

Privacy Policy

Effective: March 23, 2023

NCS Pearson, Inc. ("Pearson") respects your privacy and has adopted this Privacy Policy (hereinafter "Privacy Policy") to let you know how we collect, use, manage, share, and protect information that we may gather or receive when you use our Assessment Development and Administration platform (ADAM). This Privacy Policy applies to this Site and any personally identifiable information collected by Pearson through this Site.

This Privacy Policy applies only to the Site where this notice is posted. Other websites, including other Pearson websites linked through this Site, may have their own privacy policies and practices. Your use of any other website is subject to the privacy policy of that website.

By using this Site, you agree to the terms of the Privacy Policy in effect at the time of use. It is your responsibility to read this Privacy Policy and check for updates on a regular basis. By continuing to use our Site, products or services after such updates have been made you are agreeing to be bound by any changes to this Privacy Policy. If you do not agree to the terms and conditions of this Privacy Policy, please do not use this Site.

Purpose

Pearson is under contract with certain education agencies (including state and local education agencies), institutions, customers, or organizations (each an "Education Agency" or collectively, "Education Agencies") to provide services for designated educational assessment programs ("Assessment Programs"). Each Education Agency contracts with Pearson to provide this Site pursuant to agreed specifications.

The purpose of this Site is to provide an education data and assessment administration portal with various features designed for use by a variety of education stakeholders, including educators, parents, and students. Some features of ADAM are designed for and available only to the Education Agency, and School District and School authorized staff ("Educators"). Other features of ADAM are designed for parents and students.

The purpose of the ADAM features for the Education Agency and Educators is to facilitate: (a) the rostering of all users affiliated with the Education Agency with the appropriate role-based permissions, such that student assessment can be administered successfully and securely; (b) enrollment of students for purposes of assessment assignment and administration; (c) ordering and tracking of assessment-related materials; and (d) assessment record keeping, reporting, and results analysis or interpretation. The purpose of the ADAM features for parents and students is to provide: (a) assessment administration (students only); (b) assessment results; and (c) assessment interpretive information.

Pearson serves as a data processor, and Pearson collects, processes, and uses personal data through this Site in accordance with, and for the purpose of, fulfilling its Assessment Program contract with the Education Agency, the data Controller, for which such personal data is collected. Use of this Site is subject to the Terms of Use.

What Personally Identifiable Information Do We Collect and How Do We Use It?

Access to the ADAM Site related to each assessment program is restricted by password or other approved authentication solution, per contract with each Education Agency, to users authorized by the Education Agency sponsoring such Assessment Program. Education Agencies are responsible for authorizing Educator access to this Site or providing Pearson with such authorized user information.

Education Agencies that authorize parent and student access to this Site will provide parents and/or students with applicable student account log-in information through the student's school or school district. Pearson will not directly provide parents or students with specific user identification or password information.

Education Agency and Educators: To create an Assessment Program record for a student, register students for an assessment in that Assessment Program, and/or administer an assessment to that student, the following information will be collected from the Education Agency or Educators through this Site for their participating students, as directed by the Education Agency sponsoring the Assessment Program:

- Required Fields:
 - Student's First and Last Name
 - Student Identifier
 - Primary Organization within the sponsoring Education Agency

Other demographic information may also be collected if directed by the Education Agency for the Assessment Program, including but not limited to:

- Student's Preferred Name
- Student's Middle Name
- Grade
- Group/Class
- Local ID
- Birthdate
- Sex
- Race
- Ethnicity
- Educational Classifications
- Economic & Family Status
- Public School Residence status
- Exception Learning Plan Participation (Section 504 or Individualized Education Plans)
- Accommodations

To order materials related to an Assessment Program, the following personal information may be collected: parent organization of the requesting local education agency, name of the Education Agency sponsoring the order, name, email address, phone number, physical delivery address, and quantity. If Pearson receives inquiries or emails about or through this Site from the Education Agency or Educators, Pearson may keep a record of the email, correspondence, and comments, including the individual's name, school district or organization name, and email address to reply to the communication, perform Site support and issue resolution, and maintain business records concerning this Site.

Parents and Students: Pearson does not seek to collect personal information directly from parents or students through this website. Parents and students must obtain their account-specific log-in data from

their school or school district. **Students, including students under the age of 13, are specifically requested to not provide any personal information through this website.**

Parents and students should direct all inquiries related to this Site to their school or school district. If Pearson receives an inquiry from a student through this Site, Pearson may collect, use, and retain personal information included in that inquiry to respond on a one-time basis to the student and to refer the student and the inquiry to the applicable education agency or the student's school or school district. After responding to a student inquiry, Pearson will remove from its system any personal information of the student included in the inquiry. If Pearson receives an inquiry from a parent through this Site, Pearson may collect, use, and retain personal information included in that inquiry to respond to the parent, to refer the parent and inquiry to the applicable education agency, school or school district, perform Site support and issue resolution and maintain business records concerning this Site.

How Do We Share Personally Identifiable Information?

Pearson will never sell your personal information. Pearson will use the data provided by Educators through this Site to perform the services requested by our customers, including but not limited to assessment delivery, fulfillment of orders for assessments, creating reports and records concerning students, and performing other contractual obligations for the education agency sponsoring the assessment program.

Except as specifically stated in this Privacy Policy, it is our policy not to share or disclose personal information collected through this Site with third parties other than affiliates of Pearson, and other companies and organizations who perform work for us under contract or sell products or services that complement our products and services and who are committed to protect the privacy of personal information in a manner consistent with this Privacy Policy. We may disclose a user's personal information:

- As requested or required by the Education Agency for the Assessment Program or the user's or student's School or School District;
- in response to a subpoena, court order or legal process, to the extent permitted or required by law;
- to protect the security of the user and other persons, our systems and the data we hold, consistent with applicable law;
- in connection with a sale, joint venture or other transfer of some or all of our company or its assets;
- to address actual or suspected fraud or other illegal activities; or
- in order to enforce the Site's Terms of Use or any contract between us and such user.

Non-personally identifiable aggregated information collected through this website may be used for quality assurance and for research and development and may be disclosed to third parties in non-personally identifiable form upon receipt of written approval from the Education Agency.

Information Access and Correction

Only the Education Agency or Educators may enter data on a student's record through this Site. The Education Agency and/or Educators may review the student record on this Site, make student record

changes, review available assessment reports and otherwise review data for that student. The Education Agency or Educators may contact Pearson at MZD_Support@grps.pearson.com if they believe there may be an issue with a student record, an assessment report or encounters any issues in accessing or correcting information through this Site.

Where student or parent access is provided, the access is limited to the student's specific assessment results. Parents and students do not have authorization to alter the information found in the student record on the Site. Parents or students should contact their school or school district if they believe there may be an issue with a student record or account. Pearson is not authorized to update records at the request of parents or students.

Information from Children

This Site is not directed to children, including anyone under the age of thirteen (13). Pearson will not knowingly collect or process any personal information from anyone under the age of thirteen (13) through this Site.

Non-Personally Identifiable Information

We may collect non-personally identifiable information about users whenever they interact with this Site. Such non-personally identifiable information may include the browser name, the type of computer, and technical information about the users' means of connection to our Site, such as the operating system, internet service provider and IP address (a number automatically assigned to the user's computer by their internet service provider). This information is generally collected for system administration purposes, to monitor activity levels and for security purposes. Pearson does not link IP addresses to personal information, except that we reserve the right to link IP addresses and other non-personally identifiable information to protect the integrity of this Site, to monitor compliance with our Terms of Use, and for security purposes.

Data Retention and Destruction

Pearson acts as a data processor for our customers, the Education Agencies, and we process personal information on their behalf and at their direction. Pearson will retain and destroy all data pursuant to the contracts with our customers or applicable legal requirements.

Disclosure and Transfer of Information

The Site is hosted and operated in the United States and is subject to United States law. We will comply with the privacy and data collection laws of the jurisdiction of the individual from whom the information is collected. Personal Data and information of users located outside of the United States will be transferred to Pearson and our third-party vendors in the United States only to facilitate the purpose for which it was collected. For transfers of personal information from the European Union, the United Kingdom, and Switzerland, we rely on appropriate transfer mechanisms, including but not limited to, Standard Contractual Clauses and performance of contract.

Information Received from Internet Service Providers

This application receives information that is automatically generated by a user's Internet service provider (ISP). This information may include the IP address (a number automatically assigned to a computer by the ISP), the associated URLs, domain types, the browser type used to access our site, the country, state and telephone area code, the location of the ISP's servers, the pages of our site that the user views during the visit, any search terms entered on this site, and the user's website address and email address. This information may be collected for system administration purposes, to gather broad demographic information, and to monitor the level of activity on the site. Pearson does not link IP addresses to personally identifiable information.

Web Analytics

We use third party web analytical services, which may include Google Analytics, to collect anonymous visitor information, including IP addresses, browser types, referring pages, pages visited, and time spent on a particular site. While these analytical services collect and report information on an anonymous basis, they may use cookies and collect IP addresses to gather web trend information. We use this web trend information for system administration and marketing purposes and to identify problems and improve service. For further information about Google Analytics, and for links to Google's Privacy Policy and an opt-out tool for Google Analytics, go to <https://policies.google.com/>.

Changes to the Privacy Policy

We reserve the right to update the terms of this Privacy Policy from time to time. We encourage you to visit and review this Privacy Policy periodically to ensure you agree with any changes or updates. We will post our revised privacy notice on our website and update the 'Revision Date' to reflect the date of the changes.

By continuing to use our website after we post any such changes or updates you accept the privacy notice as modified.

How to Contact Us

If you have questions or concerns about this Privacy Policy, please contact us at dataprivacyUS@pearson.com. If you want us to respond to your comment or question, please provide your contact information in your message.

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