



PRIVACY POLICY

Last Revised: October 10, 2022

This Privacy Policy governs the privacy practices for US Math Recovery Council, a North Carolina nonprofit corporation (“USMRC,” “we,” “our,” or “us”). This Privacy Policy applies to information you provide to us when you create your user account, access our Content (defined below), or purchase our Products (defined below) by accessing our website and/or our online platform (collectively our “Platform”). This Privacy Policy specifies:

- What personal information do we collect about you through our Platform?
- How is this information used and with whom it may be shared?
- What choices are available to you regarding the use of your data?
- What are our security practices to protect the misuse of your information?
- How can you correct any inaccuracies in the information?

BY ACCESSING AND USING THE PLATFORM, YOU AGREE TO THE INFORMATION USE AND COLLECTION TERMS OF THIS PRIVACY POLICY. WE HAVE THE RIGHT TO REVISE THIS POLICY AT ANY TIME. WE MAY NOT NOTIFY USERS INDIVIDUALLY IF WE CHANGE THIS PRIVACY POLICY. ANY CHANGES WILL BE EFFECTIVE WHEN POSTED. WE ENCOURAGE YOU TO CHECK THIS PRIVACY POLICY FREQUENTLY FOR CHANGES.

Information We Collect

We are the owners of the information, educational materials and other content (collectively “Content”) we provide through our Platform. This Privacy Policy specifies our rights to the information provided by you and/or collected through our Platform. Your information includes the information you provide in setting up your user account when you purchase our books, guides, courses, and other educational material (collectively our “Products”). We only have access to and/or collect information that you voluntarily provide us via our Platform, any email you send us, your user account, or other direct contact from you. We do not require you to set up a user account to access our website; however, an account is necessary to access our online platform and may be used to acquire our Products.

“Personal Information” includes all personally identifiable information that is specific to you (e.g. name, address, phone number, email address, shipping address, billing address, etc.). Except as specifically noted herein, we do not provide any Personal Information to any unaffiliated third party. For purposes of Student Online Personal Protection Act (“SOPPA”), the Personal Information which would be deemed “Covered Information” means all of the following Personal Information we acquire for you to use our Platform:

- Name
- Date of Birth
- Student ID Number
- Gender
- Race
- School District
- School Building

- Teacher
- Assessment Results

We may collect information about you through your use of our Platform with software application tools and data files, such as cookies, web log files, IP addresses, device state information, unique device identifiers, device hardware and OS information, and information relating to your login of your user account (“Usage Information”). You may be able to control such Usage Information through the control settings on your device. You may be required to permit such Usage Information to log into your user account or to purchase our Products.

We may collect and process information through our Platform about the location of your device using GPS or other location technologies, such as sensor data from your mobile device providing information about nearby Wi-Fi access points and cellular network towers (“Location Information”). We use Location Information solely as necessary to analyze and improve our Platform and our Products.

Please note that your election to remove our access to Personal Information, Location Information or Usage Information may impact the functionality of the Platform. If you have any questions about our use of Personal Information, Location Information or Usage Information, please feel free to contact us.

Use and Disclosure of Information

We use your Personal Information as necessary to operate our Platform and as necessary to maintain your user account. In addition, we may use the information we collect about you, including any Personal Information you may provide to us and other information we collect in order to:

- Respond to any questions you ask or to respond to the reason you contacted us. We do not share your Personal Information with any unaffiliated third party, unless necessary to respond to your request.
- Enhance, improve and develop new services and products and for overall customer support.
- To process your order and/or deliver the Products you purchase through our Platform.
- Monitor usage and interaction statistics on our Platform, and/or through responses to our communications.
- Enhance, improve, and offer new products, services, and overall customer support.
- Perform data analytics for our internal business purposes.
- Allow us to respond quickly and efficiently to your questions and your requests for information.
- Communicate with you (via email, text, phone or mail) either directly or indirectly through our marketing service provider to send you special offers, or marketing information related to our Products.
- Communicate with you to request feedback or to notify you of changes to our terms, conditions and Privacy Policy.
- Track use of our Platform, investigate suspicious activity, and enforce our terms and policies, to measure and improve the operation and security of our Platform, and your Personal Information.
- Assess and improve our Products.
- Allow us to disclose your information to the extent permitted or required by law.

We may use Location Information to configure and operate the Platform for your use and provide you with the ability to control and improve the use of your devices and functionality

specific to your location. We may use Location Information to customize Products or information specific to your region.

We use the Usage Information to perform data analytics, analyze and evaluate the features and functionality of our Platform and our Products. We may also use Usage Information to process automatic crash reporting which collects reports of crashes, other technical issues, and information relating to how our Platform is functioning.

This information may also be provided to certain third party service providers as necessary to provide our Platform, Products, and related functionality and offer other services and products. Third party service providers may include software development, application and data hosting, wireless network services providers, payment processors, and any digital marketing services (collectively "Third Party Providers"). We are responsible for assuring that these Third Party Providers comply with the terms of this Privacy Policy.

Except for our Third Party Providers, we will not share Personal Information, Usage Information, or Location Information with an unaffiliated third party without your prior authorization, unless doing so is necessary (1) to enforce this Privacy Policy, to comply with law, regulation or other legal processes or to protect the rights, property or safety of us or others, (2) to comply with a valid order or process from a public authority, (3) to protect against misuse or unauthorized use of our Platform or your user account, (4) to detect or prevent criminal activity or fraud, or (5) in the event that USMRC or substantially all of our assets are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, in which case such information may be one of the transferred assets.

Your Rights

You may opt out of any future contact from us at any time. Depending on where you live, you may have certain legal rights under applicable law. For example, you may have the following rights:

- Your right to Access – means that you can ask us for a copy of any Personal Information we hold about you.
- Your right to Correct - if you believe that any of the Personal Information we hold about you is incorrect or out of date, you have the right to correct such Personal Information by providing us with the correct up-to-date Personal Information.
- Right to Erasure – you can ask us to delete the incorrect or out-of-date Personal Information and we will be happy to do so unless we are prevented from doing so by law or regulation. In certain circumstances you may also have the right to ask us to erase your Personal Information.
- Right to Portability – you have the right to request a copy of your Personal Information in a commonly used and machine readable format to be provided to you or to such other third party as you specify.
- Right to Limit – you have the right to opt out of any ancillary use of your Personal Information (e.g., for marketing purposes).

Please contact us (as specified below) to request any of the above rights. Upon confirmation that you are making the request, we will confirm our obligations under applicable law. Please note that even if a request is made to delete your Personal Information, we may be permitted or required to retain a copy for our business and legal obligations as permitted or required under applicable law.

Marketing Programs

We do not sell, lease, or otherwise disclose your Personal Information to unaffiliated third parties to market their products and services to you. While we may provide Personal Information, Location Information or Usage Information to one of our Third Party Providers in order to communicate with you, we require all such Third Party Providers (as well as our affiliates and business partners) to comply with this Privacy Policy and to take appropriate steps to secure your information.

Data Security

Data security is implemented through physical, administrative, and technical safeguards we put in place and operational procedures we follow to protect your Personal Information. We protect your transactions involving your Personal Information over the Internet using Secure Sockets Layer (SSL) technology. We restrict access to your Personal Information in our database to our authorized employees, agents, certain of our authorized business partners and/or authorized Third Party Providers as appropriate or necessary to provide the Platform and our Products and/or maintain your user account. However, no website, database or system is completely secure or “hacker proof.” You are also responsible for taking reasonable steps to protect your Personal Information against unauthorized disclosure or misuse and you are responsible for protecting the security of your user account credentials and for any use of your user account.

Data Retention

We keep your Personal Information as long as needed to process your requests, provide your user account, to operate our business and provide our Platform and Products, and as long as we are legally obligated to keep it. You have the right to ask us to delete your Personal Information at any time. Please note that deletion of your Personal Information may affect your right to use our Platform and may require de-activation of any user account. While we will use reasonable efforts to de-active your Personal Information and to delete such Personal Information, we may be required to retain such Personal Information as required by our systems or our legal requirements. Until we have deleted all of your Personal Information, we will continue to honor our privacy and security obligations related to your Personal Information.

Please note that in the event that we elect to de-identify your Personal Information, such de-identified information is no longer your Personal Information, and we may use such de-identified information, alone or in an aggregated basis to analyze our Platform and our Products, or as we deem appropriate.

Children’s Online Privacy Protection Act (COPPA)

In compliance with the Children’s Online Privacy Protection Act, 15 U.S.C. § 6501.06 and 16 C.F.R. §§ 312.1 – 312.12, we do not knowingly collect information from children under the age of 13, nor do our website(s) target children under the age of 13. By using our Platform and any associated user account, you represent that you are not younger than 13. Please contact us if you know or suspect that we have collected information from children under the age of 13 and we will take prompt measures to remove such information.

Student Online Personal Protection Act (SOPPA)

In compliance with the Student Online Personal Protection Act, 105 ILCS 85, we may collect, use, and disclose Personal Information of a student. We only collect and use Personal Information as needed to provide our Platform and Products. Under SOPPA, parents may have certain rights regarding their child’s Personal Information, including (a) the right to inspect and

review the student's Personal Information; (b) request from the school a paper or electronic copy of the student's Personal Information; and (c) request correction of factual inaccuracies contained in the student's Personal Information. We do not engage in targeted advertising using a student's Personal Information, sell or rent a student's Personal Information, use the student's Personal Information to create a profile about a student, or use or disclose Personal Information except as permitted under SOPPA.

Privacy Protections Outside of the United States

We remain responsible for any of your Personal Information (i.e., "Personal Data") that is shared under the Onward Transfer Principle with third parties for external processing on our behalf, as described above in the "Use and Disclosure of Information" section in the event that you are a resident of the European Union. We may agree to a Data Protection Agreement under which we are obligated to comply with applicable EU law to protect and secure your Personal Data. If you are a resident of the EU or Switzerland, you have certain rights in regard to your "Personal Data", please contact us for any assistance in asserting your rights using the information provided in the "Contact Us" section.

Contact Us

If you have any questions, comments or concerns about this Privacy Policy, please contact us as noted below:

CUSTOMER SUPPORT

Email: info@mathrecovery.org

Telephone: (952) 683-1521

COMPLIANCE

Email: lisaj@mathrecovery.org

Telephone: (952) 491-9856

COMPANY
US Math Recovery Council®

Attn: Compliance Officer

Changes to Our Privacy Policy

We may modify, alter or update our Privacy Policy at any time, so we encourage you to review our Privacy Policy frequently. We will not provide individual notice to you of changes to our Privacy Policy, but when we make updates to our Privacy Policy, we will update the date in this section.

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