

REFREPS PRIVACY POLICY

Effective Date: June 19, 2026

Version: 1.3

Global Data Protection Notice (GDPR)

This section applies to individuals located in the European Economic Area (EEA) and the United Kingdom (UK) and supplements the role-based privacy notices below.

Who We Are (Data Controller)

Ref Reps, LLC (“RefReps”) is the data controller for personal data collected directly through our websites, applications, and commercial services.

Contact:

Ref Reps, LLC
11589 Weeping Willow Drive
Zionsville, IN 46077
Email: hype@refreps.com

Where RefReps processes personal data on behalf of an educational institution or organization, RefReps acts as a data processor, and the institution is the data controller.

Data Processing Addendum (DPA)

When RefReps acts as a processor, the RefReps Data Processing Addendum (DPA) <https://refreps.com/dpa> applies and is incorporated by reference.

Order or Precedence

If there is any conflict between the documents that make up the Agreement, the order of precedence is: (1) the Data Processing Addendum (DPA) for matters relating to Personal Data Processing, (2) Any Order Form, Registration Page, Statement of Work, or other written ordering document between RefReps and Customer/Institution, (3) these Terms of Service (<https://refreps.com/terms>), (4) the Terms & Conditions / Terms of Use (<https://refreps.com/terms>), and (5) the Privacy Policy (<https://refreps.com/terms>) (which provides transparency and notice regarding RefReps’ data practices). For the avoidance of doubt, the DPA applies only to Personal Data processed by RefReps as a processor on behalf of a Customer/Institution, and does not limit RefReps’ processing as a controller as described in the Privacy Policy.

International Transfers

Your personal data may be transferred to and processed in the United States or other countries.

For EEA/UK users, transfers rely on (i) adequacy decisions where applicable, or (ii) the European Commission Standard Contractual Clauses (SCCs) and, for UK transfers, the UK Addendum or UK IDTA (as applicable), together with any required supplementary measures. Details are provided in our [Privacy Policy \(https://www.refreps.com/terms\)](https://www.refreps.com/terms) and, where RefReps acts as a processor, the DPA.

Lawful Bases for Processing (GDPR Article 6)

Where GDPR/UK GDPR applies, we process Personal Data under the following legal basis, depending on context:

- a. Contract (Art. 6(1)(b)) - to provide the Services, authenticate users, enable course access, process purchases, deliver customer support, and administer accounts.
- b. Legitimate Interests (Art. 6(1)(f)) - to secure and improve the Services, prevent fraud/abuse, maintain service reliability, analyze performance, and develop features (balanced against users' rights).
- c. Consent (Art. 6(1)(a)) - for optional features and certain marketing communications where required; users may withdraw consent at any time.
- d. Legal Obligation (Art. 6(1)(c)) - to comply with applicable laws (e.g., tax/accounting, lawful requests).
- e. Vital Interests (Art. 6(1)(d)) - only in rare cases where necessary to protect someone's life.

When we process Personal Data as a processor on behalf of a Customer/Institution, the Customer/Institution is responsible for determining the lawful basis and providing required notices to end users; our processing is governed by the DPA.

Purpose	Lawful Basis
Account creation, course access	Contract performance
License and portal administration	Contract performance
Billing and compliance	Legal obligation
Security, fraud prevention	Legitimate interests
Platform analytics and improvement	Legitimate interests
Marketing communications	Consent

Automated Decision-Making & Profiling

RefReps uses automated systems to analyze learning behavior, detect misuse, personalize content, and manage license compliance. Where required by applicable law, we will provide meaningful information about the logic involved, and the

significance and envisaged consequences of such processing, and we will support the right to obtain human review and contest a decision where applicable.

Logic used: using history, engagement patterns, completion data

Significance: improves content delivery, platform security, and license enforcement

User rights: EEA/UK users may request human review, express their viewpoint, and contest automated decisions. If your account or Personal Data is managed by a school, district, or other organization, you should direct requests to that organization (the controller). Where RefReps acts as a processor, we will forward requests to the controller and assist as required by the DPA.

Supervisory Authority Rights

If you are located in the EEA or UK, you have the right to lodge a complaint with your local Data Protection Authority if you believe your data has been processed unlawfully.

RefReps Privacy Policy includes provisions for Customer (Section 1), End User (Section 2), Parent (Section 3), Student (Section 4), Educator (Section 5), and Institution (Section 6).

Section 1:

Customer

RefReps Customer Privacy Policy

Customer is a term that embodies the following terms when referenced: instructor, teacher, educator, student, learner, end user etc.

Please note that this policy applies to individuals who visit RefReps commercial web sites or otherwise interact with us as customers via our web sites, social media, or at events. As a customer, you may also be an End User. Please be sure to review our End User Privacy Policy (Section 2) regarding our privacy practices for End User PII. Our commercial web sites, such as www.refreps.com, are not intended for use by minors below the age of 13. Privacy information for users of our digital learning systems, including those under the age of 13, can be found under the appropriate Sections (End User and Parents).

RefReps is a global organization. For users in the EEA/UK, international transfers rely on Standard Contractual Clauses or adequacy decisions under [GDPR Articles 44-49](#). We follow privacy laws and regulations that are applicable to our company and our services in the areas where we do business. By accessing our web sites or otherwise providing your personal information to RefReps, you acknowledge that we will process

your PII in accordance with this notice. Should our privacy practices change, we will update it here, but more importantly, we will notify you prior to making updates to allow you time to review and pose any concerns.

What is Customer Personal Information?

Personally Identifiable Information, or PII, shall mean any information relating to an identified or identifiable natural person ("data subject") including personal data as defined under applicable local law. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

What Customer Personal Information do we collect?

We collect PII, such as contact information, education details, or payment information, in order to provide you with the product and/or service requested.

We, or our service providers on our behalf, collect PII and other information when you access and/or submit PII on one of our web sites or interact with us at an event. You are not required to provide PII; however, in order to use certain services, we may need to collect certain PII for that service to function properly (e.g., to finalize your purchase) or for us to provide you with requested information.

Depending on the service or transaction, the PII we collect includes information from the following categories:

1. Name, initials or white page information: On our consumer web sites, we collect your name, initials or contact information when you create an account or purchase a product on our online store. We also collect your email address. We also collect this information if you connect with us via your social media account as an existing or potential customer.
2. Payment card industry data such as credit card number, billing address, etc.: If you make an online purchase from us, in addition to your name, we collect payment information through a third party website, which includes billing and shipping addresses and credit card data to process your transaction.
3. Contests and Promotions: If you participate in a contest or promotion with RefReps, we collect your name, contact information, and other information necessary to enter the contest or participate in the promotion.

4. Communications: If you choose to communicate with or receive communications from RefReps via phone, text, chat, email, or any other platform for technical support, customer service, or other assistance, those interactions may be recorded and monitored to deliver the service or information requested by you.
5. Third Party Marketing Lists: RefReps does not purchase or rent marketing lists from various providers including but not limited to event management companies and education non-profits.

We automatically collect computer metadata and content to provide, improve, and maintain our products and services.

When you visit or make transactions on our websites, we automatically collect certain information from you through the use of cookies, web beacons or other tracking mechanisms. This includes information about your experience such as your IP address, operating systems, pages viewed, and time spent. This allows RefReps to collect information about customer usage and online behavior to tailor marketing to areas that may be more appropriate for the customer.

Third parties also collect information automatically from you across websites and over time through the use of their own cookies, web beacons, and tracking mechanisms. This information is used to enable the functions of the site, as well as customize, maintain, and improve our web sites. You may disable cookies via your browser or third party mechanisms. However, some features of our services may not function properly without them.

Third parties include:

Third-Party Name	Link	Description
Amazon AWS	aws.amazon.com	Web Hosting
Mailgun	www.mailgun.com	Sending Emails

Twilio	www.twilio.com	SMS Messaging
Pipedrive	www.pipedrive.com	Customer Support
Freshdesk	www.freshdesk.com	Customer Support

You can change your Web browser's Internet preferences to disable or delete cookies, although that may affect certain functions on this site. To learn how to manage your cookies, please follow the instructions for your specific browser. If you wish to opt out of the use of data collected on our site to send you targeted advertising during your visits to other websites, you should adjust your browser preferences to not accept cookies. As an alternative, the following websites will allow you to opt out of the multi-site cookies <http://www.aboutads.info/choices> or <http://youronlinechoices.eu/>.

How do we use Customer Personal Information?

Contract performance
Legitimate interests
Consent
Legal obligation

We will use PII to provide the requested service or to process transactions such as information requests or purchases in order to meet our contractual obligations to you.

We will also process your PII to meet our legitimate interests, for example to personalize your experience and to deliver relevant content to you; to maintain and improve our services; to generate and analyze statistics about your use of the services; and to detect, prevent, or respond to fraud, intellectual property infringement, violations of law, violations of our rights or Terms & Conditions (<https://refreps.com/terms>), or other misuse of the services.

Except as described in this policy, we limit the use, collection, and disclosure of your PII to deliver the service or information requested by you. We do not collect, use, or disclose PII that is not reasonably related to the purposes described within this notice

without prior notification. Your information may be combined in an aggregate and de-identified manner in order to maintain and/or improve our services.

Data Retention

We retain Personal Data only for as long as reasonably necessary to provide the Services, comply with legal obligations, resolve disputes, and enforce agreements.

Retention varies by data type and context:

- a. Account and Profile Data: retained while the account is active, and for a limited period thereafter to support reactivation, billing, and dispute resolution.
- b. Customer/Institution-Managed end user data (processor context): retained according to the Customer/Institution's instructions and the DPA; deleted or returned upon termination as provided in the DPA, unless retention is required by law.
- c. Transaction and Billing Records: retained as required by applicable tax, accounting, and financial recordkeeping laws.
- d. Support communications: retained to provide customer support, maintain service history, and improve support quality; may be deleted or anonymized after a reasonable period.
- e. Security logs and device/usage data: retained for security monitoring, fraud prevention, and reliability; typically retained for a limited period and then deleted or aggregated/anonymized.

We may retain aggregated and/or de-identified information that cannot reasonably be used to identify an individual.

Do we use Customer Personal Information to market to you

Where we are permitted by law to do so, we will send electronic marketing communications to you as a customer, depending on your location, however you always have the option to change your marketing preferences.

Depending on your location, where legally permissible, RefReps uses your PII to provide you with materials that we believe are of interest. This includes information from the platforms on which you choose to communicate with us including email, social media accounts, mobile devices and apps, RefReps websites including text/chat functions, and your shopping cart.

In some locations, such as the European Union, we will only send electronic marketing communications to consumers if you provide your consent, however such communications may still be sent directly to businesses without consent. In all instances, you may choose to change your marketing preferences at any time by completing our [Global Opt-Out Form \(https://forms.gle/cXAmy1SEh2VF3EeH6\)](https://forms.gle/cXAmy1SEh2VF3EeH6), clicking the unsubscribe button in any marketing email you receive from us, or by contacting RefReps Privacy Official (hype@refreps.com).

RefReps shares your information with third parties to provide you with marketing from us, however we will not share your PII with third parties for them to market to you on their own behalf.

Please note, whatever preferences you select for marketing, you may still receive some transactional emails related to the services or products you purchase or use.

When do we share Customer Personal Information?

In general, we only share your PII in order to provide, maintain, or improve our products or services, or respond to legal requests.

1. Co-branded/Other Web Sites and Features – We may share your PII with third-party business partners for the purpose of providing the service to you. These third-party business partners include cloud service providers, respective state officiating associations, etc and will be given limited access to the PII that is reasonably necessary to deliver the service, and we will require that such third parties follow the same privacy and security practices as RefReps.
2. Business Transfer – In the event of a sale, merger or acquisition, we will be able to transfer your PII to a separate entity. We will use commercially reasonable efforts to require this entity to use your PII only for authorized purposes and by authorized persons in a manner consistent with the choices customers have made under this notice, and that security, integrity, and privacy of the information is maintained.
3. Agents/Service providers – We hire other companies to perform certain business-related functions on our behalf and according to our instructions. We provide your PII to service providers that host our platform data in the cloud, for example, AWS.
4. Law Enforcement – In the event that RefReps receives a legal demand for customer data from a law enforcement agency, that request will only be honored if:
 - The request complies with all laws and clearly establishes the legal need for disclosure.
 - The request is related to a specific investigation and specific user accounts are implicated in that investigation.
 - Whenever legally permissible, users shall receive notice that their information is being requested.

RefReps reserves the right to disclose to third parties non-personally identifiable information about our users and their use of the RefReps websites and related services.

For example, RefReps may disclose aggregate data about the overall patterns or demographics of the users of the RefReps websites to third parties.

What rights do you have around your Customer Personal Information?

You have the rights to access, export, be informed about, rectify, object to the further processing of, restrict the processing of, and withdraw consent to the processing of, and erase your PII.

If you are located in the EEA/UK, you may lodge a complaint with your local data protection authority.

1. **Access and rectification:** We strive to ensure that information we have about you is accurate and current. You may obtain confirmation as to whether or not PII concerning you exists, regardless of whether PII has already been recorded, and to be communicated such information in a readily understandable form. If you want to review the PII you have provided to us, or believe that the information we have about you is inaccurate, you should make a request by following the instructions below.
2. **Choice & Objection to processing:** With limited exceptions, you may choose to change how we use your PII at any time by following the instructions below on making a request. However, if the PII is required in order to provide you with the service or process a transaction, you may not be able to opt-out without canceling the transaction or service. You may object, in whole or in part, on legitimate grounds, to the processing of your PII, even where such processing is relevant to the purpose of the collection. In addition, you may choose whether to share information about yourself and the use of our sites with third parties such as social media sites. You can also choose whether to receive marketing messages from us (see your options in our “Do we use your PII to market to you?” section above) and you may object, in whole or in part, to such processing.
3. **Restriction of processing:** In specific cases (e.g., if you challenge the accuracy of the PII, while this is being checked), you can request a restriction on the processing of your PII, which can only be processed to file or defend claims.
4. **Information:** You may be informed a) of the source of the PII; b) of the purposes and methods of the processing; c) of the logic applied to the processing, if processing is carried out with the help of electronic means; d) of the identity of the data controller and data processors; and e) of the entities or categories of entities to whom the PII may be communicated and who may have access to such PII in their capacity as data processor(s) or person(s) in charge of the processing.

5. Data portability: You may request that we export your PII from our systems in a readily accessible file type. If completed, this means you will have received a copy of your PII that we have retained as a result of you doing business with RefReps.
6. Withdraw consent: Where we are using your PII with your consent, you may withdraw your consent at any time, though this will not affect the lawfulness of our uses of your PII prior to the withdrawal.
7. Erasure: You may request erasure, anonymization or blocking of PII that have been processed unlawfully, including PII whose retention is unnecessary for the purposes for which it has been collected or subsequently processed, and will obtain certification to the effect that such operations, as well as their contents, have been notified to the entities to whom the data were communicated, unless this requirement proves impossible or involves a manifestly disproportionate effort. At your request, in such instances, we may therefore delete or de-identify your information. However, you should be aware that doing this may limit your use of our services. For example, if you request the deletion of your account within an ecommerce portal, you may be required to re-enter this information should you wish to make another purchase.

To exercise any of your data subject rights, you should fill in a [Data Request Form \(https://forms.gle/pbBXeLTMen8iB9v79\)](https://forms.gle/pbBXeLTMen8iB9v79) or contact RefReps Privacy Official (hype@refreps.com).

How do we protect Customer Personal Information?

Our IT security team has established industry standard security measures to protect your PII from unauthorized access and use.

RefReps takes reasonable precautions to protect your information. When you submit personal information via the website, your information is protected both online and off-line. RefReps utilizes reasonable security measures to protect the security and confidentiality of your PII from unauthorized access and use.

How long do we retain Customer Personal Information?

We will retain your data for the duration of the service and up to 3 years thereafter unless required by law. We will retain and use your data as necessary to comply with our obligations, resolve disputes and enforce agreements.

For information on the retention period that applies, reach out to the Privacy Office by emailing hype@refreps.com.

Section 2:

End User

RefReps End User Privacy Policy

End User is a term that embodies the following terms when referenced: instructor, teacher, educator, student, learner, customer etc.

As a global leader in providing digital learning systems for educators and students, RefReps is deeply committed to protecting the privacy of our end users. Whether you are using any of our Services, we collect Personally Identifiable Information that we use to provide, maintain and improve the solution. We are providing the below information so that you can understand how we protect and use your information. If you are under 18 or still in high school/equivalent education level, we require that you review this information with your parents and obtain parental/guardian approval. Our commercial web sites, such as www.refreps.com, are not intended for the use by minors below the age of 13 and if done so are acknowledged as obtaining parental/guardian approval.

This information applies to all end users of our digital learning system. Since RefReps is a service provider to you or your institution, your Educational institutions are best able to provide you with a full understanding of their privacy practices and more information on how their end user's Personally Identifiable Information (PII) is collected, shared, and used. For purposes of the GDPR, your institution is the data controller and RefReps acts as a data processor under our Data Processing Addendum. To obtain more detailed information about how PII is collected, used, and shared by your educational institution, please contact the appropriate individual at that institution.

In limited circumstances, end users may also be customers of RefReps and RefReps may market to them as a customer. For example, end users may purchase products or create personal accounts on our web sites. In these circumstances, they would be treated as a customer. For more information on how your data is used as a customer, please review the Customer Data Privacy Policy (Section 1). By contrast, this End User Data Privacy Policy (Section 2) applies to end users with respect to the information collected and processed as part of a course of instruction within the digital learning solution as determined by their educational institution or employer. Aggregated

de-identified end user PII is leveraged by RefReps to improve existing or develop new educational products and services.

RefReps is a global organization. Your personal data may be transferred to and processed in the United States or other countries.

For EEA/UK users, transfers rely on (i) adequacy decisions where applicable, or (ii) the European Commission Standard Contractual Clauses (SCCs) and, for UK transfers, the UK Addendum or UK IDTA (as applicable), together with any required supplementary measures. Details are provided in our [Privacy Policy](https://www.refreps.com/privacy) (<https://www.refreps.com/privacy>) and, where RefReps acts as a processor, the DPA.

What is End User Personal Information?

Personally identifiable information, or PII, is any information relating to an identified or identifiable natural person ("data subject") including personal data as defined under applicable local law. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

What End User Personal Information do we collect?

We collect PII, such as contact information and education details, in order to provide you with the product and/or service requested.

We only collect the information required to provide, maintain and improve the digital learning solution you use. When you register, or are registered within one of our digital learning solutions, we collect your name, school, instructor, class, and login information. Once you begin using one of our solutions, we collect your input to questions, technical specifications, and other information about how you use the solution. You are not required to provide PII; however, in order to use certain services, we may need to collect certain PII for that service to function properly or for us to provide you with requested information.

Depending on the product, the PII we collect includes information from the following categories:

- Name, initials, and personal or business-related contact information

- For our digital learning systems, we collect your name/initials and contact information when you create an account. However, we collect additional PII, or confirm existing PII, if you contact customer service with an issue or question.
- Education & professional information
- For some digital learning systems, we collect PII related to your position as an educator or student. This includes the state, district, name of school, courses, etc.
- In some instances, we collect PII from third parties who provide single-sign-on functions via Learning Management Systems or related tools.

We automatically collect computer metadata and content to provide, improve, and maintain our products and services.

When you use our digital learning systems, we automatically collect certain information from you through the use of cookies, web beacons or other tracking mechanisms. This includes information about your experience such as your IP address, operating systems, pages viewed, and time spent.

Third parties also collect information automatically from you across websites and over time through the use of their own cookies, web beacons, and tracking mechanisms. This information is used to enable the functions of the digital learning system, as well as customize, maintain, and improve our digital learning systems. You may disable cookies via your browser or third party mechanisms. However, some features of our digital learning systems may not function properly without them.

Third parties include:

Third-Party Name	Link	Description
Amazon AWS	aws.amazon.com	Web Hosting
Mailgun	www.mailgun.com	Sending Emails
Twilio	www.twilio.com	SMS Messaging
Pipedrive	www.pipedrive.com	Customer Support

Freshdesk	www.freshdesk.com	Customer Support
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If you choose to communicate with or receive communications through our services via phone, text, chat, email, or any other platform for technical support, customer service, or other assistance, those interactions may be recorded and monitored to deliver the solution or information requested by you.

How do we use End User Personal Information?

Contract performance
Legitimate interests
Consent
Legal obligation

As mentioned above, we use your information to provide you with the digital learning solution on behalf of your institution, in order to meet our contractual obligation to you or your institution with respect to the service. For example, to assist with identifying users across products and providing consistent service and to enable sharing of data between our products and your institution's learning management system.

We will also process your PII to meet our legitimate interests, for example to improve the quality of services and products.

Except as described in this notice, we limit the use, collection, and disclosure of your PII to the minimum level necessary to deliver the service or information requested by you or your institution. We do not collect, use, or disclose PII that is not reasonably related to a legitimate business purpose necessary to serve you. Your information may also be used in order to maintain and/or improve our services.

Some of our digital learning solutions will use your previous responses to customize your learning experience. This customization is designed to ensure the best possible learning environment for a student without directly driving any determinative outcome.

RefReps uses automated systems to analyze engagement, learning history, and usage behavior to personalize content, detect misuse, and enforce licensing. This processing helps improve learning outcomes and platform security.

Users located in the EEA/UK may request human intervention, express their point of view, and contest automated decisions.

Provision of your PII may be necessary in order to use the chosen digital learning solution. Failure to provide us with your PII may preclude you from using the digital learning solution.

Do we sell End User Personal information or use it for marketing purposes?

We will not sell end user PII or use information from educational records for marketing purposes.

We will not sell PII to other organizations, nor will we market to students using the information from their educational records (education records are defined as records directly related to a student and maintained by an educational agency or institution, or by a party acting for the agency or institution).

When do we share End User Personal Information?

In general, we only share your PII in order to provide, maintain, or improve our products or services, or respond to legal requests.

1. Co-branded/Other Web Sites and Features – We may share your PII with third-party business partners for the purpose of providing the service to you. These third-party business partners include cloud service providers, learning management systems (LMS), other educational software providers, respective state officiating associations, etc. These business partners will be given limited access to the PII that is reasonably necessary to deliver the service, and we will require that such third parties follow the same privacy and security practices as RefReps.
2. Business Transfer – In the event of a sale, merger or acquisition, we will be able to transfer your PII to a separate entity. We will require this entity to use your PII only for authorized purposes and by authorized persons in a manner consistent with the choices end users have made under this notice, and that security, integrity, and privacy of your PII is maintained.
3. Agents/Service providers – We hire other companies to perform certain business-related functions on our behalf and according to our instructions. For

example, we provide your PII to service providers that host our platform data in the cloud (e.g., AWS).

4. Educational Institutions / Corporation – As we provide products and services to your institution / corporation, we share your data with approved individuals such as administrators or educators.
5. Law Enforcement – In the event that RefReps receives a legal demand for end user data from a law enforcement agency, that request will only be honored if:
 - The request complies with all laws and clearly establishes the legal need for disclosure.
 - The request is related to a specific investigation and specific user accounts are implicated in that investigation.
 - Whenever legally permissible, users shall receive notice that their information is being requested.

RefReps reserves the right to disclose to third parties non-personally identifiable information about our users and their use of the RefReps services. For example, RefReps may disclose aggregate data about the overall patterns or demographics of the users of the RefReps products or services.

What rights do you have around your End User Personal Information?

As an end-user, you may have the rights to access, export, be informed about, rectify, object to the further processing of, restrict the processing of, withdraw consent to the processing of, and erase your personal information.

If you are located in the EEA/UK, you may lodge a complaint with your local data protection authority.

If you are or were a student, instructor, or administrator at an educational institution using a RefReps digital product, you must direct any requests to exercise your data subject rights to the appropriate representative at your institution. Otherwise, you may reach out to RefReps directly on the requests below:

1. Access and rectification – We strive to ensure that the PII we have about you is accurate and current. You may obtain confirmation as to whether or not PII concerning you exists, regardless of whether PII has already been recorded, and be communicated such information in a readily understandable form.
2. Choice & Objection to processing – With limited exceptions, you may choose to change how we use your PII at any time. However, if the PII is required in order to provide you with the service or process a transaction, you may not be able to opt-out without canceling the transaction or service. You may object, in whole or

in part, on legitimate grounds, to the processing of your PII, even where such processing is relevant to the purpose of the collection. Please know that if we do receive a request to object to the further processing of your information, you may no longer be able to access or use the digital learning solution.

3. Withdraw consent – Your educational institution is responsible for obtaining your consent, where required. RefReps obtains consent from your institution to collect, process, and store your PII.
4. Restriction of processing: In specific cases (e.g., if you challenge the accuracy of the PII, while this is being checked), you can request a restriction on the processing of your PII, which can only be processed to file or defend claims.
5. Information – You have the right to be informed a) of the source of the PII; b) of the purposes and methods of the processing; c) of the logic applied to the processing, if processing is carried out with the help of electronic means; d) of the identity of the data controller and data processors; and e) of the entities or categories of entities to whom the PII may be communicated and who may have access to such PII in their capacity as data processor(s) or person(s) in charge of the processing.
6. Data portability – You have the right to export your PII from our systems in a readily accessible file type.
7. Erasure – You may request erasure, anonymization or blocking of a) PII that have been processed unlawfully; b) PII whose retention is unnecessary for the purposes for which it has been collected or subsequently processed. You can obtain certification to the effect that such operations, as well as their contents, have been notified to the entities to whom the data were communicated, unless this requirement proves impossible or involves a manifestly disproportionate effort. Since your educational institution has hired us to manage this information for them, we ask that you or your parent make any request to delete your information directly to your school. Please know that if we do receive a request to delete your information, you may no longer be able to access or use the digital learning solution.

How do we protect End User Personal Information?

Our IT security team has established industry standard security measures to protect your PII from unauthorized access and use.

RefReps takes reasonable precautions to protect your information. When you submit PII via the digital learning system, your information is protected both online and off-line. RefReps utilizes reasonable security measures to protect the security and confidentiality of your PII from unauthorized access and use.

How long do we retain End User Personal Information?

We will retain your data for the duration of the service and up to 3 years thereafter unless required by law. We will retain and use your data as necessary to comply with our obligations, resolve disputes and enforce agreements.

For information on the retention period that applies, reach out to the Privacy Office by emailing hype@refreps.com.

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Section 3:

Parent

RefReps Parents Privacy Policy

Parent is a term that embodies the following terms when referenced: guardian, etc.

Protecting privacy and maintaining the trust of our customers, students, and their parents has always been a key priority for us. To enhance learning, we need access to data, measurement, insight and other feedback that inform us about students' knowledge, skill levels and learning development.

Our goal is to use the data obtained in the course of current products/services to provide adaptive pathways of learning; not to drive commerce. Our commitment to privacy and innovation goes beyond compliance, it is part of our culture:

- We have implemented policies and procedures to support customers in their compliance with privacy laws, including: GDPR, COPPA, and FERPA.
- We have an internal Privacy Council comprised of senior leaders throughout our company that provides the tone at the top to perpetuate best practices across our business.
- We do not support business models that create tolls and taxes on interoperability.
- We conduct regular scans of our applications to prevent and detect security breaches. We recognize that no system is 100% secure, but we take steps to prevent and mitigate the impact of adverse events.

By increasing awareness and transparency, we hope to better understand the concerns and learn how to talk with each other about privacy, security, and confidentiality.

Educational institutions, as data controllers, are ultimately responsible for providing a full understanding of the privacy practices around how their students' personally identifiable information is collected, shared, and used. To obtain more detailed information about how data is collected, used, and shared by an educational institution, please contact the appropriate representative at that institution.

For further details on our privacy practices around student data, please review the Student Data Privacy Policy (Section 4). The Student Data Privacy Policy (Section 4) details practices around how we collect and use student information, whether they are a student at an educational institution or an individual using a product on their own.

If you have purchased a RefReps product for your child please also review the Customer Data Privacy Policy (Section 1) for information on how we handle your personally identifiable information.

If you have purchased a RefReps product and created an account for yourself as an educator, please also review the Educator Data Privacy Policy (Section 5). The Educator Data Privacy Policy (Section 5) also applies to educators at educational institutions.

If you choose to communicate with or receive communications from RefReps via phone, text, chat, email, or any other platform for technical support, customer service, or other assistance, those interactions may be recorded and monitored to deliver the information requested by you.

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Section 4:

Student

RefReps Student Privacy Policy

Student is a term that embodies the following terms when referenced: learner, customer, end user, etc.

As a global leader in providing digital learning systems for educators and students, RefReps is deeply committed to protecting the privacy of our end users. Whether you are using any of our Services, we collect Personally Identifiable Information that we use to provide, maintain and improve the solution. We are providing the below information

so that you can understand how we protect and use your information. If you are under 18 or still in high school/equivalent education level, we require/suggest that you review this information with your parents and obtain parental/guardian approval. Our commercial web sites, such as www.refreps.com, are not intended for the use by minors below the age of 13 and if done so are acknowledged as obtaining parental/guardian approval.

This information applies to all students of our digital learning system. Since RefReps is a service provider to your institution, your institution Educational institutions are best able to provide you with a full understanding of their privacy practices and more information on how their end user's Personally Identifiable Information (PII) is collected, shared, and used. For purposes of the GDPR, your institution is the data controller and RefReps acts as a data processor under our Data Processing Addendum. To obtain more detailed information about how PII is collected, used, and shared by your educational institution, please contact the appropriate individual at that institution.

In limited circumstances, students may also be customers of RefReps and RefReps may market to them as a customer. For example, students may purchase products or create personal accounts on our web sites. In these circumstances, they would be treated as a customer. For more information on how your data is used as a customer, please review the Customer Privacy Policy (Section 1). By contrast, this Student Data Privacy Policy (Section 4) applies to students with respect to the information collected and processed as part of a course of instruction within the digital learning solution as determined by their educational institution or employer. Aggregated de-identified student PII is leveraged by RefReps to improve existing or develop new educational products and services.

RefReps is a global organization. For users in the EEA/UK, international transfers rely on Standard Contractual Clauses or adequacy decisions under [GDPR Articles 44-49](#). We follow privacy laws and regulations that are applicable to our company and our services in the areas where we do business. Should our privacy practices change, we will update it here, but more importantly, we will notify your educational institution and you prior to making updates to allow time to review and pose any concerns.

What is Student Personal Information?

Personally identifiable information, or PII, is any information relating to an identified or identifiable natural person ("data subject") including personal data as defined under applicable local law. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the

physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

What Student Personal Information do we collect?

We collect PII, such as contact information and education details, in order to provide you with the product and/or service requested.

We only collect the information required to provide, maintain and improve the digital learning solution you use. When you register, or are registered within one of our digital learning solutions, we collect your name, school, instructor, class, and login information.

Once you begin using one of our solutions, we collect your input to questions, technical specifications, and other information about how you use the solution. You are not required to provide PII; however, in order to use certain services, we may need to collect certain PII for that service to function properly or for us to provide you with requested information.

Depending on the product, the PII we collect includes information from the following categories:

Category of Data	Elements	Used by RefReps
Application Technology Meta Data	IP Addresses of users, Use of cookies, etc.	<input checked="" type="checkbox"/>
Application Use Statistics	Meta data on user interaction with application	<input checked="" type="checkbox"/>
Assessment	Observation data	<input checked="" type="checkbox"/>
Attendance	Platform activity	<input checked="" type="checkbox"/>
Enrollment	Student organization enrollment	<input checked="" type="checkbox"/>
Schedule	Instructors names	<input checked="" type="checkbox"/>
	Email	<input checked="" type="checkbox"/>

Student Contact Information	Phone	<input checked="" type="checkbox"/>
	Zipcode	<input checked="" type="checkbox"/>
	State	<input checked="" type="checkbox"/>
Student Identifiers	Provider/App assigned student ID number	<input checked="" type="checkbox"/>
Student Name	First and/or Last	<input checked="" type="checkbox"/>
Student Survey Responses	Student responses to surveys or questionnaires	<input checked="" type="checkbox"/>
Student work	Student generated content; writing responses	<input checked="" type="checkbox"/>
Transcript	Student course data	<input checked="" type="checkbox"/>
	Student course grades/performance scores	<input checked="" type="checkbox"/>

We automatically collect computer metadata and content to provide, improve, and maintain our products and services.

When you use our digital learning systems, we automatically collect certain information from you through the use of cookies, web beacons or other tracking mechanisms. This includes information about your experience such as your IP address, operating systems, pages viewed, and time spent.

Third parties also collect information automatically from you across websites and over time through the use of their own cookies, web beacons, and tracking mechanisms. This information is used to enable the functions of the digital learning system, as well as customize, maintain, and improve our digital learning systems. You may disable cookies via your browser or third party mechanisms. However, some features of our digital learning systems may not function properly without them.

Third parties include:

Third-Party Name	Link	Description
Amazon AWS	aws.amazon.com	Web Hosting
Mailgun	www.mailgun.com	Sending Emails
Twilio	www.twilio.com	SMS Messaging
Pipedrive	www.pipedrive.com	CRM
Freshdesk	www.freshdesk.com	Customer Support

If you choose to communicate with or receive communications through our services via phone, text, chat, email, or any other platform for technical support, customer service, or other assistance, those interactions may be recorded and monitored to deliver the solution or information requested by you.

How do we use Student Personal Information?

Contract performance
Legitimate interests
Consent
Legal obligation

As mentioned above, we use your information to provide you with the digital learning solution on behalf of your school, in order to meet our contractual obligation to you or your school with respect to the service. For example, to assist with identifying users across products and providing consistent service and to enable sharing of data between our products and your school’s learning management system.

We will also process your PII to meet our legitimate interests, for example to improve the quality of services and products.

Except as described in this notice, we limit the use, collection, and disclosure of your PII to the minimum level necessary to deliver the service or information requested by you or your institution. We do not collect, use, or disclose PII that is not reasonably related to a legitimate business purpose necessary to serve you. Your information may also be used in order to maintain and/or improve our services.

Some of our digital learning solutions will use your previous responses to customize your learning experience. This customization is designed to ensure the best possible learning environment for a student without directly driving any determinative outcome.

RefReps uses automated systems to analyze engagement, learning history, and usage behavior to personalize content, detect misuse, and enforce licensing. This processing helps improve learning outcomes and platform security.

Users located in the EEA/UK may request human intervention, express their point of view, and contest automated decisions.

Provision of your PII may be necessary in order to use the chosen digital learning solution. Failure to provide us with your PII may preclude you from using the digital learning solution.

Do we sell Student Personal Information or use it for marketing purposes?

We will not sell end user PII or use information from educational records for marketing purposes.

We will not sell PII to other organizations, nor will we market to students using the information from their educational records (education records are defined as records directly related to a student and maintained by an educational agency or institution, or by a party acting for the agency or institution).

When do we share Student Personal Information?

In general, we only share your PII in order to provide, maintain, or improve our products or services, or respond to legal requests.

1. Co-branded/Other Web Sites and Features – We may share your PII with third-party business partners for the purpose of providing the service to you. These third-party business partners include cloud service providers, learning

management systems (LMS), other educational software providers, respective state officiating associations, etc. These business partners will be given limited access to the PII that is reasonably necessary to deliver the service, and we will require that such third parties follow the same privacy and security practices as RefReps.

2. Business Transfer – In the event of a sale, merger or acquisition, we will be able to transfer your PII to a separate entity. We will require this entity to use your PII only for authorized purposes and by authorized persons in a manner consistent with the choices end users have made under this notice, and that security, integrity, and privacy of your PII is maintained.
3. Agents/Service providers – We hire other companies to perform certain business-related functions on our behalf and according to our instructions. For example, we provide your PII to service providers that host our platform data in the cloud (e.g., AWS).
4. Educational Institutions / Corporation – As we provide products and services to your institution / corporation, we share your data with approved individuals such as administrators or educators.
5. Law Enforcement – In the event that RefReps receives a legal demand for end user data from a law enforcement agency, that request will only be honored if:
 - The request complies with all laws and clearly establishes the legal need for disclosure.
 - The request is related to a specific investigation and specific user accounts are implicated in that investigation.
 - Whenever legally permissible, users shall receive notice that their information is being requested.

RefReps reserves the right to disclose to third parties non-personally identifiable information about our users and their use of the RefReps services. For example, RefReps may disclose aggregate data about the overall patterns or demographics of the users of the RefReps products or services.

What rights do you have around your Student Personal Information?

As an end-user, you may have the rights to access, export, be informed about, rectify, object to the further processing of, restrict the processing of, withdraw consent to the processing of, and erase your personal information.

If you are located in the EEA/UK, you may lodge a complaint with your local data protection authority.

If you are or were a student, instructor, or administrator at an educational institution using a RefReps digital product, you must direct any requests to exercise your data subject rights to the appropriate representative at your institution. Otherwise, you may reach out to RefReps directly on the requests below:

1. Access and rectification – We strive to ensure that the PII we have about you is accurate and current. You may obtain confirmation as to whether or not PII concerning you exists, regardless of whether PII has already been recorded, and be communicated such information in a readily understandable form.
2. Choice & Objection to processing – With limited exceptions, you may choose to change how we use your PII at any time. However, if the PII is required in order to provide you with the service or process a transaction, you may not be able to opt-out without canceling the transaction or service. You may object, in whole or in part, on legitimate grounds, to the processing of your PII, even where such processing is relevant to the purpose of the collection. Please know that if we do receive a request to object to the further processing of your information, you may no longer be able to access or use the digital learning solution.
3. Withdraw consent – Your educational institution is responsible for obtaining your consent, where required. RefReps obtains consent from your institution to collect, process, and store your PII.
4. Restriction of processing: In specific cases (e.g., if you challenge the accuracy of the PII, while this is being checked), you can request a restriction on the processing of your PII, which can only be processed to file or defend claims.
5. Information – You have the right to be informed a) of the source of the PII; b) of the purposes and methods of the processing; c) of the logic applied to the processing, if processing is carried out with the help of electronic means; d) of the identity of the data controller and data processors; and e) of the entities or categories of entities to whom the PII may be communicated and who may have access to such PII in their capacity as data processor(s) or person(s) in charge of the processing.
6. Data portability – You have the right to export your PII from our systems in a readily accessible file type.
7. Erasure – You may request erasure, anonymization or blocking of a) PII that have been processed unlawfully; b) PII whose retention is unnecessary for the purposes for which it has been collected or subsequently processed. You can obtain certification to the effect that such operations, as well as their contents, have been notified to the entities to whom the data were communicated, unless this requirement proves impossible or involves a manifestly disproportionate effort. Since your educational institution has hired us to manage this information for them, we ask that you or your parent make any request to delete your information directly to your school. Please know that if we do receive a request to

delete your information, you may no longer be able to access or use the digital learning solution.

How do we protect Student Personal Information?

Our IT security team has established industry standard security measures to protect your PII from unauthorized access and use.

RefReps takes reasonable precautions to protect your information. When you submit PII via the digital learning system, your information is protected both online and off-line. RefReps utilizes reasonable security measures to protect the security and confidentiality of your PII from unauthorized access and use.

How long do we retain Student Personal Information?

We will retain your data for the duration of the service and up to 3 years thereafter unless required by law. We will retain and use your data as necessary to comply with our obligations, resolve disputes and enforce agreements.

For information on the retention period that applies, reach out to the Privacy Office by emailing hype@refreps.com.

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Section 5:

Educator

RefReps Educator Privacy Policy

Educator is a term that embodies the following terms when referenced: instructor, teacher, educator, etc.

As a global leader in providing digital learning systems for educators and students, RefReps is deeply committed to protecting the privacy of our end users. Whether you are using any of our Services, we collect Personally Identifiable Information that we use to provide, maintain and improve the solution. We are providing the below information so that you can understand how we protect and use your information. If you are under 18 or still in high school/equivalent education level, we require/suggest that you review this information with your parents and obtain parental/guardian approval. Our commercial web sites, such as www.refreps.com, are not intended for the use by

minors below the age of 13 and if done so are acknowledged as obtaining parental/guardian approval.

This information applies to all educators of our digital learning system. Since RefReps is a service provider to your institution, your institution Educational institutions are best able to provide you with a full understanding of their privacy practices and more information on how their end user's Personally Identifiable Information (PII) is collected, shared, and used. For purposes of the GDPR, your institution is the data controller and RefReps acts as a data processor under our Data Processing Addendum. To obtain more detailed information about how PII is collected, used, and shared by your educational institution, please contact the appropriate individual at that institution.

In limited circumstances, Educators may also be customers of RefReps and RefReps may market to them as a customer. For example, educators may purchase products or create personal accounts on our web sites. In these circumstances, they would be treated as a customer. For more information on how your data is used as a customer, please review the Customer Privacy Policy (Section 1). By contrast, this Educator Data Privacy Policy (Section 5) applies to educators with respect to the information collected and processed as part of a course of instruction within the digital learning solution as determined by their educational institution or employer. Aggregated de-identified educator PII is leveraged by RefReps to improve existing or develop new educational products and services.

RefReps is a global organization. For users in the EEA/UK, international transfers rely on Standard Contractual Clauses or adequacy decisions under [GDPR Articles 44-49](#). We follow privacy laws and regulations that are applicable to our company and our services in the areas where we do business. Should our privacy practices change, we will update it here, but more importantly, we will notify your educational institution and you prior to making updates to allow you time to review and pose any concerns.

What is Educator Personal Information?

Personally identifiable information, or PII, is any information relating to an identified or identifiable natural person ("data subject") including personal data as defined under applicable local law. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

What Educator Personal Information do we collect?

We collect PII, such as contact information and education details, in order to provide you with the product and/or service requested.

We only collect the information required to provide, maintain and improve the digital learning solution you use. When you register, or are registered within one of our digital learning solutions, we collect your name, school, instructor, class, and login information.

Once you begin using one of our solutions, we collect your input to questions, technical specifications, and other information about how you use the solution. You are not required to provide PII; however, in order to use certain services, we may need to collect certain PII for that service to function properly or for us to provide you with requested information.

Depending on the product, the PII we collect includes information from the following categories:

- Name, initials, and personal or business-related contact information
- For our digital learning systems, we collect your name/initials and contact information when you create an account. However, we collect additional PII, or confirm existing PII, if you contact customer service with an issue or question.
- Education & professional information
- For some digital learning systems, we collect PII related to your position as an educator or student. This includes the state, district, name of school, courses, etc.
- In some instances, we collect PII from third parties who provide single-sign-on functions via Learning Management Systems or related tools.

We automatically collect computer metadata and content to provide, improve, and maintain our products and services.

When you use our digital learning systems, we automatically collect certain information from you through the use of cookies, web beacons or other tracking mechanisms. This includes information about your experience such as your IP address, operating systems, pages viewed, and time spent.

Third parties also collect information automatically from you across websites and over time through the use of their own cookies, web beacons, and tracking mechanisms. This information is used to enable the functions of the digital learning system, as well as customize, maintain, and improve our digital learning systems. You may disable cookies via your browser or third party mechanisms. However, some features of our digital learning systems may not function properly without them.

Third parties include:

Third-Party Name	Link	Description
Amazon AWS	aws.amazon.com	Web Hosting
Mailgun	www.mailgun.com	Sending Emails
Twilio	www.twilio.com	SMS Messaging
Pipedrive	www.pipedrive.com	Customer Support
Freshdesk	www.freshdesk.com	Customer Support

If you choose to communicate with or receive communications through our services via phone, text, chat, email, or any other platform for technical support, customer service, or other assistance, those interactions may be recorded and monitored to deliver the solution or information requested by you.

How do we use Educator Personal Information?

Contract performance
Legitimate interests
Consent
Legal obligation

As mentioned above, we use your information to provide you with the digital learning solution on behalf of your school, in order to meet our contractual obligation to you or your school with respect to the service. For example, to assist with identifying users across products and providing consistent service and to enable sharing of data between our products and your school's learning management system.

We will also process your PII to meet our legitimate interests, for example to improve the quality of services and products.

Except as described in this notice, we limit the use, collection, and disclosure of your PII to the minimum level necessary to deliver the service or information requested by you or your institution. We do not collect, use, or disclose PII that is not reasonably related to a legitimate business purpose necessary to serve you. Your information may also be used in order to maintain and/or improve our services.

Some of our digital learning solutions will use your previous responses to customize your learning experience. This customization is designed to ensure the best possible learning environment for a student without directly driving any determinative outcome.

RefReps uses automated systems to analyze engagement, learning history, and usage behavior to personalize content, detect misuse, and enforce licensing. This processing helps improve learning outcomes and platform security.

Users located in the EEA/UK may request human intervention, express their point of view, and contest automated decisions.

Provision of your PII may be necessary in order to use the chosen digital learning solution. Failure to provide us with your PII may preclude you from using the digital learning solution.

Do we sell Educator Personal Information or use it for marketing purposes?

We will not sell end user PII or use information from educational records for marketing purposes.

We will not sell PII to other organizations, nor will we market to students using the information from their educational records (education records are defined as records directly related to a student and maintained by an educational agency or institution, or by a party acting for the agency or institution).

When do we share Educator Personal Information?

In general, we only share your PII in order to provide, maintain, or improve our products or services, or respond to legal requests.

1. Co-branded/Other Web Sites and Features – We may share your PII with third-party business partners for the purpose of providing the service to you. These third-party business partners include cloud service providers, learning

management systems (LMS), other educational software providers, respective state officiating associations, etc. These business partners will be given limited access to the PII that is reasonably necessary to deliver the service, and we will require that such third parties follow the same privacy and security practices as RefReps.

2. Business Transfer – In the event of a sale, merger or acquisition, we will be able to transfer your PII to a separate entity. We will require this entity to use your PII only for authorized purposes and by authorized persons in a manner consistent with the choices end users have made under this notice, and that security, integrity, and privacy of your PII is maintained.
3. Agents/Service providers – We hire other companies to perform certain business-related functions on our behalf and according to our instructions. For example, we provide your PII to service providers that host our platform data in the cloud (e.g., AWS).
4. Educational Institutions / Corporation – As we provide products and services to your institution / corporation, we share your data with approved individuals such as administrators or educators.
5. Law Enforcement – In the event that RefReps receives a legal demand for end user data from a law enforcement agency, that request will only be honored if:
 - The request complies with all laws and clearly establishes the legal need for disclosure.
 - The request is related to a specific investigation and specific user accounts are implicated in that investigation.
 - Whenever legally permissible, users shall receive notice that their information is being requested.

RefReps reserves the right to disclose to third parties non-personally identifiable information about our users and their use of the RefReps services. For example, RefReps may disclose aggregate data about the overall patterns or demographics of the users of the RefReps products or services.

What rights do you have around your Educator Personal Information?

As an end-user, you may have the rights to access, export, be informed about, rectify, object to the further processing of, restrict the processing of, withdraw consent to the processing of, and erase your personal information.

If you are located in the EEA/UK, you may lodge a complaint with your local data protection authority.

If you are or were a student, instructor, or administrator at an educational institution using a RefReps digital product, you must direct any requests to exercise your data subject rights to the appropriate representative at your institution. Otherwise, you may reach out to RefReps directly on the requests below:

1. Access and rectification – We strive to ensure that the PII we have about you is accurate and current. You may obtain confirmation as to whether or not PII concerning you exists, regardless of whether PII has already been recorded, and be communicated such information in a readily understandable form.
2. Choice & Objection to processing – With limited exceptions, you may choose to change how we use your PII at any time. However, if the PII is required in order to provide you with the service or process a transaction, you may not be able to opt-out without canceling the transaction or service. You may object, in whole or in part, on legitimate grounds, to the processing of your PII, even where such processing is relevant to the purpose of the collection. Please know that if we do receive a request to object to the further processing of your information, you may no longer be able to access or use the digital learning solution.
3. Withdraw consent – Your educational institution is responsible for obtaining your consent, where required. RefReps obtains consent from your institution to collect, process, and store your PII.
4. Restriction of processing: In specific cases (e.g., if you challenge the accuracy of the PII, while this is being checked), you can request a restriction on the processing of your PII, which can only be processed to file or defend claims.
5. Information – You have the right to be informed a) of the source of the PII; b) of the purposes and methods of the processing; c) of the logic applied to the processing, if processing is carried out with the help of electronic means; d) of the identity of the data controller and data processors; and e) of the entities or categories of entities to whom the PII may be communicated and who may have access to such PII in their capacity as data processor(s) or person(s) in charge of the processing.
6. Data portability – You have the right to export your PII from our systems in a readily accessible file type.
7. Erasure – You may request erasure, anonymization or blocking of a) PII that have been processed unlawfully; b) PII whose retention is unnecessary for the purposes for which it has been collected or subsequently processed. You can obtain certification to the effect that such operations, as well as their contents, have been notified to the entities to whom the data were communicated, unless this requirement proves impossible or involves a manifestly disproportionate effort. Since your educational institution has hired us to manage this information for them, we ask that you or your parent make any request to delete your information directly to your school. Please know that if we do receive a request to

delete your information, you may no longer be able to access or use the digital learning solution.

How do we protect Educator Personal Information?

Our IT security team has established industry standard security measures to protect your PII from unauthorized access and use.

RefReps takes reasonable precautions to protect your information. When you submit PII via the digital learning system, your information is protected both online and off-line. RefReps utilizes reasonable security measures to protect the security and confidentiality of your PII from unauthorized access and use.

How long do we retain Educator Personal Information?

We will retain your data for the duration of the service and up to 3 years thereafter unless required by law. We will retain and use your data as necessary to comply with our obligations, resolve disputes and enforce agreements.

For information on the retention period that applies, reach out to the Privacy Office by emailing hype@refreps.com.

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Section 6:

Institution

RefReps Institution Privacy Policy

Institution is a term that embodies the following terms when referenced: organization, corporation, university, educational institute, school, high school, associations, business, etc.

If you are purchasing RefReps products or services as an authorized representative of an educational institution or business that has a separate written agreement with RefReps, that agreement will govern the Privacy Policy and these Privacy Policy terms do not apply to you.

This information applies to all institutions of our digital learning system. Since RefReps is a service provider to your institution, your institution is best able to provide you with a full understanding of their privacy practices and more information on how their end

user's Personally Identifiable Information (PII) is collected, shared, and used. For purposes of the GDPR, your institution is the data controller and RefReps acts as a data processor under our Data Processing Addendum. To obtain more detailed information about how PII is collected, used, and shared by your institution, please contact the appropriate individual at that institution.

In limited circumstances, Institutions may also be customers of RefReps and RefReps may market to them as a customer. For example, institutions may purchase products or create personal accounts on our web sites. In these circumstances, they would be treated as a customer. For more information on how your data is used as a customer, please review the Customer Privacy Policy (Section 1). By contrast, this Institution Data Privacy Policy (Section 6) applies to institutions with respect to the information collected and processed as part of a course of instruction within the digital learning solution. Aggregated de-identified educator PII is leveraged by RefReps to improve existing or develop new educational products and services.

RefReps is a global organization. For users in the EEA/UK, international transfers rely on Standard Contractual Clauses or adequacy decisions under [GDPR Articles 44-49](#). We follow privacy laws and regulations that are applicable to our company and our services in the areas where we do business. Should our privacy practices change, we will update it here, but more importantly, we will notify your educational institution.

What is Institution Personal Information?

Personally identifiable information, or PII, is any information relating to an identified or identifiable natural person ("data subject") including personal data as defined under applicable local law. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

What Institution Personal Information do we collect?

We collect PII, such as contact information and education details, in order to provide you with the product and/or service requested.

We only collect the information required to provide, maintain and improve the digital learning solution you use. When you register, or are registered within one of our digital learning solutions, we collect your name, school, instructor, class, and login information.

Once you begin using one of our solutions, we collect your input to questions, technical specifications, and other information about how you use the solution. You are not required to provide PII; however, in order to use certain services, we may need to collect certain PII for that service to function properly or for us to provide you with requested information.

Depending on the product, the PII we collect includes information from the following categories:

- Name, initials, and personal or business-related contact information
- For our digital learning systems, we collect your name/initials and contact information when you create an account. However, we collect additional PII, or confirm existing PII, if you contact customer service with an issue or question.
- Education & professional information
- For some digital learning systems, we collect PII related to your position as an educator or student. This includes the state, district, name of school, courses, etc.
- In some instances, we collect PII from third parties who provide single-sign-on functions via Learning Management Systems or related tools.

We automatically collect computer metadata and content to provide, improve, and maintain our products and services.

When you use our digital learning systems, we automatically collect certain information from you through the use of cookies, web beacons or other tracking mechanisms. This includes information about your experience such as your IP address, operating systems, pages viewed, and time spent.

Third parties also collect information automatically from you across websites and over time through the use of their own cookies, web beacons, and tracking mechanisms. This information is used to enable the functions of the digital learning system, as well as customize, maintain, and improve our digital learning systems. You may disable cookies via your browser or third party mechanisms. However, some features of our digital learning systems may not function properly without them.

Third parties include:

Third-Party Name	Link	Description
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Amazon AWS	aws.amazon.com	Web Hosting
Mailgun	www.mailgun.com	Sending Emails
Twilio	www.twilio.com	SMS Messaging
Pipedrive	www.pipedrive.com	Customer Support
Freshdesk	www.freshdesk.com	Customer Support

If you choose to communicate with or receive communications through our services via phone, text, chat, email, or any other platform for technical support, customer service, or other assistance, those interactions may be recorded and monitored to deliver the solution or information requested by you.

How do we use Institution Personal Information?

Contract performance
Legitimate interests
Consent
Legal obligation

As mentioned above, we use your information to provide you with the digital learning solution on behalf of your school, in order to meet our contractual obligation to you or your school with respect to the service. For example, to assist with identifying users across products and providing consistent service and to enable sharing of data between our products and your school’s learning management system.

We will also process your PII to meet our legitimate interests, for example to improve the quality of services and products.

Except as described in this notice, we limit the use, collection, and disclosure of your PII to the minimum level necessary to deliver the service or information requested by you or

your institution. We do not collect, use, or disclose PII that is not reasonably related to a legitimate business purpose necessary to serve you. Your information may also be used in order to maintain and/or improve our services.

Some of our digital learning solutions will use your previous responses to customize your learning experience. This customization is designed to ensure the best possible learning environment for a student without directly driving any determinative outcome.

RefReps uses automated systems to analyze engagement, learning history, and usage behavior to personalize content, detect misuse, and enforce licensing. This processing helps improve learning outcomes and platform security.

Users located in the EEA/UK may request human intervention, express their point of view, and contest automated decisions.

Provision of your PII may be necessary in order to use the chosen digital learning solution. Failure to provide us with your PII may preclude you from using the digital learning solution.

Do we sell Institution Personal Information or use it for marketing purposes?

We will not sell end user PII or use information from educational records for marketing purposes.

We will not sell PII to other organizations, nor will we market to students using the information from their educational records (education records are defined as records directly related to a student and maintained by an educational agency or institution, or by a party acting for the agency or institution).

When do we share Institution Personal Information?

In general, we only share your PII in order to provide, maintain, or improve our products or services, or respond to legal requests.

6. Co-branded/Other Web Sites and Features – We may share your PII with third-party business partners for the purpose of providing the service to you. These third-party business partners include cloud service providers, learning management systems (LMS), other educational software providers, respective state officiating associations, etc. These business partners will be given limited access to the PII that is reasonably necessary to deliver the service, and we will require that such third parties follow the same privacy and security practices as RefReps.

7. Business Transfer – In the event of a sale, merger or acquisition, we will be able to transfer your PII to a separate entity. We will require this entity to use your PII only for authorized purposes and by authorized persons in a manner consistent with the choices end users have made under this notice, and that security, integrity, and privacy of your PII is maintained.
8. Agents/Service providers – We hire other companies to perform certain business-related functions on our behalf and according to our instructions. For example, we provide your PII to service providers that host our platform data in the cloud (e.g., AWS).
9. Educational Institutions / Corporation – As we provide products and services to your institution / corporation, we share your data with approved individuals such as administrators or educators.
10. Law Enforcement – In the event that RefReps receives a legal demand for end user data from a law enforcement agency, that request will only be honored if:
 - The request complies with all laws and clearly establishes the legal need for disclosure.
 - The request is related to a specific investigation and specific user accounts are implicated in that investigation.
 - Whenever legally permissible, users shall receive notice that their information is being requested.

RefReps reserves the right to disclose to third parties non-personally identifiable information about our users and their use of the RefReps services. For example, RefReps may disclose aggregate data about the overall patterns or demographics of the users of the RefReps products or services.

What rights do you have around your Institution Personal Information?

As an end-user, you may have the rights to access, export, be informed about, rectify, object to the further processing of, restrict the processing of, withdraw consent to the processing of, and erase your personal information.

If you are located in the EEA/UK, you may lodge a complaint with your local data protection authority.

If you are or were a student, instructor, or administrator at an educational institution using a RefReps digital product, you must direct any requests to exercise your data subject rights to the appropriate representative at your institution. Otherwise, you may reach out to RefReps directly on the requests below:

8. Access and rectification – We strive to ensure that the PII we have about you is accurate and current. You may obtain confirmation as to whether or not PII concerning you exists, regardless of whether PII has already been recorded, and be communicated such information in a readily understandable form.
9. Choice & Objection to processing – With limited exceptions, you may choose to change how we use your PII at any time. However, if the PII is required in order to provide you with the service or process a transaction, you may not be able to opt-out without canceling the transaction or service. You may object, in whole or in part, on legitimate grounds, to the processing of your PII, even where such processing is relevant to the purpose of the collection. Please know that if we do receive a request to object to the further processing of your information, you may no longer be able to access or use the digital learning solution.
10. Withdraw consent – Your educational institution is responsible for obtaining your consent, where required. RefReps obtains consent from your institution to collect, process, and store your PII.
11. Restriction of processing: In specific cases (e.g., if you challenge the accuracy of the PII, while this is being checked), you can request a restriction on the processing of your PII, which can only be processed to file or defend claims.
12. Information – You have the right to be informed a) of the source of the PII; b) of the purposes and methods of the processing; c) of the logic applied to the processing, if processing is carried out with the help of electronic means; d) of the identity of the data controller and data processors; and e) of the entities or categories of entities to whom the PII may be communicated and who may have access to such PII in their capacity as data processor(s) or person(s) in charge of the processing.
13. Data portability – You have the right to export your PII from our systems in a readily accessible file type.
14. Erasure – You may request erasure, anonymization or blocking of a) PII that have been processed unlawfully; b) PII whose retention is unnecessary for the purposes for which it has been collected or subsequently processed. You can obtain certification to the effect that such operations, as well as their contents, have been notified to the entities to whom the data were communicated, unless this requirement proves impossible or involves a manifestly disproportionate effort. Since your educational institution has hired us to manage this information for them, we ask that you or your parent make any request to delete your information directly to your school. Please know that if we do receive a request to delete your information, you may no longer be able to access or use the digital learning solution.

How do we protect Institution Personal Information?

Our IT security team has established industry standard security measures to protect your PII from unauthorized access and use.

RefReps takes reasonable precautions to protect your information. When you submit PII via the digital learning system, your information is protected both online and off-line. RefReps utilizes reasonable security measures to protect the security and confidentiality of your PII from unauthorized access and use.

How long do we retain Institution Personal Information?

We will retain your data for the duration of the service and up to 30 days thereafter account deactivation/deletion unless required by law. We will retain and use your data as necessary to comply with our obligations, resolve disputes and enforce agreements.

For information on the retention period that applies, reach out to the Privacy Office by emailing hype@refreps.com.

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