



## TouchMath Privacy Policy

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

### Computer Identifying Information (CII)

The information personal to your computer and your computer use that is automatically collected through the use of electronic tools is referred to as Computer Identifying Information (CII). The CII gathered by TouchMath generally includes cookies, specific Website page requests, the domain name (e.g., [www.touchmath.com](http://www.touchmath.com)) and Internet Provider (e.g., Comcast, Time Warner, Cox) from which you access the Internet, the Internet Protocol address of your computer, the browser software (e.g. Internet Explorer, Mozilla, Chrome) and operating system (e.g., Windows 10, Linux, or MacOS) you are using, your geographic location, the time and date you accessed the site, and the Internet address you visited prior to visiting the site.

### What personal information do we collect from the people that visit our blog, website or app?

When ordering or registering on our site, as appropriate, you may be asked to enter your name, email address, mailing address, phone number, credit card information, Title or other details to help you with your experience.

### When do we collect information?

We collect information from you when you register on our site, place an order, subscribe to a newsletter, respond to a survey, fill out a form or enter information on our site.

Provide us with feedback on our products or services

### How do we use your information?

TouchMath does not sell or rent your personal information to third parties.

We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To improve our website in order to better serve you.
- To allow us to better service you in responding to your customer service requests.
- To administer a contest, promotion, survey or other site feature.

- To quickly process your transactions.
- To send periodic emails regarding your order or other products and services.
- To follow up with them after correspondence (live chat, email or phone inquiries)

### **How do we protect your information?**

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We use regular Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.

All payment transactions are processed through PayPal Payflow, a globally recognized gateway provider, and are not stored or processed on our servers.

### **Do we use 'cookies'?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

### **We use cookies to:**

- Help remember and process the items in the shopping cart.
- Understand and save user's preferences for future visits.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some features will be disabled. It won't affect the user's experience that make your site experience more efficient and may not function properly.

However, you will still be able to place orders.

### **Third-party disclosure**

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We purchase names from list marketers for distribution of our TouchMath catalogs and we have no control of the information you provide to these companies. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety.

However, non-personally identifiable visitor information may be provided to other parties solely for TouchMath marketing, advertising, or other uses.

### **Third-party links**

We do not include or offer third-party products or services on our website.

### **Opting out:**

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

### **California Online Privacy Protection Act**

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. - See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

According to CalOPPA, we agree to the following:

Users can visit our site anonymously.

Once this privacy policy is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our website.

Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.

You will be notified of any Privacy Policy changes:

- On our Privacy Policy Page

Can change your personal information:

- By logging in to your account

### **Family Educational Rights and Privacy Act**

Although the Family Educational Rights and Privacy Act (FERPA) was enacted decades ago, and certainly well before Internet-based services became ubiquitous in academic settings, one of its core tenets was and remains the protection of the privacy of Personally Identifiable Information (PII) in students' education records. As defined in FERPA, "education records" are "those records, files, documents and other materials which (i) contain information directly related to a student; and (ii) are maintained by an educational agency or institution or by a person acting for such agency or institution." PII from education records includes information, such as a student's name or identification number, which can be used to distinguish or trace an individual's identity, either directly or indirectly through linkages with other information.

FERPA requires that educational institutions and agencies that receive certain federal funds (for example, public schools) get prior consent from a parent or legal guardian before disclosing any education records regarding that student to a third party. Consequently, before you enter, upload or access any data concerning a minor student, you must confirm that your agency or institution has (1) obtained appropriate consent from the parent or guardian of that student or (2) determined that one of the limited exceptions to the consent requirement applies.

TouchMath only uses PII from students' education records to enable the use of TouchMath products. Unless a school official expressly instructs otherwise, we will not share or reuse PII from education records for any other purpose. While we think those statements are clear, to avoid any doubt, we will not use student PII to target students or their families for advertising or marketing efforts or sell rosters of student PII to third parties

### **How does our site handle Do Not Track signals?**

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Does our site allow third-party behavioral tracking?

It's also important to note that we do not allow third-party behavioral tracking



## **COPPA (Children Online Privacy Protection Act)**

**When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.**

**We do not specifically market to children under the age of 13 years old.**

## **Fair Information Practices**

**The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.**

**In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:**

### **We will notify you via email**

- **Within 7 business days**

### **We will notify the users via in-site notification**

- **Within 1 business day**

**We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.**

## **CAN SPAM Act**

**The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.**

### **We collect your email address in order to:**

- **Send information, respond to inquiries, and/or other requests or questions**
- **Process orders and to send information and updates pertaining to orders.**
- **Send you additional information related to your product and/or service**



- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

To be in accordance with CANSPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, you can email us at

- Follow the instructions at the bottom of each email and we will promptly remove you from ALL correspondence.

## **CONTACTING US**

If there are any questions regarding this privacy policy, you may contact us using the information below.

TouchMath  
Attn: Customer Care/Privacy  
5445 Mark Dabling Blvd.  
Colorado Springs, CO 80918  
customerservice@touchmath.com  
(800) 888-9191

Last Updated: October 29, 2018