

APPENDIX 4- Privacy Policy

This Privacy Policy may be updated periodically. The most current version is always available from the [login page of Connexus](#). Any changes will be effective as soon as they are posted in Connexus.

Last updated: January 1, 2020

Connections Education LLC, dba Pearson Virtual Schools, and its affiliates (collectively, "Connections"), a part of the Pearson global learning company, respects your privacy and has established this privacy policy ("Privacy Policy") to let you know how we collect, use, manage, share, and protect information that we may gather when you visit our website, the websites of our affiliated schools, or the websites for either of our education management system, (collectively, the "Websites"), or communicate with us.

This Privacy Policy applies to the Websites where this Privacy Policy is posted and to information we gather from you over the phone, via conventional mail, or in person. Connections reserves the right to change this Privacy Policy at any time. Changes to this policy will be posted on the Websites. The most current version is always available by clicking on the "Privacy Policy" link located at the bottom of the Websites' home page. Any changes to our Privacy Policy will become effective upon posting of the revised Privacy Policy.

By using any of the Websites, you agree to the terms of the Privacy Policy in effect at the time of use. If you do not agree to the terms and conditions of this Privacy Policy, please do not use any of the Websites.

International Users

The Websites are hosted and operated in the United States and are subject to United States law. Any personal information provided to us in the United States and will be hosted on United States based servers. You consent to the transfer of your personal information to the United States in order to receive services from Connections or a Connections affiliated school. If you are accessing a Website from outside the United States, please be advised that United States law may not offer the same privacy protections as the law of your jurisdiction.

What Personally Identifiable Information Do We Collect?

We collect personally identifiable information you provide voluntarily when requesting information, catalogs, other materials or to satisfy other requests. This information may include your first and last name, postal address, email address, telephone number, and the names, date(s) of birth and grade level(s) of your child(ren). We may also collect your credit card information.

Should you decide to enroll your child in one of our programs or managed schools, we collect information during the application and enrollment process such as a birth certificate, certain health records and proof of residency.

We may collect personal information at other times, such as when you contact our technical support, send us an email, complete a user survey, or otherwise communicate with Connections.

We may collect information about you or your student from external sources with your consent or as allowed under the law. For example, information from a school your child previously attended for academic placement purposes.

How Do We Use Personally Identifiable Information?

Connections uses personally identifiable information to fulfill requests for information, deliver services to you or for your school, or to carry out the transactions you or your school have requested.

Connections may use personally identifiable information to communicate special messaging, new services, or upcoming events, to provide educational services to students and to otherwise support students, parents, legal guardians, and staff and/or your school with regard to matters such as academic progress, testing, attendance, customer service, to share information related to legislative or regulatory initiatives that could potentially benefit or threaten virtual education in your state, to invite you to share your experience with virtual education, or in the event of an emergency.

Opting Out of Communications

If you do not want to receive information unrelated to your enrollment in a school via email from Connections, you can email us at unsubscribe@connectionseducation.com.

If you provided your mobile number, you consent to receive communications by way of pre-recorded and/or autodialed calls. The information will be treated confidentially within Connections, in the same way we protect other such confidential information.

If you do not want to receive any further information from Connections, you can call us at 877-267-0777 and ask to be removed from all of Connections' contact lists.

If you opted to receive text message alerts, you consent to receiving important information regarding your student's enrollment via text or SMS messages at the mobile phone number you provided. You may opt out of these messages at any time by replying STOP to any text or SMS message.

How Do We Share Personally Identifiable Information?

We may share personally identifiable information with certain service providers. They will use this information to process transactions you have requested, provide customer service and inform you of products or services we offer that you may find useful. Our service providers may include consultants, vendors and companies that perform marketing services on our behalf to help us identify families who may benefit from the services and education offerings Connections or its affiliates provide. We require our service providers to protect your personally identifiable information and to use or disclose it only for the work they are performing for us, or as permitted by law.

If all or substantially all of Connections' assets are sold or transferred to another party, your personally identifiable information may be transferred to the acquiring entity. However, Connections will take steps to assure that the personally identifiable information is conveyed lawfully, and in a manner consistent with the privacy policy under which it was collected.

Finally, we may disclose your personally identifiable information to third parties if we believe we are required to do so in order to comply with law (including court orders and subpoenas); to comply with lawful requests from law enforcement agencies or other governmental organizations; to enforce our [Terms of Use](#); to protect the rights, privacy, safety, or property of Connections, our affiliated schools, our staff, or other users of the Websites; and/or to permit us to pursue available remedies or limit the damages that we may sustain. We otherwise exercise commercially reasonable care to not share or disclose the names of users or any other personally identifying information with third parties, except with your prior approval and in compliance with federal and state law.

Cookies and Other Third Party Marketing Technologies

What Are Cookies?

Each time you visit a Website, information is automatically gathered such as your IP address domain name, the name of the page from which you entered the Website, which pages you view, and for how long you view

them. This information is collected in order to improve the Website, remarketing activities, and for trend analysis. As with most websites, we may use "cookies" for marketing purposes, to track usage of our Website, and to improve your experience of our Websites.

A cookie is a text file that is placed on your hard disk by a Web page server. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If, however, you choose to decline certain essential cookies, you may compromise the ability to fully experience the interactive features of our Websites or have some of our services on the Websites function properly. Further information about cookies is available using the help function of your Internet browser.

Third Party Cookies

We may use third-party cookies as part of marketing activities we conduct with Google and/or other third-party vendors, to help provide you with relevant messaging as you use the internet. As part of these remarketing activities, third-party cookies may record your visits to our Websites and websites visited prior. Cookies can then be used to serve targeted messaging to you on other websites.

Managing and Blocking Cookies

Through browser settings, you can manage or block the use of cookies. In addition, you can use opt-out tools for ad networks and firms who participate in the Network Advertising Initiative at

<http://optout.networkadvertising.org/> or the Digital Advertising Alliance at <http://optout.aboutads.info/>.

To effectively manage cookies via browser settings or through these ad industry opt-out tools, you must opt-out and set cookie preferences on all browsers and all devices you use. If you clear cache or cookies, be sure to reset your preferences.

Blocking or disabling some cookies may prevent or impair functionality and use of the site.

Here is some additional information about viewing and changing your browser settings to manage or block cookies:

Google Chrome

Click on the spanner icon (top menu in browser) and select 'Settings'

Click the 'Under the Bonnet' tab on the left, then select the 'Content settings' button

Under the cookies section, choose the option that best suits your needs.

Microsoft Internet Explorer

Click on 'Tools' (top menu in browser) and select 'Internet options'

Click on the 'Privacy' tab

Move the privacy slider to the level of privacy you require. Settings above Medium will disable cookies.

Mozilla Firefox

Click on 'Tools' (top menu in browser) and select 'Options'

Select the Privacy icon

In the history section choose 'Use custom settings for history' from the dropdown menu

Cookies can be enabled or disabled by clicking on the appropriate check boxes.

Safari

Click on the Cog icon (top menu in browser) and select 'Preferences'

Click on Privacy tab and choose the option that best suits your needs.

Opera

Click on the 'Tools' at the top of your browser window and select 'Preferences'

Select the 'Advanced' tab and choose Cookies from the list on the left

Choose the option that best suits your needs.

Safari on OSX

Click on 'Safari' at the top of your browser window and select 'Preferences'

Click on the 'Privacy' tab

Adjust the level of cookie acceptance here.

Firefox

Click on 'Firefox' at the top of your browser window and select 'Preferences'

Select the Privacy icon

In the history section choose 'Use custom settings for history' from the dropdown menu

Cookies can be enabled or disabled by clicking on the appropriate checkboxes.

Opt-Out of Remarketing

You may choose to be exempt from the use of Google remarketing cookies at the [Google advertising privacy page](#).

Alternatively, you may opt-out of remarketing on the Google network and similar networks at the [Network Advertising Initiative opt out page](#). Opting out will not prevent advertisements from being served to you on the

Internet; it will only affect advertisements that utilize remarketing cookies to serve messaging on the specified networks. We are not responsible for the activities of other parties that may not comply with your opt-out requests.

Third-Party Websites

Websites may contain links to third-party websites for academic and curriculum support that are not under the control or supervision of Connections. Connections is not responsible for the tracking activities of such third-party websites.

The Websites may also contain links to other websites or other resources that are provided for your convenience. Unless explicitly stated, these links are not endorsed by Connections. The information and data privacy practices of those websites are not covered by this Privacy Policy or any other policies or terms applicable to the Websites. We recommend you review any terms of use and privacy policies of any third party website linked to the Websites before providing any information to those websites or using their products and services.

How We Use Non-Personally Identifiable Information

Since non-personally identifiable information does not identify you, we reserve the right to use it and share it for any purpose with third parties. To the extent any non-personally identifiable information is combined with personally identifiable information, the combined information will be treated as personally identifiable information for as long as it is combined.

Student Data Privacy

Connections is an education management company that provides various management services and curriculum content (“**Services**”) to our customers, including public schools, special programs, school districts, and charter organizations (collectively referred to as “**Schools**”) that wish to provide students and their families with an exceptional virtual school option. Connections also offers a private pay schooling option to families through our Pearson Online Academy (POA).

Connections uses industry best practices to protect the privacy of all students and families. When our Services are used as part of a School’s educational mission or a family enrolls their student in POA, the personal information related to the student users (“**School Users**”) that is (1) provided to Connections by a parent, student or School, or (2) collected by Connections during the provision of our services to a student or School, may include information defined as “educational records” by the Family Educational Rights and Privacy Act (**FERPA**) or other information protected by similar student data privacy laws. We call this information “**Student Records.**”

FERPA Privacy Rights

FERPA provides students with privacy rights and protection for educational personally identifiable information collected and processed on behalf of educational institutions receiving government funding from the U.S. Department of Education. FERPA provides students with rights to obtain from these educational institutions access to their educational records, as well as correction and amendment of their educational records. For more information on FERPA, students and families should refer to the FERPA policy in their respective student handbook.

Only personal information directly relating to the educational interest of a student which is (1) created by a School User, and (2) created by a School (for example, when a School creates the user name, login and password to establish School User accounts), are designated as Student Records.

Our Commitment:

Our collection and use of Student Records is governed by our contracts with the Schools, by our Privacy Policy, and by applicable privacy laws. For example, we work with Schools to help protect personal information from the Student's educational record, as required by FERPA, and to protect the personal information of students under 13 consistent with the Children's Online Privacy Protection Act (COPPA).

We collect, maintain, use and share Student Records only for an authorized educational use and as described in our Privacy Policy, or as directed by the School, the School User and/or the student's parent or legal guardian.

We do not disclose Student Records for targeted advertising purposes. We do use certain marketing technologies for the purpose of retargeting, analytics and attribution activities.

We do not build a personal profile of a School User other than in furtherance of an educational purpose or as authorized by a Caretaker.

We maintain a comprehensive data security program designed to protect the types of Student Records we maintain.

We will never sell Student Records.

How We Share and Disclose Student Records

Depending on the features and account controls applicable to School User accounts, we may share usernames and account information with other users on the Website, such as teachers, learning coaches, or school administrators. For example, student attendance may be shared with school administrators and learning coaches.

In the Connections proprietary education management system, access to student information and data is controlled by a central team of administrators, trained in FERPA and data privacy, using a complex system of roles, permissions, and locations. Only users in a particular location, who have permissions at that location, will have access to student data that is permissioned using roles and locations. Data points and reports will be assigned to roles, including vendors with whom Connections has contracted to provide a service. Access to reports and all student data will be controlled by these roles. Only users in a location with the correct roles will meet the requirements to access the data.

The education management system contains personally identifiable information that is maintained and accessible by third parties (such as service providers, content partners or vendors). These third parties are provided access to the minimum amount of information required to allow them to perform their contracted tasks. Third parties have agreed to maintain the confidentiality of such information and to use or disclose it only for the work they are performing , or as permitted by law.

Children Under 13

Connections is concerned about the safety and privacy of children online. We take reasonable efforts to comply with COPPA as well as state-specific laws that provide privacy protections for K-12 students.

The Websites are not intended to solicit information of any kind from students under the age of thirteen (13), and we do not and will not knowingly contact or collect personally identifiable information from children under thirteen (13). The only personal information we receive about children under the age of thirteen (13) is information provided by the parent or legal guardian or information provided by the student as part of their participation in a course or courses as part of their K-12 education program. By enrolling a child, a parent is consenting to the collection of that information.

It is possible that by fraud or deception by others we may receive information pertaining to children under the age of thirteen (13). If we are notified of the receipt of information under such circumstances, once verified, we will promptly obtain parental or guardian consent, and in the absence of such consent we will delete the information. If you want to notify us that we have inadvertently received information for a child under the age of thirteen (13), please do so by emailing us at privacy@connectionseducation.com.

You can request to review, edit, or prohibit personally identifiable information of a child under the age of thirteen (13) from being used by Connections, its affiliates, schools, and vendors acting on behalf of Connections by making a request in writing to privacy@connectionseducation.com. Please note that if you make a request to prohibit personally identifiable information being used by Connections, its affiliates, schools, and vendors acting on behalf of Connections, your child may no longer continue to be enrolled in Connections and this may terminate their participation in the Connections program.

For information on our use of information covered by COPPA please contact us at the following:

Connections Education LLC

10960 Grantchester Way

Columbia, Maryland 21044

Phone: 1-800-382-6010

Email: privacy@connectionseducation.com

Security

Safeguards

Connections makes commercially reasonable efforts to safeguard the personally identifiable information we collect and store. We do this, in part, by implementing account verification procedures and password protection features. As effective as our safeguards are, no security system is completely impenetrable, therefore we cannot guarantee the absolute security of our database and systems, nor can we guarantee that personally identifiable information you supply will not be intercepted while being transmitted to us over the Internet.

All data accessed via the EMS will be accessed through forced SSL for privacy and security purposes. Private data transmitted between systems for data reporting purposes will always be transmitted with secure FTP or over a private VPN that provides encryption.

Breach

In the event that any information under our control is compromised as a result of a breach of the security of our systems or inadvertent release of information, we will take reasonable steps to investigate the situation and provide notice of the security incident in accordance with applicable laws and regulations.

California Privacy Policies

If you are a California resident, please read the [Supplemental Privacy Statement for California Residents](#) in conjunction with this Privacy Policy. The [Supplemental Privacy Statement for California Residents](#) explains Connections commitment to comply with California law and applies to personal information of California residents collected in connection with this site and the services referenced on this site.

Contact Information

If you have any questions regarding this Privacy Policy, please contact us by email at privacy@connectionseducation.com. Please note that email communications will not necessarily be secure. Accordingly, you should not include sensitive information in your email correspondence with us.