



CogRead is committed to protecting the privacy of our clients and their students. This CogRead Online Privacy Statement applies to data collected by CogRead through any of its affiliated websites, including www.gcstest.com, www.brainskills.com and www.cogread.com and any authorized partner websites.

COLLECTION OF STUDENT INFORMATION

Schools must provide basic student information to register students in our administrative system. The purpose of this information is to properly present normed test results, for long-term aggregated studies and to facilitate proper identification of students in order to present student test and training results to students and appropriate school officials. As appropriate, schools may also choose to make test results and training results available to parents.

Student information required includes name, date of birth, zip code, ethnicity, grade and whether English is a first language. We do not use social security numbers, address or any sensitive information.

Schools can choose to register students anonymously, student 1, student 2, etc., but must maintain their own correlation map between user ID in our system to the actual student name to know what data belongs to which student.

USE OF STUDENT INFORMATION

CogRead collects and uses student information to operate and improve its sites and deliver the services or carry out the transactions that have been requested.

This may include providing schools with more effective customer service; making the sites or services easier to use by eliminating the need for teachers to repeatedly enter the same information; performing aggregated research and analysis aimed at improving our products, services and technologies; and displaying results of tests or use of the online exercises so teachers can track progress.

Aggregated results may be used to conduct studies on the effectiveness of our products. No personal results will be discernible in any study released to the public.

Student information collected on CogRead sites and services may be stored and processed in the United States or any other country in which CogRead or its affiliates, subsidiaries or agents maintain facilities, and by using a CogRead site or service, schools consent to any such transfer of information outside of your country. Information may be deleted once an account is no longer active, or it may be stored indefinitely.

SHARING OF STUDENT INFORMATION

Except as described in this statement, we will not disclose student information outside of CogRead and its controlled subsidiaries and affiliates under confidentiality agreement without consent of the proper school officials.

Registration information and test/training results identifiable to the individual will never be sold or provided to a third party unless required to provide requested services under confidentiality agreement. Individual scores may be part of aggregated information which may be used to develop standards for the test results and used in reports available to the public. In these reports, no individual data will be discernible. If the test or exercises are offered through and/or administered by a third party, such as a school or after-school program, then that third party will have access to the results.

We occasionally hire other companies to provide limited services on our behalf, such as handling the processing and delivery of mailings, providing customer support, hosting web sites, processing transactions, or performing statistical analysis of our services. Those companies will be permitted to obtain only the student information they need to deliver the service. They are required to maintain the confidentiality of the information and are prohibited from using it for any other purpose.

We may access and/or disclose student information if we reasonably believe such action is necessary to: (a) comply with the law or legal process served on CogRead; (b) protect and defend the rights or property of CogRead (including the enforcement of our agreements); or (c) act in urgent circumstances to protect the personal safety of users of CogRead services or members of the public.

ACCESSING STUDENT INFORMATION

Appropriate school personnel, authorized contractors, students and parents may have the ability to view or edit student information online. In order to help prevent student information from being viewed by others, students will be required to sign in with their credentials (user ID and password). The appropriate method(s) for accessing student information will depend on which sites or services students have used. Security of each student's login information is up to each school and student. Schools and students are responsible for determining each student user ID and password and maintaining its confidentiality.

SECURITY OF STUDENT INFORMATION

CogRead is committed to protecting the security of student information. We use a variety of security technologies and procedures to help protect student information from unauthorized access, use, or disclosure. For example, we store the student information schools provide on computer systems with limited access, which are located in controlled facilities operated by recognized industry leaders in the field. When we transmit confidential information over the Internet, we protect it through the use of encryption, such as the Secure Socket Layer (SSL) protocol. We use industry standard procedures to prevent hacking and unauthorized access, including a standalone firewall into our servers.

We require a user ID and password to access student accounts and student information. It is the school and student's responsibility to keep the password confidential. Students should not share this information with anyone. If a student is sharing a computer with anyone, students should always choose to log out before leaving a site or service to protect access to their information from subsequent users.

COLLECTION AND USE OF CHILDREN'S PERSONAL INFORMATION

Schools provide basic personal student information as noted above. Test and training results are automatically stored on our servers as students use the program. We follow the guidelines required by FERPA to protect this information.

We also meet the guidelines required by CIPA, the Children's Internet Protection Act.

ENFORCEMENT OF THIS PRIVACY STATEMENT

If you have questions regarding this statement, please use the contact information on the web site to contact us.

CHANGES TO THIS PRIVACY STATEMENT

We will occasionally update this privacy statement to reflect changes in our services and customer feedback. When we post changes to this Statement, we will revise the "last updated" date at the top of this statement. If there are material changes to this statement or in how CogRead will use your personal information, we will notify you either by prominently posting a notice of such changes prior to implementing the change or by directly sending you a notification. We encourage you to periodically review this statement to be informed of how CogRead is protecting your information.

CONTACTING US

CogRead welcomes your comments regarding this privacy statement. If you have questions about this statement or believe that we have not adhered to it, please contact us by using our contact information on the web site.