

We respect your privacy in your use of our Portal, Website and online services. We are committed to protecting your privacy through this privacy policy. The following core principles guide our decisions around data, security, and technology:

We collect, store, process and share personal information only for the purposes of providing our Services, or as authorized by a student, parent, or school.

We do not sell, use or share personal information or content for marketing or advertising purposes, unless with consent.

We will maintain a comprehensive data security program designed to protect the types of personal information maintained by Improvement Assurance Group, LLC and its affiliates

We will delete or de-identify personal information at the direction or request of the student, parent, or school.

We will clearly and transparently disclose our data policies and practices.

We will provide notice before any personal information is used in a materially different manner than was disclosed when the information was collected.

If you have any questions, please contact us at helpdesk@azontrackdataportal.com.

This Privacy Policy explains our practices regarding the collection, use, disclosure, and protection of personal information that is collected through our Portal, Website and our online services (collectively, our “**Services**”), as well as your choices regarding the collection and use of information. Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms of Use. Please be sure to read this entire Privacy Policy before using or submitting information with Improvement Assurance Group, LLC (“**IAG**”).

This Privacy Policy is incorporated into the IAG Terms of Use by reference. In addition to reviewing our Privacy Policy, you should also read the IAG Terms of Use. Your use of the Services constitutes your agreement to the Terms of Use and to this Privacy Policy.

“**You**” or “**your**” means a User of the Services. An “**Individual User**” as used in these Terms may be a teacher school administrator, camp operator, camp staff member, or camp lead using the Services. Where applicable, “**you**” or “**your**” also means a school or school district/board or other educational or adventure institution otherwise known as an “**Enterprise User**”, with whom the User is associated either as a teacher, school, camp, camp operator, camp staff, camp lead, staff member or camp/school/district/board administrator, and is authorized by the Enterprise User to use the Services (an “**Authorized User**”). The term “**User(s)**” as used herein will refer to all users of the Services: Individual Users, Authorized Users, and Enterprise Users. In this Privacy Policy, we use the term “**Partner School/Camp**” to refer to teachers, principals, school districts/boards, school administrators, camp operators, camp staff, camp leads and any other User acting on behalf of an educational or adventure institution that is not part of the IAG network.

What is Personal Information?

Personal information is information that can identify a specific individual, such as a name, address, telephone number, email address, or other account number, and other information linked to that personal information. Personal information does not include “aggregate” information. Aggregate information is data we collect about a group or category of products, services or users, from which individual user identities have been removed. In other words, information about how you use a service may be collected and combined with information about how others use the same service. Aggregate data helps us understand trends and our users’ needs so that we can better consider new features or otherwise tailor the Services.

1. How We Collect Information. We collect personal information in a number of ways from our website visitors and users of our Services.

A. INFORMATION ABOUT SCHOOLS. We ask for certain information when a teacher, principal, school district/board, school administrator, camp operator, camp staff, or camp lead of a Partner School/Camp registers for an account or corresponds with us online, which may include, but is not limited to, first and last name, email address, profile picture, user name and password, and any additional personal information you voluntarily provide in your online profile, which could include, but is not limited to, your school name and location, what grade level and subject matter you teach, your position within the school, and the type of devices your students use (collectively, “**School Data**”). We may also collect School Data if the Partner School/Camp sends us a message or responds to emails and surveys. Once the Partner School/Camp has an account, we collect content and information provided by the School or Camp through the Partner School/Camp’s use of the Services, which could include class rosters, parent contact information, assignments and classroom content, photos, images, video and any other content the teacher or Authorized Users posts to the Services. We use this information to operate, maintain and provide the features and functionality of the Services, to analyze and improve our Services and functionality, and to communicate with our Partner School/Camps and users.

C. INFORMATION ABOUT STUDENTS. Through the provision of Services to a Partner School/Camp, parent, or student, we may collect or have access to personal information about students (“**Student Data**”) that is provided by the Partner School/Camp, parent or by the student. The type of information we collect will depend on how the Partner School/Camp, parent or student uses the Services, but could include the student’s first and last name, email address, profile photo, class assignment data, registration, limited attendance, student goal attainment, staff information, program details, Springboard Skills Inventories and other classroom content. For students enrolling in our schools or camps, we collect additional information requested in our enrollment forms.

We consider Student Data to be highly confidential and use this data solely to provide our Services to the Partner School/Camp and to the parent and student, and in limited ways, for our internal purposes in accordance with our Terms of Use, specific agreements with Partner School/Camps, and specific agreements with the State of Arizona Governor’s Office. Our collection, use, and disclosure of Student Data is governed by our Terms of Use and/or any other agreement with the School or Camp, by the provisions of the Family Educational Rights and Privacy Act (“**FERPA**”) and applicable state laws, and by other applicable U.S. laws relating to the collection and use of personal information of students. If you have any questions about our collection and use of Student Data, please contact us at helpdesk@azontrackdataportal.com.

See “How We Share Information with Others” below for more information on the limited ways in which we share School Data and Student Data. See “Children’s Privacy” below for more information about how we collect and use the personal information of children under 13.

D. INFORMATION WE COLLECT FROM THIRD PARTY SERVICES AND SOCIAL MEDIA SITES.

We may collect information about you from third party services that use to connect with our Services. For example, if you use a single-sign on like Google Apps for Education to access your online account, we may receive certain information from that third party application. We may also receive information about you if you interact with us through various social media, for example, by following us on Twitter or liking us on Facebook. The data we receive is dependent upon your privacy settings with the social network. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to the Services.

E. INFORMATION COLLECTED THROUGH TECHNOLOGY. Like most websites and online services, we automatically collect certain types of usage information when you visit our website or use our Services. This information is typically collected through cookies, log files, web beacons, and similar tracking technology (collectively, “**cookies**”). These cookies collect information about how you use the Services (e.g., the pages you view, the links you click, and other actions you take on the Services), information about your browser and online usage patterns (e.g., Internet Protocol (“**IP**”) address, browser type, browser language, referring / exit pages and URLs, pages viewed, whether you opened an email , links clicked), and information about the device(s) you use to access the Services (e.g., mobile device identifier, mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, and, depending on your mobile device settings, your geographical location data at the city, state, or country level). We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Services. Although we do our best to honor the privacy preferences of our visitors, we are not able to respond to Do Not Track signals from your browser at this time.

Cookies allow us to provide you with a better User experience. For example, we use or may use the data collected through cookies to: (i) remember information so that you will not have to re-enter it during your visit or the next time you visit the site, and (ii) provide custom, personalized content and information. Cookies also allow us to analyze, improve and protect our Services and our Users. For example, we may also use Cookies to: (a) provide and monitor the effectiveness of our Services; (b) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website and our Services; (c) diagnose or fix technology problems; (d) investigate fraud or misuse of the Services and (e) otherwise to plan for and enhance our Services. Most browsers automatically accept cookies as the default setting. You can modify your browser setting to reject cookies or to prompt you before accepting a cookie from the sites you visit by editing your browser options. Depending on your mobile device, you may not be able to reject cookies. If you decide not to accept our cookies, you will still be able to access those parts of the Services available to the general public but you may not be able to use some of the network’s features or services, and you may have a less satisfactory experience.

F. THIRD PARTY TRACKING AND ONLINE ADVERTISING: We may permit third party online advertising networks to collect information from visitors to our websites to provide customized content, advertising and commercial messaging to you from time to time on other websites or services. Typically, the information is collected through cookies or similar tracking technologies. You may be able to set your browser to reject cookies or other tracking technology by actively managing the settings on your browser or mobile device. (To learn more about cookies, clear gifs/web beacons and related technologies and how you may opt-out of some of this tracking, you may wish to visit, <http://www.aboutads.info/choices/> and/or the Network Advertising Initiative’s online resources, at <http://www.networkadvertising.org>). Please note that although we may permit third party advertising partners to collect information on our websites for the purpose of sending targeted advertisements, we do not allow third party advertising networks to collect information about students or parents who are logged into our Service, or to collect information from our mobile apps.

2. How We Use and Share Information About You. We share data within the Services as needed to perform the Services. For example, Student Data will be shared between and among the Partner School/Camp users, students, and parent(s) as well as with others who have been authorized to access the content for an educational purpose. Sharing within the Services will depend on the settings and functionality selected by the Partner School/Camp or the features available in the particular Services used. We only share personal information with third parties in limited circumstances, described below. We will never share or sell Student Data with third parties for marketing purposes.

We use and share your personal information in the following ways:

With consent. We share information with consent and at the direction of Partner School/Camps, students and parents. A User may direct us to share specific information with another individual, for example, if a teacher directs us to send a communication to a parent, or an Enterprise User may be able to control data sharing functionality for all User accounts within that school district/board or school system. Parents of students at a Partner School/Camp should contact their child's school with any questions about Partner School/Camp-authorized data sharing functionality.

With our trusted vendors and third party service providers. We may share personal information with certain trusted vendors, third party service providers and individuals to perform tasks on our behalf, but strictly for the purpose of carrying out their work for us, which may include business development, software design, hosting, customer support, accounting, and other similar services. Personal information will be shared with these third parties as reasonably needed to perform their services to us, and under reasonable confidentiality terms.

We may share information with the State of Arizona Governor's Office or other companies owned by or under common ownership with IAG. The State of Arizona Governor's office and those companies will use your personal information in the same way as we can under this Privacy Policy.

Aggregate Data. We will share information in an aggregated and/or anonymous form that does not reasonably identify you directly as an individual. For example, we may share aggregate data with other students, parents or Schools to display statistical data related to students in a particular classroom, school, district/board, or geographic location. We may also use aggregate or anonymized data to study and improve our Services, user functionality, and product offerings.

We may disclose your personal information as required or authorized by law or subpoena or if we have a good faith belief that disclosure is necessary to (i) comply with the law or a judicial proceeding, court order, or legal process served on us; (ii) to comply with or the lawful request of law enforcement; (iii) to enforce or apply our Terms of Use or other agreements or to protect the security or integrity of our Services; and/or (iv) to exercise or protect the rights, property, or safety of our students and their families; IAG and its affiliates, our employees, our Users, or others.

If IAG or some or all of its assets are acquired or otherwise transferred to a third party in the course of a company transaction, such as a merger, sale of company assets or shares, reorganization, financing, change of control, bankruptcy or other corporate event, the personal information of our users may be transferred to or acquired by a third party, but only if such third party agrees to be subject to the same commitments set forth in this Privacy Policy with respect to user personal information. If the transaction involves the transfer of Student Data to a third party, we will provide you with notice and an opportunity to opt-out of the transfer of Student Data by terminating your account before the transfer occurs.

HOW WE USE AND SHARE STUDENT DATA. In addition to the actions described above, we may facilitate the sharing of Student Data with third parties through the Services, though only when instructed and authorized to do so on behalf of the Partner School/Camp, the student, or parent. We will use personal information about Students to provide the Services and permit data sharing among Users authorized to view and access the Student Data. Each student and his or her parent will only have access to view or submit information relative to that particular student. Neither students (nor their parents) will be able to view or otherwise access the personal information of other students, with the exception of name, email address, and profile picture. Additional information may be accessible if provided to that student account by the Partner School/Camp (for example, a class photo and class roster containing the names and photos of other students may be added by a teacher to a student account). Except for the circumstances noted above, we only share student data for purposes of providing the educational Services to and at the direction of Partner

School/Camps, parents, and students. If you have any questions about how we use or share Student Data, please contact us at helpdesk@azontrackdataportal.com.

3. Communications. As part of our Services, we may use your information to communicate with you about your child's progress at school, your account or transactions with us, or send you information about updates and changes to our Services.

COMMUNICATIONS WITH STUDENTS. We use Student Data to facilitate the sending of communications relating to the Services to and from the Partner School/Camp. We send these communications only on behalf of, and at the direction of the Partner School/Camp. Please note that all Users who have been authorized to have access to a student's account, which could include a school administrator, teacher, camp operator, camp staff member, or camp lead and/or other User, may be able to view activity and content associated with such student account, including the content of communications.

4. Links to Other Websites. The Services and our email communications may contain links to other websites or services offered by IAG or its affiliates. Any personal information you provide on the linked pages is provided directly to that third party and is subject to that third party's privacy policy. Except as described above, we are not responsible for the content or privacy and security practices and policies of websites to which we link. Links from the Services to third parties or to other sites are provided for your convenience. We encourage you to learn about their privacy and security practices and policies before providing them with personal information.

5. Our Security and Data Storage Practices. We care about the security of your personal information and we use commercially reasonable physical, administrative and technological safeguards to preserve the integrity and security of all information we collect and that we share with our service providers. Our employees and contractors are bound to uphold the provisions in this Privacy Policy. We maintain physical, electronic, and procedural safeguards that are designed to protect our Users' personal information. We use internet security best practices to transfer Personal Information. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls to buildings and files. You can help protect against unauthorized access to your account limiting access to your computer and browser by signing off after you have finished accessing your account.

By using the Services, you consent to the use of your personal information in accordance with this Privacy Policy. In addition, if you access your data from overseas some of your data may be replicated to a nearby data center. You understand that your personal information will be subject to the laws of these jurisdictions, which may be different from those of your country of residence.

We store and process your personal information in compliance with FERPA, state laws relating to student data privacy, and other applicable U.S. law.

6. Control, Access, and Deletion of Personal Information. You may request updating or correction of your personal information at any time by emailing helpdesk@azontrackdataportal.com. If you are a School, you may access, update and correct the personal information contained in any account under your control by logging into your account, and/or by logging into your School Student Information Management System ("SIS"). Parents may request to access, correct and update a student's personal information, but these requests may require the School's or Camp's authorization to update or delete information contained in active School or Camp accounts.

We retain your personal information, including content, for as long as the account is covered by an active subscription or license as described in our Terms of Use, or until we receive a request to delete such information.

7. Children's Privacy. We do not knowingly collect personal information through the Services from a child under 13 without parental consent. When personal information is collected by a Partner School/Camp, we request our Partner School/Camps to obtain appropriate parental consent and authorization for a student under 13 to use the Service and for us to collect information from such student. Please contact us at helpdesk@azontrackdataportal.com if you believe we have inadvertently collected personal information from a child under 13 without proper consents so that we may delete such information as soon as possible.

8. Service Development. The Services are under continuous development and testing. Any Services that are software-based may contain bugs and other errors that could adversely affect the use or performance of the Services. Issues or errors of this nature may impact our ability to comply with this privacy policy.

9. Our Privacy Policy Will Change Over Time. Because we continue to develop the Services and take advantage of technologies to improve the services we provide, our policies will change over time. We will note the effective date of the policy at the bottom of this page, and you should review this page periodically for any changes. If we make any material changes in the way we use personal information, we will attempt to notify registered users by sending an email to the user's registered email address and posting a notice on our website homepage and login page. It is your responsibility to check for updates to the Privacy Policy and to delete your account if you do not agree to such changes, as any such update shall be effective even if you do not receive notice of such update. Your continued access and use of the Services will constitute your acceptance of any changes or revisions to our Privacy Policy.

PRIVACY POLICY CHANGES WITH RESPECT TO STUDENT DATA. We will use our best efforts to provide at least 30 days-notice of a Privacy Policy change that may involve collecting, using, storing, or sharing Student Data in a materially different way than was disclosed in our previous Privacy Policy, so that you have sufficient time to evaluate the change in practice. If you do not choose to accept the changes, you may opt-out by deleting your account before the changes take effect. You may request previous versions of this Privacy Policy by contacting us at helpdesk@azontrackdataportal.com.

10. Your Comments or Concerns. We welcome your feedback. If you have any comments or concerns about this privacy policy or would like to contact us for any reason, you may reach us at helpdesk@azontrackdataportal.com.