**Illuminate Education**

**Your Privacy Rights Are Important To Us**

The privacy of students and their parents and guardians is important to Illuminate Education, Inc. (“Illuminate”) and the teachers, administrators, school districts, counties and other educational institutions (“Educational Organizations”) with whom we partner. This Privacy Policy is intended to answer your questions about the data Illuminate maintains on behalf of Educational Organizations throughout the country as well as the privacy practices applicable to our Website, [www.illuminateed.com](http://www.illuminateed.com), and the various applications and services Illuminate offers.

By using our services, you consent to the disclosure of information regarding you and your student (“Student Information”) to Illuminate and agree to be bound by the terms and conditions of this Privacy Policy as well as the Terms of Service of the Website and any of Illuminate’s services that you use.

This Privacy Policy does not cover the practices of companies that Illuminate does not own or control, or individuals that Illuminate does not manage. As we explain below, your Student Information will be used to fulfill the educational interests of the Educational Organizations with whom we partner. This Privacy Policy may change over time, so it is important that you review this Privacy Policy regularly to learn about how Illuminate uses and maintains your information.

If you have any questions or concerns about this Privacy Policy, please [Contact Us](#).

**The Information We “Collect”**

Illuminate does not “collect” Student Information. It provides the software platform through which your Educational Organization collects, manages, and analyzes information about its students, teachers, and administrators. Your Educational Organization uses Illuminate’s Services to assist with the administration of school-related activities and to provide a streamlined way to organize and access your information. This Privacy Policy explains the ways Illuminate maintains the information provided to us by the Educational Organizations with whom we partner.

The Student Information maintained by Illuminate may include, among other things, information about you and your student, such as:

- Demographic information including name, mailing address, email address, and date of birth;
- Student education records including your student’s grades, class enrollment, and behavioral records;
• Health-related information including your student’s immunizations and vision and hearing screening results;
• Portions of our services available to Parents and Students require a username and password that Parents and Students must obtain from their Educational Organization. Those usernames and passwords are then stored on Illuminate’s servers.

The Educational Organizations with whom we partner may also collect information about other individuals within their institutions, such as teachers and other school administrators (“User Information”). The User Information maintained by Illuminate may include, among other things, information such as:

• Demographic information including the individual’s name, address, email address, and date of birth;
• The individual’s ethnicity;
• Credentials obtained and the granting institution;
• Information about the individual’s employment with the Educational Organization;
• System usernames and passwords.

Illuminate strongly discourages Educational Organizations from using our Services to store social security numbers or financial account information.

How Illuminate Obtains Your Information

Illuminate has partnered with your Educational Organization to provide them with tools to collect, organize, and analyze data about the students in their district. As stated above, Illuminate does not collect any Student or User Information itself. Instead, your Educational Organization uses software applications created by Illuminate to collect and process Student and User Information. Your Educational Organization likely collects this data from a variety of sources, including you, your student, teachers, school administrators, and other data sources. Illuminate does not use any third-party services, such as credit bureaus, marketing firms, data aggregators, or social media networks to collect or process Student or User Information.

Information Collected by Illuminate’s Website

Although you can visit our Website without telling us who you are, when you access Illuminate’s services or our Website, our servers automatically gather information from your browser, such as your IP Address. Your IP address is a unique number assigned to your computer or device assigned by your Internet Service Provider (ISP). Collecting IP addresses is a standard practice and is generally done automatically. Our servers may also track additional information, including but not limited to the pages of our Website that you visit or the services you use, the browser you are using, the operating system of your computer or mobile device, and the way you interact with our services. We use this information for a number of purposes, including calculating usage levels,
diagnosing server issues, improving our Website and services to better accommodate user patterns, and detecting and diminishing security threats.

We also use other automated collection tools, like “cookies” and “web beacons”, to gather information from you and your computer while you are using our services or visiting our Website. A cookie is a small file stored on your computer that lets us know whether you’ve visited our Website or accessed our services before and your navigation experience during your visit. Our cookies do not contain or capture Student or User Information. We use cookies to facilitate your access to our services, to enhance your experience, to increase security, and to recognize your computer or device. Cookies allow us to collect statistical information about the usage of our services and Website to improve functionality and design. Most browsers automatically accept cookies, but you can usually adjust your browser’s settings to decline cookies or otherwise modify your browser’s interactions with cookies. If you choose to disable cookies, it is possible that some of our services’ features may not function properly.

Email marketing sent by Illuminate may contain web beacons and other similar technologies to track the response rate to such communications. Web beacons (also known as pixel gifs, pixel tags, clear gifs, third-party pixels, or targeting pixels) are small graphics with a unique piece of identifying code, similar to a cookie, used to track the online movements of a web user or to access previously set cookies. These tools are used in email communications to determine whether messages have been opened or otherwise acted upon.

Do Not Track

Our services and Website do not respond to your browser’s “do-not-track” signals or comparable mechanisms.

How We Use Your Information

Illuminate only uses your information to fulfill legitimate educational interests. Our services provide a data platform that Educational Organizations use to collect, organize, and analyze demographic, assessment, and other student information to report back to teachers, administrators, and parents on individual and aggregate student data. To that end, our systems only maintain and process student data according to the transaction requests supplied by our users (the Educational Organizations). Such transaction requests are individual to each Educational Organization with whom we partner and may include:

- Generating reports about an individual student or aggregate groups of students
- Creating class schedules
- Capturing and reporting student assessment data
- Reporting student performance
- Utilizing built-in data analysis tools
- Accessing Individualized Education Plans
• Processing Medicaid billing through the Illuminate Special Education™ (ISE) platform on behalf of Educational Organizations in Louisiana and Michigan.

We do not use your Student or User Information to create a marketing profile about you.

How We Share Your Information

Illuminate only shares Student and User Information in the ways described in this Privacy Policy. We never sell Student or User Information to third parties. Illuminate stores such information in locations outside its facilities, such as on servers co-located with third-party hosting providers. As we grow, we may buy or sell assets or business divisions. Generally, Student and User Information stored on our systems would be transferred in such a transaction. We may also transfer or assign such information in the course of business combinations, including but not limited to mergers, divestitures, or dissolution. In the event of such a transaction, any successor entity that acquires your information will continue to be subject to the terms and conditions of this Privacy Policy.

We may share your information with third parties we engage for the purpose of providing our services to you. If we do, such third parties’ use of your information will be bound by this Privacy Policy and is only authorized to the minimum extent necessary to provide these services.

Illuminate may, from time to time, use a third-party service, such as Google Analytics, to collect anonymous visitor data on our network of websites and Services, such as IP addresses, browser and version, and referring websites. This information is used for various purposes, including but not limited to analyzing usage of our services and Website, administering our services, allowing for the audit of our services by third parties, and improving our services. Such third parties are not authorized to collect any Student or User Information from any users of our services or Website.

Except for the ways outlined in this Privacy Policy, we will not disclosure Student or User Information to any third party unless we are required to do so by law or if we believe that such action is necessary to (a) comply with a court order or other legal process served on us or assist government enforcement agencies; (b) investigate or prevent suspected illegal activities or protect the security and integrity of Illuminate Education, Inc.; (c) enforce this Privacy Policy, our Terms of Service, or other such binding agreements; (d) take precautions against liability, investigate or defend against any third-party claims or allegations; or (e) exercise or protect the rights, property, or personal safety of Illuminate Education, Inc., its employees, customers, or others.

Your Educational Organization may, for legitimate educational interests, share your Student or User Information with third parties through tools provided by Illuminate. Such disclosures are not governed under this Privacy Policy. Please contact your Educational Organization regarding any information they may share with third parties.

How We Protect Your Information
Protecting the privacy of your information is important to us, and we take security measures—including physical, electronic, and procedural—to help defend against unauthorized access and disclosure. In addition to the restrictions discussed in this Privacy Policy, our employees are required to comply with information security safeguards, and our systems are protected by technological measures to help prevent unauthorized individuals from gaining access. Furthermore, all Illuminate employees are trained to observe and comply with applicable federal and state privacy laws.

Unfortunately, despite these precautions, no system can be completely secure and there remains a risk that unauthorized access or use, hardware or software failure, human error, or a number of other factors may compromise the security of your information.

**Choices Regarding Your Information**

Because Illuminate merely provides the tools by which Educational Organizations collect and use Student and User Information, Illuminate does not have the ability to honor direct requests from students, their guardians, or other users to delete or otherwise alter the uses of your Student Information as described in this Privacy Policy. Such requests should instead be directed to your Educational Organization.

To review or update your Student or User Information to ensure its accuracy or to correct any errors and omissions, please contact your Educational Organization directly. Any requests or communications regarding the specifics of your information received by Illuminate will be forwarded to your Educational Organization.

Educational Organizations receiving our direct solicitations may choose to stop receiving our marketing materials by either following the unsubscribe instructions contained in our emails or by contacting us directly.

**The Children’s Online Privacy Protect Act (COPPA)**

If enabled by your Educational Organization, a portion of Illuminate’s services may be available to a range of students, some of whom could be under age thirteen (13) (“Children” or “Child”). In such cases, Illuminate is required to obtain verifiable parental consent to collect, use, or disclose Student information about such Children. The Children’s Online Privacy Protection Act allows the Child’s Educator to obtain such consent on our behalf.

As described in this Privacy Policy, Educational Organizations use Illuminate’s Services to collect, maintain, and analyze student data, as well as facilitate communication between Educational Organizations, parents, and students. Because we only provide the tools through which Educational Organizations accomplish these goals, we are not responsible for any errors contained in the Student Information passed from Educational Organizations to us. We do not knowingly collect Student Information from Children...
except when a Child voluntarily submits such information through our “Contact Us” link or other supplied contact information. Any information received from these communications is treated in accordance with this Privacy Policy.

Parents and Guardians have the right to review their Child’s Student Information, and may obtain a copy of any such information maintained by Illuminate by submitting a request through their Child’s Educational Organization. Similarly, Parents and Guardians may ask Illuminate to update or delete the Child’s Student Information by requesting such changes directly through the Child’s Educational Organization. Parents and Guardians may also prohibit us from sharing a Child’s Student Information with a third party by requesting such prohibition through the Child’s Educational Organization. In the absence of such requests, Illuminate may continue to share a Child’s Student Information with third parties for the legitimate educational purposes described in this Privacy Policy.

If Parents and Guardians choose to prohibit the future collection, use, or disclosure of their Child’s Student Information, they may do so by requesting the deletion of the Child’s Student Information through her Educational Organization. Please note that while Illuminate will act in accordance with such requests, when we delete Student Information it will be deleted from our active databases but may remain in our archives.

Updates to this Privacy Policy

We may update or modify this Privacy Policy from time to time to reflect changes in the way Illuminate maintains, uses, shares, or secures your information. Please check this policy each time you visit the Website or interact with our systems to ensure that you are aware of any revisions. Any changes to this Privacy Policy will become effective when we post the revised Policy to our Website. Your use of the Website or any Illuminate Systems following these changes means that you accept the revised Privacy Policy and agree to be bound by its terms and conditions.

No Rights of Third Parties

This Privacy Policy does not create rights enforceable by third parties or require the disclosure of any information relating to the users of our services or Website.

How to Contact Us

If you have questions about this Privacy Policy, please contact us by email, telephone, or postal mail:

Email: help@illuminateED.com
Phone: 949-242-0434
Address: 47 Discovery
Suite 100
Irvine, CA 92618