

Rubicon Privacy Policy

Effective 5/17/2018

Our Commitment to Ethical Data Use

We value your privacy and want to make sure your experience with Rubicon websites, mobile applications, and event registrations are as safe as possible. Therefore, we established this privacy statement to explain what personal information Rubicon collects from you from when you visit our website, why we collect it, and how we use that data.

First of note, we collect and store data to communicate with our customers more effectively, and to optimize the experience of our customers with our website content, products, and services.

Rubicon does not sell your personal data. Rubicon may provide your personal data to third party agents (an onward transfer), who act on our behalf, and enable us to service your account effectively. These agents are required to maintain the same level of privacy protection and compliance as Rubicon. Rubicon will take reasonable steps to ensure these agents handle personal data for limited time and purpose, and act consistently with Rubicon's data privacy commitments and legal obligations. Rubicon may be liable if our agent fails to meet these obligations, and we are responsible for an event that resulted in damages.

By submitting your email address to access content resources on Rubicon.com, you agree to receive communications and content from Rubicon related to your subscription request.

General Data Protection Regulation (GDPR)

Whether you are a small independent school, or a large urban district, you've likely heard of GDPR. The General Data Protection Regulation, known as GDPR, was approved by the European Union in April 2016 and goes into effect on May 25, 2018. To date, it is the most sweeping legislation in the last two decades focused on data security and privacy, and significantly updates and enhances data protection legislation across the EU/EEA.

To read more about GDPR, please click [here](#).

Rubicon is committed to data privacy and welcomes the new regulation. We'll explain more of how we meet the GDPR regulations below.

Cookies and Passive Data Collection

Rubicon uses cookie, IP address, GPS location, URL information and other technical connection details to improve and further develop our products and services, and to provide enhanced or geographically differentiated features, event offerings, and product levels to our customers.

Rubicon uses cookies to save customer screen names, session validators, and on customer's browsers and hard drives, and may use them to provide targeted advertising about product features and services, as well as geographically specific event offerings.

We may also obtain information for statistical purposes. For example, we may count the number of visitors to the different sections of our site to help us make them more useful to visitors in the future. Similar information is gathered for anonymous ftp, remote account log-ins, or for other comparable types of connections.

Examples of personal data Rubicon collects and stores includes:

- Names
- Addresses
- E-mail Addresses
- Phone Numbers
- School/Company Name

Rubicon also collects data when a customer provides us information in optional, voluntary submissions, such as event registration forms, newsletter subscriptions, promotional sign-ups, and other communications sent directly to us.

Additionally, by sending us an electronic mail message, you may be sending us personal information (e.g., name, address, email address). We may store the name and address of the customer in order to respond to the question or request or to otherwise resolve the subject matter of your email.

Regardless of the information being transmitted to Rubicon, we will protect all such information consistent with applicable law. You have the right to access your data, to make changes, or delete your data, and to opt out or unsubscribe from our emails and notifications at any time.

As our systems develop and change, we may amend this Privacy Policy at any time without notice to you. Amendments to this Privacy Policy will be posted to this URL <https://www.rubicon.com/privacy/> and will be effective when posted. Continued use of the Rubicon website following the posting of any amendment, modification, or change shall constitute your acceptance of amendments.

Purposes of Collecting Data

The reason for collecting and storing data is to provide better service to our customers. Data provides insights to us when enhancing product features and functionality; when

creating content for resources and newsletters; for event registrations and themes for professional development events; and other exchanges of information.

How Rubicon uses the information it collects

Rubicon creates newsletters and designs professional development events based on data collected. We also use customer feedback to guide our new product features, and to create new platforms for our suite of products. The personal information you provide to Rubicon will not be sold, rented, loaned or disclosed to any third parties outside of Rubicon.

Rubicon does utilize other third-party companies (i) Salesforce, (ii) Hubspot, (iii), Microsoft, (iv) GoToMeeting, (v) Sage Intacct and discloses customer contact information to them for limited services on its behalf, including but not limited to web analytics, coordination of mailings, accounting, and event management. These third parties are permitted to access only the information they require to perform those services. Rubicon requires these companies to maintain the confidentiality of any personal information and prohibits them from using the information for any other purpose than the purpose for which it was collected.

Change of Ownership

In the event of a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we reserve the right to transfer all of your personal Information, including names, email addresses, and phone numbers, to that entity. We will use reasonable efforts to notify users of such a transfer (by a posting on our homepage, or by email to your email address that you provided to us, as chosen by us in our discretion).

Updating or Removing Information and Unsubscribing

You may, at any time, choose to correct or update the information you have submitted to Rubicon by updating your account on our website or in the product purchased. If you cancel your account, your personal data and other information may be retained in our archive or backup records. Regarding communications sent from Rubicon, you can opt out or unsubscribe from our emails and notifications at any time.

Disclaimer

Rubicon may provide links to Web pages which are not part of the Rubicon Web family, or the Rubicon.com domain. These sites are not under Rubicon control, and Rubicon is not responsible for the information or links you may find there. Rubicon is providing these links only as a convenience. The presence of these links on any Rubicon website is not intended to imply Rubicon endorsement of that site, but to provide a convenient link to relevant sites which are managed by other organizations, companies, or individuals.

Security

Rubicon follows necessary technical and physical procedures to protect information stored in our servers, which are located in the United States at our Portland, Oregon headquarters. Security safeguards may include but are not limited to data encryption, firewalls, access limitations, and physical access controls to buildings. If you have questions about such security, please contact us at the address listed below.

European Union Data Protection

Rubicon complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield, as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Rubicon has certified to the Department of Commerce that it adheres to the Privacy Shield Principles.

Rubicon is committed to subjecting all personal data received from the EU and Switzerland, in reliance on the Privacy Shield Framework, to the Framework's applicable principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List: <https://www.privacyshield.gov/>.

Under certain conditions, an individual may invoke binding arbitration to resolve a complaint that has not been satisfied by other Privacy Shield mechanisms. Please review Annex I: Section C at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction> for details.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Rubicon is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Rubicon may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Contact for Questions

For general questions related to Rubicon products, you can contact our support team at support@rubicon.com. For specific GDPR-related questions as related to Rubicon, and inquiries about the Privacy Policy or the User Agreement, please email dataprivacy@rubicon.com.

This is the privacy policy of Rubicon. Our address is One World Trade Center, 121 SW Salmon, Suite 1200; Portland, OR 97204 USA. You can also reach us at dataprivacy@rubicon.com.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

