



## Read Live Privacy and Security Policy

Read Live is an educational program provided by Read Naturally, Inc. that consists of a web-based application and an optional, corresponding iPad App. Read Naturally considers the privacy of all users, and especially the security and confidentiality of student data, to be extremely important.

Several federal and state laws govern measures to secure and protect student data. To help your educational institution comply with these laws, Read Naturally has adopted certain practices, and requires that educators using Read Live fulfill certain responsibilities, to safeguard student data. This document describes the practices we employ to secure and protect this data.

By using Read Live, you consent to these practices and agree to accept the responsibilities described below. If you have any questions about this document, we can be reached via e-mail at [info@readnaturally.com](mailto:info@readnaturally.com) or by phone at 800.788.4085.

### DATA COLLECTED

Read Live collects only information that is required for the program to effectively improve students' reading skills and enable teachers and other staff members to efficiently administer the program.

**Student data:** Read Live collects information about students who use the program, including but not limited to name, grade, school, and scores and other results from working in the program. The student record may also contain the name, telephone number, and email address of the student's parent or guardian.

**Staff Member data:** Read Live collects information about users who administer the program, including but not limited to name, telephone number, and email address. Staff members can correct or update their information using the "My Profile" link within Read Live.

Read Live collects non-personally identifiable information for the purposes of evaluating, monitoring, and improving the program's functionality and performance. This information includes but is not limited to a user's IP address, domain information, and "cookie" information. A cookie is a piece of data stored on the user's hard drive containing information about the user. Read Live uses cookie information to help provide an enhanced functional system experience to those visiting the site. If a user rejects the cookie, the user may still use the site.

### DATA ENTRY AND DATA QUALITY

Read Naturally operates in compliance with the Children's Online Privacy Protection Act ("COPPA"). We will not knowingly collect or use personal information from anyone under 13 years of age.

You, as a user authorized by your educational institution, control what user data is entered in Read Live.

Student data entered on this site should be limited to information that is relevant to the legitimate educational purpose of improving student performance. We will not ask you to enter, and you should not enter, data about students that is not relevant to this legitimate educational purpose.

Because you enter the student and staff member data stored in Read Live, you control its accuracy. If you discover that this data in Read Live is inaccurate or if it changes, you are responsible for correcting the information in your account.

Authorized staff members may delete student and staff member data from Read Live. Deleting a student removes all data pertaining to that student, including personal data and scores. Upon deletion, Read Naturally no longer has access to the user data, and the data cannot be recovered.

Requests by students, parents, or guardians to review, access or correct student data shall be handled by you. If you need assistance in complying with such requests, or if you need any assistance entering, accessing, or correcting the user data in Read Live, please contact Read Naturally.

Students may retain possession and control of their student data by notifying you or your educational institution in writing of such request. You must in turn provide a written request to Read Naturally to transfer the appropriate student data to a personal Read Live account, to be accessed and controlled by the student. Read Naturally will complete such requests within five (5) business days. Standard subscription fees will apply to the personal account.

#### OWNERSHIP AND USE

Read Naturally does not own, nor does it control, the student data entered into Read Live. Student data will be used by Read Naturally and its authorized contractors for the sole purpose of providing contracted services to the educational institution. Read Naturally will not disclose, sell, rent or otherwise use this data in any manner other than that described in this document. Read Naturally will not use data entered in Read Live to market products or services directly to students or their parents or guardians.

Read Naturally may use de-identified student data in research, product development, and marketing. This non-personally identifiable data may be shared with third parties.

In the event that Read Naturally wishes to release aggregated data that identifies your educational institution by name, Read Naturally will enter into a separate agreement with you to authorize its release and publication.

From time to time, Read Naturally sends out informational communications about Read Live, relying on the Staff Member data it has collected. These communications include but are not limited to announcements of new releases, notifications that the system will be unavailable due to scheduled maintenance, and information on efficiently using the program. These communications are sent to staff members only, not to students or their parents or guardians.

#### DISCLOSURE AND STORAGE

Read Naturally will only disclose student data to authorized representatives of your educational institution, and will not knowingly disclose the student data to any third person without express written authorization. You may not disclose or otherwise use the student data entered on this site for any unauthorized purposes. Your educational institution may from time to time request that Read Naturally provide student data to third parties of its choosing. We will do so with written authorization, which acknowledges that Read Naturally is providing that data as your educational institution's agent and that once the data is received by the third party, Read Naturally no longer has any control over the use or disposition of the data.

Read Naturally will not keep student data after your educational institution instructs us in writing to destroy it. If a reasonable amount of time passes after an educational institution's Read Live subscription lapses, Read

Naturally may, at its discretion, destroy the student data for the lapsed account, even without a specific request from that institution to do so.

In the unlikely event of the unauthorized disclosure of personally identifiable student data, Read Naturally will notify the educational institution of the breach in writing. Read Naturally does not have sufficient contact information to identify and notify other affected parties. Therefore, Read Naturally and your educational institution must work together in good faith to identify and notify the appropriate affected parties.

#### SECURITY SAFEGUARDS

Read Naturally employs certain practices and safeguards to help educational institutions meet the requirements of the Family Educational Rights and Privacy Act (“FERPA”).

We are committed to protecting student data against unauthorized access, use, modification, destruction, or disclosure. Protecting student data requires efforts from us and from you. We will implement reasonable and appropriate safeguards when collecting student data from you and when storing that student data in our database and you will observe our security safeguards and exercise reasonable caution when using this site.

Specific institutional and technological security safeguards include:

1. Read Naturally will only authorize access to the program to trained employees and contractors who are necessary to provide service to the educational institution and to support the development of the program.
2. The educational institution should only allow authorized employees to access the educational institution’s data. The use of Staff Member Roles within the program allow the educational institution to designate specific levels of access to student data.
3. Each user authorized by the educational institution is given a unique user ID and password. You must safeguard your username and password, and not permit any unauthorized access to student data entered or kept in the Read Live system.
4. Upon written request by the educational institution, Read Naturally will destroy any student data for educational institutions that no longer subscribe to the Read Live program. Read Naturally will provide written verification that the data has been destroyed as requested.
5. Read Naturally uses industry standard server and network hardware and software to ensure that data is protected from unauthorized access or disclosure.
6. Student users do not have access to links to external websites once they log into Read Live. However, Staff Member users may find links to web sites owned and operated by other organizations. Please note that when you click on one of these links, you are moving to another web site. While we reviewed the linked sites at the time of the posting of the link, and only provide a link if we believe the content of a site might be of interest to Read Live users, the content of those linked sites is the responsibility of the organization actually owning and/or operating the site. Read Naturally is not responsible for the content of any linked site. We encourage you to read the privacy statements of any linked site as its privacy policy may differ from Read Naturally’s policy.

#### DOCUMENT UPDATES

Read Naturally reserves the right to revise this document at any time. Changes to this document will be posted within Read Live and on the Read Naturally website.