EXHIBIT A - Education Law §2-d Bill of Rights for Data Privacy and Security

Parents (including legal guardians or persons in parental relationships) and Eligible Students (students 18 years and older) can expect the following:

1. A student's personally identifiable information (PII) cannot be sold or released for any Commercial or Marketing purpose. PII, as defined by Education Law § 2-d and the Family Educational Rights and Privacy Act ("FERPA"), includes direct identifiers such as a student's name or identification number, parent's name, or address; and indirect identifiers such as a student's date of birth, which when linked to or combined with other information can be used to distinguish or trace a student's identity. Please see FERPA's regulations at 34 CFR 99.3 for a more complete definition.

2. The right to inspect and review the complete contents of the student's education record stored or maintained by an educational agency. This right may not apply to Parents of an Eligible Student.

3. State and federal laws such as Education Law § 2-d; the Commissioner of Education's Regulations at 8 NYCRR Part 121, FERPA at 12 U.S.C. 1232g (34 CFR Part 99); Children's Online Privacy Protection Act ("COPPA") at 15 U.S.C. 6501-6502 (16 CFR Part 312); Protection of Pupil Rights Amendment ("PPRA") at 20 U.S.C. 1232h (34 CFR Part 98); and the Individuals with Disabilities Education Act ("IDEA") at 20 U.S.C. 1400 et seq. (34 CFR Part 300); protect the confidentiality of a student's identifiable information.

4. Safeguards associated with industry standards and best practices including, but not limited to, encryption, firewalls and password protection must be in place when student PII is stored or transferred.

5. A complete list of all student data elements collected by NYSED is available at www.nysed.gov/data-privacy-security/student-data-inventory and by writing to: Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, NY 12234.

6. The right to have complaints about possible breaches and unauthorized disclosures of PII addressed.
    (i) Complaints should be submitted to the EA at: CA BOCES Data Privacy Officer, 1825 Windfall Road, Olean, New York 14760, via email at DPO@caboces.org or by using the form available at the following website: https://caboces.org/resources/new-york-state-education-law-2d/report-an-improper-disclosure/.
    (ii) Complaints may also be submitted to the NYS Education Department at www.nysed.gov/data-privacy-security/report-improper-disclosure, by mail to: Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, NY 12234; by email to privacy@nysed.gov; or by telephone at 518-474-0937.

7. To be notified in accordance with applicable laws and regulations if a breach or unauthorized release of PII occurs.

8. Educational agency workers that handle PII will receive training on applicable state and federal laws, policies, and safeguards associated with industry standards and best practices that protect PII.

9. Educational agency contracts with vendors that receive PII will address statutory and regulatory data privacy and security requirements.

CONTRACTOR	
Signature:	
Printed Name:	
Title:	
Date:	

**BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY -
SUPPLEMENTAL INFORMATION FOR CONTRACTS THAT UTILIZE PERSONALLY IDENTIFIABLE
INFORMATION**

Pursuant to Education Law § 2-d and Section 121.3 of the Commissioner's Regulations, the Educational Agency (EA) is required to post information to its website about its contracts with third-party contractors that will receive Personally Identifiable Information (PII).

Name of Contractor	
Description of the purpose(s) for which Contractor will receive/access PII	
Type of PII that Contractor will receive/access	Check all that apply: ☐ Student PII ☐ APPR Data
Contract Term	Contract Start Date _____ Contract End Date _____
Subcontractor Written Agreement Requirement	Contractor will not utilize subcontractors without a written contract that requires the subcontractors to adhere to, at a minimum, materially similar data protection obligations imposed on the contractor by state and federal laws and regulations, and the Contract. (check applicable option) ☐ Contractor will not utilize subcontractors. ☐ Contractor will utilize subcontractors.
Data Transition and Secure Destruction	Upon expiration or termination of the Contract, Contractor shall: • Securely transfer data to EA, or a successor contractor at the EA's option and written discretion, in a format agreed to by the parties. • Securely delete and destroy data.
Challenges to Data Accuracy	Parents, teachers or principals who seek to challenge the accuracy of PII will do so by contacting the EA. If a correction to data is deemed necessary, the EA will notify Contractor. Contractor agrees to facilitate such corrections within 21 days of receiving the EA's written request.

Secure Storage and Data Security	Please describe where PII will be stored and the protections taken to ensure PII will be protected: (check all that apply) ☐ Using a cloud or infrastructure owned and hosted by a third party. ☐ Using Contractor owned and hosted solution ☐ Other: Please describe how data security and privacy risks will be mitigated in a manner that does not compromise the security of the data:
Encryption	Data will be encrypted while in motion and at rest.

CONTRACTOR	
Signature:	
Printed Name:	
Title:	
Date:	

EXHIBIT C - CONTRACTOR'S DATA PRIVACY AND SECURITY PLAN

CONTRACTOR'S DATA PRIVACY AND SECURITY PLAN

The Educational Agency (EA) is required to ensure that all contracts with a third-party contractor include a Data Security and Privacy Plan, pursuant to Education Law § 2-d and Section 121.6 of the Commissioner's Regulations. For every contract, the Contractor must complete the following or provide a plan that materially addresses its requirements, including alignment with the NIST Cybersecurity Framework, which is the standard for educational agency data privacy and security policies in New York state. **While this plan is not required to be posted to the EA's website, contractors should nevertheless ensure that they do not include information that could compromise the security of their data and data systems.**

1	Outline how you will implement applicable data security and privacy contract requirements over the life of the Contract.	
2	Specify the administrative, operational and technical safeguards and practices that you have in place to protect PII.	
3	Address the training received by your employees and any subcontractors engaged in the provision of services under the Contract on the federal and state laws that govern the confidentiality of PII.	
4	Outline contracting processes that ensure that your employees and any subcontractors are bound by written agreement to the requirements of the Contract, at a minimum.	
5	Specify how you will manage any data security and privacy incidents that implicate PII and describe any specific plans you have in place to identify breaches and/or unauthorized disclosures, and to meet your obligations to report incidents to the EA.	
6	Describe how data will be transitioned to the EA when no longer needed by you to meet your contractual obligations, if applicable.	
7	Describe your secure destruction practices and how certification will be provided to the EA.	
8	Outline how your data security and privacy program/practices align with the EA's applicable policies.	Click here to see more
9	Outline how your data security and privacy program/practices materially align with the NIST CSF v1.1 using the Framework chart below.	PLEASE USE TEMPLATE BELOW.

EXHIBIT C.1 – NIST CSF TABLE

The table below will aid the review of a Contractor's Data Privacy and Security Plan. Contractors should complete the Contractor Response sections in the table below to describe how their policies and practices align with each category in the Data Privacy and Security Plan template. To complete these 23 sections, a Contractor may: (i) Demonstrate alignment using the National Cybersecurity Review (NCSR) Maturity Scale of 1-7 ; (ii) Use a narrative to explain alignment (may reference its applicable policies); and/or (iii) Explain why a certain category may not apply to the transaction contemplated. Further informational references for each category can be found on the NIST website at https://www.nist.gov/cyberframework/new-framework. Please use additional

Function	Category	Contractor Response
IDENTIFY (ID)	**Asset Management (ID.AM):** The data, personnel, devices, systems, and facilities that enable the organization to achieve business purposes are identified and managed consistent with their relative importance to organizational objectives and the organization's risk strategy.	
	Business Environment (ID.BE): The organization's mission, objectives, stakeholders, and activities are understood and prioritized; this information is used to inform cybersecurity roles, responsibilities, and risk management decisions.	
	Governance (ID.GV): The policies, procedures, and processes to manage and monitor the organization's regulatory, legal, risk, environmental, and operational requirements are understood and inform the management of cybersecurity risk.	
	Risk Assessment (ID.RA): The organization understands the cybersecurity risk to organizational operations (including mission, functions, image, or reputation), organizational assets, and individuals.	
	Risk Management Strategy (ID.RM): The organization's priorities, constraints, risk tolerances, and assumptions are established and used to support operational risk decisions.	
	Supply Chain Risk Management (ID.SC): The organization's priorities, constraints, risk tolerances, and assumptions are established and used to support risk decisions associated with managing supply chain risk. The organization has established and implemented the processes to identify, assess and manage supply chain risks.	
PROTECT (PR)	**Identity Management, Authentication and Access Control (PR.AC):** Access to physical and logical assets and associated facilities is limited to authorized users, processes, and devices, and is managed consistent with the assessed risk of unauthorized access to authorized activities and transactions.	

Function	Category	Contractor Response
	Awareness and Training (PR.AT): The organization's personnel and partners are provided cybersecurity awareness education and are trained to perform their cybersecurity-related duties and responsibilities consistent with related policies, procedures, and agreements.	
	Data Security (PR.DS): Information and records (data) are managed consistent with the organization's risk strategy to protect the confidentiality, integrity, and availability of information.	
	Information Protection Processes and Procedures (PR.IP): Security policies (that address purpose, scope, roles, responsibilities, management commitment, and coordination among organizational entities), processes, and procedures are maintained and used to manage protection of information systems and assets.	
	Maintenance (PR.MA): Maintenance and repairs of industrial control and information system components are performed consistent with policies and procedures.	
	Protective Technology (PR.PT): Technical security solutions are managed to ensure the security and resilience of systems and assets, consistent with related policies, procedures, and agreements.	
DETECT (DE)	**Anomalies and Events (DE.AE):** Anomalous activity is detected and the potential impact of events is understood.	
	Security Continuous Monitoring (DE.CM): The information system and assets are monitored to identify cybersecurity events and verify the effectiveness of protective measures.	
	Detection Processes (DE.DP): Detection processes and procedures are maintained and tested to ensure awareness of anomalous events.	
RESPOND (RS)	**Response Planning (RS.RP):** Response processes and procedures are executed and maintained, to ensure response to detected cybersecurity incidents.	
	Communications (RS.CO): Response activities are coordinated with internal and external stakeholders (e.g. external support from law enforcement agencies).	
	Analysis (RS.AN): Analysis is conducted to ensure effective response and support recovery activities.	
	Mitigation (RS.MI): Activities are performed to prevent expansion of an event, mitigate its effects, and resolve the incident.	

Function	Category	Contractor Response
	Improvements (RS.IM): Organizational response activities are improved by incorporating lessons learned from current and previous detection/response activities.	
RECOVER (RC)	**Recovery Planning (RC.RP):** Recovery processes and procedures are executed and maintained to ensure restoration of systems or assets affected by cybersecurity incidents.	
	Improvements (RC.IM): Recovery planning and processes are improved by incorporating lessons learned into future activities.	
	Communications (RC.CO): Restoration activities are coordinated with internal and external parties (e.g. coordinating centers, Internet Service Providers, owners of attacking systems, victims, other CSIRTs, and vendors).	

Privacy Policy

19 May 2023

At 3P Learning, we value your privacy and understand the importance of keeping your personal information secure.   We have this Privacy Policy to help you understand how we collect, store, use and remove the information that you provide us.

About 3P Learning Ltd's Privacy Policy

This webpage explains our privacy and security commitments in plain language.

- 3P Learning is a global provider of e-learning resources. We produce and/or distribute a range of online resources and a network of websites including but not limited to those for the <u>Mathletics</u>, <u>Spellodrome</u>, <u>Reading Eggs</u>, <u>Mathseeds</u>, <u>Wordflyers</u>, <u>Writing Legends</u>, <u>Storyathon,</u> <u>Teachers Workshop Series</u> and Brightpath Progress (collectively, the '**Site**'), and World Maths Day/ World Education Games branded resources and products.

- Each product or resource, together with challenge websites for national and regional events which may use or integrate with the Site, is owned and operated by the 3P Learning group of companies (including 3P Learning Limited, Blake eLearning and their related entities and subsidiaries) (collectively, '**3P Learning**' or '**us**' or '**we**').

- References to the Site in this Privacy Policy include all products and resources that we produce and /or distribute.

- 3P Learning is committed to protecting the safety and security of our registered users, including students, teachers, school administrators and parents (collectively, **Registrants**) and we are sensitive to our Registrant's concerns about the safety of the personal information provided to us. Please read this Privacy Policy carefully in order to understand how any personal information collected by us is used.

- As a global company, our Privacy Policy has been developed in accordance with a range of legislation which applies to us. In addition, we have developed our privacy framework to assist our customers that are schools, districts and education bodies to comply with privacy legislation and regulations applicable to them and the way they manage personal information.

- Collectively, this legislation includes, but is not limited to:

  - The Australian Privacy Act 1988
  - The New Zealand Privacy Act 1993
  - The United Kingdom Data Protection Act 2018 (<u>View 3P Learning's ICO Registration Certificate</u>)
  - The United States Children's Online Privacy Protection Act ("COPPA") and Rule as administered by the Federal Trade Commission
  - The United States Family Educational Rights and Privacy Act ("FERPA")
  - The Alberta Freedom of Information and Protection of Privacy Act
  - The Canadian Personal Information Protection and Electronic Documents Act ("PIPEDA")
  - The Freedom of Information and Protection of Privacy Act (British Columbia) ("FIPPA")

- o The Personal Information International Disclosure Protection Act (Nova Scotia) ("PIIDPA")
- o The Municipal Freedom of Information and Protection of Privacy Act, Ontario ("MFIPPA")
- o The Student Online Personal Information Protection Act, California ("SOPIPA")
- o The EU General Data Protection Regulation (Regulation 2016/679)("GDPR")
- o The UK General Data Protection Regulation ("UK GDPR")
- o The South African Protection of Personal Information Act ('POPI Act').

What personal information we collect

- We collect personal information to provide Registrants our learning products, services and related information. The kinds of personal information we collect depends on how you interact with us.

- We collect the following categories of personal information:
  - o As a customer, prospective customer, or user of our Site, we may collect information such as your name, contact information including phone number and email address, school name, class year and country or state of residence or school.

  - o We may also collect details of other interactions that you have with us, together with any other information that you choose to provide us with, for example, through your interactions with our customer and technical support teams.

  - o We do not however collect any unnecessary personal information from Registrants (for instance, information about religious beliefs).

  - o It is impractical in most circumstances for you to remain anonymous, and we may not be able to interact with you, provide access to the Site, or answer your enquiry if we are not able to identify you or collect your personal information.

  - o In the case of school/educational institution customers (**School Customer**), we seek consent from the School Customer to be provided with Registrant information for and on behalf of that student or teacher.

  - o In the case of individual / home subscriptions (**Home Customers**) we seek consent from the Home Customer at the time of purchasing and registering the product to use the information collected. Subscriptions on behalf of a student who is a minor must be completed by the student's parent or legal guardian.

- Registrants who do not give this consent (or do not have this consent provided on their behalf) cannot provide us with their personal information and cannot use the Site. You can however withdraw your consent at any time.

How we collect and process your Personal Information

- We may collect your personal information in a number of ways, including:
  - o directly from you (unless it is unreasonable or impracticable to do so);

  - o from our School Customer (e.g. teachers or school administrators that purchase access to our Site for their students and teachers); or

  - o from third parties such as our distributors (resellers or sales agents).

- Students registering individually and not part of a school, must give their consent at the time of registration to provide us with their personal information such as their name, age and email address (or if they are under 13 years of age, or legally a minor in

their relevant location, a parent or guardian must consent on their behalf and provide the student's personal information). Alternatively, parents registering on behalf of their child(ren), must give their consent at the time of registration to provide us with information about them and their child(ren).

- Teachers or administrators registering for their class or school must give their consent at the time of registration to provide us with their own name, class name, school name and their email address, as well as the names of their students.

- We also ask for Registrants' consent to use any personal information collected in accordance with this Privacy Policy at the time of login to our Site. If a Registrant does not wish to provide us with their consent, they cannot agree to the Site Terms and Conditions and must not use the Site.

What we will do with your information

- The information collected from Registrants, customers or prospective customers may be used for the following purposes:

  o to provide access to our products and services;

  o to manage prospective purchases, purchased subscriptions and payments including to provide quotes or offers ;

  o to send a confirmation notice to the Registrant of the registration; to administer and manage accounts, including password resetting, responding to questions raised by Registrants, to contact the Registrant about any problems with the Registrant's account or conduct on the Site;

  o to receive updates about our products and services;

  o to send out a 3P Learning newsletter or emails about the Site including information about current events, changes, improvements, upgrades, new product development and rules of the Site;

  o to publish the names of winners and high performers on the Site or in the 3P Learning newsletter and to provide results data for each Registrant or school class;

  o to send prizes or certificates for participation and performance on the Site;

  o for administrative, planning, product or service development, staff training, quality control and research purposes relating to our products and services;

  o for marketing purposes, but only where we have express or implied consent to contact someone or we are otherwise permitted by law to do so. Registrants may also opt out at any time by following the specific opt out instructions within the communications that we send.

- Hall of Fame leaderboards: 3P Learning strives to provide a highly engaging Site for students. Given students have indicated their strong preference for their name to be shown publicly on our Sites in recognition of their achievements, we allow this – but we do not allow full names (i.e. First Name and Surname) to be shown publicly. In addition, all administrative user access to any Site permits the partial (to initials only) or full anonymising (by use of a pseudonym) of names, where preferred by the user. If you have any questions about the Hall of Fame and managing the information that is disclosed, please contact us.

- The Site does not provide students with any means to communicate directly with each other. There are no chat rooms connected with the learning resources. Access to, and use of customer feedback forums, such as 3P Learning Uservoice, is designed for use by parents, teachers and other contributors who are not legally minors.

- The Site may have additional features in which parents and teachers can give their consent, and/or give consent on behalf of a student, to access, disclose or use their personal information or learning activity information.

What we will not do with your personal information

- 3P Learning will keep your personal information confidential and not sell or disclose your information to advertisers or any external third parties, unless:

  o we believe, in good faith, that we are required to share your information with a third party such as a regulator or court in order to comply with law, regulation, legal process, court order or subpoena;

  o to enforce our Terms & Conditions or the terms of the licence granted to access and use the Site;

  o the disclosure is to a third party that acts on our behalf, powers certain aspects of our Sites or processes data on our behalf, such as a distributor of our products and services, the licensor or owner of a product or resource that we distribute, or to a contracted service provider;

  o in connection with any transaction involving our companies or assets, where another party acquires ownership or operation of the Site, in which case that successor organization will be subject to the obligations in this Privacy Policy and any contractual representations we have entered into; or

  o to protect the safety and security of our Registrants and our Site.

- If third parties act on our behalf, we require them to hold, use and disclose your personal information in accordance with this Privacy Policy, applicable privacy obligations and our contractual obligations.

- Generally we will only use your information within 3P Learning, however, sometimes we provide data on results to government education departments, peak bodies managing or representing schools, or schools themselves, especially in the case of School Customers, who use the features of our products (such as performance reporting tools) for educational / teaching purposes. We will require these third parties to comply strictly with our instructions, use the information only for legitimate educational interests and not for any commercial purposes.

- We do not sell data to advertisers (whether personal, anonymous or aggregated). We do not use data to engage in targeted advertising to children and we do not create or build personal profiles of students other than for the purpose of supporting authorized educational/school purposes or as otherwise specifically authorized by a parent/student or school/educational institution customer.

- We do not use cookies or third party providers to engage in behavioural targeting of advertisements to students. For more information refer to our Cookies & Third Party Technologies Policy.

How long we hold your information

- We retain the personal information that we collect from and about our Registrants for as long as it is needed to provide access to the Site or to manage that Registrant's account.

- We take reasonable steps to delete the personal information we collect if your registration to use our Site lapses and you (or if you are under 13 or legally a minor in your relevant location, a parent or guardian may request on your behalf) opt out of receiving further communications from us, or if you ask us to delete your information. We may however retain and use personal information as necessary to comply with our legal and regulatory obligations, to resolve disputes and to enforce our agreements, and we may retain and use anonymous and aggregated information for performance reporting, benchmarking and analytic purposes and for product and service improvement.

- Registrants can request that their personal information be deleted by contacting the 3P Learning Data Protection and Privacy Officers as set out below:
  For Reading Eggs/Mathseeds products: dpo@3plearning.com
  For other products: privacy@3plearning.com

Updating and accessing your personal information

- Registrants have a right to request a copy of the personal information we hold about them, and Registrants can also update their personal information at any time, in each case by contacting 3P Learning.

- If you wish to receive a copy of this information or to update or correct information held about you, please address your request to the Privacy and Data Protection Officers. We will endeavour to deal with your request promptly.

Keeping your personal information secure

- 3P Learning is committed to information security. We will use all reasonable endeavours to keep the personal information we collect and use in a secure environment, and we have implemented appropriate technical, administrative and physical security measures that are designed to protect personal information from unauthorised access, disclosure, use and modification. These measures include the encryption of personal information and the implementation of organisational measures, such as our incident response plan. As part of our privacy compliance processes we review these security procedures to consider appropriate new technology and methods and engage independent third parties to review and audit aspects of our information security.

- We use Microsoft Azure and Amazon Web Services (AWS) for data hosting and storage as set out in the table below. Both providers are recognised for their leading approaches to data security.

	Where data is hosted:		(Back up)
Reading Eggs, Mathseeds, Wordflyers	AWS	US	(Australia)
Mathletics, Spellodrome	Microsoft Azure	US	(West Europe)

Writing Legends, Storyathon	Microsoft Azure	Australia	(West Europe)
Brightpath Progress	AWS	Australia	(Australia (Vic))

- Further information regarding Microsoft Azure privacy and security practices, including the latest updates and compliance information, at news.microsoft.com/security2015 and www.microsoft.com/en-us/trustcenter/security/azure-security.
- Further information regarding Amazon Web Services privacy and security practices, including the latest updates and compliance information, can be found at aws.amazon.com/compliance/data-privacy-faq and aws.amazon.com/security

- We provide our personnel with training about data security and privacy, and we require all our employees and contractors to comply with this Privacy Policy and their obligations of confidentiality. We will take appropriate actions to address breaches by employees and contractors of the obligations imposed by this Privacy Policy.

Data transfers, storage and processing globally

- Registrants' personal information is uploaded to and stored on servers that are maintained by third party providers, Microsoft Azure and Amazon Web Services, at locations in the United States, Europe and Australia. For further information about where personal information is hosted please see our Data Privacy and Security FAQs.

- As we operate globally, we may on occasion allow your personal information to be accessed in countries other than your own location. We may do this where data is accessed:
    o by companies within the 3P Group (i.e. 3P Learning Limited, Blake eLearning and their related entities and subsidiaries) for operational, administrative and compliance purposes;

    o by our sales, operational or global customer support teams (primarily, although not exclusively, located in Australia, the United Kingdom, the USA and Canada); or

    o by one of our licensors (who owns, develops and hosts a particular product) or distributors (sales agents or resellers) who requires the information to set up, service or manage a customer account;

    o where a copy is sent to the Registrant itself at their request.

- By consenting to the collection and use of their personal information, Registrants' consent to their personal information being transferred and stored in this manner.

- Registrants in Canada, please refer to 'Special information for users across Canada'.

- Registrants in the EU and UK, please refer to 'Special information for users in the European Union and the United Kingdom'.

- We may record, with your express consent, calls with customers for quality and staff training purposes. If, with your consent, we record a telephone call for this purpose, that recording will be stored in data centres located in US and deleted when no longer required.

Anonymous or aggregated information

- In addition to personal information and results data, 3P Learning also collects anonymous information about Registrants and the activities of Registrants on the Site. Anonymous information is information that is not linked to the name or identity of a user. This information is used for educational performance reporting and analytics and to assist us in enhancing the learning resources. The information remains anonymous at all times.

- 3P Learning utilises third-party providers to power certain elements of the Company's online marketing and advertising. These service providers collect data about your activities that does not personally or directly identify you when you visit our website or the websites and online services where we display advertisements (i.e. publishers). This information may include the content you view, the date and time that you view this content, the products you purchase, or your location information associated with your IP address. We use the information we and these third party service providers collect to serve you more relevant advertisements regarding 3P Learning resources (referred to as "retargeting"). We collect information about where you saw the ads and what ads you clicked on. This is data that does not personally or directly identify you. We do not engage in this type of marketing or advertising to students or children.

- When agreeing to the Term and Conditions, Registrants grant us the right to use this anonymous information for our own purposes, such as the preparation of statistical reports or to improve and change the content of our products.

- You can find more information on cookies in our 'Cookies & Third Party Technologies Policy'.

Revision of Privacy Policy

3P Learning reserves the right to change, modify, or revise this Privacy Policy in order to comply with any applicable laws, to reflect changes in our processes or for any other reason at any time. Material changes in our Privacy Policy will be communicated to Registered Users and customers, but we also encourage our Registrants to check the Privacy Policy periodically to read about any changes, modifications, or revisions. Registrants may wish to check it each time they submit personal information. You will be deemed to have consented to such variation by your continued use of the Site following any changes being made.

Contact Us

All requests to access, update and delete personal information as well as questions and concerns about your personal information and this Privacy Policy should be directed as follows:

For Reading Eggs/Mathseeds products: dpo@3plearning.com
For all other products: privacy@3plearning.com

If you have a question or a complaint you can also write to us at:

Privacy Officer 3P Learning,
655 Parramatta Road,
Leichhardt, NSW, Australia 2040

We will endeavour to respond to your query as quickly as possible.

If you are not satisfied with the response you receive, you may have the right to contact the regulator responsible for privacy in your home country.

To contact us by phone, please find the contact numbers to our customer support office on the last page of this policy.

Special information for users across Canada

- 3P Learning is committed to providing access to our resources through an environment that is compliant with all national and provincial privacy requirements applicable to us, and those requirements that apply to our School Customers across Canada.

- This Privacy Policy has been developed with the standards required to be compliant with the Alberta Freedom of Information and Protection of Privacy Act, the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA), the Personal Information International Disclosure Protection Act (Nova Scotia) ("PIIDPA"), the Freedom of Information and Protection of Privacy Act (British Columbia) ("FIPPA") and the Municipal Freedom of Information and Protection of Privacy Act, Ontario ("MFIPPA").

  Information that is located outside Canada will be subject to legal requirements in those foreign countries and may be subject to access requests from foreign governments, courts, law enforcement officials and national security authorities, according to the laws applicable to us and our service providers.

  ### *For School Customers – Mathletics*

  Our customer service team in Canada administers student data for Mathletics for Canadian school customers. Accordingly, student names remain in Canada for this service. The data pertaining to a student's activity within the platform (non-personally identifiable data) is stored in the East US 2 region of Microsoft Azure, and backed up in West Europe. Access to data is restricted to users with approved access to 3P applications. The School may approve teachers, administration and IT personnel to access information (including student information) held in the school account.

  Schools may request that their users in a class are identified by pseudonyms rather than names to access our products and resources.

  Please contact our Privacy Officer if you require additional information at:
  Privacy Officer, 3P Learning, 655 Parramatta Road, Leichhardt, NSW 2040 Australia, or privacy@3plearning.com.

  If you have any further questions or would like to contact us by telephone regarding the above: please visit our Contact Us page for details.

Special Information for users in the European Union and the United Kingdom

- 3P Learning welcomes the EU GDPR and UK GDPR as essential regulations to affirm our commitment to data protection across the European Union and the United Kingdom. We are committed to ensuring:
  - Personal data is processed fairly, lawfully and in a transparent manner
  - Personal data is collected and processed only for specified and lawful purposes
  - Processed data is adequate, relevant and not excessive
  - Processed data is accurate and, where necessary, kept up to date
  - Personal data is not kept longer than necessary
  - Personal data is processed in accordance with an individual's rights
  - Personal data is kept secure
  - Personal data is not transferred to countries outside of the EU or the UK without adequate protection

  The information below should be read in addition to our Privacy Policy, and outlines specific information relevant to certain aspects of our GDPR compliance.

- 3P Learning UK Ltd is registered with the Independent Commissioners Office (ICO), registration reference no: **Z2188515.** A copy of this certificate can be downloaded here. 3P Learning UK Ltd is a company registered in England and Wales with company registration no. 05919214 and is a trading company within the 3P Learning Group.

- Lawfulness of processing: 3P Learning collects personal information in a number of contexts and for a number of purposes. Please refer to the "What personal information we collect", "What we will do with your information" and "How we collect and process your information" sections of the Privacy Policy. Our processing activities are based either on consent or legitimate interests pursued by 3P Learning and our school and district customers in delivering learning resources for use by schools, teachers, parents and students which are designed to improve learning outcomes and inspire a love of learning.

- Is personal information transferred outside of the European Union or the United Kingdom?

  Yes, personal information in relation to Registered Users and customers located in the EU or the UK may be transferred outside of the EU or UK in 2 main situations:

  - User data may be uploaded to and stored on our servers located in the USA or Australia. For further information about where personal information is hosted please see our Data Privacy and Security FAQs
  - Additional information about Microsoft's compliance with the EU GDPR is available here.
  - Additional information about Amazon Web Services' compliance with the EU GDPR is available here.
  - In most instances, personal data about our EU and UK based customers is collected, accessed and managed by our sales, operational and customer support teams in the United Kingdom. Very occasionally however, such information may be shared with our employees in one of our offices outside of the UK e.g. to respond to an urgent customer support query outside of normal hours or for internal reporting processes. Our main offices outside of the EU

and UK are located in Calgary, Canada and Sydney, Australia.
To ensure appropriate safeguards exist in relation to such transfers, 3P Learning has implemented <u>standard contractual clauses</u> to cover the transfer of data relevant to EU and UK registrants to other companies within the 3P Group that are not located in the EU.

- o We stay up to date with regulatory developments in the EU and the UK to ensure that appropriate and compliant safeguards are in place for the transfer of any personal information outside of the EU or UK.

- Additionally, please refer to information about our Hall of Fame.
- For further information, please contact the 3P Learning Data Protection and Privacy Officers, whose details are as below:
For Reading Eggs/Mathseeds products: <u>dpo@3plearning.com</u>
For other products: <u>privacy@3plearning.com</u>

If you have any further questions or would like to contact us by telephone regarding the above: please visit our <u>Contact Us</u> page for details.

More privacy information

- For more information on privacy legislation and guidelines in your local jurisdiction please contact your relevant local authorities.
  - o Australia: <u>privacy.gov.au</u>
  - o Canada: <u>priv.gc.ca/en</u>
  - o European Union: <u>gdpr.eu</u>
  - o India: <u>meity.gov.in/</u>
  - o New Zealand: <u>privacy.org.nz</u>
  - o Singapore: <u>pdpc.gov.sg</u>
  - o United Kingdom: <u>ico.org.uk</u>
  - o USA: <u>ftc.gov</u>
  - o South Africa: <u>popia.co.za</u>

Cookies & Third Party Technology Policy
1 June 2023

This section explains how 3P Learning Limited and its group entities (**3P Learning** or **we**) use cookies and third party technologies on our websites (**Websites**) and in online products and services that we own, operate and/or distribute, including Mathletics, Mathseeds, Reading Eggs, Word Flyers, Writing Legends, Storyathon, Teachers Workshop Series and Brightpath Progress (**Services**). It explains what these technologies are and why we use them, and how to contact us with any questions concerning our use of cookies or third party technologies.

What are cookies?

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies perform various tasks, including remembering your preferences, and are an important part of improving your experience of our Websites and Services.
There are three main types of cookies:

- **Session cookies:** specific to a particular visit and limited to sending session identifiers (random numbers generated by the server) so you don't have to re-enter information when you navigate to a new page or check out. Session cookies are not permanently stored on your device and are deleted when the browser closes;

- **Persistent cookies:** record information about your preferences and are stored in your browser cache or mobile device; and

- **Third party cookies:** placed by someone other than us which may gather data across multiple websites or sessions.

We use cookies and third party technologies for several reasons, including:

- for technical reasons in order for our Websites and Services to operate;

- to store user preferences and other information to save you time, or tell the web server that you have returned to a specific page;

- to enable functionality and personalisation to provide an improved user experience;

- to track and target the interests of our users (such as parents and/or school teachers and administrators), to help us understand how our Websites are being used or how effective our marketing campaigns are, or to help us customise our Websites for you to deliver customized content and promotions to customers or users whose behaviour indicates that they are interested in a particular subject area;

- third party cookies through our Websites and Services for advertising, analytics and other purposes. This is described in more detail below.

We **do not** use cookies or third party providers to engage in behavioural targeting of advertisements to students.

What cookies do we use?

We use the following cookies:

- **Essential website cookies.** These are cookies that are required for the operation of our Website, Services and the use of their features. The information collected relates to the operation of our Website and Services (e.g. website scripting language and security tokens) and enables us to provide you with the service you have requested. In most cases these are session cookies and are deleted when you close your browser. Some may persist for up to 48 hrs to improve the experience for users that log back into the Services within a short period of logging out.

- **Analytical / performance cookies.** These cookies collect information on how users use our Website, for example which pages you visit most often, whether you receive any error messages and how you arrived at our website. Information collected by these cookies is used to improve your use of our Website and Services. These cookies expire after a period of inactivity.

- **Functionality cookies.** These cookies are used to enhance the functionality of our Websites and Services, to improve your user experience and to make your visits more tailored and enjoyable, by remembering the choices you have made when interacting with our websites and online products. In most cases these cookies are persistent cookies and remain stored, in order to recall your preferences, until you clear your cache.

- **Advertising cookies.** These cookies are used to make advertising messages more relevant to the user of the Website and are based on the user's browser settings. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and in some cases selecting ads that are based on your interests. In most cases these cookies expire within 90 days. We do not use cookies to engage in behavioural targeting of advertisements to students.

Additional information about third party cookies

Some of the third party cookies we use on our Website include:

- Cookies to monitor web traffic and analysis services. We use Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. All the information these cookies collect is aggregated and therefore anonymous. You can find more information about Google Analytics at the following links: Marketing Platform Google and Safeguarding your data.
- Cookies that allow the provision of enhanced functionality and personalisation, such as videos.
- Cookies used for advertising and marketing purposes to promote our Services, including but not limited to Google AdWords, LinkedIn and Facebook.

Other third party technologies

Other third party applications and services may be used to add features to our Website or Services, or to gauge the effectiveness of our website and marketing campaigns. These may include but are not limited to:

- services to allow users to share content on social media platforms
- third-party speech recognition services
- plug ins that help us better understand our site visitors and app users
- technologies to support the internal operations of our business.

Specifically, some features in our Websites and products use third-party speech recognition service provider Soapbox Labs (https://www.soapboxlabs.com). Soapbox Labs delete the audio files we send them after processing.

We sometimes contract third-party service providers, vendors, SDKs or plug ins to assist us in better understanding our site visitors and app users. These service providers link such as Salesforce and Zoho, are not permitted to use the information collected on our behalf except to help support the internal operations of our business.

IP Addresses

Additionally, when visitors request pages from our Websites and Services, 3P Learning's servers log the visitor's internet protocol address ("**IP address**"). Your IP address, browser type, browser language, and the date and time of your query, enable us to better understand and improve the usability, performance and effectiveness of our websites for purposes of system administration, to infer a visitor's geographic location, to track the use of our websites, and to identify a visitor when 3P Learning feels it is necessary to enforce compliance with our policies.

How can I manage cookies?

Most internet browsers are set up by default to accept cookies. However you can manage or disable cookies and you can find instructions for the following browsers here: Microsoft Edge, Google Chrome, Firefox and Safari. Keep in mind that if you use your browser settings to block all cookies (including necessary cookies) you may not be able to access all or parts of our Website and Services and some functionality may be restricted.

You can find more information about cookies, including how to disable them at www.allaboutcookies.org.

In addition, most advertising networks offer you a way to opt out of targeted advertising. If you would like to find out more information, please visit www.aboutads.info/choices.

You may opt out by clicking here or if located in the European Union, by clicking here. Please note this does not opt you out of being served advertising. You may continue to receive generic advertisements.

Privacy Officer

Privacy@3plearning.com
3P Learning Ltd
655 Parramatta Road,
Leichhardt, Sydney,
NSW, 2040, Australia

For Telephone details please see below:

Other Enquiries:

Asia Pacific	Australia	Asia
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	New Enquiries info.usa@3plearning.com	

https://www.3plearning.com/contact/

Data Privacy and Security FAQ's

Company Name who supply Services

Mathletics, ReadiWriter
3P Learning Limited

Reading Eggs, MathSeeds, Wordflyers
Blake eLearning (resold & supported by 3P Learning Limited)

ABN

Mathletics, ReadiWriter
3P Learning Limited
50 103 827 836

Reading Eggs, MathSeeds, Wordflyers
Blake eLearning
64 140 998 821

ICO Registration number

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Z2188515

UK entity company number

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
05919214

Does your company have an insurance policy which includes claims for data breaches?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Yes

Where is your data hosted?

Mathletics, ReadiWriter
Live data: Azure East United States (Microsoft Azure)
Backup data: West Europe (Microsoft Azure)

Reading Eggs, MathSeeds, Wordflyers
Live data: Amazon AWS Oregon USA
Backup data: Asia Pac Southeast Sydney (Amazon Web Services)

When providing support where are the support staff accessing data from?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
We have regional support centers in Australia, New Zealand United Kingdom Canada & United States)

Is the data contained within your Solution encrypted in transit?

Mathletics, ReadiWriter
Yes, AES-256 or higher

Reading Eggs, MathSeeds, Wordflyers
Yes, AES-128 or higher

Is the data contained within your Solution encrypted at rest?

Mathletics, ReadiWriter
Yes, all personally identifiable data is kept at AES-256 or higher

Reading Eggs, MathSeeds, Wordflyers
Yes, AES-128 or higher

Does your solution include access controls to ensure only your authorised staff have access to the data?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Yes, via role based access control (RBAC)

What physical access controls are in place at the locations from which data may be stored?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Microsoft Azure and Amazon AWS Data Centres are all subject to ISO27001 certification, and equivalent physical access control requirements.

How frequently do you conduct vulnerability & penetration testing?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Every 6-12 months

3P Learning

Do you conduct investigations into security breaches and implement remediation strategies?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Yes

Do you regularly conduct reviews of user access levels?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Yes, user access is regularly audited

What access controls are in place?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Role based access control (RBAC)

How long do you retain data for?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Until end of contract (or) upon authorised request for deletion of data

Who will the provider share user personal information with and what personal information may be disclosed?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
No school, teacher or student related data is shared with any third parties

Do you conduct regular security training for all staff to prevent inadvertent disclosures?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Yes

Do you immediately notify your customers of any security breaches?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Yes, we would seek to inform any impacted customers immediately upon becoming aware of any potential breach.

Do you regularly review audit logs?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Yes

Does the solution provide unique usernames and passwords for end users?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
Yes

Does the solution provide Single Sign-on capabilities?

Mathletics, ReadiWriter
Google, O365, Clever (Mathletics), LGfl (Mathletics) RM-unify (Mathletics), AzureAD

Reading Eggs, MathSeeds
O-auth via Clever

What is the SLA for the availability of the Solution?

Mathletics, ReadiWriter, Reading Eggs, MathSeeds, Wordflyers
At least 99.9% uptime