

## **EDUCATION LAW 2-d RIDER**

New York State Education Law 2-d was enacted in 2014 to address concerns relative to securing certain personally identifiable information. In order to comply with the requirements of Education Law 2-d, educational agencies and certain third-party contractors who contract with educational agencies must take certain additional steps to secure such data. These steps include enacting and complying with a Parents' "Bill of Rights" relative to protected data, ensuring that each third-party contractor has a detailed data privacy plan in place to ensure the security of such data, and that each third-party contractor sign a copy of the educational agency's Parents' Bill of Rights, thereby signifying that the third-party contractor will comply with such Parents' Bill of Rights. This Agreement is subject to the requirements of Education Law 2-d and MIND Education (the "Contractor") is a covered third-party contractor.

In order to comply with the mandates of Education Law 2-d, and notwithstanding any provision of the Agreement between the Huntington Union Free School District (the "District") and Contractor to the contrary, Contractor agrees as follows:

Contractor will treat "Protected Data" (as defined below) as confidential and shall protect the nature of the Protected Data by using the same degree of care, but not less than a reasonable degree of care, as the Contractor uses to protect its own confidential data, so as to prevent the unauthorized dissemination or publication of Protected Data to third parties. Contractor shall not disclose Protected Data other than to those of its employees or agents who have a need to know such Protected Data under this Agreement. Contractor shall not use Protected Data for any other purposes than those explicitly provided for in this Agreement. All Protected Data shall remain the property of the disclosing party. As more fully discussed below, Contractor shall have in place sufficient internal controls to ensure that the District's and/or Participants' Protected Data is safeguarded in accordance with all applicable laws and regulations, including, but not limited to, the Children's Internet Protection Act ("CIPA"), the Family Educational Rights and Privacy Act ("FERPA"), and the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), if applicable.

**"Protected Data"** includes any information rendered confidential by State or federal law, including, but not limited to student data, student demographics, scheduling, attendance, grades, health and discipline tracking, and all other data reasonably considered to be sensitive or confidential data by the District and/or a Participant. Protected Data also includes any information protected under Education Law 2-d including, but not limited to:

"Personally identifiable information" from student records of the District and/or its Participants as that term is defined in § 99.3 of FERPA,

-AND-

Personally identifiable information from the records of the District and/or its Participants relating to the annual professional performance reviews of classroom teachers or principals

that is confidential and not subject to release under the provisions of Education Law §§3012-c and 3012-d.

Contractor and/or any subcontractor, affiliate, or entity that may receive, collect, store, record or display any Protected Data shall comply with New York State Education Law § 2-d. As applicable, Contractor agrees to comply with District policy(ies) on data security and privacy. Contractor shall promptly reimburse the District and/or its Participants for the full cost of notifying a parent, eligible student, teacher, or principal of an unauthorized release of Protected Data by Contractor, its subcontractors, and/or assignees. In the event this Agreement expires, is not renewed or is terminated, Contractor shall return all of the District's and/or its Participants' data, including any and all Protected Data, in its possession by secure transmission.

### **Data Security and Privacy Plan**

Contractor and/or any subcontractor, affiliate, or entity that may receive, collect, store, record or display any of the District and/or its Participant's Protected Data, shall maintain a Data Security and Privacy Plan that aligns with the NIST Cybersecurity Framework and includes the following elements:

1. A provision incorporating the requirements of the District's Parents' Bill of Rights for data security and privacy, to the extent that any of the provisions in the Bill of Rights applies to Contractor's possession and use of Protected Data pursuant to this Agreement.
2. An outline of how all state, federal, and local data security and privacy contract requirements will be implemented over the life of the contract, consistent with the Contractor's policy on data security and privacy.
3. An outline of the measures taken by Contractor to secure Protected Data and to limit access to such data to authorized staff.
4. An outline of how Contractor will use "best practices" and industry standards with respect to data storage, privacy and protection, including, but not limited to encryption, firewalls, passwords, protection of off-site records, and limitations of access to stored data to authorized staff.
5. An outline of how Contractor will ensure that any subcontractors, persons or entities with which Contractor will share Protected Data, if any, will abide by the requirements of Contractor's policy on data security and privacy, and the contractual obligations with respect to Protected Data set forth herein.

Contractor shall ensure any the subcontractors, persons or entities that Contractor will share Protected Data with, if any, will abide by contractual obligations with respect to Protected Data set forth herein.

Contractor hereby acknowledges that it is aware of and agrees to abide by the District's Bill of Rights, attached. A copy of this signed document must be made a part of Contractor's data security and privacy plan.

SIGNATURE:   
[Brett Wunderberg \(Jul 29, 2025 08:44:54 PDT\)](#)

TITLE: Chief Executive Officer

DATE: 07/29/2025

**DATA PRIVACY AND SECURITY PLAN**

1. Attached hereto is a copy of Contractor's Data and Privacy Plan.
2. Attached hereto is a copy of the District's Bill of Rights signed by Contractor.

## **HUNTINGTON UNION FREE SCHOOL DISTRICT**

### **PARENTS' BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY**

Pursuant to New York State Education Law §2-d, parents, legal guardians and persons in parental relation to a student are entitled to certain rights with regard to their child's personally identifiable information, as defined by Education Law §2-d. This document contains a plain English summary of such rights.

1. A student's personally identifiable information cannot be sold or released for any commercial purposes.
2. Parents have the right to inspect and review the complete contents of their child's educational records maintained by the Huntington Union Free School District.
3. State and Federal Laws protect the confidentiality of personally identifiable student information, and safeguards associated with industry standards and best practices, including, but not limited to, encryption, firewalls, and password protection must be in place when data is stored or transferred.
4. A complete list of all student data elements collected by New York State is available for review at the following website:

<http://www.p12.nysed.gov/irs/sirs/documentation/NYSEDstudentData.xlsx>

The list may also be made available by writing to:

Office of Information & Reporting Services  
New York State Education Department  
Room 863 EBA,  
89 Washington Avenue  
Albany, NY 12234

5. Parents have the right to have complaints about possible breaches of student data addressed. Complaints should be directed to:

Huntington Union Free School District  
Attn: Beth Mccoy, Superintendent  
50 Tower Street  
Huntington Station, New York 11743  
Email: [Bmccoy@hufsd.edu](mailto:Bmccoy@hufsd.edu)  
Phone: 516-673-2038

OR

Chief Privacy Officer

New York State Education Department  
89 Washington Avenue  
Albany, NY 12234

Email: CPO@mail.nysesd.gov

6. Each contract with a third-party contractor which will receive student data, or teacher or principal data will include information addressing the following:
  - a. The exclusive purposes for which the student data or teacher or principal data will be used.
  - b. How the third-party contractor will ensure that the subcontractors, persons or entities that the third-party contractor will share the student data or teacher or principal data with, if any, will abide by data protection and security requirements.
  - c. When the agreement expires and what happens to the student data or teacher and principal data upon expiration of the agreement.
  - d. If and how a parent, student, a student over eighteen years of age, teacher or principal may challenge the accuracy of the student data or teacher or principal data that is collected; and
  - e. Where the student data or teacher or principal data will be stored, and the security protections taken to ensure such data will be protected, including whether such data will be encrypted.
7. Third-party contractors are also required to:
  - a. Provide training on federal and state law governing confidentiality to any officers, employees, or assignees who have access to student data or teacher or principal data;
  - b. Limit internal access to education records to those individuals who have a legitimate educational interest in such records.
  - c. Not use educational records for any other purpose than those explicitly authorized in the contract;
  - d. Not disclose personally identifiable information to any other party (i) without the prior written consent of the parent or eligible student; or (ii) unless required by statute or court order and the third-party contractor provides a notice of the disclosure to the New York State Education Department, board of education, or institution that provided the information no later than the time the information is disclosed, unless providing notice of the disclosure is expressly prohibited by the statute or court order;

- e. Maintain reasonable administrative, technical and physical safeguards to protect the security, confidentiality and integrity of personally identifiable student information in its custody;
  - f. Use encryption technology to protect data while in motion or in its custody from unauthorized disclosure as specified in Education Law §2-d;
  - g. Notify the Huntington Union Free School District of any breach of security resulting in an unauthorized release of student data or teacher or principal data, in the most expedient way possible and without unreasonable delay;
  - h. Provide a data security and privacy plan outlining how all state, federal and local data security and privacy contract requirements will be implemented over the life of the contract;
  - i. Provide a signed copy of this Bill of Rights to the Huntington Union Free School thereby acknowledging that they are aware of and agree to abide by this Bill of Rights.
8. This Bill of Rights is subject to change based on regulations of the Commissioner of Education and the New York State Education Department's Chief Privacy Officer, as well as emerging guidance documents.

### **Third-Party Acknowledgement**

As a third-party contractor, I acknowledge that our contract with the Huntington Union Free District necessitates the receipt of student data and as such, requires adherence with NY State Education Law 2-d and the District's Parents' Data Bill of Rights for Data Privacy and Security. In this regard, we acknowledge our responsibility to adhere to the noted elements of the document, and have instituted processes to abide by same.

Name Brett Woudenberg Position Chief Executive Officer Company MIND Education

Signature  Date 07/29/2025

[Brett Woudenberg \(Jul 29, 2025 08:44:54 PDT\)](#)



5281 California Avenue, Suite 300  
Irvine, California 92617  
*MIND Research Institute, Inc. is a nonprofit, social benefit organization that is exempt under section 501(c)(3) of the Internal Revenue Code, EIN 87-2002807.*

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## Privacy Policy

Last Updated: May 8, 2024

A note:

MIND Education, the creator of ST Math, is a nonprofit social benefit organization with a mission to mathematically equip all students to solve the world's most challenging problems. As a nonprofit committed to the betterment of children's education and futures, we take student privacy seriously.

MIND/ST Math does not utilize or share any personally identifiable information in student records for the purposes of targeted advertising or other commercial purposes. The organization is compliant with relevant federal and state legal requirements, including, as a non-limiting example, the federal Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g) ("FERPA"), the Children's Online Privacy Protection Act (15 U.S.C. Secs. 6501 – 6506) ("COPPA"), and the Student Online Personal Protection Act (105 ILCS85) ("SOPPA"). We are also a signatory of the Student Privacy Pledge.

We know that our organization's mission comes with the responsibility of ensuring our students' and educators' safety and privacy. We do not take this responsibility lightly, and we will continue to fiercely uphold it. We encourage you to read through our full Privacy Policy below for more information.

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MIND Education ("MIND", "we", "us", "our") has created this privacy policy to demonstrate our commitment to the privacy of our partners / customers, online visitors, and users of our websites, mobile applications, and other software. The following statement explains our information-gathering and dissemination practices for the websites at [mindeducation.org](http://mindeducation.org) and [stmath.com](http://stmath.com), as well as such other websites and mobile applications as may be operated by MIND (the "Site(s)"), including our ST Math® software products that may be accessed by students or teachers via such sites and applications (the "Software"), and the versions of our Software that are licensed by parents or legal guardians for homeschool use. This Privacy Policy is part of and incorporated into the Terms of Use of the Site and the Homeschooling EULA (as defined below). This policy may change periodically, but any changes will be posted on the Site. Please refer to MIND Education Privacy Policy periodically when visiting, browsing, or using any portion of the Site. Your continued use of any portion of the Site after the effective date of any changes to the Privacy Policy constitutes your agreement to the changed terms. IF YOU DO NOT



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AGREE TO FUTURE CHANGES TO THIS PRIVACY POLICY, YOU MUST STOP USING THE SERVICES AFTER THE EFFECTIVE DATE OF SUCH CHANGES.

## Who are the Users of the Sites?

Certain of our Sites host our ST Math® instructional Software, which has been developed for use by students from pre-kindergarten through high school (“Student(s)”), for the improvement of math-related skills and achievement. Students are provided access to our Software and Sites through their schools and school districts (collectively, “Local Educational Agencies” or “LEAs”), who utilize these services to assess their Students’ progress and supplement their mathematics curriculum. Homeschooled Students may also access versions of our Software that are licensed by their parent or legal guardian for homeschool use, per the terms of our end user license agreement for such Software (“Homeschooling EULA”). “Users” of our Sites include these Students; authorized representatives of the LEAs, including the Students’ teachers (“LEA Representative(s)"); parents / legal guardians of the Students (“Parent(s)"); and other visitors to our websites and mobile applications (“Visitor(s)”).

## What Student information does MIND Education receive via LEAs?

We are engaged by LEAs to provide the services described herein to them and to their Student Users. To utilize the Software, LEA devices are activated, and students obtain user names and passwords in order to utilize the software. We receive one or more of the following types of information regarding each Student User either directly from their LEA, or through the Student’s use of the Software via their school / LEA (“Student Records”): the Student’s legal name; name of the Student’s teacher; name of the course in which the Software is used, if applicable; the Student’s grade in school; the school and school district; the Student’s user name and password (in text or and/or pictorial form); date-of-birth; the Student’s identifier assigned by the LEA. Student Records may also include additional Student information owned, controlled by the LEA and provided to us in connection with research studies that we conduct at the applicable LEA’s discretion, including the Student’s ethnicity; free/reduced lunch status; English-learner status; special-needs status; test scores / performance, separate from the Software. To the extent that we receive any of the foregoing as Student Records provided by or on behalf of an LEA, such Student Records shall remain owned and controlled by the LEA. We will not use or share any



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personal or sensitive information contained in Student Records for commercial purposes unrelated to the operation of the Sites or the services provided to the applicable LEA, Students, parents, or teachers, or for any other purposes other than those expressly described herein, the Terms of Use, or the Homeschooling EULA. We do not knowingly collect any personally identifying information regarding the Parents or other family members through the LEAs, except to the extent that such family members are themselves Students whose Student Records are provided via a LEA hereunder; for the avoidance of doubt, we may collect personally identifying information that is voluntarily provided by Visitors to our Sites, as described elsewhere under this Privacy Policy.

## **What Student information does MIND Education collect itself from the Sites and Software?**

We may collect or generate certain information automatically from the Student's use of the Sites, including login and logout timestamps. We may also collect and generate additional information about students through their use of the Software ("Student Performance Data"), including measurements / assessments of Student's progress against the ST Math® curriculum (for example, Learning Objectives encountered, passes, fails) as well as applicable educational standards; ST Math® quiz scores; and information derived and reports generated from the foregoing information and the Students' use of the Software, for utilization by the Students, their parents / legal guardians, teachers, and the LEAs.

## **How does MIND Education use Student Records?**

We may use Student Records for the following purposes:

- To monitor and generate Student Performance Data, and provide students, parents, and/or the students' teachers or LEAs, with Student Performance Data;
- To operate our software and Sites, including personalizing / customizing content for the applicable Students, reviewing / analyzing Site performance; authenticating Students; maintaining the Sites; and protecting the security or integrity of the Sites.

We may also use aggregated or de-identified information about Students, from which we have removed personally identifying information, for educational research, analysis, and similar purposes.



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For the avoidance of doubt, we will not utilize any personally identifiable information in Student Records for the purposes of targeted advertising. We do not utilize Student Records for any purposes other than those set forth in this Privacy Policy, the Terms of Use, or, if applicable, the Homeschooling EULA.

## **What Other Personal Information does MIND Education collect from its Users?**

Additional information gathered by the MIND Education via the Sites falls into the following categories: (1) information voluntarily supplied by Visitors through optional online forms completed by such Visitors of our Sites when requesting additional information about MIND Education or its products or services, or through Communications (as defined below) with MIND Education; (2) information automatically obtained from the use of User names and password to access the restricted portion(s) of the Sites (the "Restricted Pages") to do things such as view online demonstrations or presentations about MIND Education or its products or services, including, by way of example, pages visited and time stamps; and (3) tracking information gathered as Visitors navigate through our websites or mobile applications.

MIND Education may provide Users with opportunities to contact us via e-mail, conventional mail, or other methods, with questions or comments you may have about our Site, products and services, personnel, employment opportunities, or any other matter of interest to you ("Communications"). These Communications may also include e-mail attachments or any materials that you would like to send us. Any Communications and materials attached thereto that you provide to MIND Education will be treated as non-confidential and non-proprietary. Please see our Terms of Use for additional information regarding how such Communications are treated.

In visiting or using our Site and in transmitting Communications with us, we may request and collect the following types of personally identifiable information from Visitors including: legal name; business name (if applicable); e-mail address; or user name and password). MIND Education may also ask for additional personal information from Visitors at various times such as when we run a promotion or contest or conduct a survey, as described in such promotion or contest or elsewhere on the Site. The personally identifying information we collect from Visitors helps us offer Visitors more personalized features, respond to Visitor requests, provide you with information that is of most interest to you, improve our products and services,



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and, to the extent that you consent to such communications, send you promotions and events offered by MIND Education.

## **Does MIND Education track my IP address?**

When you visit the Site, our servers automatically collect information about your Internet address (which is a number that lets computers attached to the Internet know where to send you data). Your Internet address does not identify you personally. We log your Internet address to deliver our web pages to you upon request, help diagnose problems with our servers, administer our Site in order to constantly improve its quality and the services we offer you, and identify and authenticate you and your licensed content and preferences as you navigate the Site. We may also use your Internet address to gather broad demographic information. We may also track and analyze non-identifying and aggregate usage and volume statistical information from our Visitors and other Users and provide such information to third parties.

## **How does MIND Education use information collected from me?**

The MIND Education researches our customers' and Visitors' demographics based upon information provided by them or, their LEAs (if applicable), gathered from their Communications or password, or contained in our server log files or surveys. We do this to better understand and serve our customers and other Visitors. This research is compiled and analyzed on an aggregated basis.

## **How does MIND Education share information?**

MIND Education does not provide, sell, trade, or rent personally identifiable information. We may disclose or share personally identifying information as follows:

### **To our service providers.**

We may share personally identifying information collected through the Site or otherwise in our possession with companies and organizations that perform services on our behalf, for example, companies that provide data management or other support services to us (such as data storage and Web hosting services), subject to confidentiality and security obligations.

### **For compliance with law.**



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We may disclose personally identifying information to comply with applicable law, including requests from a governmental agency, court of law, regulation, or civil service process. MIND Education also reserves the right to use or disclose any information as needed to fulfill your requests or to cooperate in any law enforcement investigation or an investigation on a matter of public safety, or the safety of our users or customers; to enforce the Terms of Use, Homeschooling EULA, or this Privacy Policy; to protect the integrity of the Sites and our services; to protect our rights or those of our Users, customers, contractors, or licensors; to investigate, prevent, or take action regarding illegal activities, fraud; to take precautions against liability; to provide evidence in litigation or dispute; or to respond to an emergency.

#### **To parents/legal guardians.**

We may provide Student Records or Student Performance Data to the Students' Parents / legal guardians.

#### **To teachers / LEAs.**

We may provide Student Records and corresponding Student Performance Data to the teachers or other authorized LEA representatives for the applicable Students.

#### **In a business transfer.**

We may transfer personal information and other data in our possession in connection with an acquisition by or merger with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding.

### **How do I review, correct, update and / or remove my personal information or my child's personal information?**

MIND Education does not provide, sell, trade, or rent personally identifiable information. We may disclose or share personally identifying information as follows:

#### **Reviewing and updating Student Records.**

Parents, legal guardians, and Students aged 13 and above may review the personally identifying information contained in Student Records and may have us correct any erroneous Student Records. We will terminate use and storage of any personal information contained in Student Records received from the LEA following written notice of termination, unless we have received consent directly from such Student, if aged 13 or above, or the Student's parent or legal guardian otherwise, to store such Student Records. We will terminate use and storage of any personal information contained in Student Records that we have collected for children under 13 following written request from their parent or legal guardian. To exercise these rights, you



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may contact us at [privacy@mindeducation.org](mailto:privacy@mindeducation.org). To review Student Records for Students under the age of 13, you will be required to authenticate yourself as the Student's parent / legal guardian, teacher, or other authorized LEA representative to receive information about that Student. You agree and acknowledge that the Sites or Software, or features of the Sites or Software, may be inaccessible or inoperable upon removal of Student Records..

### **Review and updating other User information.**

Visitors may review, update and/or correct your contact or other personal information at any time by sending an e-mail to us at [privacy@mindeducation.org](mailto:privacy@mindeducation.org) and/or notifying the MIND Education of the changes, as applicable. If you have been prompted to provide information to register an account, you will be provided limited access to your account information to update and/or correct the personal information you have supplied.

## **How does MIND Education protect personal information?**

Our Site has security measures in place to minimize the risk of loss, misuse, and alteration of the information under our control. Your access to the Restricted Pages or other accounts (if you have any) established through MIND Education or the Site is password-protected so that only you have access to that personal information, so keep your password private and secure.

We provide and require training of all of our personnel involved in the handling, usage, or storage of Student Records or other personally identifying information, which training is renewed periodically. This training includes compliance with relevant federal and state legal requirements, including, as a non-limiting example, the federal Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g) ("FERPA"), the Children's Online Privacy Protection Act (15 U.S.C. Secs. 6501 – 6506) ("COPPA"), and the Student Online Personal Protection Act (105 ILCS 85) ("SOPPA"). To protect our information technology environment and the data that we store, we take commercially reasonable security measures, implemented with a multi-tier software architecture, that are consistent with standards generally recognized in the industry. Please be aware, however, that despite our efforts, no security measures are perfect or impenetrable. Due to the open nature of the Internet, we cannot guarantee that any of your information stored on our servers, or transmitted to or from a us or a user, will be 100% free from unauthorized access, and we disclaim any liability for any theft or loss of, unauthorized access or damage to, or interception of any data or communications. By using the Site, you acknowledge that you understand and agree to assume these risks.



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## Whom does this Privacy Policy apply to?

MIND Education requires its employees and agents who access or utilize Student Records or any other personally identifying information of students or of their families to abide by the terms of this Privacy Policy. MIND Education also contractually requires any of its subcontractors or vendors who are accessing or utilizing such data on its behalf to comply with the requirements of this Privacy Policy pertaining to the use and access of such data.

## Where does MIND Education host its services?

MIND Education's infrastructure is hosted within the United States. We design and implement our systems to provide resiliency against server, segment, and geographic failure, through the implementation of a clustered redundant architecture that yields highly available service endpoints, which provide resiliency against server, segment, and geographic failure. We utilize service providers whose systems have been certified for compliance with security standards including ISO 27001. We cannot, however, guaranty that systems will never be subject to a security breach, or will be otherwise error-free. Additional information regarding our system availability and security practices is provided below, and for additional questions, please reach us at [privacy@mindeducation.org](mailto:privacy@mindeducation.org).

## How does MIND Education protect data?

Unauthorized access of User data is a real risk facing the users of today's electronic information services. MIND Education strives to keep informed of these risks, and we work diligently to combat them. One method of protecting User data is to utilize cryptography to prevent data visibility in the event of its unauthorized access. MIND Education leverages cryptography to protect user data in the following two ways:

### **Data in Transit.**

Our services support Transport Layer Security ("TLS") to encrypt User communications (TLS 1.2 or greater and only the strongest ciphers). Data transferred between our Site and its end Users (including credential submission, data uploads, and data downloads) are sent over TLS connections, which protect such data using strong encryption, so that data in transit is kept in a private channel between the intended User and our systems.

### **Data at Rest.**



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User data that contains personally identifying information, when “at-rest” (i.e., when in storage) is encrypted using industry standard AES-256. There are two types of “at rest” storage:

- **Database.** Database server disk storage is “volume” encrypted (i.e., encrypted at the level of the database).
- **User Files.** User files are individually encrypted before being recorded on long-term, secondary storage systems.

## **What does MIND Education do with personally identifiable information after the customer relationship has ended?**

Personally identifiable information received from a LEA is de-identified or deleted in a reasonable period of time after the relationship between MIND Education and the LEA has been terminated. Personally identifiable information that is voluntarily submitted by a Visitor pursuant to this Privacy Policy may be retained by MIND Education for the purposes described for Visitor data herein, provided that such information may be reviewed, updated or corrected as provided under the applicable sections of this Privacy Policy.

## **How does MIND Education respond to breaches?**

If you correspond with us by e-mail, or using the “contact us” feature on the Site, you should be aware that your transmission might not be secure. We will have no liability for disclosure of your information due to errors or unauthorized acts of third parties during or after transmission. If we believe that the security of User information may have been compromised, we will comply with applicable laws and regulations regarding notice of such breaches. Without limiting the foregoing, we will notify any LEA whose data is affected by such a breach, and will provide any reasonable cooperation to the LEA to notify affected parents / legal guardians in the event of an unauthorized disclosure of student records. You consent to our use of your e-mail address as a means of such notification. Please notify us of any unauthorized use of your password or account or any other breach of security of which you are aware.

## **What are "cookies" and how does MIND Education use them?**

“Cookies” are pieces of information that a web site transfers to your computer’s hard drive for record-keeping purposes. Like many sites on the Internet, we use cookies to identify you when you visit the Site. Most web browsers automatically



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accept cookies, but if you prefer, you can set your computer to not accept cookies. If you do this, however, you may not be able to use some of the features or services we offer on our Site.

## **Will MIND Education send me unsolicited communications? How do I opt-out?**

The MIND Education may use the information it collects to respond to requests for information, to notify you about functionality changes to the web site, or to provide industry and company updates. You may update or modify your information or change your privacy preferences (such as whether you wish to receive promotional offers) at any time by emailing us at [privacy@mindeducation.org](mailto:privacy@mindeducation.org). If you wish to have your name removed from any of our mailing or subscription lists, please write to us at our above address or click the “remove subscription” link set forth in the relevant communication (typically provided at the end of such communication). In the event that you contact us with this request, all reasonable efforts will be taken to ensure that you will not receive any further communications from which you have opted-out in the future.

## **What should I know about third party sites?**

The MIND Education Site may contain links to other web sites. The MIND Education is not responsible for the privacy practices or the content of such third party sites. Use of information on third party sites is governed by the privacy policy of the operator of the site you are visiting. That policy may differ from ours. The MIND Education has no control over such third party sites, and the existence of a link from our Site is not meant to imply any endorsement of these other third party web sites.

## **How does MIND Education respond to Do-Not-Track signals?**

In some cases, third parties may be able to collect information about a user's online activities over time and across different websites when he or she uses our Site or services. Some web browsers may transmit “do-not-track” signals to the websites with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. Because there currently is no industry standard concerning what, if anything, websites should do when they receive such signals, we currently do not take action in response to these signals.



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## For our international customers

Because MIND Education is headquartered within the United States, any personally identifiable information (PII) shared with us by international customers for the purpose of creation and ongoing use of ST Math accounts shall be stored on our servers. Our secure servers, hosted by Amazon Web Services (AWS), are located within North America. By partnering with MIND Education and using ST Math, you acknowledge and accept this nature of our business.

## What constitutes my acceptance of this Privacy Policy?

By using the Site provided by the MIND Education, you expressly consent to the use and disclosure of information as described in this Privacy Policy. Your continued use of the Site after the effective date of any modification to the Privacy Policy will be deemed to be your agreement to the changed terms.

## How do I contact MIND Education? What are my information rights?

If you have any questions about this privacy statement, the practices of this Site, your dealings with this Site, or any disclosure of personal information to third parties for direct marketing purposes, you can contact us in the following ways:

MIND Education

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