may include, for example, name, email address, gender, city, state, grade (for students or teachers), and school. We may indicate that some Personal Information is required for you to register for the account or to create the profile, while some is optional. Interactive Features. Our Services may contain interactive functionality that allows you to upload or post user content (the “User Materials”) and, if you are a student, to interact with your teacher and schoolmates. We collect any Personal Information that may be provided in the course of using interactive features. Correspondence. If you contact us by e-mail, using a contact form on the Services, or by postal mail, fax, or other means, we collect the Personal Information contained within, and associated with, your correspondence. Contests and Sweepstakes. We may conduct or sponsor special contests, sweepstakes, and other promotions that users may enter or otherwise participate in on our Services. If users participate in any such sweepstakes or other promotion, we will collect Personal Information provided to us in connection with entry.

### **Passive Information Collection**

When you visit our Services, some information is collected automatically. For example, when you access our Services, we automatically collect your browser’s Internet Protocol (IP) address, your browser type, the nature of the device from which you are visiting the Services (e.g., a personal computer or a mobile device), the identifier for any handheld or mobile device that you may be using, the Web site that you visited immediately prior to accessing any Web-based Services, the actions you take on our Services, and the content, features, and activities that you access and participate in on our Services. We also may collect information regarding your interaction with e-mail messages, such as whether you opened, clicked on, or forwarded a message. We may collect this information passively using technologies such as standard server logs, cookies, and clear GIFs (also known as “Web beacons”). We use passively-collected information to administer, operate, and improve the Website and our other services and systems, and to provide content that is tailored to you. If we link or associate any information gathered through passive means with Personal Information, or if applicable laws require us to treat any information gathered through passive means as Personal Information, we treat the combined information as Personal Information under this Policy. Otherwise, we use and disclose information collected by passive means in aggregate form or otherwise in a non-personally identifiable form. Also, please be aware that third parties, such as sites or services provided by third parties (“Third-Party Sites”) that may be linked to from the Services, may set cookies on your hard drive or use other means of passively collecting information

about your use of their services, Third-Party Sites or content. We do not have access to, or control over, these third-party means of passive data collection.

### **Information from Other Sources**

We may receive information about you, including Personal Information, from a school's third-party service providers, and may combine this information with other Personal Information we maintain about you. If we do so, this Policy governs any combined information that we maintain in personally identifiable format. As a teacher, you may be given the option to export your students' school-related information from their Get More Math accounts to your school's third-party service providers, including a learning management system, student information system, or a digital gradebook. To facilitate the transfer, we may collect some information about you and the students from such school's service provider to transfer the appropriate data to it.

### **Use of Personal Information**

We use Personal Information to:

- provide services and information that you request;
- enhance, improve, operate, and maintain our Services we provide to your school;
- prevent fraudulent use of our Services and other systems;
- prevent or take action against activities that are, or may be, in violation of our Terms and Conditions or applicable law;
- tailor content and other aspects of your experience on and in connection with the Services you use, including messages we send to users;
- maintain a record of our dealings with you; and
- send informational messages about Get More Math and the Services (including, for example, notification that a new lesson or exam has been assigned to them on the Services, or information about service changes, outages, or maintenance).

We may use Personal Information collected from users over the age of 13 to enhance, improve, operate, and maintain any of our programs, services, Websites, and other systems, and for any other purposes that we may disclose to you at the point at which we request your Personal Information, and pursuant to your consent.

Where permitted by law, we may also use Personal Information you provide to contact you regarding products, services, and offers, including new Get More Math products, services, and features that we believe you may find of interest. For example, we may contact you regarding new lessons, programs, or features on our Services. We allow you to opt-out from receiving marketing communications from us as described in the "Choice" section below.

### **Disclosure of Personal Information**

Except as described in this Policy, we will not disclose your Personal Information that we collect on the Services to third parties without your consent. We may disclose information to third parties with consent, as well as in the following circumstances:

#### **Service Providers**

We may disclose Personal Information to third-party service providers (e.g. data storage and processing facilities) that assist us in providing and improving our services.

## School's Service Providers

We may disclose Personal Information about teachers and students to a school's third-party service providers at the school's request. Such service providers may include learning management system providers, student information system providers, and digital gradebook providers.

## Public Areas

Some features on our Services allow you to upload, post, or otherwise transmit User Materials to areas of the Services that may be viewed by other users, such as content that you post in a profile on the Services. Please be aware that any Personal Information that you include within any User Materials will be made available to other users of the Services who view it. You include Personal Information in User Materials at your sole risk. We may allow you to select privacy options that limit access to some types of Personal Information in User Materials, but no security measures are impenetrable or perfect. Additionally, even after information posted on the Website is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on the Services. We cannot warrant or guarantee that any Personal Information that you provide on and in connection with the Services will not be accessed, viewed, or used by unauthorized persons.

## Business Transfers

Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of company assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which Personal Information is transferred to one or more third parties as one of our business assets.

## To Protect our Interests

We also disclose Personal Information if we believe that doing so is legally required, or is in our interest to protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights or property of others, or otherwise to help protect the safety or security of our Services and other users of the Services.

## Choice

As noted above, we do not disclose Personal Information to third parties for their marketing purposes. We may, however, send promotional communications to our users. If you receive commercial e-mail from us, you may unsubscribe at any time by following the instructions contained within the e-mail. You may also opt-out from receiving commercial e-mail from us, and any other promotional communications that we may send to you from time to time (e.g., by postal mail) by sending your request to us by e-mail at [privacy@getmoremath.com](mailto:privacy@getmoremath.com) or by writing to us at the address given at the end of this Policy. Additionally, we may allow you to view and modify user account settings relating to the nature and frequency of promotional communications that you receive from us.

Please be aware that if you opt-out of receiving commercial e-mail from us, it may take up to ten business days for us to process your opt-out request, and you may receive commercial e-mail from us during that period. Additionally, even after you opt-out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding our Services.

## Access

Through user account functionality on the Service, you may have the ability to access and update many categories of Personal Information that you provide to us by logging into your account and accessing your account settings. If you wish to access or amend any other Personal Information we hold about you, you may contact us at [privacy@getmoremath.com](mailto:privacy@getmoremath.com).

If you request that we delete your account on any of our Services (via e-mail, or otherwise), we will do so within a reasonable period of time, but we may need to retain some of your Personal Information in order to satisfy our legal obligations or where we reasonably believe that we have a legitimate reason to do so. Notice to Schools and Parents of Children Under 13 Years of Age We recognize the need to provide further privacy protections to personal information we collect from children under 13 years of age using our Services.

When we intend to collect personal information from children, we take additional steps to protect children's privacy. This notice provides information for schools and parents of children under 13 years of age about our practices with respect to such information that we collect from children who register for and use our Services. We do not knowingly collect, use, or disclose personal information from children under 13 years of age without a school's authorization. In this section of the Privacy Policy, we use the term "personal information" as such term is defined in the Children's Online Privacy Protection Act ("COPPA") and the Federal Trade Commission's rules implementing COPPA.

## Operator of this Web Site or Online Service / Contact Information

The operator collecting or maintaining personal information from children through this Website or online service is Get More Math ("Company," "we," or "us"). Our address is 905 Mono Way, Sonoma, CA 95370. Our contact email address is [privacy@getmoremath.com](mailto:privacy@getmoremath.com), and our telephone number is (209) 288-5550.

We also work with third parties who may also collect personal information through the Services. A list of third parties along with their contact information is provided below.

## Information Collected by Us from Children

We collect the following information from children under 13 years of age during our registration process:

- First and Last Name
- Username/ID
- User-selected Password
- Classroom code (for students to join a teacher's online classroom)

We also may collect the following additional information from children under 13 in the context of using our Services:

- Our Services may contain interactive functionality that allows users to upload or post user content (the "User Materials") and for students to interact with their teacher and schoolmates. We collect any personal information that may be provided in the course of users using interactive features.

- Information about the child’s activities on our Services, including the child’s participation in our online adaptive math learning program, the lessons he or she participates in, the answers he or she provides, and his or her performance on those lessons, tests, and curricula.
- Information about users, including personal information, from a school’s third-party service providers, and may combine this information with other personal information we maintain about users. If we do so, this Policy governs any combined information that we maintain in personally identifiable format.
- Teachers also may have the option to export students’ school-related information from their Get More Math accounts to the school’s third-party service providers, including a learning management system, student information system, or a digital gradebook. To facilitate the transfer, we may collect some information about children from such school’s service provider to transfer the appropriate data to it.
- We also may collect and use persistent identifiers, such as IP addresses, mobile device identifiers, or identifiers associated with a cookie, and may associate other information that we collect (e.g., information about content viewed on the Services) with a particular persistent identifier. We also may associate these persistent identifiers, and any other information associated with them, with a particular user account. We only use this information for support for our internal operations. For example, we may use cookies to keep a user logged into the Services.
- We also may collect other information about children’s use of our Services, such as browser type, the nature of devices from which the child is visiting the Services (e.g., a personal computer or a mobile device), the Web site that a child visits immediately prior to accessing any Web-based Services, the actions children take on our Services, and the content, features, and activities that children access and participate in on our Services. We may collect this information passively using technologies such as standard server logs, cookies, and clear GIFs (also known as “Web beacons”).

## Information Uses

We use the information we collect from children under 13 years of age for the following purposes:

- to provide services and information that a child may request, including to make available curricula and other activities that we offer as our Services;
- to enhance, improve, operate, and maintain our Services provided to the child’s school;
- to prevent fraudulent use of our Services and other systems;
- to prevent or take action against activities that are, or may be, in violation of our Terms and Conditions or applicable law;
- to tailor content and other aspects of users’ experience on and in connection with the Services, including messages we send to users;
- and to send informational messages about Get More Math and the Services (including, for example, notification that a new lesson or exam has been assigned to them on the Services, or information about service changes, outages, or maintenance).

We may use de-identified and aggregate information for enhancing, improving, operating, and maintaining our Services, programs, services, Websites, and other systems.

## Information Disclosures

We disclose the information we collect from children under 13 years of age in the following circumstances:

- Teachers will have access to their students' personal information, as indicated to us in connection with the registration process and optional profile information that the student provides. Additionally, we may make students' personal information available to their parents.
- Certain portions of our Services may allow users to upload or post information about themselves, including personal information, and in some instances it may be viewable by their teachers or schoolmates. The Services do not permit children under 13 years of age to make personal information publicly available.
- We may disclose personal information to third-party service providers (e.g., data storage and processing facilities) that assist us in our work.
- We may disclose personal information about teachers and students to a school's third-party service providers at the school's request. Such service providers may include learning management system providers, student information system providers, and digital gradebook providers.
- Personal information of children under 13 years of age may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of company assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.
- We may disclose personal information of children under 13 to third parties if we believe that doing so is legally required, or is in our interest to protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights or property of others, or otherwise to help protect the safety or security of our Services and other users of the Services.

### **Retention of Information**

Except as is otherwise stated in this Privacy Policy, Get More Math retains personal information as reasonably necessary to provide the Services. After accounts are closed, we may retain that user's personal information if we believe that retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, meet contractual requirements with the school, resolve disputes between users, prevent fraud and abuse, enforce this Privacy Policy and our Terms and Conditions, or to otherwise provide the Services, including but not limited to any support-related reporting and trend analysis. We will also respond to parental requests to delete personal information provided by children, as discussed below.

### **Parents' Rights under COPPA**

Parents and guardians of children under 13 years of age may request that we provide a description of the types of personal information collected from children, direct us to delete the personal information that we have collected from a child, and refuse to permit our further collection or use of the personal information collected from the child. To do so, please contact your local education agency or school. You may also contact us at [privacy@getmoremath.com](mailto:privacy@getmoremath.com). If you do not have access to email, or if you otherwise prefer to use postal mail to communicate with us, please contact us by writing us at the following address: Get More Math, 905 Mono Way, Sonoma, CA 95370. Please also be aware that if you refuse to permit our further use or collection of information from your child, or have directed us to delete your child's personal information, we may not be able to provide the Services to your child, and may close his/her account. Additionally, we may ask you to verify your identity and the child's age at the time of the request before permitting access to review your child's personal information or before fulfilling another request of yours as described in this section.



## **International Visitors**

Our servers and data centers are located in the United States. If you choose to use the Services from outside the U.S., then you should know that you are transferring your Personal Information outside of your region and into the U.S. for storage and processing. By providing your Personal Information to us through your use of the Service, you agree to that transfer, storage, and processing in the U.S. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. You should know that each region can have its own privacy and data security laws, some of which may be less stringent as compared to those of your own region.

## **Security**

We use security measures that are designed to protect Personal Information from accidental loss, disclosure, misuse, and destruction. We use a modern Web Application Firewall to restrict access to our internet facing web-servers. All communication between you and our web-servers happens through a secure HTTPS connection. Our Internet facing web-servers communicate with backend database servers through a secure connection.

## **Updates to this Policy**

We may occasionally update this Policy. When we do, we will also revise the “last updated” date at the beginning of the Policy. Your continued use of our Services after such changes will be subject to the then-current Policy. If we change this Policy in a manner that is materially less restrictive of our use or disclosure of your Personal Information, we will use reasonable efforts to notify you of the change and to obtain your consent or a school’s consent with respect to students under the age of 13 prior to applying the change to any Personal Information that we collected from you prior to the date the change becomes effective. Additionally, please be aware that we will obtain a school’s consent to any material change in our collection, use, or disclosure practices with respect to children under 13 years of age to which a school has already consented. We encourage you to periodically review this Policy to stay informed about how we collect, use, and disclose Personal Information.

## **Contacting Us**

If you have any questions or comments about this Policy, please contact us using the following contact information: Get More Math, 905 Mono Way, Sonora, CA 95370 or [privacy@getmoremath.com](mailto:privacy@getmoremath.com).