

SUMMIT LEARNING PLATFORM PRIVACY POLICY

Effective Date: August 1, 2017

Summit believes that students can be self-directed learners, coached by teachers and armed with the skills, knowledge, and habits they need to lead a successful and fulfilling life. Summit makes available a personalized learning platform and related services that enable students to develop an individualized learning plan in coordination with their teachers and parents or guardians to achieve academic success (the “Platform”). Within the Platform, students set learning goals; make plans to achieve these goals; learn using a combination of individualized resources, peer coaching, and one-on-one mentoring; demonstrate their knowledge; and reflect on their progress. Students learn at their own paces, accessing the learning resources that help them learn best.

We provide the Platform directly to schools and school districts, including their authorized teachers, employees, and agents (collectively, “Partner Schools”) pursuant to agreements that allow Summit to collect and use certain information in order to operate the Platform as set forth in this Privacy Policy for the Partner School’s educational purposes and in accordance with applicable federal and state laws.

There are no ads in the Platform and student data isn’t used for advertising. **Summit does not, and will not, sell student data, or seek to profit from public schools, teachers, students or parents.** We’re proud signatories to the Future of Privacy Forum’s [Student Privacy Pledge](#). Parents can get more information about the Platform here.

This Privacy Policy explains how Summit protects the information that it collects for the educational purposes of providing the Platform to authorized students, teachers, parents or guardians, and school employees, officials, or agents of its partner schools (collectively, “Users”).

Information We Collect

Summit collects the following information to enable Users to effectively use the Platform for educational purposes:

Information Provided Directly to Us

In order to provide and improve the Platform, Summit may collect information from Users including, but not limited to:

- Contact information such as full name and email address;
- Username and password;
- Class rosters;

- Student identification numbers such as school identification number or school information system identification number;
- Course information including coursework in applicable media (e.g., video, audio, text and images) and course progress;
- Test scores, grades and standardized test results;
- Narratives input by students, including goals and learning plans, communications with teachers and other students;
- Answers to surveys about the Platform or curricula;
- Teacher curricula and notes and feedback to or about students;
- Mentor observations;
- Feedback, suggestions, questions, and ideas submitted to Summit;
- Student record information such as attendance, suspension, and expulsions;
- Student demographic data; and
- Student outcome information such as grade level promotion and matriculation, AP and IB test information, college admission test scores, college eligibility and acceptance, and employment.

Information We Collect Automatically

Summit may collect certain information automatically through the Platform, such as Internet protocol (IP) address and other device identifiers that are automatically assigned to a User's computer or device, browser type, operating system, Internet service provider, the date and time of a User's use of the Platform, and information about the links clicked and pages viewed within the Platform.

Summit may use technologies such as cookies, pixel tags, local storage, mobile identifiers, and similar technologies to automatically collect this information. By using the Platform, you consent to our use of cookies and similar technologies. If you choose to refuse, disable, or delete these technologies, some of the Platform functionality may no longer be available.

We Limit Use of the Information We Collect s

Summit uses the information it collects as directed by its Partner Schools for its educational purposes and in connection with providing the Platform, including to:

- Operate, develop, analyze, evaluate, and improve the educational tools, features, products, and services;

- Communicate with Users in connection with providing the Platform;
- Evaluate the efficacy of the Platform;
- Administer surveys, studies, and interviews;
- Provide curricula choices or recommendations;
- Maintain the security of the Platform, troubleshoot, and perform audits;
- Drive learning engagement and progress via content suggestions to Users;
- Perform any other activities requested by a Partner School for educational purposes or with the consent of a parent or legal guardian or student of the age of majority;
- Protect or defend the rights, safety, or property of Summit, Partner Schools or Users, or to comply with any law enforcement, legal, or regulatory process; or
- Comply with applicable law.

Summit will not use the information it collects for targeted advertising purposes or use identifiable information for the creation of other products or services. However, Summit may use the information it collects from Users other than students to provide relevant information about the Platform and its features to Partner Schools and parents.

Before using information collected from student Users for any purposes other than the Partner School's educational purposes, Summit will de-identify information so that it cannot reasonably be linked to an identifiable student User.

We Limit How Information Is Shared

Summit does not disclose information except:

- *With Other Users:* With Partner Schools and other Users within a school for the Partner School's educational purposes.
- *With parents and legal guardians* authorized by the school.
- *With Service Providers and Partners Supporting the Platform:* With third-party service providers and partners carrying out authorized educational purposes as directed or authorized by a Partner School. We provide service providers and partners with the information that they need to perform their specific function, which may include identifiable User information. Third-party service providers and partners must comply with this Privacy Policy, the terms of Summit's agreement with the Partner School, and applicable law. We require partners and service providers to employ reasonable and comprehensive data protection and security protocols. Examples of service providers and partners include applications management services; data hosting services; and customer service tools.
- *Consistent with Legal Requirements:* If we believe in good faith that doing so is necessary or appropriate (i) to protect or defend the rights, interests, safety, or security of Summit, Partner Schools, Users, Service Providers or Partners; (ii) to comply with any law enforcement,

legal, or regulatory process, such as to respond to a warrant, subpoena, court order, or other applicable laws and regulations; (iii) to respond to claims that content violates the rights of third parties, and (iv) as otherwise required and permitted by law. We also may share information in connection with or during negotiations of any merger, sale, financing, consolidation, asset sale, acquisition, or in the unlikely event of a bankruptcy. In these cases, the successor entity will treat previously-collected information consistent with this Privacy Policy.

- o *At Partner School's Direction or With Parental Consent:* As directed or authorized by the Partner School for educational purposes or, consistent with applicable law, with the consent of a parent or legal guardian or of a student who is the applicable age of majority.

Partner Schools Can Delete Information

Partner Schools may request the deletion of information held by Summit in the Platform. Summit will delete or de-identify such information in a commercially reasonable amount of time in compliance with applicable law, unless we otherwise have consent to retain such information or are required to retain such information to comply with our legal obligations or law enforcement, resolve disputes, or enforce our agreements.

We Support Parent Engagement

We support the involvement of parents and guardians in their children's education. Parents and guardians (and teachers) may use the Platform's controls to track student progress and receive feedback. Parents, guardians, and students can access, review, and request correction of certain information in the Platform directly. They also may request a review or correction of other information by contacting the appropriate official at the student's school or school district. The school may either make the change themselves or submit the request to Summit by emailing info@summitlearning.org. We will use commercially reasonable efforts and process such requests in a timely manner consistent with applicable law.

We Are Committed To Keeping Information Secure and Accurate

Summit uses physical, technical, and administrative measures to help protect information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. We maintain controls to restrict access to information to our employees, agents, partners, and service providers who require such access to perform their assigned duties. We also require partners and service providers to employ data protection and security protocols.

We Are Transparent About Changes

Summit may update this Privacy Policy from time to time. When we update the Privacy Policy, we will revise the "Effective Date" date above and post the new Privacy Policy on our website

summitlearning.org, and clearly indicate which section(s) have changed. If you continue to use the Platform following these changes, you will be bound to the new Privacy Policy. In connection with such changes, we will provide User notice and choices in accordance with applicable law.

We Want To Hear From You

If you have any questions about this Privacy Policy or our practices, please contact privacy@summitlearning.org.