



Castle Software, Inc.
Harris School Solutions
1501 Reedsdale Street
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Pittsburgh, PA 15233
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CastleLearning.com

Data Privacy & Security Policy

Castle Software, Inc. ("Castle") is committed to protecting the privacy of its users. Because Castle gathers certain types of information about the users of the Castle websites ("Service"), we believe you should fully understand the terms and conditions surrounding the use of the information we collect. The following discloses our information gathering and dissemination practices for the CastleLearning.com web sites.

Please review the following statement to understand how the information you provide to Castle through our websites will be treated.

Information Castle collects

You can visit the CastleLearning.com web site without identifying yourself. You can sign-up for the company newsletter/blog where you need to supply an email address plus other optional information (name, organization, title). You can opt-out of the newsletter/blog at any time and modify or delete any personal information that you previously provided. We will not share any of your personal information with any outside organization.

The Castle service requires that you have a subscription. Each subscription is associated with a Login ID and a Password which are used for accessing the information and activities on the web site.

Other information, including names, student numbers, email addresses and passwords may be supplied to us.

For home subscriptions, the purchaser of the subscriptions supplies the subscription-holders names.

For school subscriptions, a representative from the school specifies some or all of the following information about the subscription-holders:

- First and Last Name - this information is used to identify students and teachers in various student, teacher, and administrator reports.
- Email Address - this is optional and is used only to email forgotten login information to a student or teacher. The school can disable this feature.
- Grade - this is the student's current grade level or year of graduation and is optional. It is used to help teachers identify their students in the database.
- Login IDs and Passwords - the school representative optionally supplies this information. Otherwise, Login IDs are generated by Castle. Passwords not supplied to us are specified by each individual user the first time they sign in.
- Identification Number - this the Student Identification Number that helps identify a user in the database.

For home a subscription, the purchaser supplies the subscription-holder's name.

Google User Data

If you utilize Google Classroom, the only data we retrieve from Google Sign-In and Google Classroom is your email address. This is used to match up to the associated account in Castle. We do not retrieve or store any other data aside from Google Classroom assignment and student identification values used to grade assignments and push the grades over to Google Classroom. None of this data is distributed to any 3rd parties.

What Castle Learning Online does with the information collected

The Login ID and Password assigned to users are used to login and participate in activities of the Castle websites.

The PISI personal information is only used for educational purposes. The PISI supplied to Castle will not be given, sold, rented, loaned, or otherwise disclosed to any third parties outside of Castle, except when we have your permission or under special circumstances, such as when we believe in good faith that disclosure is reasonably necessary to (i) comply with legal process, (ii) enforce the Terms of Use, (iii) respond to claims that any content on the Castle web sites violates the rights of third parties, or (iv) protect the rights, property, or personal safety of Castle, its customers, or the public. In addition, when you subscribe to any 3rd party service through Castle, such as Method Test Prep, you are giving Castle implicit permission to give student information to that 3rd party in order to achieve a single sign on between the services.

Note that our database is stored in a co-location facility owned and managed by:

Rackspace
 1 Fanatical Place
 City of Windcrest
 San Antonio, TX 78218

Rackspace's Acceptable Use Policy and Privacy Statement can be found at <http://www.rackspace.com/information/legal/>

Castle may use aggregated personal information to determine the demographics of our users and to distribute statistics and general marketplace information about Castle's products. These demographics will always represent aggregate information and will never identify a specific user. Castle does not display any paid advertising on their websites.

Access to Your Information

Depending on options specified by school representatives for the school version of Castle's websites, users have the ability to correct or change some or all the information specified when the subscription was created.

Data Destruction

Each school year, student data from approximately 16 months prior to the new school year is deleted from the database.

All student data will be deleted at end of contract if requested by the customer. Otherwise, the student data remains in the database for approximately 16 months after the end of the contract.

Security

Physical Location

All personal information is stored on servers at a location designed specifically to ensure that no unauthorized individuals have access to the server or its data. Our web hosting provider is Rackspace, one of the leading hosting providers.

Encryption-In-Motion

All transmitted data is encrypted using HTTPS/SSL protocols.

Encryption-At-Rest

All data in the Castle databases that can identify a student is encrypted.

Staff Training

Castle requires all internal personnel who would be in direct contact with user data information be trained in the secure handling and privacy distribution of student data. This includes, but is not limited to, access rights, communication with customers, along with the importing and

exporting of files. Customer service and training personnel are trained to only release student information to authorized school/district personnel or parents through a series of validation methods.

Data Breach Protocol

Castle maintains a contact list of the key administrators for each customer. Should a data breach occur, these administrators will be notified via email as soon as it is known what breach, exposure, or data loss may have occurred.

Subcontractors

Subcontractors' are required to sign Non-Disclosure Agreements and must return or destroy all Castle property and data at the end of their contracts.

Cookies Policy

Castle's websites use cookies. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web-server to a web-browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. By using Castle's websites and agreeing to this policy, you consent to Castle's use of cookies in accordance with the terms of this policy.

Castle uses cookies on their websites to:

Improve the websites' usability

Administer the websites

Prevent fraud and improve the security of the websites

Personalize the websites for each user

Castle uses both session and persistent cookies on their websites. Castle does not use third party cookies. Most browsers allow you to refuse to accept cookies. If you block cookies, you will not be able to use all the features on the Castle websites. You can delete cookies already stored on your computer. Deleting cookies will have a negative impact on the usability of many websites. (note that part of this cookie policy was created using a template from SEQ Legal - <http://www.seqlegal.com>).

Castle's Data Security & Privacy Policy Statement Changes

Changes to this policy will be posted on the Castle websites. By using these websites, you signify your assent to Castle's Security & Privacy Policy. If you do not agree to this policy statement, please do not use the Castle websites or its Services. Your continued use of the

Castle websites or its services following the posting of changes to these terms will mean you accept those changes.

Contact Castle Software, Inc.

Please contact us if you have any questions about this Privacy & Security policy..

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