Curriculum Associates, LLC

Data Handling and Privacy Statement

Last Updated: December 6, 2018

Purpose. Curriculum Associates takes the protection of our customers’ data and information, particularly student data, very seriously. The purpose of this Data Handling and Privacy Statement is to inform Curriculum Associates’ customers about its current data security policies and practices, which are intended to safeguard this sensitive information. Curriculum Associates handles customer data in a manner consistent with applicable laws and regulations, including, without limitation, the Federal Family Educational Rights and Privacy Act (FERPA), the California Student Online Personal Information Protection Act (SOPIPA), and other state student data privacy protection laws.

Scope. This policy covers the collection, use, and storage of data that is obtained through the use of Curriculum Associates’ proprietary i-Ready® platform and related services provided by Curriculum Associates. The i-Ready® platform includes the online diagnostic and instruction components as well as learning games, which are collectively referred to in this policy as “i-Ready.”

Student Data Obtained and Collected. Curriculum Associates receives certain information from its school district customers to enable students to use i-Ready. The following information is generally provided to Curriculum Associates for each student user of i-Ready: student first and last name, date of birth, gender, ethnicity or race, student school enrollment, student grade level, teacher name, English language learner status, and eligibility for free- or reduced-price lunch. When students use i-Ready, certain assessment results and usage metrics are also created. These results and usage metrics are used by Curriculum Associates as described below. While teachers and school administrators are able to access student information and related i-Ready usage data, this information is not made available to other students or the public. Note that Curriculum Associates does not solicit personally identifiable information directly from students—all student information is provided by school district customers or created through the use of the i-Ready platform.

Use of Student Data. Curriculum Associates only uses student data for education-related purposes. Curriculum Associates only uses student-identifiable data provided by schools and/or school districts to make i-Ready available to that particular student, and to provide related reports and services to that student’s school and school district and its teachers and administrators. Curriculum Associates uses student data collected from the use of i-Ready for the purpose of making i-Ready available to its customers and improving its content and effectiveness. Curriculum Associates collects and uses aggregated, de-identified student data for core product functionality to make i-Ready a more effective, adaptive product. “De-identified student data” refers to data generated from usage of i-Ready from which all personally identifiable information has been removed or obscured so that it does not identify individual students and there is no reasonable basis to believe that the information can be used to identify individual students. Curriculum Associates also uses de-identified student data for research and development purposes, including analyzing the efficacy of i-Ready. While some of this work is done internally, Curriculum Associates does share de-identified data with trusted third-party research partners as part of these research initiatives. Curriculum Associates does not attempt to re-identify
de-identified student data and takes reasonable measures to protect against the re-identification of its de-identified student data. It also prohibits its research partners from attempting to re-identify de-identified student data. Curriculum Associates does not sell student data or otherwise share student identifiable data with third parties. Curriculum Associates does not include advertisements within i-Ready nor does it use student data for targeted advertising in any manner.

**Student Privacy Pledge.** To further demonstrate its commitment to protecting the privacy of student information, Curriculum Associates has taken the Student Privacy Pledge [https://studentprivacypledge.org/](https://studentprivacypledge.org/). This means that, among other things, Curriculum Associates has pledged not to sell student information, not to engage in behaviorally targeted advertising, and to use collected data for authorized purposes only. Curriculum Associates only uses collected student data for the purposes described in the previous paragraph.

**Data Storage Location.** i-Ready is a cloud-based application. Our servers are located in Tier 1 data centers located in the United States. We do not store any student data outside of the US.

**Network-Level Security Measures.** Curriculum Associates’ i-Ready systems and servers are hosted in a cloud environment. Our hosting provider implements network-level security measures in accordance with industry standards. In addition, Curriculum Associates manages its own controls of the network environment.

**Server-Level Security Measures.** Access to production servers is limited to a small, identified group of operations engineers that are trained specifically for those responsibilities. The servers are configured to conduct daily updates for any security patches that are released and applicable. The servers have anti-virus, intrusion detection, configuration control, monitoring/alerting, and automated backups. In addition, Curriculum Associates conducts regular vulnerability testing.

**Computer/Laptop/Device Security Measures.** Curriculum Associates employs a full IT staff that manages and secures its corporate and employee IT systems. Laptops are encrypted and centrally managed with respect to configuration updates and anti-virus. Access to all Curriculum Associates computers and laptops is password-controlled. Curriculum Associates sets up teacher and administrator accounts for i-Ready so that they are also password-controlled.

**Encryption.** i-Ready is only accessible via https and all public network traffic is encrypted with the latest encryption standards. Encryption of data at rest is implemented for all data stored in the i-Ready system.

**Employee and Contractor Policies and Procedures.** Curriculum Associates limits access to student-identifiable data and customer data to those employees who need to have such access in order to allow Curriculum Associates to provide quality products and services to its customers. Curriculum Associates requires all employees who have access to Curriculum Associates servers and systems to sign non-disclosure agreements. Curriculum Associates requires its employees and contractors who have access to student data to participate in annual training sessions on IT security policies and best practices. Any employee who ceases working with Curriculum Associates is reminded of his or her non-disclosure obligations at the time of departure, and network access is terminated at that time.

**Third-Party Audits and Monitoring.** In addition to internal monitoring and vulnerability assessments, Curriculum Associates contracts with a third party to conduct annual security audits, which includes
penetration testing of the i-Ready application. Curriculum Associates reviews the third-party audit findings and will implement recommended security program changes and enhancements where practical and appropriate.

**Data Retention and Destruction.** Student and teacher personal data is used only in the production systems and only for the explicitly identified functions of the i-Ready application. Student and teacher personal data is de-identified before any testing or research activities may be conducted. Upon the written request of a customer, Curriculum Associates will remove all personally identifiable student and teacher data from its production systems at the end of a contract. In addition, Curriculum Associates reserves the right, in its sole discretion, to remove a particular customer’s student data from its production servers a reasonable period of time after its relationship with the customer has ended, as demonstrated by the end of contract term or a significant period of inactivity in all customer accounts. Student data is removed from backups in accordance with Curriculum Associates’ data retention practices. If Curriculum Associates is required to restore any materials from its backups, it will purge all student-identifiable data not currently in use in the production systems from the restored backups.

**Correction and Removal of Student Data.** Parents of students who use i-Ready may request correction or removal of their child’s personally identifiable data from i-Ready by contacting their students’ teacher or school administrator. The teacher or school administrator can then verify the identity of the requesting party and notify Curriculum Associates of the request. Curriculum Associates will promptly comply with valid requests for correction or removal of student data; however, removal of student personally identifiable data will limit that student’s ability to use i-Ready.

**Breach Notification.** Curriculum Associates follows documented “Security Incident Management Procedures” when investigating any potential security incident. In the event of a data security breach, Curriculum Associates will notify impacted customers as promptly as possible that a breach has occurred, and will inform them (to the extent known) what data has been compromised. Curriculum Associates expects customers to notify individual teachers and parents of any such breach to the extent required, but will provide customers reasonably requested assistance with such notifications and will also reimburse customers for the reasonable costs associated with legally required breach notices.