

# DBQ Online Privacy Policy

The DBQ Project's goal is to provide excellent teaching tools in a cutting-edge online learning environment. Alongside enhancing student learning, protecting your privacy is a top priority. We created this Privacy Policy so you know how we collect, protect, use and share information gathered on the our Site.

In short, the DBQ Project:

- Only collects the minimum data needed to provide our services to you
- Only uses your data to provide you access and support
- Never sells your data under any circumstances
- Never advertises to students
- Protects all of your data with robust security protections.

This Privacy Policy governs the use of our web-based Site that students will be using in their classrooms and on their home devices. By using our Site, you are confirming that you are an authorized user and you are agreeing to the terms of this Privacy Policy. If we update this Privacy Policy, you will be notified of this the next time you log in to our Site.

## Information We Collect and How We Use It

**What Student and Teacher Information Is Collected:** The DBQ Project collects only the limited information needed to enable you to use our programs and services. We collect the first and last name of the student, along with their email address, so we can set up an account for your student to access our Site. The DBQ Project also collects the first and last name of the teacher, email address, school and district to allow teachers to access DBQ Online materials and to submit questions to us for technical assistance. All information you provide to us is owned by you.

DBQ Online is interactive. Our platform allows students and teachers to share their content by downloading answers, notes and essays to a text format outside of DBQ Online. Since these downloads are outside our Site, we do not control or monitor these downloads. As with any online activity, we encourage you to avoid including personal information about yourself or others in downloads that will be shared or that can become public, and we encourage teachers to talk with their students about not including sensitive personal information in any resource or lesson used on the Site.

**How Student and Teacher Information Is Used:** Our goal is to provide learning resources, so we use the information provided to us solely to offer our services and to respond to your questions and comments. The DBQ Project does not use student or teacher information for any purpose other than to enable access to and use of our services. We never sell, rent, or share your data for any purpose, including marketing or sales purposes. We do not engage in marketing or targeted advertising to students or parents and we do not use your data to create or amass a profile about a student except in furtherance of educational purposes.

We limit the viewing of any of your personal information to our employees who need to see it in order to provide our services to you. These employees have all reviewed and been trained on this Privacy Policy. As discussed below, we do collect anonymous metadata to support the internal operations of our Site and to improve our services for you.

**How We Use Data Analytics, Cookies and Other Technology Used to Collect Information:** We may use a third-party service, such as Google Analytics, to collect anonymous visitor data on the Site. We would use this service to collect information about your computer like IP addresses, browser types, the accessing app, or referring pages and websites. We collect this data so that we can manage and improve our Site and your experience using our resources. We use the information that you provide to figure out traffic patterns on our Site, to track how our services are being provided online and to ensure that our services are secure. In collecting this data, we do not identify any individual user.

**Cookies:** With the use of cookies and other technologies, The DBQ Project may receive and store certain types of information about you whenever you interact with this Site.

Cookies are small text files that we transfer to your local device, through your web browser, to:

- speed your navigation on the Site
- recognize you and your access privileges
- track your usage and preferences of the Site
- detect the existence of any cookies previously set by our server
- identify certain information on how and when you accessed the Services such as type of browser, operating system, domain names, IP addresses and the like.

We may also use single pixel images, web beacons and other similar technology (collectively “Beacons”) to provide the same benefits as Cookies.

Cookies allow you to take full advantage of this Site (disabling cookies may prevent proper functioning of certain parts of the Services, so we recommend that you leave them turned on for our Site.

The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. You can also disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on’s settings or visiting the website of its manufacturer.

## How and When We Share Data

Like many companies, we engage a small group of trusted third-party vendors, including Google Analytics and Amazon Web Services (AWS), to help run our Site and provide services to you. To protect user privacy, we require our vendors to maintain the confidentiality of any information and do not authorize our vendors to retain, disclose, or share any information. These third parties comply with the same level of safety and security procedures and retention policies that we employ when storing your data and we hold these third parties to the terms set forth in our Privacy Policy.

We only share data in the following additional circumstances:

- When you give us permission to share it.
- With your teachers and school staff.
- If we are required to do so to comply with the law or with direction from the courts or other authorities.
- If DBQ goes through a business transition, such as merging with another company or being acquired by another company, your personal information will, in most instances, be transferred to the new company. We will only contract in this way with a new company that adheres to the same privacy and security procedures that we do and that are set out in this Privacy Policy.

## How We Protect Your Data and What Steps We Will Take if There is Breach

We maintain a security program that is designed to protect the security, privacy, confidentiality and integrity of the student and teacher information that is submitted to our Site, including by using SSL and secure firewalls and storing our data in highly secure AWS data centers. We collect only limited amounts of personal information and our limited use of outside services helps to secure against unintended transfer of personal information. Our security procedures and practices meet or exceed industry standards.

Although we take great measures to ensure the security of the personal information entrusted to us, no company can guarantee that there will never be a security breach. However, if there ever is such a security breach, we will do everything we can to protect your personal information. Should a breach occur, we will work with the school to notify parents of all affected student users. The DBQ Project’s response to a breach is fully detailed in its Data Breach Policy which is available on our website. A hard copy of the Data Breach Policy is available upon request.

## When We Modify This Policy

The DBQ Project may make changes to this policy from time to time. Any changes to our Privacy Policy will be posted on the Site so that you are always aware of what information we collect and how we use it. If we update this Privacy Policy, you will be notified of this the next time you log in to our Site. We encourage you to review this Privacy Policy on a regular basis so you can see any changes that we make. Any changes become effective immediately once we notify you by posting the new policy. Because we take student data protection very seriously, no material changes to the collection, use and sharing of student data will be made without the school agreeing to it in writing.

## We Comply with Federal and State Laws

**FERPA Compliance:** We are committed to complying with FERPA. During your use of the Site you and your students may create content in the course of teaching or studying The DBQ Project Materials and we may store and link such content to your account. As a provider of educational services, we act as a school official, operating under the direction and control of our school district partners. We provide school districts full access to their student content and data. All student data belongs to the school district and teachers can view student content and data and download it at any time. We archive all of this content data at the end of each school year. We can delete any information earlier at the request of the school district.

**COPPA Compliance:** The DBQ Project complies with the Children's Online Privacy Protection Act (COPPA). COPPA requires that website operators never knowingly collect personally identifiable information from anyone under the age of 13 without prior verifiable parental consent. In our relationship with school districts, we understand that, because we are offering online programs solely for the educational benefit of students, that school districts may obtain or provide the appropriate consent to enable us to provide services for their students. We comply with all notice requirements under COPPA as our Privacy Policy sets forth our practices as to the collection, use, and disclosure of student information.

**California Users:** The DBQ Project's Online Subscription Agreement for DBQ Online and this Privacy Policy meet the requirements under California Education Code § 49073.1. The Subscriber is responsible for ensuring compliance with California Education Code § 49073.1.

**New York Users:** We confirm that we comply with the applicable state law and regulations, including Education Law section 2-d and its implementing regulations at Part 121, and the "bill of rights" required therein. We will train all employees with access to your data on the requirements of state and federal law governing the confidentiality of such data. We will require all subcontractors to comply with the terms of this Privacy Policy, including its terms on data breach.

**International Users:** If you access DBQ Online from outside the United States, your connection may be through and to servers located in your country or the United States. Any information you provide may be processed and maintained in the United States on servers and/or other network systems operated by us or for our benefit. Regardless of where you live, you consent to have your personal information transferred, processed and stored in the United States, and allow us to use and collect your personal information in accordance with this Privacy Policy. If you access the Site from and/or reside outside of the United States, your information may be stored, transmitted and shared in accordance with U.S. data privacy laws which may not be equivalent to those in effect in your country. You expressly agree that you will not use the Site with any expectation of greater privacy rights than those to which you have expressly agreed as stated in this Privacy Policy.

## How Long We Maintain Your Data/Data Retention

We will archive and delete data from any student accounts on June 30th of each year. Basic information on teacher accounts is maintained as long as the subscription is renewed. We will send a notification to the account administrator 30 days prior so that the account administrator can notify students, teachers and other end users.

## How to Remove Data From Our Site

We respect the right of teachers, school administrators, and parents to view and modify their account information at any time. In the event you wish to review, change or delete your account, or contact information and any personal information from DBQ Online, kindly contact your school district or contact us directly. If you have any questions or concerns about the Privacy Policy please contact [support@dbqproject.com](mailto:support@dbqproject.com)