

## **Grouping Matrix Privacy Policy**

### **Overview**

The following Privacy Policy summarizes the ways that Really Great Reading (RGR) treats the information you provide while using the Grouping Matrix Online (GMOL). The GMOL is designed for use by adults working with a child or groups of children on decoding skill development. Our goal is to protect your privacy and the privacy of students whose data and scoring information you may enter here.

Please read this policy carefully. Your registration constitutes your agreement to this Privacy Policy.

This Privacy Policy may be modified from time to time; the date of the most recent revisions will appear on this page, so check back often. Continued access of the GMOL by you constitutes your acceptance of changes or revisions to the Privacy Policy.

This Privacy Policy must be read in conjunction with our Really Great Reading Privacy Policy at [www.rgrco.com/privacypolicy](http://www.rgrco.com/privacypolicy). To the extent those terms conflict with the terms of this GMOL Privacy Policy, the terms of this GMOL Privacy Policy shall control.

### **Collection and Use of Data Relating to GMOL Users**

#### **Non-Personally Identifiable Information**

We automatically collect and store: the name of the domain and host from which you access the Internet; the Internet protocol (IP) address of the computer you are using; the browser software you use and your operating system; the date and time you access the GMOL; and the Internet address of the site from which you linked directly to the GMOL (if applicable). We use this information only as anonymous aggregate data to determine the number of visitors, to ensure the GMOL is working properly, and to help us make the GMOL more useful. We do not use it to track or record information about individuals.

We use cookies to track usage patterns, and to record registration for accounts. For example, when you register for a user account and are given the option to save your user name and password on your computer, we provide this convenience to you by placing a cookie on your computer.

If you don't want any cookies, your Web browser likely includes an option that allows you to not accept them. However, if you set your browser to refuse cookies, some portions of the GMOL may not be as functional and easy to use.

We use the above information for the purposes of administration and operation of the GMOL. We collect statistical information in order to monitor usage. This helps us to develop the GMOL and the service. We may provide aggregate statistical information to third parties. This information will not identify you personally and will not be traceable to individual students.

#### **Personally Identifiable Information**

If you are a parent, teacher or administrator (OT), we ask you to provide us with personal details like your name, position, state, and your email address. If you are a teacher or are registering on behalf of your school, we ask you to additionally provide us with your school, school district, and type of school (public or private). You also will provide personally identifiable information relating to the children being entered into the GMOL. Our collection and handling of children's personally identifiable information is addressed in the section titled "Student Data Policy" below.

In addition to using your information for the purposes of administration and operation of the GMOL, we may also use the personally identifying information supplied by you to notify you of, or provide you with, new features, products or services, and/or to improve services that we offer by tailoring them to your needs. We will not provide this information to third parties.

### **Student Data Policy**

Really Great Reading is especially concerned about protecting children's privacy. The GMOL is intended for use by adults in the fields of education and reading instruction and related businesses and parents. It is not designed to be used by children under the age of 13 for any reason. We ask that children under the age of 13 do not use the GMOL or submit any Personal Information to us.

When using the GMOL, adults create student profiles which contain information that allows RGR to provide a personalized student report and class summary reports with comparison data regarding grade level expectations. RGR also provides remediation suggestions for each student. Adults may access the student account throughout the year to input the results of additional assessments and monitor how children are doing.

The GMOL has the capacity collect and store the following data for each student: First name, last name, date of birth, unique id and/or unique student identifier (USI), grade, gender, teacher's name, state, school district, school, whether a student has an Individualized Education Plan (IEP), demographic information, test data, and remediation suggestions. Most of this data is optional, however the following fields are required to accurately group and suggest instruction; first name, last name, and grade.

GMOL users may maintain confidentiality of student records by entering their own unique identifying information for student first and last names; there is no minimum character requirement for either field. For example, users may enter student first and last name data as: A.B.; Student 1; AB Smith (where "Smith" is the teacher's last name).

Student data is added by individual adults (such as teachers or interventionists), or authorized staff in schools who have an individual account and who manually create one or more student accounts.

Student data is used within student accounts for grouping and individual progress tracking. We do not use student data for any commercial purpose. The student data supplied by schools does not contain email or postal addresses or other contact details for students. The data is also used to generate progress reports for whole classrooms or other groups of students, which may be shared with teachers

or schools. Group progress reports contain the first and last names of individual students and their test scores.

Registered adults control the student data, and can add, modify and delete student data without RGR's involvement.

### **Non-Personally Identifiable Aggregate Student Data**

RGR has not previously and does not plan to aggregate usage data and marks for statistical analysis and research, which may be published and used to provide comparative data to other schools and bodies interested in education.

### **Security**

We store all data on a secure server. This means that we use encryption technology and firewalls in an effort to protect the information from being accessed by anyone else.

Registered adults choose passwords so that access to the system is protected and to help ensure that only they can access student data. Registered adults are solely responsible for safeguarding their passwords.

Please understand, however, that we do not warrant as fail-proof the security of information provided by or submitted to us. Due to the nature of Internet communications and evolving technologies, we cannot provide, and we expressly disclaim, assurance that the information you provide us will remain free from loss, misuse, or alteration by third parties who, despite our efforts, obtain unauthorized access.

Except as disclosed above, we will not disclose your personally identifiable information to unaffiliated third parties without your consent, except in the following limited circumstances.

*Vendors.* We may employ other companies to perform functions on our behalf, such as maintaining the GMOL, providing services related to the GMOL, collecting information, or other functions necessary to our business. We may need to share personally identifiable information with these companies. We will provide our Vendors, contractors and agents with only that information necessary to perform their functions, and we will not allow them to use personally identifiable information for any other purpose.

*Legal.* We will reveal your or student personally identifiable information to the extent we reasonably believe we are required to do so by law or where permitted by law. For example, we may disclose personally identifiable information to government authorities or third parties pursuant to a legal request, subpoena or other legal process and we may also use or disclose your personally identifiable information as permitted by law to collect debts, fight fraud or protect the rights or property of RGR, our clients, our website and its users or third parties, or when we otherwise believe in good faith that the law requires it.

*Transfer of GMOL.* We shall be entitled to transfer to a third party information we collect, including any personally identifiable information, in connection with a merger, change of control of RGR, a sale of all or substantially all of the assets of the business entity responsible for the information under this Privacy Statement, or bankruptcy. For example, this information may be transferred to the new party assuming our functions or in control, or the party acquiring assets.

**Effective Date**

The effective date of this Privacy Policy is February 1, 2012.

**Contact Us**

How to contact us: If you have any questions about our use of student data, please email:

[info@reallygreatreading.com](mailto:info@reallygreatreading.com)