PRIVACY POLICY

----

1 INTRODUCTION

We, the Typing Pal Team, are deeply committed to making our web application a safe and secure place for students to learn. That is why we make every effort to comply with the most established standards for safeguarding personal information.

This privacy policy is addressed to you as school administrators and teachers, but is relevant to anyone using the school edition of Typing Pal Online. We describe in simple and clear terms all internal practices and policies that we have adopted to ensure that Typing Pal Online protects the privacy of its users.

2 OVERVIEW

A. COMPLIANCE

→ We comply with the following privacy laws:

- *Children's Online Privacy Protection Act* (COPPA)
- *Student Online Personal Information Protection Act* (SOPIPA)
- *AB-1584 Pupil records: privacy: 3rd-party contracts: digital storage services and digital educational software*
- *Personal Information Protection and Electronic Documents Act* (PIPEDA)

→ We support schools and libraries in their compliance with the following laws:

- *Family Educational Rights and Privacy Act* (FERPA)
- *Children's Internet Protection Act* (CIPA)

→ We are a signatory to the *K-12 School Service Provider Pledge to Safeguard Student Privacy.*

2

B. WHAT WE DO

- ⊘ We collect both personal information, which identifies users, and student data, which tracks their performance. For students, personal information is limited to their full name, their user name and, optionally, their email address.

- ⊘ We use HTTPS (SSL) to ensure that personal information and student data are encrypted and transmitted securely from end to end.

- ⊘ We enable you to review and delete personal information and student data at any time.

- ⊘ We also allow parents or legal guardians to review their child's personal information and data while the subscription is active, and to request that we delete it at any time.

- ⊘ We delete all personal information and student data upon request, or automatically at the end of the school year (June 30) that follows the school year in which the subscription expired.

- ⊘ We innovate safely without compromising student privacy by only analyzing de-identified and aggregated data as we develop and improve Typing Pal Online.

C. WHAT WE DON'T DO

- ⊗ We do not collect, use, or disclose personal information and student data for non-educational purposes.

- ⊗ We do not sell, trade, rent or otherwise provide personal information and student data to any advertisers or third parties.

- ⊗ We do not use or disclose any students' information for behavioral targeting of advertisements.

- ⊗ We do not create advertising profiles on students.

- ⊗ We do not expose students to advertisements, as we are a fee-based service.

- ⊗ We do not provide any messaging system for students to communicate privately with each other.

3   WHAT INFORMATION DO WE COLLECT AND WHY?

A. INFORMATION PROVIDED BY USERS

1. Subscription Manager, School Administrator and Teacher Identification

Contact information — For the subscription account, we collect the subscription manager's name, phone number and email address. School accounts are associated with a broad location (country, state, city), and with the school administrator's name, phone number and email address, if different from the subscription manager. Teacher accounts are associated with their name and email address. On the rare occasions when it is necessary or advisable to do so, we use this contact information for service-related communications, technical support requests and announcements.

Username and password — During the registration process, a username and a temporary password are assigned to school administrators and teachers. Subscription managers are assigned a subscription code (instead of a username) and a temporary password. Even though all passwords are encrypted, we invite users to replace the password they have been assigned with a new one. Aside from login purposes, the username (which can also be modified by users) may be requested to authenticate users when they request technical support.

2. Student Identification

Contact information — When a student is registered, we collect minimal contact information : name, username, password, group assigned and school attended. Optionally, we may also collect the student's email address to facilitate the recovery of lost passwords. Contact information is used by school officials and teachers to manage student accounts. We will never use this information to communicate with students.

Username and password — Once registration is complete, the username cannot be changed by the student. Username modification has to be done by you. However, the password may be changed by the student if the password modification option has been activated for their assigned group. You may export usernames and passwords in clear text, but all passwords chosen or modified by students will be hidden.

3. Communicating With Us

Support requests — Typing Pal Online's support section includes a form to describe a problem, express a comment, or share a suggestion. We ask you to provide us with all the information that could help us answer your questions or process your requests. We only use this information to provide the services or support requested.

Feedback — We occasionally ask you to provide us with feedback on your experience with Typing Pal Online through anonymous surveys. The surveys are optional and the information submitted to us will only be used to improve our services. We might use third-party services to collect this information, such as Google Forms or SurveyMonkey.

B. INFORMATION COLLECTED AUTOMATICALLY

Performance information — When students are engaged in a Typing Pal Online activity, we collect information related to their typing performance. This information allows us to track their progress, calculate game scores, create replay videos, and generate performance reports on demand. You can delete all performance information by resetting a student account.

Single sign-on — When an account is linked to a single sign-on service, such as Google Single Sign-In, we collect authentication information through that login service, including the username and email address. The password, however, is not collected.

Cookies — Like most web-based services, we may use both session and persistent cookies, a standard technology embedded in browser software. A session cookie disappears after the browser is closed, while a persistent cookie remains. Cookies can be removed, but if they are disabled or blocked, you will be prevented from logging in to Typing Pal Online. To learn more about cookies, visit http://allaboutcookies.org.

Log information — As an online service, we automatically collect and store certain information in our server logs. The information collected could be related to the device used (operating system, hardware version, browser name, etc.), or how Typing Pal Online is used (frequency and duration of visits, which options are enabled, etc.). This information helps us make decisions about future improvements. For example, we can focus on improving Typing Pal Online's integration with the most popular browsers.

IP address — We may collect and process IP addresses. We may use these to find the cause of a technical problem. We do not collect precise geolocation data from students, nor do we store or track any device location.

Web analytics — In order to improve our service, we may use third-party web analytics providers, such as TrackJS or Google Analytics, to understand the context of a bug or how users interact with Typing Pal Online. These providers may use their own tracking technologies to do this, but they cannot collect any personally identifying information from Typing Pal Online.

C. WHAT WE DON'T DO WITH INFORMATION COLLECTED

We do not collect, use or share personal information in any way that is not disclosed in this Privacy Policy. This also means that:

- We do not collect, use, or disclose personal information and student data for non-educational purposes.
- We do not sell, trade, rent or otherwise provide personal information and student data to any advertisers or third parties.
- We do not use or disclose any students' information for behavioral targeting of advertisements.

- We do not create advertising profiles on students.
- We do not expose students to advertisements, as we are a fee-based service.
- We do not provide any messaging system for students to communicate privately with each other.

HOW DO WE PROTECT INFORMATION?

A. SECURITY MEASURES

When it comes to protecting user information, security is our highest concern. Here's what we do to keep Typing Pal Online secure:

- We use two standard security technologies, SSL (Secure Sockets Layer) and HTTPS (Hypertext Transfer Protocol Secure), to establish an encrypted link between our web server and a browser. This link ensures that all data transferred remains private and secure.

- We use firewall-protected servers stored in a secured location to prevent any unauthorized access.

- We store and transfer passwords using the most robust encryption technologies.

- We control and limit our employees' access to the Typing Pal Online database.

- We periodically review all above security measures and practices.

B. IN CASE OF FAILURE

We strive to protect our users against unauthorized use, disclosure, or access to their personal information. Although we adhere to the best industry standards, we cannot claim that our security system is 100% immune to failure. In the event that we discover a security failure, we will post a notice in the subscription manager's management module and will send an email to the subscription manager within 24 hours.

5 WHICH REGULATIONS DO WE COMPLY WITH AND HOW?

A. COMPLIANCE

→ We comply with the following privacy laws:

- *Children's Online Privacy Protection Act* (COPPA)

- *Student Online Personal Information Protection Act* (SOPIPA)

- *AB-1584 Pupil records: privacy: 3rd-party contracts: digital storage services and digital educational software*

- *Personal Information Protection and Electronic Documents Act* (PIPEDA)

→ We support schools and libraries in their compliance with the following laws:

- *Family Educational Rights and Privacy Act* (FERPA)

- *Children's Internet Protection Act* (CIPA)

→ We are a signatory to the K-12 School Service Provider Pledge to Safeguard Student Privacy.

- To learn more about the commitments we are sworn to honor, visit https://studentprivacypledge.org

B. GENERAL MEASURES

While the privacy laws and regulations above were adopted by different jurisdictions which may have specific local objectives, they contain similar overall requirements. To avoid redundancies in this Privacy Policy, the following text presents what we do to comply with these various privacy laws and regulations.

1. Children's Information

We are committed to protect the information of all users—notably children under age of 13. We will not require them to disclose more personal information than necessary, and will collect it solely for educational purposes.

Should you become aware that we have inadvertently collected personal information from children— for example, a child requested access to the demo version—we will take action to promptly delete such information. To report to us that a child's personal information has been inadvertently collected outside the boundaries of this Privacy Policy, or provided without the parent's or legal guardian's consent, please contact us at privacy@typingpal.com.

Please note that the parent or legal guardian can review their child's personal information through the child's student account and may direct us to delete it. You also can review and delete any student account yourself with Typing Pal's managing tools.

2. Deletion and Retention

You are able to delete student accounts and all associated information by using your managing tools. In addition, student accounts with personally identifiable information are deleted automatically at the end of the school year (June 30) that follows the school year in which the subscription expired. When the process is completed, deletion is permanent and no information can be restored.

School and teacher accounts are deleted automatically at the end of the second school year (June 30) that follows the school year in which the subscription expired. Only the subscription manager's information and the business-related notes are archived.

3. Educational Records

Some of the information collected by Typing Pal Online may be construed as "educational records". We use such educational records only to provide services to you, and do not sell, rent or disclose this information to any third parties. In addition, students and their parents are allowed to access and review their educational records at any time, and they may request that you correct any erroneous information.

4. Data Property and Control

Educational records are the property of the students; they are under your control for the duration of your subscription. We do not have any claim to ownership or control of any educational records. When your subscription has expired, you may decide to export your students' educational records or to delete them.

5. Parental Consent

COPPA mandates obtaining parents' verifiable consent before collecting information from their children, and describes different accepted ways to do so. We take the position that you are acting as the parent's agent in consenting to our collection of students' information and therefore assume that you have obtained parental consent to this. However, as a best practice, you should consider keeping a record of the parents' verifiable consent to such collection and consider allowing parents to review the personal information collected.

6. Forbidding Access to Inappropriate Content

There is no embedded link in Typing Pal Online that would lead minors to access inappropriate, obscene or harmful content over the Internet. We do provide original content free of inappropriate, obscene or harmful words. In addition, we do not provide students with any electronic mail, chat rooms or other forms of direct electronic communication.

7. Legal Requirements

We may disclose personal information in good faith in the following circumstances: when required to do so by law or by a court; to investigate or defend against third-party claims or allegations; to protect the security and integrity of our services; and to protect our rights and those of our users.

6 ABOUT THIS PRIVACY POLICY

A. MODIFICATIONS

This document will occasionally be updated to keep pace with improvements to Typing Pal Online, to security technology and with changes to privacy legislation. We expect that such updates will be minor amendments. However, if any modification materially changes the protections outlined in this document, we will notify the subscription manager to obtain consent, either through an email or by a prominent notice in the management module.

B. GENERAL CONSENT

We advise you to carefully read the latest version of our Privacy Policy, because your use of Typing Pal Online implies your consent to its terms. Should you disagree with any terms of this Privacy Policy, Typing Pal Online should not be used.

C. CONTACT

We strive to make our Privacy Policy as easy to understand as possible. Should you have questions about it, please contact us at privacy@typingpal.com.

The Typing Pal Team

© 2017 Druide informatique inc. All rights reserved.