

Website Privacy Policy

Effective September 29, 2016



IO Education, LLC (“IO Education,” “we,” or “us”) understands that privacy is tremendously important to our online visitors to our website. We hope the following will help you understand how we collect, use and safeguard the personal information provided to us on our website, www.ioeducation.com, and associated webpages (the “Site”), by users of and visitors to the Site. This Privacy Policy (the “Policy”) is part of our website Terms of Use, <https://ioeducation.com/terms-of-use/>, (together with this Policy, collectively, the “Terms”). By using the Site, you acknowledge that you have read and agree to this Policy. If you do not agree with this Policy, you may not use the Site.

This Privacy Policy does not apply to IO Education’s online software services or applications or other web-based products and services (collectively, the “Services”); separate privacy terms apply to the Services and the data provided by our clients that is stored in our Services. If you have questions about the privacy terms applicable to our Services, which is available here <https://ioeducation.com/product-privacy-policy>, please contact us at privacy@ioeducation.com. You may also contact our Privacy Officer, Peter Bencivenga, at pbencivenga@ioeducation.com or 866-817-0726.

A Special Note for International Visitors to our Site: Much of our computer systems are currently based in the United States, so your personally identifiable information will be processed by us in the United States, where data protection and privacy regulations may be different than other parts of the world, such as the European Union. If you visit the Site as a visitor from outside the United States, you are agreeing to the terms of this Policy and our Terms, and you will have consented to the transfer and processing of all such information in the United States, which may not offer an equivalent level of protection of that in the European Union or certain other countries.

This Policy provides the following information:

1. How We Collect and Use Information
2. How We Share Information
3. How We Protect Your Information
4. Choices About Your Information
5. Children’s Privacy
6. Links to Other Websites and Services
7. How to Contact Us
8. Changes to This Policy

1. HOW WE COLLECT AND USE INFORMATION

We collect the following types of information:

Information about Site Users: We ask for certain information when Site user submits a request for further information about the Services, which may include a name, school name, school district name, email address, phone number, and/or message content. We use this information to communicate with our website visitors and, if a Site user subscribes to the Services, we may also use this information to operate, maintain, and provide to the features and functionality of the Services and to monitor our service offerings and functionality.

We may also use this information we collect from Site users to periodically send information that we think our website visitors might find of interest from IO Education or its affiliates such as new services or special offers. You always have the option to opt out of our internal marketing communications by contacting us at unsubscribe@ioeducation.com or by following the opt-out procedure outlined in such communications. Please note that opting out of receiving these communications will not remove your personal information from our files and we will still contact you as necessary to provide the Services (or information about our Services) at your request.

Information Collected through Technology: We automatically collect certain types of usage information when visitors view the Site. We may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets IO Education enhance your navigation through the site. A cookie may also convey information to us about how you use the Site (e.g., the pages you view, the links you click and other actions you take on the Site), and allow us to track your usage of the Site over time. We may collect log file information from your browser or mobile device each time you access the Site. Log file information may include anonymous information such as your web request, Internet Protocol (“IP”) address, browser type, information about your mobile device, number of clicks and how you interact with links on the Site, pages viewed, and other such information. We may employ clear gifs (also known as web beacons), which are used to anonymously track the online usage patterns of our website visitors. In addition, we may also use clear gifs in HTML-based emails sent to Site visitors who have provided their contact information to us as described above to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Site. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends

for the Site. We do not allow third party advertising networks to collect information about the users of our Site.

We use or may use the data collected through cookies, log files, device identifiers, and clear gifs information to: (a) remember information so that a user will not have to re-enter it during subsequent visits; (b) provide custom, personalized content and information; (c) to provide and monitor the effectiveness of our Site; (d) monitor aggregate metrics such as total number of visitors, traffic, and usage on our website and our Site; (e) diagnose or fix technology problems; and (f) help users efficiently access information.

2. HOW WE SHARE INFORMATION

IO Education only shares personal information in a few limited circumstances, described below. We do not rent or sell information for marketing purposes.

- We may share information with certain third-party providers whose software or services interface with or otherwise may receive information from, or provide information to, the Site.
- We may share information with those that provide us with technology services (e.g. web hosting and analytics services), but strictly for the purpose of carrying out their work for us.
- We may be required to share information with law enforcement or other third parties when compelled to do so by court order or other legal process, to comply with statutes or regulations, to enforce our Terms of Use or other service agreements, or if we believe in good faith that the disclosure is necessary to protect the rights, property or personal safety of our users.
- If we sell, divest or transfer the business or a portion of our business, we may transfer information, provided that the new provider has agreed to data privacy standards no less stringent than our own. We may also transfer personal information – under the same conditions – in the course of mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of our business.

By submitting or posting information, materials or content via the Site, you agree that we can further distribute such content as described in the Terms under “Submissions.” You agree that you have no expectation of or right to privacy with respect to such Submissions, except for any limits on our ability to use or distribute such content as set forth in the Terms.

3. HOW WE PROTECT YOUR INFORMATION

We store our data in the United States and take strong measures to keep data safe and secure.

Storage and Processing: Any information collected through the Service is stored and processed in the United States. If you use our Service outside of the United States, you consent to have your data transferred to the United States.

Keeping Your Information Safe: IO Education maintains

administrative, technical and physical procedures to protect information stored in our servers, which are located in the United States. While no service provider can guarantee absolute security when communicating over the internet or wireless networks, we are committed to taking steps to help secure any personal information that may be in our possession. Access to information is limited (through user/password credentials and two factor authentication) to those employees who require it to perform their job functions. We use industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process and sign-up information. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls to building and files.

You should always be mindful and responsible whenever disclosing information online that the information is potentially accessible to the public, and consequently, could be collected and used by others without your consent.

4. CHOICES ABOUT YOUR INFORMATION

Marketing Communications: Website visitors can opt-out of receiving promotional email from us by clicking on the “unsubscribe” feature at the bottom of each email. You cannot unsubscribe from Service-related messaging.

Deleting or Disabling Cookies: You may be able to disallow cookies to be set on your browser. Please look for instructions on how to delete or disable cookies and other tracking/recording tools on your browser’s technical settings. You may not be able to delete or disable cookies on certain mobile devices and/or certain browsers. For more information on cookies, visit www.allaboutcookies.org. Remember, disabling cookies may disable some of the features available on the Site, so we recommend you leave cookies enabled.

How Long We Keep User Content: We may retain information you submit via the Site for a commercially reasonable time for backup, archival, or audit purposes. We may maintain anonymized or aggregated data, including usage data, for analytics purposes.

If you have any questions about data retention or deletion, please contact support@ioeducation.com.

5. CHILDREN’S PRIVACY

As addressed in the federal Children’s Online Privacy Protection Act (COPPA) and associated rules, IO Education does not knowingly collect any information from children under the age of 13 via the Site. BY USING THE SITE, YOU ARE ATTESTING THAT YOU ARE 18 YEARS OF AGE OR OLDER. We encourage parents and guardians to take an active role in their children’s online activities and interests. If you are a parent or guardian and you believe that your child has provided personally identifiable information on our Site, please contact us at support@ioeducation.com so that we can delete the child’s information.

6. LINKS TO OTHER WEB SITES AND SERVICES

Please remember that this Policy applies to the IO Education website, and not other websites or third party applications that may be linked via our Site or Services, which may have their own privacy policies. You should carefully read the privacy practices of each third party application before agreeing to engage with the application through the Site or the Services. We assume no responsibility or liability for the privacy practices of any vendor or operator of third party sites or applications.

7. HOW TO CONTACT US

If you have any questions about this Policy, the Site or the Services, please contact us at support@ioeducation.com.

8. CHANGES TO THIS POLICY

We reserve the right to change this Policy at any time by posting revised Policy on the Site or by sending an email to the last email address you gave us, so we encourage you to review this web page periodically. The changes will be effective immediately upon notice or posting, and we will update the effective date of this Policy upon such posting. Your use or continued use of the Site following the posting or email notification (as applicable) of any changes to the Policy will be deemed to be your acceptance of the changed Policy.