

# Privacy Policy Last updated: October 2016

## Introduction

The Student Performance System (SPS) is operated by IDEAL Consulting Services (IDEAL). This page informs IDEAL's Clients (i.e., educational institutions/agencies, administrators, teachers, specialists, and parents/students) of the company's policies regarding the collection, use, and disclosure of personal information which IDEAL receives from users of SPS.

IDEAL uses personal information solely for the purpose of managing student data, supporting curricular and instructional opportunities, and developing/improving the SPS platform. By using SPS, the Client agrees to the collection and use of information in accordance with this policy.

## Information Collection and Use

Using a variety of data gathering protocols, IDEAL uses SPS to collect and house information from its Clients and Visitors who access the SPS site. IDEAL uses this information primarily to provide a customized experience for its users, and it does not share this information with third parties.

## Log Data

Similar to many site operators, IDEAL gathers information (Log Data) sent by a district browser whenever a Client or Visitor logs into or visits the SPS Site.

This Log Data may include information such as a computer's Internet Protocol (IP) address, browser type, browser version, time and date of visit, site pages visited, time spent on site pages, and other site-relevant statistics. The aforementioned information is not released to any third parties without the Client's consent unless required by law. This information is collected to help IDEAL process the Client's requests for information and to perform research and analyses aimed at improving IDEAL's services and technologies.

## Cookies

Cookies are files with small amount of data, which may include an anonymous, unique identifier. Cookies are sent to a browser from a web site and stored on the computer's hard drive. Like many sites, IDEAL uses "cookies" to collect information. IDEAL's use of cookies is strictly for user sessions. All cookies are destroyed upon logout and IDEAL does not share them with any other parties.

A user **can** instruct a browser to refuse all cookies or to indicate when a cookie is being sent. However, if the user does not accept cookies, he/she may not be able to use certain functions within SPS.

## Security

The security of the Client's personal information is important to IDEAL, but please note the following: No method of transmission via the internet, or method of electronic storage, is 100% secure. While IDEAL strives to use commercially acceptable means to protect its Clients' personal information, IDEAL cannot guarantee its absolute security.

SPS runs on an application server that uses servlet container security with Role-Based Access Control (RBAC); it also uses a form-based authentication to manage access. Using this model, access permissions are granted to an

abstract entity called a security role, and access is allowed only to users or groups of users who have that role. IDEAL also utilizes an Access Control List (ACL) for all connections and queries to the database.

Passwords are encrypted using an AES algorithm, which is a 128-bit key. IDEAL does not allow for passwords to be unencrypted, which means they cannot be retrieved and thus, cannot be stolen. This feature means if a user loses his/her password, a temporary password will be assigned and the user will need to create a new one.

## **Student Information and Assessment Data**

IDEAL takes extreme precautions to secure all Clients' data. Furthermore, IDEAL will never sell a Client's data to any third parties. Any data collected and/or retained by IDEAL will only be used for purposes authorized by the Client. IDEAL's internal use of the data will be to perform research and analyses aimed at improving the company's services and technologies.

IDEAL does not collect, maintain, use or share student personal information beyond that needed for pre-authorized educational/school purposes, or as requested by the Client.

IDEAL will never sell students' personal information or assessment data.

IDEAL will not use or disclose student information collected via an educational/school service (whether personal information or otherwise) for behavioral targeting of advertisements intended for student audiences.

IDEAL will not build students' personal profiles other than those needed to satisfy pre-authorized educational/school purposes or as requested by the Client.

IDEAL will not make material changes to school service provider consumer privacy policies without first providing prominent notice to its Clients and allowing a right of refusal if the data are to be used in any manner inconsistent with the previously agreed upon terms. In addition, IDEAL will not make material changes to other policies or practices governing the use of students' personal information which are inconsistent with contractual requirements.

## **Changes to this Privacy Policy**

This Privacy Policy is effective as of October 2016 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on SPS. IDEAL reserves the right to update or change the company's Privacy Policy at any time and all Clients are encouraged to periodically check the Privacy Policy. Once IDEAL posts any modifications to the Privacy Policy, a Client's continued use of SPS will constitute his/her acknowledgment of the modifications and his/her consent to abide and be bound by the modified Privacy Policy. If IDEAL makes any material changes to the Privacy Policy, the company will notify its Clients either via email (using an email address provided by the user) or by placing a prominent notice on SPS.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact IDEAL at [support@idealconsultingservices.com](mailto:support@idealconsultingservices.com) or (508) 636-6615.