

# Privacy Policy

We, at ReadTheory LP (“ReadTheory“, “we” or “us“) regard your privacy with the seriousness it deserves. This Privacy Policy will help you understand what information we may collect about you and your children. It also explains how we store, use and disclose such information, including any personally identifiable information (“**Personal Information**” or “**PII**”), in connection with your or your children’s use of our web-based application (“**Website**”).

Note: ReadTheory has relationships and agreements with schools, districts state Departments of Education and other organizations (“**Entity or Entities**”) for classroom and group use of this Website. When we have a relationship with these Entities there are separate written agreements that also govern your use of this Website and the use of your Personal Information. If you belong to one of these Entities or your use of this Website falls under the category of classroom or group use, please check with your relevant Entity to review the terms and conditions that may also govern your use of this Website.

To review [our policies on children’s data](#).

**PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE YOU ACCESS OR USE THE WEBSITE. IF YOU DO NOT AGREE TO ALL OR SOME OF THE TERMS HEREOF, WE KINDLY REQUEST THAT YOU IMMEDIATELY LEAVE THE WEBSITE.**

## **Consent**

By using the Website you expressly consent to the terms of this Privacy Policy and the **Terms of Use** (of which this Privacy Policy is an integral part and which is binding on all users of our Website), and to the collection, use and disclosure of your information, including Personal Information, as may be applicable to you or your children, in accordance with the terms of this Privacy Policy. Capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in our Terms of Use. Certain services featured on our Website may require submission of your Personal Information. Any such Personal Information will be collected solely with your prior consent. Where a ‘Student Account’ is created on behalf of a student who is under the age of 13 (“**Child**” or “**Children**”, respectively), the Child’s parent or legal guardian will be required to consent to the collection of the Child’s Personal Information in accordance with the Children’s

Online Privacy Protection Act (COPPA). You are encouraged to maintain a record of the Child's username and password; supervise and keep track of the Child's activity in the account; and contact any teacher linked to your Child's account with any specific questions regarding the Child's progress and the use of the information by such teacher.

If you, as a parent or legal guardian, become aware that a Child under your care or supervision has provided us information without your consent, or provided us with information that you would like to have removed or updated, please contact us at [support@readtheory.org](mailto:support@readtheory.org).

If your use of the Website is under the umbrella of a relationship and agreement we have with your school or district, please note that the ownership of your personal information vests with the school or district. ReadTheory will handle your data in accordance with this Privacy Policy, and you retain various rights over your personal information, such as the right to delete it.

#### **Information We Collect**

In order to enjoy the benefits of our Website, you will be required to open a user account (either a 'Student Account', 'Parent Account' or 'Teacher Account'), and provide certain Personal Information, such as your name, a user name and password and an optional e-mail address. A Student Account can be created by the student, the student's parent or legal guardian or the student's teacher.

When creating a username for your account, please do not use personally identifiable information such as the user's name, phone number, date of birth or email address, but rather use pseudonyms or other combinations of letters and numbers that do not identify you.

When associating a Student Account with a Teacher Account, we will collect the user's first and last name to help teachers identify their students. The collection of the student's e-mail address is optional. When a Student Account is for a Child and associated with a Teacher Account, we will not collect the full first name of the Child but only the first initial of the first name and the last name and an optional field of the parent's e-mail address.

If you contact us for customer support or submit other types of queries through our Website by clicking on an email link, we may ask for or collect additional information from you in order to respond to you or address your concerns.

The Website allows the collection of such information such as quiz results, comparative analyses of students' performance, and other statistical data concerning students, which may provide teachers with insight and a better understanding of their students' performance trends and results, such data and progress reports are accessible only by the teacher whose registered Teacher Account is directly linked to that particular 'Student Account', and are not shared by us with any third party for commercial purposes.

We may also collect certain information that does not by itself identify a specific individual ("**non-Personal Information**"). Such information may tell us about the type of browser you use, identify your Internet Service Provider (ISP), tell us about your browsing actions, demographic information, network status and other types of user activity (clicks on links or advertisements, downloads, etc.).

We use analytics and similar services (e.g., Google Analytics) to help us deliver a better and more personalized service to you by enabling us to gauge usage patterns, customize our services according to your individual preferences, and speed up your searches.

#### **COPPA Compliance**

Our Website and the collection of Children's Personal Information are operated in compliance with COPPA. You will see numerous references throughout this Privacy Policy concerning parental consent and supervision of Children's Student Accounts, ensuring that targeted advertising is not served to Children, et cetera. If you become aware that a Child under your care or supervision has provided us with Personal Information without your consent or provided us with information that you would like to have removed or updated, please contact us at [support@readtheory.org](mailto:support@readtheory.org).

#### **FERPA Compliance**

In certain circumstances, we may contract with an Entity that may disclose FERPA-protected data and Personal Information to us. Under

these contractual agreements, and to the extent applicable, we collect and use the data in compliance with FERPA.

#### **GDPR Compliance**

ReadTheory's privacy practices are compliant with the General Data Protection Regulation (GDPR) and this Privacy Policy has been drafted taking into consideration the provisions of the regulation. By using this Website, any information provided to us is collected for the purposes of providing our services to you. Any processing or transfer of your Personal Information will be done by ReadTheory as described in this Privacy Policy. You have a right to access and update your or your Child's Personal Information at any time. You also have the right to request that your or your Child's Personal Information and/or account be deleted. Please contact us at [support@readtheory.org](mailto:support@readtheory.org) to submit your request. Please be advised that if you request the deletion of your account, all Personal Information collected about/from you will be promptly deleted and you will no longer be able to use the services on our Website.

#### **Use of Cookies**

Our Website uses "cookies" and other similar technologies (such as web beacons, pixel tags, scripts, tags, etc.) in providing our services to you. Such technologies allow us to collect information about our users, their devices and their online behavior automatically, which we can then use to enhance your navigation on the Website, improve our services, personalize your user experience, and collect statistics about user preferences, behavior, etc. and administer a variety of other analytical tasks.

If your use of the Website is under the umbrella of a relationship and agreement we have with your school or district who pays for the use of the Website, we will only use the following cookies:

1. Our own cookies for operating the Website.
2. Third party cookies for the purposes of support, maintenance and ongoing administration of the Website.

If your use of the Website is not under the umbrella of a school or district who pays for the use of the Website, then in addition to the cookies explained above, we will also use third party cookies to

display online targeted ads to you. We exclusively partner with reputable and thoroughly vetted third party ad networks. We also have a specialized team in place that proactively filters and restricts any inappropriate advertising categories and creatives. You cannot opt-out of our sharing data with advertisers. However, we will not use cookies for targeted advertising in each of these cases:

1. Students under the age of 13 years.
2. Upon specific requests from school districts, which have provided us with email suffixes associated with student and teacher accounts.

A “cookie” is a small piece of information that a website assigns to your computer or mobile device while you are viewing it. Cookies could be very helpful and can be used for a variety of purposes, such as allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and the services offered on our Website quicker and easier. Cookies are also used to help ensure that the advertisements you see, if any, are relevant to you and your interests. You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org). You may remove our cookies by following the instructions of your device preferences; however, if you choose to disable cookies, some features of our Website and/or services we may offer may not operate properly and your online experience may be limited.

From time to time, our Website may include a link to a third-party site and if the link is clicked the third-party may place a cookie on your device. Such cookies may be used to serve you personalized advertisements, measure such advertisements’ effectiveness, or otherwise personalize the content provided to you through the Website. Although we do not have control over these third-party cookies, you are able to disable such cookies through your individual browser settings. Please note that the settings offered by a certain browser or device often only apply to that particular browser or device, so you may need to reset your settings if you access our Website on a different device. All of the above is, subject, however, to our policy of not serving personalized advertising to Children (as further described

in the section titled ‘Interaction with Third Party Services and Third Party Advertising’ of this Privacy Policy).

Importantly, we do not track student behavior (e.g. browsing habits, search inquiries, use of social media) outside of the Website.

#### **How We Use Information We Collect**

ReadTheory uses Personal Information provided by you upon creation of your account in order to provide the educational tools and services featured on our Website, as well as offer you administrative or technical support, when needed.

We may also use your information for the following purposes:

1. To provide you with ongoing customer assistance and technical support.
2. To send you marketing information about products, services and offers, which may be of relevance to you, but only as permitted by law or specifically approved by you. If you do not want to receive any more communications from us, please send us an email to **support@readtheory.org**, with the subject heading “Unsubscribe”. You may also select the “Unsubscribe” link that appears on marketing emails to opt-out of receiving any additional marketing emails.
3. We may transfer or disclose PII to our **affiliated companies, subcontractors or such other trusted third-party service providers or partners** who may be located in different jurisdictions across the world for the purpose of: (a) assisting us with our business operations and to provide and improve our Website and/or services we may offer; (b) performing research, technical diagnostics, or analytics on our behalf; or (c) carrying out your express instructions in connection with your queries submitted to us.
4. We may disclose PII, or any information you submit through your use of the Website if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (a) comply with any applicable law, regulation, court order, legal process or governmental request; (b) enforce our policies (including our Terms of Use and Privacy Policy), including investigations of potential violations thereof; (c) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (d) to establish or exercise our rights to defend against legal claims; or (e) prevent harm to the rights, property or safety of ReadTheory, our users, yourself or any third party.

#### **Use of Anonymous Information**

We may use or share “Anonymous Information” (i.e. information which does not enable identification of an individual user, non-Personal Information, aggregated information or Personal Information in non-



human readable form) in any of the circumstances listed above, as well as for the purpose of providing and improving the Website and/or services we may offer, aggregate statistics and conduct business and marketing analysis, and in order to enhance your experience with the Website and/or services we may offer.

#### **Accessing Your PII and Opting Out**

As required by applicable law, we enable you to view, amend or delete the PII that we have collected about you or your Child. To do so, contact our customer support at [support@readtheory.org](mailto:support@readtheory.org) and detail your request. Please allow us up to 2 business days to complete the processing of any such request.

Please be advised that if you request the deletion of some or all of your Personal Information, certain features of our Website or services may no longer be available to you.

#### **How We Share Your Information**

We may disclose your Personal Information, or any information you submitted to us in connection with the Website and/or services we may offer, as follows:

1. to a third party in our business network in connection with providing services to educators and students (including advertising partners (but only as indicated above), business consultants, or professional advisors), all subject to confidentiality undertakings by such third parties in accordance with applicable laws. We use the following third party providers, for the following purposes which form an integral part of the functioning of the Website and our business:
  1. Amazon Web Services – our cloud hosting and storage provider for our entire infrastructure, including student data and educator data. All data is stored in the United States.
  2. Sendgrid – Transactional application and marketing emails. Only educator data is handled by Sendgrid.
  3. Customerly – Sending and responding to in-app messages and emails. Only educator data is handled by Customerly.
  4. Google Workspace – Internal company communication and customer support via email/video/voice calls. Only educator data is handled by Google Workspace.
  5. Calendly – Appointment booking / demo scheduling. Only educator data is handled by Calendly.

6. Pipedrive – customer relationship management. Only educator data is handled by Pipedrive.
  7. Stripe – Payment processing and subscription management. Only educator data is handled by Stripe.
  8. Slack – Internal team communication. Only educator data is handled by Slack.
  9. Asana – Project management platform. Only educator data is handled by Asana.
2. if we have a good faith belief that disclosure of such information is reasonably necessary to comply with applicable laws, regulations, legal processes or governmental requests;
  3. to enforce our policies and agreements with you (including our Terms of Use and this Privacy Policy);
  4. for investigating, detecting, preventing, or taking action regarding illegal activities or other wrongdoing, suspected fraud or security issues; or
  5. any other purpose for which we have obtained your specific prior consent, or as may be expressly directed by you.

These disclosures to third parties are key to the functionality of the Website, our legitimate business activities and our relationship with you and the school or school district. You cannot opt-out of these disclosures.

Except for the online targeted advertising activities explained in the cookies section above, we do not sell or distribute user data to any third parties other than providing the app service.

#### **Storage and Transfer of Data**

We store your information on our servers located in the United States. If you are located within the European Union, please note that information collected by us may be transferred outside the European Union / European Economic Area and your consent to this Privacy Policy and continued use of our Website represents your agreement to such transfer. Note, however, that any such transfer will be made solely for the purposes specified in this Privacy Policy and in accordance with applicable laws.

#### **How We Protect Your Information**



The security of your Personal Information is important to us. We follow generally accepted industry frameworks and standards, including the use of appropriate administrative, physical and technical safeguards, to protect information submitted to us.

We encrypt your data when in transit and during storage. We segment and store sensitive data on separate networks. We enforce a Least Privilege Access Policy where data can only be viewed and accessed on a need to know basis. We conduct internal risk assessments and security assessments and undergo yearly security audits by a different independent third party.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we apply industry-standard security measures to protect your Personal Information, we cannot guarantee its absolute security or confidentiality.

We also have implemented a comprehensive breach response protocol that involves containment and isolation, followed by assessment and a timely, clear, and transparent notification to appropriate stakeholders, including internal teams, users, and regulatory authorities. Communication to users regarding such incidents would be conducted directly through in-application messages and email, ensuring clarity and timely dissemination of information.

If you have any specific questions or security concerns, please contact us at [support@readtheory.org](mailto:support@readtheory.org).

#### **Interaction with Third Party Services and Third Party Advertising**

This Privacy Policy does not apply to the practices of companies that we do not own, control, or manage, including the third party that may advertise on our Website or provide links on our Website. Although while using our Website you may be able to connect or interact with third-party sites, including those involving serving of advertisements, we are not responsible for the privacy practices or the content displayed on or by any Third-Party sites. Because such Third-Party sites may involve the collection of Personal Information from you, whether through cookies or otherwise, we encourage you to read the

terms of use and privacy policy of each Third-Party service or site that you choose to use or interact with.

While our Website includes third-party advertising, ReadTheory ensures that any such third-party advertising only shows advertisements that are appropriate for children. Furthermore, targeted or interest-based advertising is displayed only for those users who have been expressly flagged as being over the age of 13. If at any time you see an advertisement on our Website that you feel is inappropriate for children, please contact us at [support@readtheory.org](mailto:support@readtheory.org) with the details of such advertiser and advertisement (screenshot/URL) and we will take appropriate actions to remove and/or block any such inappropriate advertising as promptly as possible.

#### **Retention of Personal Information**

We will retain any Personal Information that we collect only for as long as is required for the purposes for which such PII is collected and agree to delete any such PII following an opt-out request received from you and/or upon deletion of your account. We reserve the right to retain a copy of the opt-out request and any necessary accompanying details for administrative and regulatory compliance purposes only. Even if you do not request to opt-out, we automatically delete data of users that are inactive for more than two years.

#### **Merger, Sale or Bankruptcy**

In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign information, including Personal Information, in connection with the foregoing events. In such an event, our affiliated companies or acquiring company will assume the rights and obligations as described in this Privacy Policy.

#### **Contact Us**

If you have any questions or queries about our Privacy Policy or your Personal Information that we may have collected, contact us by e-mail at the following address: [support@readtheory.org](mailto:support@readtheory.org) or by phone: +1 302 684 6988

#### **Modifications to the Privacy Policy**

We reserve the right, at our discretion, to revise or update this Privacy Policy at any time, provided that any such changes will always take into consideration your rights under applicable law.

We will notify teacher-users in the event of any material changes to the Privacy Policy by direct email . We will also update the privacy policy to reflect when it was last changed.

Any modifications to this Privacy Policy will be effective following our notification to users. Your continued use of the Services after the amendments to this Privacy Policy have entered into effect will constitute your acceptance thereof.

Last updated: February 26, 2024