Inq-ITS Privacy Policy

Last modified: December 18, 2019

Introduction

This Privacy Policy (the "Policy") explains how Apprendis collects, use, and protect the information you share when using Inq-ITS and Inq-Blotter (the "Service", "Services", "Website", "Websites", "Site", "Sites"). These services are operated by Apprendis LLC (www.apprendis.com), in collaboration with Worcester Polytechnic Institute (WPI; www.wpi.edu), and Rutgers University (www.rutgers.edu), our "University Research Partners." The Services are both a subscription service provided by Apprendis, and an educational research platform in which research questions are addressed regarding: (1) teaching and learning of science; (2) assessment of science knowledge, skills and competencies; (3) how our technology is utilized in authentic educational settings, like schools. The Services are owned by Apprendis.

Apprendis values your privacy and will take all reasonable steps to protect your personal information. No advertisements (ads) unrelated to Apprendis, Inq-ITS and Inq-Blotter appear on The Site, even for free tier usage. Apprendis also does not freely distribute, or sell your personally identifiable information as defined in this Policy below. Certain data may be made accessible to those who administer the site and conduct research, including those associates at University Research Partners.

Use of our services indicates agreement to the terms and conditions within in this Policy.

Overview of Services and Technology

Inq-ITS and Inq-Blotter are educational technology services that promote students' learning of science and help educators monitor their students' performance and track their growth. They are *software services*, meaning that the software and user data do not reside on computers owned and maintained by the school or district. They instead reside on computing equipment owned/leased by Apprendis, and/or its University Research Partners.

The Inq-ITS and Inq-Blotter services are distributed across two platforms, our *main system platform*, and *our research platform*. Our *main system platform* includes all <u>inqits.com</u> sites, including its subdomains, like <u>selfservice.inqits.com</u>. The platform utilizes cloud technology, namely Amazon Web Services (AWS), to host the service and securely store information.

Our services make use of JavaScript and Browser Cookies to track logins, sessions, and collect anonymous traffic data. Disabling JavaScript and/or Cookies will prevent you from using the features of these services.

Kinds of Users

Apprendis collects data for three kinds of users elaborated as follows:

- <u>Unregistered Users</u>: Unregistered users can access basic functionalities of the site including reference documents, informational videos, and demonstration virtual labs.
- Registered Students: Registered students can also access virtual labs assigned by their teachers as
 well as other site features. USERS UNDER 18 YEARS OF AGE SHALL HAVE PRIOR APPROVAL FROM
 THEIR PARENT OR LEGAL GUARDIAN, AND/OR SHALL HAVE BEEN AUTHORIZED BY THE
 APPROPRIATE PERSONNEL WITHIN THEIR SCHOOL OR DISTRICT TO REGISTER FOR USE OF THE
 SERVICES.
- Registered Educators: Registered educators (teachers, curriculum coordinators, after school
 program supervisors, etc.) can also preview virtual labs, assign labs to students and track student
 progress, change student information (such as their names or passwords).

Information will be collected regarding users' usage of all services. The data collected and how these data are used are described in the sections below.

Unregistered User Data Collected

When accessing the site, Apprendis may collect IP addresses, Site URLs visited, how long you spent on Site pages, Site access times, information about your use of and actions on our Site, and system information used to access the Site including (but not limited to): operating system, browser type, browser version, and browser language. The Site may log information using "cookies." Cookies are small data files stored on your hard drive by a website. The Site may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. This type of information is collected to make the Site more useful to you and to tailor the experience with us to meet your special interests and needs.

Registered User Data Collected: Personally Identifiable Information (PII)

Apprendis defines Personally Identifiable Information (PII) as any information that can be used to distinguish one person from another, and can be used to deanonymize anonymous data.

Apprendis collects the following PII from our users:

- Registered Students: First name, last name, and (optional) email address. This information is
 acquired either through manual entry when creating/updating account information, or when a
 student authorizes creating/updating accounts using one of our supported third party
 authentication platforms: Google (Google Classroom) and/or Clever.
- <u>Registered Educators:</u> First name, last name, email address, school name, school city, school state
 and school country. Additional information optionally collected are phone number, best time to call,
 job title, grade(s) taught, subject(s) taught, and best contact information about purchasing the

Service. First name, last name and email addresses are acquired either through manual entry when creating/updating account information, or when a teacher authorizes creating/updating accounts using one of our supported third party authentication platforms: Google (Google Classroom) and/or Clever.

Registered User Data Collected: Non-Personally Identifiable Information

Non-PII are data that, by themselves, cannot be used to reveal a person's specific identity. These data may include all data sources listed for unregistered users (above). As part of our assessment process, The Site also collects mouse movements, mouse clicks, UI selections, and keyboard strokes – all of which are used to generate data about students' performance within our activities.

How Apprendis Uses Your Data

Apprendis collects PII and non-PII for six explicit purposes: (1) to enable users to register and create secure, unique logins; (2) to contact via email students and/or educators about the services; (3) to enable educators and their students to easily monitor performance and learning within the system; (4) to conduct educational research in conjunction with our University Research Partners; (5) to improve our software and services; (6) for legal and/or government compliance and user protection.

- (1) Unique and Secure Logins: Student usernames are generated from PII, a combination of the first two letters of their first name, their last name, and additional characters. For example, a student named John Smith may have the username: JoSmithbear. If students provide an email address, they may log in with that email address. In either case, their password must also be entered to access the system. Educator usernames are the email address they used for signup. Alternatively, students and educators may securely log in using Google authentication or Clever authentication. Usage of these data are described below in more detail.
- (2) Contact via Email: Apprendis uses email to convey important updates and notices about services. Students shall only receive notification via email related to core service functionality including: notification of assignments due, or notification of password / information changes. Educators may receive notification via email of core service functionality, terms of service updates, and promotions, upcoming events, and other news or additional information related to Inq-ITS or other Apprendis products. Apprendis may use your personal information to respond to comments and questions and provide customer service.
- (3) Monitoring Performance: Once registered within the system, students associate themselves to an educator by entering a unique code (or following a link with the unique code embedded) into the system. By entering this code, the student enables an educator to have access to their first and last name, their username, and all prior performance / activity data logged and/or aggregated within the system. The educator may also reset the student's password in the event that it is forgotten. Such performance data is stored separately from PII. Parents are encouraged to login with their student to view their performance within our services.

- (4) Educational Research: Apprendis, possibly in collaboration with its University Research Partners, may use both PII and non-PII to conduct educational research on the services. All research protocols are reviewed by Internal Review Boards (IRBs) and kept on file. All Apprendis staff/contractors and University Research Partner staff/contractors who handle PII have been approved to do so. In our research, Apprendis may aggregate PII and non-PII, but will keep such data private and secure. Anonymized data (aggregated or non-aggregated data with PII removed), however, may be shared or made publicly available. Similarly, research publications and presentations in journals, conferences, etc. may also report on such aggregated data. SUCH PUBLICATIONS AND DATASETS WILL NEVER INCLUDE INFORMATION THAT CAN BE USED TO UNIQUELY IDENTIFY ANY TEACHER, STUDENT, OR SCHOOL/SCHOOL DISTRICT.
- (5) Service Improvement: Apprendis, possibly in collaboration with its University Research Partners, may use both PII and non-PII to improve its software services and to troubleshoot and add new features to the system. Apprendis and its University Research Partners may work with third parties who provide services including, but not limited to: analytics, infrastructure support, and email delivery support. PII may be shared with these parties solely for providing these services.
- (6) Legal Processes and Protection: Apprendis may use your personal information to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity. Apprendis reserves the right to disclose PII to others (a) under applicable law; (b) to comply with legal process; (c) to respond to governmental requests; (d) to enforce our Terms of Service; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of Apprendis and its University Research Partners, you or others; and (g) to permit us to pursue available remedies or limit the damages that Apprendis may sustain.

All user data may remain in our records, even the user terminates usage of our services. Such data can be used in accordance with this Privacy Policy.

Integration with Third Party Platforms

Google OAuth and Google Classroom: The Site optionally enables students and educators to 1) create accounts and 2) log into the Site using Google credentials. For educators only, if the account associated with Google Classroom, The Site also enables them to 3) import and organize students by Google Classroom class names, and 4) post Inq-ITS assignments lab activities assigned by to their Google Classroom classes. Students may then access Inq-ITS assignments from Google Classroom, only if assigned to by their educator. To support these functionalities, The Site securely stores Google-provided unique multi-character identifiers (IDs) associated with each user who uses them; such IDs are not shared outside The Site. The Site does not use any Google restricted API scopes.

<u>Clever Single Sign-on:</u> The Site optionally enables students and educators to 1) create accounts and 2) log into the Site using Clever credentials. The Site also enable educators to 3) pull in and organize students by Clever Classroom class names. To support these functionalities, The Site securely stores Clever-provided unique multi-character identifiers (IDs) associated with each user who uses them; such IDs are not shared outside The Site.

<u>ConstantContact</u>: Apprendis uses ConstantContact to maintain educator contact information and provide users with updates and information about Apprendis and its products. ConstantContact receives this information when an educator creates / updates their account with their data (see registered user data for educators above to see which data are collected). Data collected from ConstantContact are private, stored securely, and not shared outside Apprendis.

<u>PipeDrive</u>: Apprendis uses PipeDrive to maintain its sales process and track email communication with educators. PipeDrive receives this information when an educator creates / updates their account with their data (see registered user data for educators above to see which data are collected). Data collected from PipeDrive are private, stored securely, and not shared outside Apprendis.

Sharing of Personal Information

Apprendis may share PII as follows:

- Apprendis may share personal information with your consent. For example, you may let us share
 personal information with others for their own marketing uses. Those uses will be subject to their
 privacy policies.
- Apprendis may share personal information when it executes or negotiates a business deal, involving
 the sale or transfer of all or a part of our business or assets. These deals can include any merger,
 financing, acquisition, or bankruptcy transaction or proceeding.
- Apprendis may share personal information for legal, protection, and safety purposes.
- Apprendis may share information to comply with laws.
- Apprendis may share information to respond to lawful requests and legal processes.
- Apprendis may share information to protect the rights and property of Apprendis LLC, our agents, customers, and others. This includes enforcing our agreements, policies, and terms of use.
- Apprendis may share information in an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.
- Apprendis may share information with those who need it to do work for us (e.g. our University Research Partners).
- As described previously, Apprendis may also share aggregated and/or anonymized data for internal system improvements or conducting educational research.

Disclaimer

Apprendis values your privacy and take all reasonable steps to protect PII. In the unlikely event that PII is compromised, Apprendis will rectify the infringement as fast as possible, and notify all user(s) of the nature and extent of the infringement. Users who register for our service indicate willingness to assume this risk.

Amendments and Modifications

Amendments and modifications may be made to this Policy. Apprendis may amend or modify this Policy by posting updates to this Site. Similarly, amendments and modification notices may be sent to users via email. Usage of our services indicates agreement to accept the new Policy by using or relying on our services and materials.

Questions

If you have any questions about any of these practices, use of your personal information, or have reason to believe your PII is no longer secure, please email privacy@inqits.com.