

## **Privacy Policy**

At Yeti Academy, a DBA of Typing Agent, LLC (located in Snohomish, WA 98291) we are acutely aware of the trust you place in us and our responsibility to protect your and your childrens' and students' privacy. Throughout cyberspace, we want to contribute to providing a safe and secure environment for all our Clients, Customers and Visitors. This privacy policy applies to Yeti Academy.

The purpose of this privacy policy is to inform you, as a client of Yeti Academy, what kind of information we may gather about you, how we may use that information, whether we disclose it to anyone, and the choices you have regarding our use of and your ability to correct the information. Yeti Academy offers an educational product known as "Yeti Academy".

# **Information Rights**

This website is designed to comply with applicable privacy regulations, including the General Data Protection Regulation (GDPR), except as limited by applicable law. We acknowledge the importance of privacy

regulations and assure you we have taken steps to comply with relevant laws, however, please note that user data is stored and processed outside the European Union. These are the rights we comply with under GDPR:

**Access:** This includes your right to access the personal information we gather about you, and your right to obtain information about the sharing, storage, security and processing of that information.

**Correction:** This is your right to request correction of your personal information.

**Erasure:** This is your right to request, subject to certain limitations under applicable law, that your personal information be erased from our possession (also known as the "Right to be forgotten"). However, if applicable law requires us to comply with your request to delete your information, fulfillment of your request may prevent you from using our services and may result in closing your account.

**Complain:** You have the right to make a complaint regarding our handling of your personal information with the appropriate supervisory authority.

**Restrict Processing:** This is your right to request restriction of how and why your personal information is used or processed.

**Object:** This is your right, in certain situations, to object to how or why your personal information is processed.

**Portability:** This is your right to receive the personal information we have about you and the right to transmit it to another party.

Automated Decision-Making: This is your right to object and prevent any

decision that could have a legal, or similarly significant, effect on you from being made solely based on automated processes. This right is limited, however, if the decision is necessary for performance of any contract between you and us, is allowed by applicable US or European law, or is based on your explicit consent.

#### Collection of Information

Yeti Academy will not knowingly collect information from children located in the United States under the age of 13 and children located in the European Union under the age of 16. However, some parts of Yeti Academy are designed for students who may be children. Students may access the sections of Yeti Academy directed at children only after their teacher or school official has entered into an agreement with Yeti Academy.

We keep all user and account information, including demo and free trial registrants and licensed users, strictly private and confidential. We only use the information we collect to process orders and to provide our product technical support.

Your email address will serve as your login username. Your email address may be used to send a confirmation email at registration, as well as information and updates to the programs. We may use the email address as an additional means of communicating with you about Yeti Academy and the programs we offer, including notifying you of updates to the website or its related policies.

If you choose to provide us with personal information by ordering our products, sending an email, or by filling out a form with your personal information and submitting it through our website, we use that information to fulfill your order, respond to your message or to help us provide you with product support or information or material that you request.

Yeti Academy will not sell, trade, rent or publish customer data to any advertisers, or third parties, other than for purposes of processing a transaction and providing direct product support for Yeti Academy and its subsidiaries. Student data, most specifically, is not used, accessed, or shared with any third party and is kept strictly confidential by Yeti Academy.

#### **Details of Transactions:**

All payment details you provide during online transactions are processed by a secure third party and transaction details are NOT retained or kept on our secure servers.

## **How Does Yeti Academy Protect Student Data:**

Any customer information received by Yeti Academy directly, from any of its authorized resellers or from its online registration service providers (see below) is hosted on a secured server. Firewalls, passwords, and encryption technology protect the information about our customers that we collect and securely store.

Yeti Academy may release customer information when we believe, in good faith, that such release is reasonably necessary to (i) comply with law, (ii) enforce or apply the terms of any of our member agreements or (iii) protect the rights, property or safety of Yeti Academy our customers or others. We

will not send you unsolicited third-party promotional emails.

Except for the circumstances set forth in the previous paragraph, we will not knowingly distribute customer information to be used in mailing lists, surveys, or any other purpose other than what is required to perform our services.

Student information collected is limited to what is required for the teachers to identify the students in their class. This includes: username, password, name and grade. Only this information is stored securely online for students.

Furthermore, Yeti Academy understands the importance of protecting student data and information. Personal student information is NOT required to be able to use Yeti Academy. In light of this, the only parties that have access to student information will be: District Administrators, Teachers and Yeti Academy support and this is strictly limited to customer or technical support purposes only.

In the event of an unauthorized disclosure of a student's records, Yeti Academy will report to the master account holder of the affected school or district in an app communication and email as to the depth and breadth of the data breach and provide messaging that can be shared with the parents of legal guardians of the students.

In addition, following a one year period of time after a school or districts account expires, student identifying records will be deleted from our database archives and no longer available for use by Yeti Academy. For reporting purposes, an overview report of the school or districts progress (excluding student identifying data) will be retained for analytical purposes. Prior to this one year period and during the duration of the Yeti Academy subscription, students, parents, teachers, and administrators can print a

report of an overview of the work that the student accomplished while on the program.

Please note: student passwords are visible to teachers and administrators of the program. Best practice is NOT to have students use common passwords or passwords they use elsewhere.

Yeti Academy shall take actions to ensure the security and confidentiality of all students, including but not limited to designating and training responsible all employees on ensuring the security and confidentiality of student records, by securely storing student data behind a 256 Bit secure SSL certificate. Schools and districts have control over how they would prefer to identify their students within the Yeti Academy program. In addition, only Yeti Academy support staff, teachers or school administrators have access to student records. The minimal student identification information that is required to use Yeti Academy, is a username. Personal student contact information is NOT required to be able to use the Yeti Academy program. Yeti Academy does allow schools or districts to enable third party single sign-on applications. Schools and Districts who elect to do this are responsible for managing their student privacy relationship with those third party entities. We will share information if required in order to comply with the law or to protect ourselves against third party claims. When a Child User account is created by a School, the school may provide consent.

When Yeti Academy is used by a teacher, school or district (a "School") in the classroom for educational purpose, we permit the School to create Child User accounts and to provide the requisite consent for Yeti Academy to collect personal information of a Child user for this purpose, in lieu of parental consent. Schools may create a Child User account by adding students to the Service through Google Classroom, Clever, Classlink, or

similar single sign-on service, or through a school integration mechanism, or a School may create logins/passwords for each individual student. When Schools create accounts in this manner, we do not request additional consent from the Parent.

### **Children's Information:**

Children under the age of 13 in the United States and children under the age of 16 in the European Union are not permitted to create their own account on Yeti Academy without the consent of a parent or legal guardian. If you are the parent or legal guardian of a child who has provided us with personal information without your consent, please contact support@yetiacademy.com so we can delete such information.

# **FERPA and COPPA Compliance:**

In compliance with the Family Educational Rights and Privacy Act ("FERPA") and Children's Online Privacy Protection Act ("COPPA"), see the following regarding the use of our site by children.

Children may use Yeti Academy's School Edition provided that the school has complied with its responsibilities under the Family Educational Rights and Privacy Act ("FERPA") and COPPA. If a teacher or school official has

consented to our collection of information from children who are students in a manner consistent with COPPA, we will collect and use such information. This consent can be revoked and the student's information removed at any time.

If a teacher or school official has consented to our collection of information from children who are students in a manner consistent with COPPA, we will collect and use such personal information solely for the use and benefit of the school and for no other commercial purpose. We do not send promotional material or surveys to children or students using Yeti Academy. A parent or school official may revoke at any time their consent to allow a child(ren) to use Yeti Academy by contacting support@yetiacademy.com.

## **Parents Rights**

Upon request from a parent or legal guardian, we will provide a description of the personal information we collect, give parents the opportunity to review their child's personal information or have their child's personal information deleted. Such requests can be made by contacting support@yetiacademy.com.

### **CIPA Considerations**

Yeti Academy hereby warrants that the creative content provided on this Site complies with the Children's Internet Protection Act (CIPA).

# **Stringent Employee Policies**

All Yeti Academy employees and contracted employees are educated about the importance of privacy and confidentiality and held to the highest standards. In addition to this training all employees must sign a stringent student data protection document and adhere to our student data privacy policies. Only those employees having a business reason for knowing such information may have access to student data.

### **API'S use and Student PII**

Yeti Academy uses API's from 3rd party entities to manage data for students. If API's are used for sending or receiving data that includes student PII, Staff assignments, Classroom assignments, rostering data, grades or rostering transfer then explicit opt-in consent from the user is required. API's used include Google API;s for Google Classroom Rostering, Google Single Sign on and Google Drive for assignment workflow. Other 3rd party API's that the school or district administrators will need to activate and authorize include, Classlink Rostering, Clever Rostering.

#### What about Cookies?

"Cookies" are small pieces of information that are stored by your browser on your computer's hard drive. Yeti Academy's cookies are used only to store your geographical region/language settings, which enables us to always show correct ordering information to you. These cookies do not store sensitive data and they do not identify any specific customer traits.

#### **Links to Other Sites:**

The Yeti Academy website may provide links to other Internet sites that we think may be of interest to our customers. Once you link to another site, you are subject to the privacy policy of the new site.

The privacy policies of our service providers or linked sites are the responsibility of each provider and site and Yeti Academy has no control or influence over their policies. Please check the policies of each provider for specific information. Yeti Academy cannot be held liable for damage or misdoings of other sites linked or otherwise. All our order processing partners respect the privacy of our customers and security is their number one priority. Any and all information collected through their systems is treated with the utmost care.

### **International Visitors**

If you do not live in the United States, know that information we collect will be transferred to and processed in the United States. By using our site, you consent to the collection, transfer, processing and storage of your information in the United States.

### **Privacy Policy Changes**

If we decide to change our privacy policy for Yeti Academy, we will post changes here so that you will always know what information we gather, how we might use that information, and whether we will disclose it to anyone. If making any material changes that increase our rights to use of personal information we will obtain consent through an email or posting on our sites.

# **Summary**

All services provided by Yeti Academy to the Client are subject to the above Yeti Academy Global Privacy Policy.

### **Contact Information:**

If you have any questions about your privacy or security measures at Yeti Academy, please contact us at:

## **Company Headquarters:**

Yeti Academy A dba of Typing Agent, LLC PO BOX 1248 Snohomish, WA 98291-1248

Email: <a href="mailto:support@yetiacademy.com">support@yetiacademy.com</a>

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