

Schoolwires Privacy Policy

Effective on 01/20/05

Schoolwires, Inc.® is proud to power your Internet site. We are dedicated to providing easy-to-use, powerful and affordable Internet sites.

At Schoolwires, we are equally committed to protecting your privacy. This Statement was developed to give you a full understanding of terms and conditions relating to information collected through your organization's site.

This Privacy Statement pertains only to the information that Schoolwires collects or that is provided to us by your organization. Your organization may have its own policies addressing collection, use and sharing of personally identifiable information. For information about your organization's policy, please contact your organization directly.

This Privacy Statement applies only to ASP-Delivered sites and NOT to sites hosted by your organization or a Third-Party Hosting Facility. Please contact your organization's Primary Contact to Schoolwires to learn if this Privacy Statement applies to you.

Message from TRUSTe

Schoolwires, Inc. is a licensee of the TRUSTe Children's Privacy Program. This Privacy Statement discloses the privacy practices for Schoolwires.com. TRUSTe is an independent, non-profit organization whose mission is to build users' trust and confidence in the Internet by promoting the use of fair information practices. Because this site wants to demonstrate its commitment to your privacy, it has agreed to disclose its information practices and have its privacy practices reviewed for compliance by TRUSTe. This Web site complies with the TRUSTe Children's Privacy Program, which has been approved by the Federal Trade Commission as an authorized safe harbor under the Children's Online Privacy Protection Rule. When you and your child visit a Web site displaying the TRUSTe trust mark, you can expect to be notified of:

- a. What Personal Information the Web site seeks to collect from your child;
- b. The organization(s) collecting the information;
- c. How the information is used;
- d. With whom the information may be shared;
- e. What choices are available to you regarding collection, use and distribution of the information collected from your child;
- f. The kind of security procedures that are in place to protect the loss, misuse or alteration of information under the control of Schoolwires;
- g. How you can review and delete any information collected from your child;
- h. How you can opt not to share Personal Information collected from your child with third parties, if you so choose.

Information We Collect

You may visit your organization's site as a guest without registering. Registration, however, will give you access to certain features as well as the ability to personalize certain features.

Schoolwires collects personal information via registration. Registration occurs in two ways:

1. Self-Registration. If you choose to become a registered guest, we will ask for personal information from you through your organization's site powered by Schoolwires. After we collect this information from you, it may be verified by an official at your organization. So that the registration process is compliant with federal law under the Children's Online Privacy Protection Act (COPPA), you are first asked for your birth date. Birth date information is collected only to validate your age and is not stored.

- a. Children under 13 years of age are not allowed to register themselves with your organization's Schoolwires site. Before a child under 13 may access features that require registration, the organization must first obtain a signed parental consent form. Consent is received by the organization, the organization is responsible for providing parent access to the child's profile so the parent may, at any time, review, modify delete the child's personal information. A parent also has the right to refuse to further collection of the child's information. If you have questions regarding your profile, please contact your organization's Primary Contact to Schoolwires.
- b. If you are over 13 years of age, you are required to supply your First and Last Name, Email Address, Sign-In Name and Password. These fields are labeled to indicate that they are required. The following fields are labeled as optional: Title, Address, City, State, ZIP Code, Phone and Fax. After registration, the Site Director for your organization may decide to assign to you a role or roles (viewing privileges). Based upon your designated role(s), you may have access to additional information or services. If you have questions concerning your role(s), please contact your organization's Primary Contact to Schoolwires.

2. Pre-Registration. You may be pre-registered by your organization in one of two ways. Either way, your organization may not share personal information for children under 13 years of age with Schoolwires without first receiving parental consent.

- a. Your registration information may be shared with Schoolwires via a school-provided list. Schoolwires would use this list to conduct a batch import of information.
- b. A school-designated individual may input registration information for you.

Information collected for registration may also be used to (1) provide you with important information about your school's site, such as updates or notices, (2) improve our product and services, (3) improve customer service and/or (4) in aggregate, guide our internal marketing efforts. No personally identifiable information will be shared with third parties.

Additional information may be requested of you in other situations, for example, if you submit a customer support request or a content submission request. In such instances, the goal of collecting additional information is to serve you more effectively and efficiently.

It is important to understand that sites powered by Schoolwires are used to present and archive information supplied by content contributors designated by your organization. Schoolwires does not supply the organization-specific content appearing on your organization's website. Once posted to the Internet, content supplied by content contributors at your organization is public information available via the Internet.

Privacy of Children

Schoolwires is dedicated to the privacy of children under 13 years of age. We do not collect or entice (by use of contests, games, prizes, or other enticements) from children more information than is needed to access services. We will not share any personal information about children with third parties.

As a parent or legal guardian for children under 13, you may review your child's personal information. After your child's parental consent form is submitted, an individual at your organization will supply you with your child's Sign-In and Password. If you would like to refuse to allow any further collection or use of your child's information, please contact your organization's Primary Contact to Schoolwires.

How We Use Information

Profile

We do not associate information that we collect through log files or third parties with your personal profile. The information is provided voluntarily by you when you register for the site. A profile is stored information that gives you access to certain features as well as the ability to personalize certain features. Your profile can be used only by you, Schoolwires and your organization.

Cookies

A cookie is a piece of data stored on your computer tied to information about you. The only personal information a cookie can contain is information you supply.

Schoolwires uses session or dynamic cookies to let us know when a user is signed in. Once you close your browser, the cookie simply terminates.

When a user is signed in and depending on the user's assigned role(s), additional services become available through our menu system. Again, depending on your assigned role(s), cookies may offer the following benefits after Sign-In:

1. A personalized salutation greeting
2. Content tailored to your role(s)
3. Use of services that require Sign-In
4. Session time-out, a security feature

You can disable cookies in your browser's preferences. If you disable cookies in your browser, you may still use your school's site. Services, however, that require Sign-In will not work if cookies are disabled.

We use web beacons (single-pixel gifs) to count visitors or deliver co-branded services.

Communications from the Site

Service Announcements

From time to time, it may be necessary to send out a strictly service-related announcement. For instance, if our service is temporarily suspended for maintenance, we might send you a notification email. Users cannot opt-out of these communications though they can deactivate their account. (See section entitled Modifications to Personal Information later in this Statement.) However, these communications are not promotional in nature.

E-Alerts and Subscriptions

E-Alerts and Subscriptions is an optional feature that allows registered users to subscribe to content on a site. If your organization purchased the E-Alerts software option, you can use two different kinds of E-Alerts:

1. **Broadcast E-Alerts:** These are accessed by Site and Subsite Directors to send an email message to a specific group or multiple groups of users (i.e., users assigned the same viewing permissions[roles]).
2. **Content E-Alerts:** These provide for automatic email notification to users whenever significant changes are made to one or more homepages or sections to which they subscribe. Please note that the content editors decide whether to send an E-Alert to subscribers. The email message that users receive contains a link to the actual homepage or section, allowing them immediate and direct access.

Users can disable this feature by checking the "OFF" option for the "Your E-Alerts are" question. The default option is OFF. Registered users can also modify site homepage or section subscriptions by clicking the "Edit Subscriptions" button.

Customer Service

As necessary, Schoolwires may communicate with you via email, phone or online to provide requested services and in regards to account-related issues.

Sharing

When Required by Law

Though we make every effort to preserve your privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on your organization's site.

District and School Editors

Users who have been assigned editorial positions of Site or Subsite Directors have access to all registered user information strictly and solely on their organization's site. Contact your organization's Primary Contact to Schoolwires for more information regarding who has been assigned these positions and how this position-assigning process works for your organization.

Business Transitions

In the event Schoolwires goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, your personal information will, in most instances, be part of the assets transferred. You



will be notified by a prominent notice on our corporate website prior to a change of ownership or control of your personal information. For more information, see the Schoolwires Privacy Policy Statement Changes section.

Links

Your organization's site may contain links to other sites. Schoolwires is not responsible for the privacy practices of other such sites. Schoolwires privacy statement applies solely to information collected by Schoolwires.

Surveys and Feedback Forms

From time to time, our site may request information from you through surveys or feedback forms. Participation in these surveys or feedback forms is voluntary. If personal information is requested, Schoolwires will fully disclose this to you prior to submission. Information collected is used for the purposes of improving our product and services and understanding our audience.

Security

Schoolwires takes security seriously and employs measures to protect your information. Only employees who need the information to perform a specific job (for example, a customer service representative) have access to personally identifiable information.

If Schoolwires hosts your site, the servers that store personally identifiable information are in a secure environment. Personal information is stored in password-controlled servers with limited access. If you have any questions about the security of your organization's web site, please send a message to security@schoolwires.com.

If your organization hosts your site or chose to host with a Third-Party Hosting Facility, your organization or the Third-Party Hosting Facility is responsible for ensuring security. Contact your organization's Primary Contact to Schoolwires for information regarding its security provisions.

Modifications to Personal Information

There are three ways your personal information can be modified:

1. If your personally identifiable information changes (such as ZIP code, phone, email or postal address), or if you no longer desire full access to Schoolwires services, you may update or delete your personally identifiable information. This can be done by Signing In and clicking on the Access My Info button at the top of your organization's page.
2. Site and Subsite Directors have access and the ability to update personal information. These Editors only have access to their organization's user information. For children under 13 years of age, your organization is responsible for first validating receipt of the parental consent form.
3. Schoolwires may gather information from Site Directors in your organization which would allow Schoolwires to conduct a mass user import to update user information. For children under 13 years of age, your organization is responsible for first validating receipt of the parental consent form.

Schoolwires Privacy Policy Statement Changes

If we change our privacy policy, we will post the revised policy to www.schoolwires.com/policies and other places we deem reasonable and appropriate to keep you informed. When material changes affecting users under 13 years of age are made to this privacy policy, Schoolwires will post a change notification announcement on all of our clients'



Schoolwiresites. This announcement will include a link to the current privacy policy. The same notification procedure will be followed for users over the age of 13. If Schoolwires materially changes how it uses personal information about children under age 13, Schoolwires will have the school obtain verifiable parental consent for the new use of children's personal information.

Usage Implies Consent

By using sites powered by Schoolwires, Inc., you consent to this Privacy Statement. If you do not agree to this Privacy Statement, please do not use Schoolwireservices.

Schoolwires Corporate Site: www.schoolwires.com

When visiting the Schoolwires corporate site at www.schoolwires.com, personally identifiable information is collected in several ways. For example, we may ask for contact information when you correspond with us, request a demonstration, register for a seminar, inquire about special offers or programs, etc. Depending on the nature of your submission of personally identifiable information, a Schoolwires representative may contact you to gather or share additional information. No personally identifiable information will be shared with third parties.

Contact Information

At Schoolwires, we take privacy issues very seriously. If you have any questions, suggestions or concerns regarding our privacy policy, please contact us. For children's privacy issues, please contact Jason Coudriet at (814) 689-1046 ext. 309.

Schoolwires, Inc.

ATTN: Privacy Officer

320 Rolling Ridge Drive, Suite 201

State College, PA 16801

Phone: 814.689.1046

Fax: 814.689.3962

Email: privacy@schoolwires.com

URL: www.schoolwires.com/policies

If you have questions or concerns regarding this statement, you should first contact Schoolwires. If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you should then contact the TRUSTe Watchdog Dispute Resolution Program at http://www.truste.org/consumers/watchdog_complaint.php. TRUSTe will then serve as a liaison with the Web site to resolve your concerns.