Introduction

The iKeepSafe FERPA Program® is available to operators and service providers of websites and online services, data management systems and other technologies that are, in whole or in part, intended for use in and by schools, and which may collect, store, process or otherwise handle student data.

This iKeepProfile is intended to assist you in determining whether or not Think Through Math complies with FERPA, as well as with your state laws and district policies. It indicates that Think Through Learning Inc. has been assessed for alignment with the iKeepSafe FERPA Program Guidelines.

The iKeepProfile is not legal guidance, nor does it guarantee or otherwise assure compliance with FERPA. If you have questions on how to use the iKeepProfile to support your school’s compliance efforts, please contact your school attorney.

Agreement

Think Through Learning Inc.

Think Through Math (TTM) - https://lms.thinkthroughmath.com/users/sign_in

Think Through Math is a web-based math solution that combines live teacher support, unique student motivation, and engaging adaptive instruction to help students learn and love math. Think Through Math provides teachers with easy-to-use real-time information about each student’s specific needs and progress.

As a participant in the iKeepSafe FERPA Program, Think Through Learning Inc. agrees:

1. It will act as a School Official as defined by FERPA. As such, it is under the direct control of the applicable school with regard to use and maintenance of education records. It uses education records only for the purposes authorized by the school, and will not disclose personally identifiable information from education records to other parties unless it has received specific authorization from the school to do so and it is otherwise permitted by FERPA.

2. Personally identifiable information from education records will be controlled by the school, and Think Through Learning Inc. is willing to stipulate as such in a contract or terms of use with the school.

3. It is willing to include contract provisions or other terms of use detailing rights related to transfer of students’ personally identifiable information from education records to the school or its designated third party upon request by the school or upon expiration or termination of the agreement, and subsequent deletion of students’ personally identifiable information held by the Member Company and third parties operating in connection with the Member Company.
4. **It will conduct annual training related to data privacy and security**, including FERPA requirements, for all employees responsible for any aspect of student data management.

5. **It will not make material changes to its privacy and security policies**, including adding practices around new or additional data collection, or changes that may lessen the previously noted protections **without prior notice to the school**, separate from any notice in a “click wrap” agreement.

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**Data Review Process**

Think Through Learning Inc. understands that it must respond in a timely manner to school requests to inspect, review, amend or correct personally identifiable information held in education records in cases where such access and change requires Think Through Learning Inc.’s direct involvement and is not otherwise provided for by product functionality available directly to the school. The following is the process for handling such requests:

<table>
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<th>TTM conducts an initial training with each district customer, and as part of that process, TTM assists a district point-of-contact in setting up an account. The district point of contact can use the account to send invitations through the application to other members of their district. Those district personnel (administrators and teachers) get an email with a one-time use link that allows them to select a password and establish an account. District personnel are responsible for creating student accounts and distributing credentials at their discretion. Students cannot create their own accounts.</th>
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<td>District personnel have direct access to student data via the account login to review, modify or delete student information. Any access to student data not otherwise accessible via the district personnel login such as tutoring logs may be obtained by contacting TTM directly at:</td>
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Privacy Office  
Think Through Learning, Inc.  
116 Federal Street, 2nd Floor  
Pittsburgh, PA 15212  
privacy@thinkthroughmath.com  
866.357.8664
Security Protocols

The following is a general overview of Think Through Learning Inc. data security protocols:

TTM stores minimum PII. Only authorized TTM staff are permitted to access student data; logins for internal staff are limited by role-based access controls to enforce this. All TTM staff must undergo annual FERPA training.

TTM adds encryption and safeguards to hosted data both during transport and storage. Think Through Math usage data is stored encrypted in a secure data facility operated by their infrastructure provider. The data center includes physical and technical security controls, and has passed multiple SAS70 Type II audits. The data center is ISO27001 and PCI DSS certified. Data is also encrypted in transit via Secure Socket Layer (SSL) technology.

TTM conducts platform security reviews annually or after any significant update to platform functionality. TTM uses the Brakeman Security Scanner, which is optimized for the underlying technology used in the TTM platform. TTM also regularly audits for the Open Web Application Security Project's Top Ten vulnerabilities. Any identified issues are given top priority and resources to address immediately.

Think Through Math is a web-based application that can be accessed via a standard Web browser or mobile device, there are no differences between application functionality or student data security whether the application is accessed at school or on a home network. Due to the fundamental nature of Web protocols and Web browser technology, cloud-based applications such as Think Through Math are not able to access any data or information stored on student or user machines, hard drives or devices.

TTM employs online password reset functionality, which sends an email to the user's account with a link to reset their password. TTM bootstraps an account with educator information gathered face-to-face. These initial accounts can create or delete additional accounts. TTM does not provide credentials over the phone. If an educator contacts customer service requesting a data change, TTM staff will call them back through their district switchboard to verify identity.

Data and backups are purged at minimum annually, but core records for active accounts are stored for the duration of client contracts, plus 30 days. After 30 days, client data is purged from the system. TTM stores nightly backups for 7 days (rotating) and full system backups for 30 days.

Data in transit:

All traffic to and from TTM is encrypted via SSL 3.0/TLS. Data can be downloaded to customers through application functionality; this data is encrypted in transit via HTTPS. Data may be transferred via SFTP at District request.

Data at rest:

Data at rest is stored encrypted. All internal access is restricted to authorized personnel via role-based access controls.
Access to Audit

Once per year, Think Through Learning Inc. will provide schools with:

☐ audit rights to the school’s data
X access to the results of Think Through Learning Inc.’s or its third-party security audit

Product Data List

<table>
<thead>
<tr>
<th>Data Required for Operation:</th>
<th>General Purpose of Data Collection</th>
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<tbody>
<tr>
<td>1  First and Last Name</td>
<td>Required to effectively support the learning experience</td>
</tr>
<tr>
<td>2  Grade-Level</td>
<td>Required to effectively support the learning experience</td>
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Optional Data Fields Available for Schools | General Purpose of Data Collection

| 1  District-provided ID Number (recommended for longitudinal) | Recommended for longitudinal reporting |
| 2  District-provided ID number                                | Used by some districts as a student identifier |
| 3  Second Language Requirements                               | In support of the learning experience |

Third Parties

Think Through Learning, Inc., does not provide, sell or lend any personally identifiable information to any third party. Think Through Math utilizes the following non-identifying performance and page-level monitoring tools within the product:

| 1  New Relic         |                                   |
| 2  Google Analytics  |                                   |
| 3  Skylight.io       |                                   |

iKeepSafe technical assessment indicated appropriate use of 3rd parties for product functionality and analytics.
Accuracy Statement

Think Through Learning Inc. hereby confirms the accuracy and truthfulness of all information contained in the profile, and has authorized iKeepSafe to make the profile available to any interested schools.

Signed and agreed:

[Signature]

James Wrubel
(Printed Name)

Chief Technology Officer
(Title)

Think Through Learning Inc. - Think Through Math
(Member Company and Applicable Product)

10/27/15
(Date)

Notarized By:

[Notary Seal]
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compliance with FERPA or for any claim that you are not in compliance with FERPA. You
acknowledge and represent that it is your sole responsibility to evaluate whether or not you are in
compliance with FERPA.
COPPA Safe Harbor Program

The iKeepSafe COPPA Safe Harbor program assists operators of websites and online services that are – in whole or in part – directed to children under the age of 13. The program is designed to help ensure that practices surrounding collection, use, maintenance and disclosure of personal information from children are consistent with principles and requirements of the Children’s Online Privacy Protection Act (COPPA) and general tenants of iKeepSafe’s mission to encourage healthy and safe use of the Internet.

Think Through Learning Inc. has been awarded iKeepSafe’s Safe Harbor Seal for its Think Through Math product signifying that it has been reviewed by iKeepSafe for compliance with iKeepSafe’s COPPA Safe Harbor Program guidelines encompassing the following principles:

1. Transparency
2. Minimization of Data Collection
3. Parental Control of Student Data
4. Security
5. Education

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As a participant in the iKeepSafe COPPA Safe Harbor Program, Think Through Learning Inc. agrees:

1. It contracts directly with schools and, as such, may rely on consent from the school instead of the parents for collection of personal information from students when data collected is for the use and benefit of the school, and not for any other commercial purposes.

2. It makes available clearly written policies explaining what data Think Through Math collects from users, how such data is used, stored and to whom it may be disclosed. Such policies must accurately reflect actual website or service data handling practices, and must be easy for the user to find and understand.

3. It makes available a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.
4. It provides the school a description of the types of personal information collected; an opportunity to review the child’s personal information and/or have the information deleted; and the opportunity to prevent further use or online collection of a child’s personal information.

5. It collects data from or about children that is reasonably needed to provide users with a feature or activity, or to perform a valid business function that meets the strict definition of support for internal operations.

6. It does not/will not condition a child's participation in a game, the offering of a prize, or another activity on the child disclosing more personal information than is reasonably necessary to participate in such activity.

7. It maintains reasonable procedures to protect the confidentiality, security, and integrity of personal information collected from children. It takes reasonable steps to release children's personal information only to service providers and third parties who are capable of maintaining the confidentiality, security and integrity of such information, and who provide assurances that they will maintain the information in such a manner.

8. It retains personal information collected online from a child for only as long as is reasonably necessary to fulfill the purpose for which the information was collected. It must delete such information using reasonable measures to protect against unauthorized access to, or use of, the information in connection with its deletion.

9. It will conduct annual training related to data privacy and security, including COPPA requirements, for all employees responsible in whole or in part for design, production, development, operations and marketing of their products. Such training will include all employees who are directly or peripherally involved in collection, use, storage, disclosure or any other handling of data.

10. It will not make material changes to its privacy and security policies, including adding practices around new or additional data collection, or changes that may lessen the previously noted protections without prior notice to the school, separate from any notice in a "click wrap" agreement. It will notify schools and obtain the prior verifiable consent for any material changes to its privacy policy that affect the collection or use of personal information from students.

Notice and Consent

Think Through Math is a product sold directly to school districts for educational purposes and, as such, it obtains consent from the school instead of the parents prior to the collection of personal information from students.

Think Through Math makes available its Terms of Use and Privacy Policy for review at several points within the sale and delivery of Think Through Math product to a school district to include: sales proposal, license agreement, district training, product login screen, and at point of interactivity.

The Think Through Math Privacy Policy accurately reflects its product data collection and handling.
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Notarized By: [Notary Public Seal]

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
KIMBERLEE LYNN LANE
Notary Public
CITY OF PITTSBURGH, ALLEGHENY COUNTY
My Commission Expires Mar 2, 2019