

## CPM Educational Program Privacy Policy

CPM Educational Program (“CPM”) respects your privacy and we are committed to protecting it through our compliance with this policy. This policy describes the types of information we may collect from you or may be provided about you when you use our services and our practices for collecting, using, maintaining, protecting and disclosing that information. As you are using our services, we want to be clear about how we are using information and the ways in which you can protect your privacy.

### Information We Collect and How We Collect It

We collect information from you when you register on and use CPM.ORG and any related subdomains, including any “**Licensed Content**” (as that term is defined in the [Website Terms of Use](#)), functionality and services offered on or through CPM.ORG (the “**Website**”). When registering on our Website, you may be asked to enter your: name, e-mail address (personal, student, or employer e-mail address), mailing address, phone number, employer (or school and school district), and/or job title. If applicable, after entering into a license agreement or Purchase Agreement with CPM, your school or school district may provide the following information to CPM about you so that you may access CPM’s Licensed Content: name, grade level, teacher, and class. When purchasing items through our online store, you may be asked to also provide payment information (which also includes credit or debit card and billing contact information). You may, however, for some purposes visit our website anonymously.

When you visit our Website (whether by registering or anonymously), we also automatically collect usage details regarding your visit to our Website such as your Internet Protocol (IP) address and other information collected through cookies (see “*Use of Cookies*” below).

### How We Use Your Information

Any of the information we collect from you may be used in one of the following ways: to personalize your experience on our Website; to improve our Website; to provide you with information you request; to improve customer service; to send you periodic emails; to allow you to access the Licensed Content, to provide you a preview of the Licensed Content via eBook, and to complete your order of any CPM materials ordered through the online store. The email address you provide may also be used to confirm your order of CPM materials and to send you information and updates about CPM. CPM only uses Pupil Records (defined below) for the purpose of providing pupils access to the Licensed Content or as otherwise described in this Privacy Policy and will not use any personally identifiable information in a Pupil Record to engage in targeted marketing.

### How We Protect Your Information

We implement a variety of security measures and provide training to responsible individuals to maintain the safety of your personal information when you enter, submit, or access your personal information and to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted via the Internet to our Website. CPM servers are physically located within the continental United States.

### Use of Cookies

Cookies are small files that a site or its service provider transfers to your computer’s hard drive through your Web browser (if you allow) that enables the site’s or service provider’s systems to recognize your browser and capture and remember certain information regarding your visit to the Website such as: your IP address; the domain from which you accessed the Website; the date, time and duration of your visit; and the pages you visited.

We use this information to understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

The information we collect automatically is statistical and does not include personal information. We do not perform any behavioral tracking.

### Disclosure of Your Information

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information except that we may

disclose your personally identifiable information under the following limited circumstances:

- To trusted third parties, listed below, who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential;
- To comply with any law, court order or legal process, including responding to any government or regulatory request;
- To enforce our site policies, or protect our or other's rights, property, or safety; and
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of CPM's assets.

For the avoidance of doubt, CPM will not provide to any third party any personally identifiable information in a Pupil Record (defined below) to engage in targeted marketing.

#### **Authorized Third Parties Who May Receive Your Information**

- **Website Pipeline**, Dan Pennell, Project Manager, [dan.pennell@websitepipeline.com](mailto:dan.pennell@websitepipeline.com), (864) 272-4000 x 107, 555 N Pleasantburg Drive #214, Greenville, SC 29607.
- **Go Sign Me Up**, Tanja Morrison, (949) 951-3820, 9200 Irvine Center Drive Suite 100, Irvine, California, 92618.
- **QuanteraSystems.com**, Bob Pfahnl, [Bob@quanterasystems.com](mailto:Bob@quanterasystems.com), (408) 280-7587, 96 N 3rd Street, San Jose, CA 95112.
- **Delta Web Printing**, Jim Davis, [jim@deltawebprinting.com](mailto:jim@deltawebprinting.com), (916) 375-0044, 1871 Enterprise Blvd, West Sacramento, CA 95691.
- **TC Printing**, Jon Harris, [jon@tcprinting.net](mailto:jon@tcprinting.net), (916) 447-6387, 1215 G St, Sacramento, CA 95814.

#### **When this Privacy Policy Applies**

Our Privacy Policy applies to all of the services offered by CPM via the Website, including eBooks and any other Licensed Content, resources or tools available on the Website, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy. This policy applies to information we collect on this Website, in email, text and other electronic messages between you and this Website.

This policy does not apply to information collected by CPM offline or through any other means, including on any other website operated by any third party or information collected by any third party.

#### **Student (or Pupil) Records Pursuant to AB 1584 (California)**

Control of Pupil Records. Student (or pupil) records obtained by CPM from a “local education agency” (as defined in Cal. Education Code section 49073.1, and referred to as “agency” in this section regarding AB 1584) are, and will continue to be, property of and under the control of the agency. Such “**Pupil Records**” include any information directly related to a pupil that is maintained by the agency or acquired directly from the pupil through the use of instructional software or applications assigned to the pupil by a teacher or other agency employees. Pupil Records do not include de-identified information (i.e., information that cannot be used to identify an individual student) collected or used by CPM: (1) to improve educational products for adaptive learning purposes and for customized pupil learning; (2) to demonstrate the effectiveness of CPM's products in the marketing of those products; or (3) to develop and improve CPM's educational websites, services, or applications.

Control and Transfer of Pupil-Generated Pupil Records. Pupils currently cannot generate any Pupil Records through the use of CPM's Licensed Content or Website, therefore there are no pupil-generated Pupil Records that may be retained, controlled, or transferred by pupils.

Ability to Correct or Access Pupil Records. Because the agency enters and maintains the accuracy of the student roster, the agency is responsible for providing the means by which parents, legal guardians, and eligible pupils may review and correct erroneous information contained in a Pupil Record. To review, correct, update, or delete any personally identifiable information contained in a Pupil Record provided by the agency, a parent, legal guardian, or eligible pupil should contact

the agency directly.

How CPM Ensures Security and Confidentiality of Pupil Records. Please see the “*How We Protect Your Information*” section above.

Notice of Unauthorized Access or Disclosure of Pupil Records. Please see the “*Unauthorized Access or Disclosure*” section below.

CPM’s Use of Pupil Records. Please see the “*How We Use Your Information*” section above.

Use or Disclosure of Pupil Records for Targeted Marketing. Please see the “*How We Use Your Information*” and “*Disclosure of Your Information*” sections above.

Retention of Pupil Records. CPM certifies that Pupil Records shall not be retained or available to CPM upon completion of the terms of the applicable license agreement or Purchase Agreement with the agency. Such certification will be enforced through the following procedure: within one (1) week following the expiration of the class covered by the applicable license agreement or Purchase Agreement, all data related to that class, including but not limited to personally identifiable information of a pupil, shall be deleted from CPM’s servers using industry best practices.

Family Educational Rights and Privacy Act Compliance (“FERPA”). A pupil’s agency will work with CPM to ensure compliance with FERPA by the following procedure: prior to the transmission of any Pupil Records, the parties will execute a license agreement or Purchase Agreement in accordance with FERPA unless the agency demonstrates that the information to be provided to CPM has been designated by the agency as “directory information” under FERPA.

### **Data Retention**

CPM will securely maintain personally identifiable information, other than Pupil Records, for only as long as required to satisfy applicable federal and state record retention requirements. Upon the expiration of such period of time requiring retention, the data will be securely de-identified or destroyed.

### **Unauthorized Access or Disclosure**

In the event of an unauthorized disclosure of a user’s personally identifiable information or Pupil Records (collectively, “**Records**”), CPM shall report such disclosure to the affected user(s) (or parent or guardian, if applicable) within twenty-four (24) hours of learning the security, confidentiality, or integrity of such Records was, or is reasonably believed to have been, compromised. If applicable, CPM and the school or school district shall work together to provide notice to the affected individuals.

### **Accessing and Correcting Your Information**

At any time, you may review your personally identifiable information maintained by us, require us to correct or delete the personal information and/or refuse to permit us from further collecting or using your information. Please submit an e-mail to the address below in the “*Contacting Us*” section. To protect your privacy and security, we may require you to take certain steps or provide additional information to verify your identity before we provide any information or make any corrections.

### **Use of Website by Children Under the Age of 13**

The Children’s Online Privacy Protection Act of 1998 and its rules (collectively, “**COPPA**”) require us to inform parents and legal guardians (as used in this section “**parents**”) about our practices for collecting, using and disclosing personal information from children under the age of 13 (“**child**” or “**children**”). COPPA, and applicable laws in foreign jurisdictions regarding minors, also require us to obtain verifiable consent from a child’s parent for certain collection, use, and disclosure of the child’s personal information. This section only applies to children and supplements the other provisions of this Privacy Policy which apply to teens and adults.

This section hereby notifies parents of: (1) the types of information we may collect from and about children; (2) how we use the information we collect; (3) our practices for disclosing that information; (4) our practices for notifying and obtaining parental consent when we collect personal information from children, including how parents may revoke consent; and (5) all operators that collect or maintain children’s information through this Website.

Information We Collect From Children. Children can access many parts of the Website and its content and use many of its features without providing us with personal information. However, some Licensed Content and features are available only to registered users (which may include children) which requires us to collect certain information, including personal

information, from them. In addition, we use certain technologies, such as cookies (described above), to automatically collect information from users (including children) when they visit or use the Website. We only collect as much information about a child as is reasonably necessary for the child to access the Licensed Content, and we do not condition a child's participation on the disclosure of more personal information than is reasonably necessary.

Information We Collect Directly. If a school or school district contracts with CPM to make CPM's Licensed Content available to its students, the school or school district will provide CPM with certain Pupil Records (defined above). CPM creates usernames and passwords for the pupils and provides this information to the school or school district for distribution.

Automatic Information Collection and Tracking. Please see the "*Use of Cookies*" section above.

How We Use Your Child's Information. We may use the personal information we collect from your child to register the child for the Licensed Content for his/her grade level or class.

Our Practices for Disclosing Children's Information. Please see the "*Disclosure of Your Information*" section above.

Accessing and Correcting Your Child's Personal Information. Please see the "*Ability to Correct or Access Pupil Records*" and "*Accessing and Correcting Your Information*" sections above.

Operators that Collect or Maintain Information from Children. CPM does not use any third party providers who collect or maintain any information from children.

### **International Users**

If you are accessing this Website from outside of the United States, your personally identifiable information may be transferred to, and be maintained on, computers located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and chose to provide your personally identifiable information to CPM, you are aware and hereby agree that CPM may transfer your personally identifiable information to the United States and process it there.

### **Changes to Our Privacy Policy**

If we decide to change our Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date that follows. The use of personally identifiable information will be subject to the privacy policy in place at the time the information was collected.

This policy was last modified on February 16, 2016.

### **Contacting Us**

If there are any questions or concerns regarding this Privacy Policy or if you would like to correct, update, delete, or request use or disclosure be limited to any personally identifiable information, you may contact us at [security@cpm.org](mailto:security@cpm.org).