



HARRIS

HARRIS SCHOOL SOLUTIONS

PRIVACY POLICY

September 20, 2016

Corporate Officer: Tim Fitzgerald, Executive Vice President, Harris School Solutions

Signature:  SEVP

REVISION

Rev	Date	Author	Type	Description	Approval
1.1	09/20/2016	Katie Rose	Minor	Changed current policy to new format.	Tim Fitzgerald
1.0	07/2015	Gina Martin	Major	Initial	Tim Fitzgerald

POLICY:

Harris School Solutions (referred to as "Company," "we," "us," or "our") is committed to protecting your privacy. This Policy discloses the privacy practices for the Company's website, hosted software, its related web-based applications and services (collectively, "Service") we may offer to you, or to our educational customers, such as schools, school districts, or universities. This Policy governs the use and sharing of personally identifiable information ("Personal Information") when an individual is using the Service. (collectively "users" or "you").

This Policy does not apply to: (i) information collected by us offline or through any other means or (ii) any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may linked to or be accessible from the Service.

We may change this Privacy Policy from time to time in our sole discretion. Revisions are effective upon posting and your use of the Service subsequent to our revision of this Policy shall be deemed to constitute acceptance by you of any revised terms. You should periodically review this Policy carefully.

BY USE OF THIS SERVICE, YOU GIVE YOUR CONSENT THAT ALL PERSONAL DATA THAT YOU SUBMIT MAY BE PROCESSED BY US IN THE MANNER AND FOR THE PURPOSES DESCRIBED BELOW. IF YOU DO NOT AGREE TO THIS POLICY, DO NOT USE THE SERVICE.

COLLECTION AND USE OF INFORMATION:

All data created and maintained to provide the Service will only be used or disclosed to provide the Service, to personalize or continually improve user experience related to the Service, to respond to your requests, to provide customer support, or to notify you about changes to the Service we offer or provide, or as required by law or court order. We may request and store certain types of Personal Information when you use this Service. We only collect information that is voluntarily provided by you and necessary to provide the Service.

Cookies and IP address collection: Our web server collects and stores the following general information about you: the domain from which you access the Internet; the date and time you access our website; the pages you visit; the Internet address of the website that linked you directly to us; and the type of device and web browser you use to access our website. This information may be collected automatically. It may be used to help us improve the Service by tabulating the number of visitors in terms of new users, origin of referrers, popularity of pages, amount of use, and types of errors, and to make the Service more useful to you.

We may use "cookies," which are small files stored on your computer's hard drive that are used to store and track personal information. We may use cookies to perform certain tasks, such as monitoring aggregate site usage metrics, storing and remembering your passwords (if



you allow us to do so), storing account preferences that you have set, and personalizing the Service we make available to you. Many browsers can notify you when you receive a cookie, giving you the option to accept it or not. By not accepting cookies, you may not be permitted to access certain information and some web pages may not display properly.

Information You Give Us: The types of Personal Information gathered depends on the utilization of the Service. Certain Services may require you to register. To register you will be required to provide certain Personal Information. You may also be required to create a user name and password. You should not disclose your password to anyone. For certain Services, we may collect Personal Information, such as name, email address, mailing address, zip code, telephone number, job title, or other identifiers, from all users to provide the Services. For password protected areas, we capture information including the user name and date, time and/or length of visit. If you are purchasing something through our ecommerce, then we will need Personal Information, such as your name, address and credit card information to process the order. If you email us with questions or concerns, we will maintain your email address.

Sharing and Use of Information: We may share your information with our affiliates, subsidiaries, or divisions and with their respective officers, directors, employees, accountants, attorneys, and agents to provide Service. In addition, we may share data with subcontractors to help us perform statistical analysis. All such third parties are required by contract to maintain the confidentiality of your information and are prohibited from using Personal Information, except to provide services to us or as required by law. Furthermore, we utilize fully de-identified aggregate data for data analysis, meaning all personal identifiers are removed from the data prior to analysis.

We may provide information to regulatory authorities and law enforcement officials in accordance with applicable law or when we otherwise believe in good faith that the law requires it. There may be instances when we may access or disclose Personal Information in order to protect or defend the legal rights or our property, and its affiliated companies or their employees and agents, to protect the safety and security of users, and to protect against fraud.

We do not sell personally identifiable data under any circumstances. Nor do we use or disclose Personal Information for behavioral targeting of advertising to students. We, however, may sell, transfer or otherwise share some or all of its assets in connection with a merger, reorganization or sale of assets, or in the event of bankruptcy. In such an event, Personal Information may be one of the assets transferred. Any successor entity shall be subject to the same commitments in the Policy for the previously collected Personal Information.

THIRD PARTY WEBSITES:

This privacy policy does not apply to any third party websites or to other companies or persons. Links from the Service may contain links to, and media and other content from, other sites. In addition, such third-party media and content may also contain external links.



WE CANNOT AND DO NOT GUARANTEE THE PRIVACY POLICIES AND PRACTICES OF ANY THIRD PARTY. We do not control, operate, or endorse any information, products, or services of any third-party websites that may be reached through links from the Service. The use of any Personal Information provided by you to such a third party will be governed by that party's privacy policy. You should review the privacy policy at each linked website to determine how that website treats your Personal Information.

PROTECTING CHILDREN:

Parents and Teachers: When using the Service, we encourage parents, guardians, and teachers to spend time with their children, especially if the child is 12 and under, to participate in the activities that may be offered by the Service. No Personal Information should be submitted to the Service without the consent of a parent, guardian, or teacher.

Children: Please do not provide your name, address, telephone number, email address, any screen name or user name you may use, or any other Personal Information that would enable someone to contact you either online or offline, without first asking your parent, guardian, or teacher for permission.

WE ASK PARENTS, GUARDIANS, AND TEACHERS TO HELP US PROTECT CHILDREN'S PRIVACY BY INSTRUCTING THEM NEVER TO PROVIDE PERSONALLY IDENTIFIABLE INFORMATION ON THE SERVICE OR ANY OTHER SITE WITHOUT FIRST GETTING PARENTAL, GUARDIAN, OR TEACHER PERMISSION.

DATA SECURITY:

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. All information provided to us is encrypted and stored on our private, secure servers behind firewalls. Access to the network is strictly controlled and has industry standard administrative, technical, and physical safeguards in place. We work hard to ensure that the data we collect is reliable, accurate, complete and current. We use Personal Information only for the purposes for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements. We also limit access to Personal Information only to specific employees, contractors, and agents who have a reasonable need to come into contact with your information.

The safety and security of your Personal Information also depends on you. Where we have given you (or where you have chosen) a password for access to Service, you are responsible for keeping this password confidential. Unfortunately, the transmission of information via the Internet is not completely secure. We use industry-standard SSL-encryption to protect User information and uses a secure connection to our servers, which are protected by firewalls to prevent unauthorized break-ins. The Service is protected by GoDaddy Security Certificates for customers located in the United States. The administrative system, authentication system,



and sensitive user information are encrypted using SSL encryption of HTTP data. Unfortunately, data transmission over the internet cannot be guaranteed as completely secure. GIVEN THE INHERENT OPERATION AND STRUCTURE OF THE INTERNET, USER ACKNOWLEDGES THAT ALL TRANSMISSIONS ARE DONE AT ITS OWN RISK.

CONTACT INFORMATION:

If you have any questions about the Personal Information and data retained by us or about this Policy and Harris School Solutions' privacy practices, you may contact us at Data_Security_Inquiries@harriscomputer.com. We will use commercially reasonable efforts to respond to any request and update your Personal Information, if necessary.