

## ONLINE PRIVACY POLICY

Sunburst Digital (“we”, “us”) recognizes the importance of protecting the information that we collect from our customers. Sunburst Digital has created this privacy statement in order to demonstrate its firm commitment to privacy. The following discloses our information gathering for the “Type to Learn 4” site, located at <http://teacher.ttl4.com> (the “site”). This Privacy Policy applies solely to information collected at this site. By using or accessing the site, you signify your assent to our Privacy Policy. **IF YOU DO NOT AGREE TO THIS PRIVACY POLICY YOU MAY NOT ACCESS OR OTHERWISE USE THIS SITE.**

### PRIVACY POLICY FOR CHILDREN

**COPPA:** Sunburst Digital adheres to the Children’s Online Privacy Protection Act (COPPA). Under COPPA, “personal information” is defined as individually identifiable information such as first and last name, a home or other physical address including street name and city or town, an e-mail address, a telephone number, a Social Security number, or persistent identifiers such as customer or processor serial numbers held in a cookie, where the identifier is associated with individually identifiable information. We do not collect personal information, as defined under COPPA, directly from children on this site. Rather, the subscribing school provides Sunburst Digital with a student’s full name, grade, and the address and telephone number of the school in which the student is enrolled. The subscribing school is responsible for providing the student’s personal information for the “Type to Learn 4” program (“Program”). If the subscribing school does not wish to disclose the student’s real name then it may provide a fictitious name in order to download and use the program. No personal information is ever solicited directly from the student by Sunburst Digital. If the Site staff becomes aware that personal information has been collected from a child under 13 without such child’s parent or guardian’s consent, we will use reasonable efforts to delete such information from our database.

**FERPA:** The Federal Educational Rights and Privacy Act (FERPA) is federal legislation that protects the privacy of student education records. All student records are the property and under of the control of the subscribing school. Sunburst Digital operates in compliance with FERPA and takes every measure to ensure the confidentiality of students attending our subscribing schools. Sunburst Digital transmits data over encrypted channels and stores all pupil data on secure servers.

**Use of personal information:** Students retain control over their pupil-generated content. We collect and use only as much personal information as necessary for the activity, and do not condition participation in “Type to Learn 4” or any on-line activity on the disclosure of more personal information than is reasonable necessary. We use the information we collect only for internal business purposes, and/or to give credit to children for scores they have achieved. If we receive a request form a child that we know is under 13, we keep that child’s email address for long enough to respond to them and then we delete this information from our system after we answer the child’s question. Any information provided by the child will not be used to re-contact the child.

**Involvement of parents:** In accordance with the provisions of COPPA, we will notify parents when collecting personal information from children under age 13, and will seek parental consent before collecting, using, and/or disclosing personal information from children. Parents may consent to our collection and use of their child’s personal information without consenting to the disclosure of that information to third parties. Parents may review and have deleted their child’s personal information, and may refuse to permit further collection or use of their child’s information. Parents should contact their child’s school to have any personal information removed from the “Type to Learn 4” product.

## PRIVACY POLICY FOR ADULTS

**Types of personal information collected from adults:** We do not collect personally identifiable information from teachers, administrators, parents or other adults who may use “Type to Learn 4” and this site, unless they voluntarily provide such information to us. When using this site, a teacher, administrator or parent may choose to contact us and provide us with personal information. Personal information can include, name, email address, physical address, telephone number and school.

**Use of personal information from adults:** We will use information voluntarily provided to us by adults only for internal business purposes and to respond to their inquiry or request. Gathering this information helps us develop web sites and products that meet our clients’ interests.

**Non-personal information:** In addition, we may also collect non-personally identifiable information from users, such as user’s IP web address and/or pages viewed, and may aggregate any information collected in a manner which does not identify the individual. Occasionally, Sunburst Digital uses “cookies” to store pertinent user information during a session. Cookies are small pieces of information that are stored in a designated file on your computer. Sunburst Digital uses cookies solely for the purpose of holding information during on-line sessions (for example, to hold answers to on-line quizzes for short-term storage, or to create an ID for use in a multiple-session assessment). We do not collect personally identifiable information from the user’s computer, like account logins or passwords. However, for performance analysis purposes we may obtain basic information about your hardware and/or system software configuration, including but not limited to the capabilities of your video card or the speed of your Internet connection. Gathering this information helps us develop web sites and products that meet our clients’ interests and needs.

**Sharing of Personal Information to Third-Parties:**We do not sell any personally identifying information collected on the Site or through the Program to third parties or mass marketers. Unless you consent to the disclosure of your personally identifiable information, only we and our affiliates, our technical consultants, third party auditors and other third parties who make our Site available, or enhance its functionality, have access to this information, and we require them to agree that they are covered by this policy. However, we reserve the right to use or disclose any information as needed to satisfy any law, regulation or legal request, to protect the integrity of the website, to fulfill our requests, or to cooperate in any way with law enforcement investigation or in connection with the sale or merger of Sunburst Digital.

### Security Policy

The importance of security of personally identifiable information associated with our site is of utmost concern to us. We exercise reasonable care in providing secure transmission of your information from your computer to our servers, utilizing encryption software. We have put in place reasonable physical, electronic, and managerial procedures to protect the information we collect. However, due to the inherent open nature of the Internet, Sunburst Digital cannot ensure or warrant the security of any information you transmit to us or any information provided online, and you do so at your own risk. Users must accept all risks associated with any data transmission, including the risk that their personal information may be intercepted in transit. In the event of a security breach, Sunburst Digital will notify the subscribing school when substantial risk of harm from the breach provides for such notice.

### Web Site Terms and Conditions

Use of this web site is governed by, and subject to, the terms and conditions contained here. Your use or access of the web site constitutes your agreement to be bound by these provisions. **IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS YOU MAY NOT ACCESS OR OTHERWISE USE THE SITE.**

**How to Contact Us:** If you have any questions about this privacy statement, the practices of our site, or your dealings with the Web site, you can contact Sunburst Digital:

**Address:** 3150 Higgins Rd, Ste 140, Hoffman Estates, IL 60169

**Telephone:** (800) 321-7511

**Email Address:** [service@sunburst.com](mailto:service@sunburst.com)

**United States of America**

Our site is maintained in the United States of America. By using the site, you authorize the export of personal information to the USA and its storage and use as specified in this policy. **Effective Date:** This privacy policy is effective and was last updated on March 11, 2015.