

## *Privacy Policy*

---

*(Updated June 28, 2023)*

### **Your privacy is important to us.**

TeachingBooks.net (“TeachingBooks.net”, “TeachingBooks”, “Book Connections”, “we”, “us”) is committed to maintaining the privacy of our subscribers (“you”, “your”). We view our responsibility as stewards of your information, so we take this privacy and your personal data very seriously.

This Privacy Policy describes how we treat personal information that is entered by users on TeachingBooks.net. By accessing or using our services, you acknowledge that you accept the practices and policies outlined in this Privacy Policy.

### **We Commit To**

- X** Not collect, maintain, use or share student personal information.
- X** Not sell personal information.
- X** Not use or disclose any information collected through an educational/school service (whether personal information or otherwise) for behavioral targeting of advertisements.
- X** Not build a personal profile of a student, because we do not collect, maintain, or use student personal information.
- X** Not make material changes to school service provider consumer privacy policies without first providing prominent notice to the account holder(s) and allowing them choices before data is used in any manner inconsistent with terms they were initially provided; and not make material changes to other policies or practices governing the use of student personal information that are inconsistent with contractual requirements.
- X** Not knowingly retain personal information for adults (and never any for students) beyond the time period required to support the authorized educational/school purposes.
- ✓** Disclose clearly in contracts or privacy policies, including in a manner easy for parents to understand, what types of student personal information we collect, (which is none), and the purposes for which the information we maintain is used or shared with third parties.
- ✓** Maintain a comprehensive security program that is reasonably designed to protect the security, privacy, confidentiality, and integrity of student personal information against risks – such as unauthorized access or use, or unintended or inappropriate disclosure – through the use of administrative, technological, and physical safeguards appropriate to the sensitivity of the information.

- ✓ Require that our vendors with whom student personal information is shared in order to deliver the educational service, if any, are obligated to implement these same commitments for the given student personal information.
- ✓ Allow a successor entity to maintain the student personal information, in the case of our merger or acquisition by another entity, provided the successor entity is subject to these same commitments for the previously collected student personal information.

### **Summary of TeachingBooks' purposes for using information**

In an effort to be transparent about how TeachingBooks will internally use your information, we have outlined the following purposes:

- To set up and maintain your account, and to do all other things required for providing our services, such as enabling collaboration, providing website and email hosting, and backing up and restoring your data.
- To communicate with you via the website and email about your TeachingBooks access, changes to this Privacy Policy, changes to the Terms of Service, or important notices regarding this service.
- To keep you posted on updates and enhancements to our services, as well to highlight resources that we think might be of interest to you.
- To ask you to participate in surveys, or to solicit feedback on our products and services.
- To understand how users use our products and services, to monitor and prevent problems, and to improve our products and services.
- To provide customer support, and to analyze and improve our interactions with customers.
- To detect and prevent fraudulent transactions and other illegal activities, to report spam, and to protect the rights and interests of TeachingBooks, TeachingBooks's users, third parties and the public.
- To update, expand and analyze our records, identify new customers, and provide products and services that may be useful to you.
- To analyze trends, administer our websites, and track visitor navigations on our websites to understand what visitors are looking for and to better help them.
- To monitor and improve marketing campaigns and make suggestions relevant to the user.

Your choices regarding information include:

- *Opt out of non-essential electronic communications:* You may opt out of receiving newsletters and other non-essential messages by using the 'unsubscribe' function included in all such messages. However, you will continue to receive essential notices.
- *Disable cookies:* You can disable browser cookies before visiting our websites. However, if you do so, you may not be able to use certain features of the websites properly.
- *Optional information:* You can choose not to provide optional profile information such as non-mandatory fields when you submit any form linked to our websites.

Your rights with respect to information we hold about you:

- *Right to access:* You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including its use and to whom the information is shared.
- *Right to rectification:* You have the right to update the information we hold about you or to rectify any inaccuracies.
- *Right to erasure:* You have the right to request that we delete your personal information, such as when it is no longer necessary for the purpose for which it was originally collected.

## Guiding Principles

TeachingBooks acknowledges that all information about you is yours, and is shared with us for very specific educational reasons. With that in mind,

1. TeachingBooks collects, maintains and uses the information you provide to us for educational purposes. TeachingBooks will not sell, rent, swap, or otherwise disclose to any third party any information you provide for any purpose - including for advertising or marketing purposes.
2. TeachingBooks does not knowingly request, store, collect, or distribute any information about students—no first name, email, student rostering information, or anything else. Our policy is we feel it is best to never collect anything that we don't need or want—so we truly don't have any information about students. See Section 10 of this Privacy Policy for more about our handling of personal information from children.
3. TeachingBooks asks adults who want to maximize their use of our service to complete the Educator Login registration process. The personally identifiable information in Educator Login may include, but is not limited to, your name, email address, zip code, and facts about your profession and interests in children's books.
4. When data is transmitted, TeachingBooks uses industry standard SSL to ensure that information is encrypted and transmitted securely.
5. TeachingBooks strives for numerous privacy regulation authorities to be comfortable with our policies. With that in mind, we do all we can to ensure consistency with the Family Educational Rights and Privacy Act (FERPA) policies and the General Data Protection Regulation (GDPR). We comply with the Children's Online Privacy Protection Act (COPPA). We are compliant with web accessibility guidelines, and are approved by various student privacy protection regulators.

## **Acceptable Uses**

6a. TeachingBooks.net does not collect, maintain, use or share adult personal information beyond that needed for educational purposes. We may use information that we collect in the following ways:

1. for the purposes for which you specifically provided the information including, but not limited to, enabling us to process, validate and verify subscriptions;
2. to send you email notifications about services and updates;
3. to offer and/or enhance existing features or develop new features, products or services;
4. to provide third parties with aggregate, not-user-specific information about our usage patterns; and
5. in any other ways that are in compliance with this policy as it may be amended from time to time.

6b. We may use your email address to communicate with you. For example, we may inform you about content relevant to your interests, about new features and material on our site, to request your opinion on matters concerning the site, and/or to make you aware of highlights in our services. You can opt out of receiving these communications and unsubscribe by visiting your profile under My Account > My Profile or by emailing [info@TeachingBooks.net](mailto:info@TeachingBooks.net).

7. TeachingBooks reserves the right to send subscribers maintenance emails, such as, but not exclusively including, service confirmation, renewal/expiration notices, and infrequent service alert messages. The purpose of these maintenance email messages are to inform subscribers of specific changes that may impact their ability to use this site.

## **Information Collected Automatically**

8. TeachingBooks automatically tracks site usage information from your browser or device; this information is not Personal Information. For example, site usage information includes the type of browser and/or device you are using, the number and frequency of visitors to each web page, and the length of their visits. The information that is collected helps us evaluate how our visitors and subscribers use and navigate TeachingBooks on an aggregate basis.

## **Cookies**

9. TeachingBooks automatically uses "cookies" to allow us to identify return visitors and track the pages you've visited. A "cookie" is a small file that we transfer to your device. It contains no personal information, like your name or email address, but "remembers" that your computer has visited this site before. So if you leave the site and then return, this technology allows you to

connect directly to our site (bypassing Sign In), saves your password so you don't have to re-enter it each time you visit our site, and in the future, may be used to personalize your TeachingBooks experience. TeachingBooks uses HubSpot cookies for remarketing.

9a. You may remove all TeachingBooks cookies by going to:

<https://www.teachingbooks.net/ClearCookies>

9b. If you click on a link that takes you away from TeachingBooks to a third party or service, they may also store cookies on your browser or device. Our Privacy Policy does not cover the use of cookies by other parties and we are not responsible for their policies and/or practices.

### **Children Under 13**

10. TeachingBooks does not knowingly collect any information, including any identifiable information from students in PreK-12 environments. Specifically regarding children under 13, we do not collect, maintain, use or share student data to third parties. If you are a person under the age of 13, we do not want to receive any personal information about you—including information like your name, address or email address. In the event that we learn that we have collected any personal information from a child under the age of 13 with or without verification of parental consent, we will delete that information from our database as quickly as possible. Please contact us if you believe we have inadvertently collected information from a child under 13 by emailing [accounts@TeachingBooks.net](mailto:accounts@TeachingBooks.net).

We offer access to our materials that does not require a student's personal information as part of authentication.

We encourage institutions to share our [COPPA Compliance Notice](#) with families and guardians so that they can be assured that their student's personal information is not part of the TeachingBooks service.

### **Security**

11. Whenever TeachingBooks handles information that you enter on our site, regardless of where this occurs, we take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. We maintain a comprehensive security program that is designed to protect the security and confidentiality of your personal information. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, TeachingBooks.net cannot ensure or warrant the security of any information you transmit to us. The following is a list of some of the security measures we take in

order to protect the personal information you have provided us and to help reduce the risk of unauthorized access.

1. Data between users and the TeachingBooks.net website is encrypted in transit using SSL/TLS 1.2+. You can see that with our use of https everywhere instead of http.
2. Data at rest is encrypted using AES-256.
3. Passwords are stored as salted and hashed with a secure algorithm so that a database breach will not reveal them. They are not visible to TeachingBooks staff.
4. TeachingBooks' staff access to information requires multiple levels of authentication, and automatically signs out after 30 minutes of non-use.
5. A firewall is in place on both the database server and the web server. Penetration tests were run to identify and resolve vulnerabilities. We maintain anti-intrusion software to actively monitors for attempts to hack the site through various means.
6. Cookies are handled via anonymous/random session ids to further protect user information.

12. TeachingBooks does not control the privacy policies or procedures of our business partners, sponsors or other third party sites to which we provide hyperlinks.

12a. Chrome Extension. The TeachingBooks Chrome Extension is optional and not required for the TeachingBooks service. If you choose to use the TeachingBooks Chrome Extension your web searches will be enhanced with recommended book titles and links to resources that connect you to books and authors. In order to provide you with these enhanced search results TeachingBooks and Chrome will need to process your search terms. If you use this extension your search terms and IP address are retained for up to two weeks.

12b. JWPlayer. JWPlayer is the third-party service that we use to play you embedded content. We have set up JWPlayer to be consistent with our policies here, and do not transfer PII through it.

### **Retention of Information**

13. TeachingBooks retains your personal information for as long as your account is active, unless we are required by contract or law to retain it, need it to ensure the security of our community or our Service, or to enforce our Terms. Sometimes, we may retain your information for longer periods as permitted to maintain suppression lists, prevent abuse, if required in connection with a legal claim or proceeding, to enforce our agreements, for tax, accounting, or to comply with other legal obligations. Please know that when we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion

is possible.

You may close your account at any time by contacting us by email at [info@TeachingBooks.net](mailto:info@TeachingBooks.net) or by mail at the address listed under 20. If your account is inactive for two years or more (meaning you have not used your account or signed in), TeachingBooks automatically removes the account details, including all personally identifiable data provided by you. However, please know that we may retain Personal Data for an additional period as required under applicable laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

**Summary of Information TeachingBooks collects and processes**

14. To clarify TeachingBooks’ policies for collection, disclosure, and sale of information, please see the following chart.

	Categories of Personal Information	Collection: Does TeachingBooks use and collect?	Disclosure: Does TeachingBooks disclose?	Sale: Does TeachingBooks sell or share with anyone other than the user themselves?
A	Identifiers	YES	YES	NO
B	Categories of PI	YES	YES	NO
C	Commercial information	YES	NO	NO
D	Biometric information	NO	NO	NO
E	Internet or other electronic network activity information	NO	NO	NO
F	Geolocation data	YES	YES	NO
G	Audio, visual or similar information	NO	NO	NO

H	Professional or employment related information	YES	YES	NO
I	Non-public education information (as per the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99))	NO	NO	NO
J	Inferences drawn from other personal information to create a profile about a consumer.	NO	NO	NO

### Single Sign-on Services

15. TeachingBooks has created OAuth2 secure protocols within two established SSO products that enables secure student signons without any student data being transferred to TeachingBooks. Try setting up TeachingBooks within Clever and/or ClassLink to experience this secure system. And email [accounts@TeachingBooks.net](mailto:accounts@TeachingBooks.net) if you need support on these

### Web Content Accessibility Guidelines

16. TeachingBooks is compliant with the web content accessibility guidelines of WCAG 2.1 AA compliance, as accepted by [Section 508 of the Rehabilitation Act of 1973](#), and the [Americans with Disabilities Act \(ADA\)](#).

- See our latest Voluntary Product Accessibility Template at <https://TeachingBooks.net/VPAT>
- Report accessibility issues to [nick@TeachingBooks.net](mailto:nick@TeachingBooks.net) or 800-596-0710

### Family Educational Rights and Privacy Act Compliance

17. TeachingBooks understands the obligation public agencies and school systems have to comply with the Family Educational Rights and Privacy Act (FERPA). With this in mind, we agree to act as a "School Official" as defined by FERPA, meaning that we:

1. Perform an institutional service or function for which the school or district would otherwise use its own employees;
2. Have been determined to meet the criteria set forth in the school's or district's annual

notification of FERPA rights for being a School Official with a legitimate educational interest in the education records;

3. Are under the direct control of the school or district with regard to the use and maintenance of education records; and
4. Use education records only for authorized purposes and will not re-disclose Personally Identifiable Information from education records to other parties (unless we have specific authorization from the school or district to do so and it is otherwise permitted by FERPA).

### **Student Privacy Alliance**

18. TeachingBooks was reviewed by the [California Student Privacy Alliance](#) and is listed by them as approved for use. TeachingBooks' specific page is at [https://sdpc.a4l.org/search\\_company\\_national.php?company\\_name=TeachingBooks](https://sdpc.a4l.org/search_company_national.php?company_name=TeachingBooks)

### **General Data Protection Regulation**

19. General Data Protection Regulation (GDPR) is a relatively new body of regulation regarding the handling of personal data for citizens of the European Union (EU). The primary objective of the GDPR is to give citizens control of their personal data. In keeping with this important goal, TeachingBooks.net is working towards compliance with this regulation.

19a. To empower users of our service to control their own personal data, TeachingBooks.net considers many factors. Below are some of the most relevant articles from the GDPR, and how TeachingBooks.net currently responds.

1. Article 5 “Principles relating to processing of personal data”: TeachingBooks is a trusted steward of personal data. Data received from educational agencies is to be used solely for purposes of providing our educational services. TeachingBooks does not sell, rent, swap, or otherwise disclose to any third party any information you provide for any purpose - including for advertising or marketing purposes.
2. Article 17 “Right to be forgotten”: Subscribing institutions can choose to delete users from TeachingBooks at any time. Individual users can choose to delete any data they’ve added to TeachingBooks at any time.
3. Article 32 “Security of processing”: TeachingBooks keeps all personal data confidential and secure. TeachingBooks’ data security protections include: internal data management policies and procedures, limitations on access to personal data, data encryption for both data in transit and at rest (latter coming soon), maintaining secure firewalls, data systems monitoring, incident response plans, and safeguards to ensure personal data is not accessed by unauthorized persons when transmitted over communication networks.
4. Article 33 “Notification of a personal data breach to the supervisory authority”: TeachingBooks recognizes that GDPR requires notice to the supervisory authority within

72 hours of awareness of a personal data breach. If there ever is discovery of a security breach that results in an unauthorized release of personal data, TeachingBooks shall promptly notify affected educational agencies of such breach, shall conduct an investigation, and shall restore the integrity of its data systems as soon as possible. TeachingBooks will fully cooperate and assist with required notices to those individuals affected by such breach.

5. Article 35: “Data protection impact assessment”: TeachingBooks conducts various security assessments of our systems. Certain security tests are conducted annually, others much more frequently, and some other tests are running constantly.

TeachingBooks plans to continue to explore, update, and be accountable for data security and regulation.

### **Changes to our Privacy Policy**

20. TeachingBooks.net may modify or update this Privacy Policy from time to time. If we change the policy in a manner that affects and seeks to use your personal information in a way different than previously stated, we will provide at least 30 days notice so that you may evaluate the change in our policy.

### **Questions**

21. If you have any questions about this privacy statement, the practices of the TeachingBooks.net site, or your dealings with our website, please contact us at:

[info@TeachingBooks.net](mailto:info@TeachingBooks.net)

TeachingBooks / Book Connections

100 River Place, Suite 250

Madison, WI 53716

(800) 596-0710

Or contact our Founder & Head, Nicholas Glass, at [nick@TeachingBooks.net](mailto:nick@TeachingBooks.net) (800) 596-0710.

## Parental Rights under the Protection of Pupil Rights Amendment (PPRA)

*(Updated February 27, 2022)*

### Notification of Rights under the Protection of Pupil Rights Amendment (PPRA)

The Protection of Pupil Rights Amendment (PPRA) gives parents and students (18 years or older or emancipated) certain rights when a school conducts student surveys, collects and uses information for marketing purposes, and administers certain physical exams to students. While TeachingBooks and Book Connections never survey students, we acknowledge and agree to the following:

Parents have the right to:

1. Consent before students can be given a survey concerning one or more of the following protected areas (“protected information survey”):
  - a. Political affiliations or beliefs of the student or student’s parent;
  - b. Mental or psychological conditions of the student or student’s family;
  - c. Sexual behavior or attitudes;
  - d. Illegal, anti-social, self-incriminating, or demeaning behavior;
  - e. Critical appraisals of others with whom respondents have close family relationships;
  - f. Legally recognized privileged or analogous relationships, such as those of lawyers, physicians, and ministers;
  - g. Religious practices, affiliations, or beliefs of the student or student’s parent; or
  - h. Income, other than as required by law to determine eligibility for program participation or financial assistance.
2. Receive notice and an opportunity to opt a student out of:
  - a. Activities involving collection, disclosure, or use of personal information obtained from students for marketing or to sell or otherwise distribute the information to others;
  - b. Any other protected information survey, regardless of funding; and
  - c. Any non-emergency, invasive physical exam or screening required as a condition of attendance, administered by the school or its agent, and not necessary to protect the immediate health and safety of a student, except for hearing, vision, or scoliosis screenings, or any physical exam or screening permitted or required under State law.
3. Inspect the following, upon request and before administration or use:
  - a. Protected information surveys of students;

- b. Instruments used to collect personal information from students for any of the above marketing, sales, or other distribution purposes; and
- c. Instructional material used as part of the educational curriculum.

These rights transfer from the parents to a student who is 18 years old or an emancipated minor under local law.

Please note that parents are not required by PPRA to be notified about the collection, disclosure, or use of personal information collected from students for the exclusive purpose of developing, evaluating, or providing educational products or services for, or to, students.

Parents or anyone who believe their rights have been violated may file a complaint with:

[info@TeachingBooks.net](mailto:info@TeachingBooks.net)

TeachingBooks / Book Connections

100 River Place, Suite 250

Madison, WI 53716

(800) 596-0710

Or contact our Founder & Head, Nicholas Glass, at [nick@TeachingBooks.net](mailto:nick@TeachingBooks.net) (800) 596-0710.

For more information about PPRA, visit the United States government website at:

<https://studentprivacy.ed.gov/content/ppra>

## COPPA Compliance Notice

*(Updated February 22, 2020)*

Dear [Parent or Guardian's Full Name],

We are writing to you in connection with our subscription to TeachingBooks—an online literacy resource we license to deepen connections to the books and authors read in our community. We use TeachingBooks as part of our reading and comprehension efforts.

We want you to know that we have oversight and control of login details, and that TeachingBooks does not knowingly request, store, collect, or distribute any information about students who are under the age of 18. Period. No first name. No email. No student rostering information. Nothing. What follows is a privacy notice TeachingBooks, along with their Executive Director's contact information if you have any questions or concerns.

### **Parent/Guardian Privacy Notice from TeachingBooks**

The purpose of this notice is to explain the data privacy plan of the TeachingBooks service we license. This notice explains how personal data is collected and used, for adults and children. Please note that this notice is only about what TeachingBooks does with personal data, not our institution.

### **Who Is TeachingBooks And How To Contact TeachingBooks?**

TeachingBooks is a small, dedicated team working to enrich every student's reading experience. The organization's mission is to "equitably give all readers insights and opportunities that deepen their understanding and joy of the books they are reading."

TeachingBooks strives to empower every reader to...

- Connect deeply with a book
- Gain new insights and understanding from the author
- Thoroughly experience the joy of reading.

Learn more about TeachingBooks and the staff of professionals who develop and support this service at [www.TeachingBooks.net/About](http://www.TeachingBooks.net/About)

You can contact TeachingBooks via email at [info@TeachingBooks.net](mailto:info@TeachingBooks.net); by toll-free phone at (800) 596-0710; or by mail at:

TeachingBooks.net  
100 River Place, Suite 250  
Madison, WI 53716

### **Regarding Personal Collection of Data**

TeachingBooks.net does not knowingly collect any information, including any identifiable information from students in PreK-12 environments. Specifically regarding children under 13, we do not collect, maintain, use or share student data to third parties. If you are a person under the age of 13, we do not want to receive any personal information about you—including information like your name, address or email address. In the event that we learn that we have collected any personal information from a child under the age of 13 with or without verification of parental consent, we will delete that information from our database as quickly as possible. Please contact us if you believe we have inadvertently collected information from a child under 13 by emailing [accounts@TeachingBooks.net](mailto:accounts@TeachingBooks.net).

Student access to our materials does not require any personal information as part of authentication.

### **How To Get More Information**

For more information on TeachingBooks' privacy practices, you are encouraged to review the full version of TeachingBooks' Privacy Policy, available at [www.TeachingBooks.net/Policies](http://www.TeachingBooks.net/Policies) or contact TeachingBooks directly as noted above.