

JST Virtual Programs ("we", "us") is committed to improving the education and lives of students. We recognize our responsibility to protect student privacy and ensure security of data. We therefore strive to maintain all required security procedures and practices to safeguard information in our possession and protect student data from unauthorized access, use, disclosure, or modification. All children's records are protected as required by the Family Educational Rights and Privacy Act (FERPA), the Children's Online Privacy Protection Act (COPPA), and other applicable federal and state laws. We require matching username and password combinations to gain access to data and include features to enforce password strength for added user security.

This privacy policy ("Privacy Policy") is instituted to maintain your personally identifiable information ("PII") in a safe, secure, and responsible manner. It describes how we collect, use, and share PII we may obtain from you. It does not apply to information that we may collect outside the use of the Website, such as over the phone, by fax, or through conventional mail. You will be notified of any material changes to this Privacy Policy and given options before any PII is used inconsistently with the current terms.

## **1. What information is collected with JST Virtual Programs?**

We only collect Personally Identifiable Information that is provided to us by you, your parent, or your school. The PII we collect includes first, middle and last names, email address, username, services requested, teacher and student identifiers, and campus identifiers. The only PII collected from you is voluntarily submitted and provided to JST Virtual Programs through your use of the Website, in response to surveys, or in response to other requests for information. We collect PII for purposes of administering educational programs, to improve the content of the Website, and to develop JST Virtual Program's services. It is limited to what is required to identify

the User and is only used to identify the User. We will not collect, maintain, use, or share your PII beyond what is needed for authorized educational purposes or as authorized by you or your parent. Apart from PII, we may collect and log non-personal information related to your use of the Website.

## **2. What do we do with the information?**

JST Virtual Programs maintains all student data, student educational information, and student files as confidential in order to protect the privacy of students and schools. Strict security procedures ensure that student and school files and information are not disclosed to unauthorized parties. Student PII is only disclosed to third parties that comply with our strict confidentiality requirements. We do not build personal profiles of a student other than for supporting authorized educational purposes. We do not sell PII or use PII for behavioral targeting of advertisements to you.

## **3. How do you secure the information?**

We maintain a comprehensive security program that is reasonably designed to protect the security, privacy, confidentiality, and integrity of PII 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 PII.

## **4. Can I control what information you have?**

Parents or guardians have the right to review their child's PII collected by JST Virtual Programs, request that their child's PII be revised or deleted, or refuse to allow further PII to be collected. To do so, simply make a request in writing using the contact information listed below.

## **5. What about Third Party Web Sites?**

This Privacy Policy applies only to the Website and not to any other website. Any other website is governed by its own policy. You may be required to accept additional policies to use a website accessed through the Website. We cannot be responsible for the policies of any other website.

## **6. Where is information stored? How is it transmitted?**

We may store or transmit some information, including PII, in or to third party servers. All these servers are in the United States and protected by necessary levels of security. Transmission of PII is secured with proper connections and certificates. You release JST Virtual Programs from any liability associated with our responsible use of third party servers.

## **7. What about my user generated content?**

If you participate in any message boards, chat rooms, blogs, or other interactive features of the Website it is at your own risk. You are solely responsible for user generated content you post to the Website. We have no responsibility or liability for or association or involvement with such content. We may, but are not obligated to, monitor message boards, chat rooms, blogs, or other interactive features of the Website but we do not guarantee the safety or security of any user generated content.

## **8. When can you share information?**

The Family Educational Rights and Privacy Act (FERPA) allows us to release information from a student's educational record to the following parties or under the following conditions:

- (a) School officials with legitimate educational interest;
- (b) Other schools to which a student is transferring;
- (c) Specified officials for audit or evaluation purposes;
- (d) Appropriate parties in connection with financial aid to a student;
- (e) Organizations conducting certain studies for or on behalf of the school;
- (f) Accrediting organizations;
- (g) To comply with a judicial order or lawfully issued subpoena;
- (h) Appropriate officials in cases of health and safety emergencies; and
- (i) State and local authorities, within a juvenile justice system, pursuant to specific state law.

## **9. What about cookies?**

A cookie is a small file stored on your computer or device that

lets us know whether you've visited the Website or accessed our services before. A cookie also enhances your navigation experience while using the Website. JST Virtual Programs may use cookies to personalize your experience with the Website. JST Virtual Programs cookies do not contain or capture personal information.

**10. When is information deleted?**

JST Virtual Programs retains your information and PII only so long as necessary, whether required by contract or law. All PII will be deleted when our relationship with your school is terminated or when it is no longer needed. We will make all reasonable efforts to remove PII from our database.

**11. What if JST Virtual Programs merges or is sold?**

If all or part of JST Virtual Programs or any of its affiliates are sold, merged, or otherwise transferred to another entity, the PII provided through use of the Website may be transferred as part of that transaction or process. The other entity would be subject to these same privacy commitments regarding your PII.

**12. How and why do I contact JST Virtual Programs?**

You can contact JST Virtual Programs at:

JST, Inc.  
Attn: Legal Department  
1000 N. Opdyke Road Suite D-2  
Auburn Hills, MI 48326  
800-841-8162  
Info@mik12learning.com

Please contact us if you want to: correct or update any PII in our database that you think is wrong or erroneous; opt-out of future communications from JST Virtual Programs; or request that we remove PII from our database. You are also welcome to contact us with any questions about this Privacy Policy.