Castle Software, Inc.

Data Privacy & Security Policy

Castle Software, Inc. ("Castle") is committed to protecting the privacy of its users. Because Castle gathers certain types of information about the users of Castle's web sites ("Service"), we believe you should fully understand the terms and conditions surrounding the use of the information we collect. The following discloses our information gathering and dissemination practices for the **CastleLearning.com** and **PrepPath.com** web sites.

Please review the following statement to understand how the information you provide to Castle through our web sites are treated.

Information Castle collects

You can visit the Castle's websites without identifying yourself. You can sign-up for the company newsletter/blog where you need to supply an email address plus other optional information (name, organization, title). You can opt-out of the newsletter/blog at any time and modify or delete any personal information that you previously provided. We will not share any of your personal information with any outside organization.

The Castle services require that you have a subscription. Each subscription is associated with a Login ID and Password which are used for accessing the web site's information and activities .

Other information, including names and email addresses may be supplied to us.

For school subscriptions, a representative from the school specifies some or all of the following information about the subscription-holders:
- First and Last Name - this information is used to identify students and teachers in various student, teacher, and administrator reports.
- Email Address - this is optional and is used only to email forgotten login information to a student or teacher. The school can disable this feature.
- Grade - where applicable, this is the student's current grade level or year of graduation and is optional. It is used to help teachers identify their students in the database.
- Login IDs and Passwords - the school representative supplies this information or agree to a formula for generating them. Passwords not supplied to us are specified by each individual user the first time they sign in.
- Identification Number - where applicable, the Student Identification Number helps identify a user in the database.

For home subscriptions, the purchaser supplies the subscription-holders names.

What Castle does with the information collected

The Login ID and Password assigned to users are used to login and participate in the activities of the Castle websites.

The personal information supplied to Castle will not be given, sold, rented, loaned, or otherwise disclosed to any third parties outside of Castle, except when we have your permission or under special circumstances, such as when we believe in good faith that disclosure is reasonably necessary to (i) comply with legal process, (ii) enforce the Terms of Use, (iii) respond to claims that any content on the Castle web sites violates the rights of third parties, or (iv) protect the rights, property, or personal safety of Castle, its customers, or the public. In addition, when you subscribe to any 3rd party service through Castle, such as Method Test Prep, you are giving Castle implicit permission to give student information to that 3rd party in order to achieve a single sign on between the services.

Note that our database is stored in a co-location facility owned and managed by:

Rackspace
1 Fanatical Place
City of Windcrest
San Antonio, TX 78218

Rackspace's Acceptable Use Policy and Privacy Statement can be found at http://www.rackspace.com/information/legal/

Castle may use aggregated personal information to determine the demographics of our users and to distribute statistics and general marketplace information about Castle's products. These demographics will always represent aggregate information and will never identify a specific user. Castle does not display any advertising on their web sites.

Access to Information

Depending on options specified by school representatives for school versions of Castle's websites, users have the ability to correct or change some or all the information specified when the subscription was created.

Data Destruction

For yearly subscription products, student data is destroyed for accounts that were created approximately 16 months prior to the current school year.

All student data will be deleted at end of contract if requested by the customer. Otherwise, the student data remains in the database for approximately 16 months after the end of the contract.

Security

Physical Location
All personal information is stored on servers at a location designed specifically to ensure that no unauthorized individuals have access to the server or its data. Our web hosting provider is Rackspace, one of the leading hosting providers.

Encryption-In-Motion
All transmitted data is encrypted using HTTPS/SSL protocols.

Encryption-At-Rest
All data in the Castle databases that can identify a student is encrypted.

Staff Training

Castle requires all internal personnel who would be in direct contact with user data information be trained in the secure handling and privacy distribution of student data. This includes, but is not limited to, access rights, communication with customers, along with the importing and exporting of files. Customer service and training personnel are trained to only release student information to authorized school/district personnel or parents through a series of validation methods.

Subcontractors

Subcontractors' are required to sign Non-Disclosure Agreements and must return or destroy all Castle property and data at the end of their contracts.

Data Breach Protocol

Castle maintains a contact list of the key administrators for each customer. Should a data breach occur, these administrators will be notified via email as soon as it is known what breach, exposure, or data loss may have occurred.

Cookies Policy

Castle's websites use cookies. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. By using Castle's websites and agreeing to this policy, you consent to Castle's use of cookies in accordance with the terms of this policy.

We use cookies on our website to:
- improve the websites' usability
- administer the websites
- prevent fraud and improve the security of the website
- personalize the websites for each user

We use both session and persistent cookies on our websites. We do not use third party cookies. Most browsers allow you to refuse to accept cookies. If you block cookies, you will not be able to use all the features on our websites. You can delete cookies already stored on your computer. Deleting cookies will have a negative impact on the usability of many websites. (Note that part of this Cookie Policy was created using a template from SEQ Legal (http://www.seqlegal.com).

Castle's Data Privacy & Security Policy Statement Changes

Changes to this policy will be posted on the Castle web sites. In addition, notifications of changes will be emailed to the customer's primary contact.

Contact Castle Software, Inc.

By using these web sites, you signify your assent to Castle's Privacy & Security Policy. If you do not agree to this policy statement, please do not use the Castle web sites and Services. Your continued use of these web sites or its Services following the posting of changes to these terms will mean you accept those changes.

Please contact us if you have any questions about this Privacy & Security policy.

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