Emergent Tree Software Privacy Policy

At Emergent Tree Education, Inc. ("Emergent Tree"), we strive to protect your privacy and the privacy of information you provide to us. This Privacy Policy applies to the following software products developed and maintained by Emergent Tree:

● Universal Behavior Screener, currently hosted at https://screener.emergenttree.com; and

● Progress Monitoring Daily Behavior Report Card, currently hosted at https://progress.emergenttree.com; and

● Classroom Coaching Tool, currently hosted at https://classroom.emergenttree.com (individually and collectively, the "Software").

This Privacy Policy describes the nature of the information that the Software collects from Users; how such information is used, stored, and protected; and when such information may be disclosed. By accessing the Software, you are consenting to this Privacy Policy. If you do not consent, please discontinue or refrain from accessing the Software and contact us.

This Privacy Policy does not apply to other aspects of Emergent Tree's business, including but not limited to the primary website (http://www.emergenttree.com), online learning and resources (https://learn.emergenttree.com), on-site training, consultations, and the like, although we seek to maintain the privacy of information we collect in all aspects of our business.

The Software is not directed to nor meant to be accessed or utilized by: children, those under the age of 13, any minors under the age of 18, non-adults, and the like ("Children" or "Students"). **Children are not users of the Software, and the Software does not collect information directly from Children.** Users of the Software are adults such as teachers, school administrators and staff, district administrators and staff, guidance counselors, and the like ("Users" or "Teachers") that may input and access information about Students by using the Software as detailed below.

Summary

For your convenience, the following is a summary of the Privacy Policy. Please read the entire Privacy Policy for details.

What Information We Collect and How We Use It:	We collect information only from Teachers and only what is necessary for use of the Software. We do not collect any information directly from Students. Teachers may input Student demographic, identification, and screener assessment data as well as Teacher contact information. We also may collect non-personal information about computer systems and devices used to access the Software for technical support, troubleshooting, security, administration, and Software improvement services.
How We Protect the Information:	We use secure communication channels, encrypted storage, and access limitations to protect collected information.
Disclosure of the Information:	Collected information is disclosed only to authorized Users, Emergent Tree personnel and contractors, and legal authorities if compelled, or by your consent. Collected information is not disclosed to advertisers of any kind.

Information Collected and How We Use It

Information Collected from Teachers

Within the Software, Emergent Tree strives to collect only the minimum Student information from Teachers required for use of the Software including but not limited to:

- Student name, to identify each student and allow their specific Teachers to access, review, screen, and edit their records;

- Student identification number, to disambiguate multiple students with the same name or similar names, and to permit integration with school information systems;

- Assigned district, campus, and Teachers, to identify which Teachers may access, review, screen, and edit the records of specific Students;

- Student demographic information, such as sex, race, ethnicity, and the like to aggregate screening results for Teachers;

- Screener and other assessment data, to allow Teachers to monitor and record the progress of Students' general and specific behavior goals, objectives, patterns, and examples; and

- Assigned campus and Teacher(s), to determine which Teachers will be permitted to enter or review the student's progress;

The Student information collected is limited to that provided directly by Teachers at their own discretion. Within the Software, Emergent Tree collects contact information about Teachers such as names, email addresses, assigned campus, grade level, login/password, and the like primarily for the purpose of granting and restricting access to Student information within the Software.

Non-Personal Technical Information

Emergent Tree may collect, store, aggregate, and analyze non-personal information from Users that is typically communicated by computer systems. Such information may include, but is not limited to, the name, version, description, and capabilities of the browser, device, and operating system, as well as the Internet Protocol addresses of computer systems accessing the Software. We retain and use this information for system administration purposes including technical support, troubleshooting issues, monitoring activity levels, improving the Software, and security.

Software Usage Analytics

Emergent Tree may use third party analytical services, including User identifiers and the non-personal technical information described above, for system administration purposes including identifying problems and improving service. Such third parties may use cookies and collect other information regarding the Software, but Student and Teacher information is de-personalized by the Software to prevent disclosure to third parties.

Cookies and Do-Not-Track Signals

Emergent Tree uses cookies primarily for the purpose of establishing and maintaining the authentication of Users. We may use cookies or similar technical measures for other limited purposes to improve the User experience of the Software. Because cookies are a requirement for maintaining authentication of Users, we do not respond to web browser "do not track" signals or similar mechanisms.

Protection, Storage, and Security of Collected Information

Protection of Collected Information

Emergent Tree strives to protect the privacy of all collected information. We maintain strict access controls on all systems that process or store the collected information, and we employ industry-standard technical safeguards to maintain the confidentiality and integrity of collected information.

In particular, we employ (at least) the following technical measures in the Software:

- We require secure TLS-encrypted connections, using the strongest available ciphers, for all Users of the Software;

- We employ secure, HTTP-only cookies for all User sessions, and we employ security measures supported by modern browsers, such as HTTP Strict Transport Security and Content Security Policy, to detect and/or mitigate the possibility of third-party attacks;

- We require authenticated SSH and/or TLS connections for all back-end server and database communications, all of which occur within virtual private networks or are subject to stringent network firewalls, for further hardening against external threats; and

- We employ an additional level of encryption for personally identifying Student information that is collected and stored within our database.

Storage and Security of Collected Information

Emergent Tree stores collected information using encrypted storage processes and devices. We maintain reasonable technical and organizational steps to help ensure that collected information is secure including limiting the number of people who have physical access to the collected information and using electronic security systems and password protections to guard against unauthorized access. We limit access to collected information to employees and contractors who are authorized for the proper handling of such information, and any employee or contractor found violating our standards of security and confidentiality will be subject to disciplinary action.

Disclosure of Collected Information

Collected information is not disclosed to advertisers of any kind. All collected information is intended solely for use by Teachers at the campus(es) or district that is employing the Software. To that end, Emergent Tree takes reasonable measures to ensure that only Teachers are granted access to the Software. Emergent Tree will NOT disclose collected information to third parties unless:

- We receive prior permission from an appropriately authorized User;

- We are required to by valid law, regulation, search warrant, subpoena, or court order; or

- In the event that assets relating to one or more of the Software are transferred or sold to another entity as a result of, for example, a corporate sale, merger, consolidation, asset sale, bankruptcy, or the like, information collected may be transferred to the successor-in-interest.

Collected information is disclosed to Emergent Tree personnel and contractors for technical support, troubleshooting, security, administration, and Software improvement services.

<u>With Your Consent</u>

We may disclose collected information pursuant to your consent.

Contact Us

If you have any questions about our collection, protection, storage, security, or disclosure of information, please contact us at:

Emergent Tree Education, Inc.
technology@emergenttree.com

512-657-9507

Thank you!