

## **Safe Harbor**

Renaissance Learning, Inc (RLI) and its U.S. entities adhere to the Safe Harbor Agreement concerning the transfer of personal data from the European Union to the United States of America. Accordingly, RLI follows the Safe Harbor Principles published by the U.S. Department of Commerce with respect to all such data. This statement outlines our general policy and practices for implementing the Principles, including the types of information RLI gathers, how it is used, and the choices affected individuals have regarding RLI use of, and their ability to correct, that information.

This statement applies to all personal information RLI handles, including on-line, off-line, and manually processed data. For purposes of this statement, "personal information" means information that:

- is transferred from the European Union to the United States;
- is recorded in any form;
- is about, or pertains to, a specific individual; and
- can be linked to that individual.

It does not include information that pertains to a specific individual, but from which that individual could not reasonably be identified.

## **Principles Protecting Individuals' Privacy**

### *Notice and Choice*

RLI notifies individuals about the personal information we collect from them, how we use it, and how to contact us with privacy concerns. We collect personal information from individuals only as permitted by the Principles or with the consent of the individual affected. Consent for personal information to be collected, used, and/or disclosed in certain ways may be required in order for an individual to obtain or use our services. To the extent permitted by the Safe Harbor Agreement, we reserve the right to process personal information in the course of providing professional services to our clients without the knowledge of individuals involved.

### *Disclosures and Transfers*

RL does not disclose an individual's personal information to third parties, except when one or more of the following conditions is true:

- RLI has the individual's permission to make the disclosure;
- The disclosure is required by law;
- The information in question is publicly available;
- The disclosure is reasonably necessary for the establishment of legal claims; or
- The disclosure is to another RLI entity or to persons or entities providing services on our or the individual's behalf (each a "transferee"), consistent with the purpose for which the information was obtained, if the transferee, with respect to the information in question:
  - is subject to law providing an adequate level of privacy protection;
  - has agreed in writing to provide an adequate level of privacy protection; or

- subscribes to the Principles.

Permitted transfers of information, either to third parties or within RLI, include the transfer of data from one jurisdiction to another, including transfers to and from the United States of America. Because privacy laws vary from one jurisdiction to another, personal information may be transferred to a jurisdiction where the laws provide less or different protection than the jurisdiction in which the information originated.

#### *Data Security, Integrity, and Access*

RLI employs various physical, electronic, and managerial measures, including education and training of our personnel, designed to provide personal information with reasonable protection from accidental loss or destruction, improper use, alteration, or disclosure. Personal information collected or displayed through a Website is protected in transit by standard encryption processes.

RLI processes personal information only in ways compatible with the purpose for which it was collected or authorized by the individual. To the extent necessary for such purposes, we take reasonable steps to make sure that personal information is accurate, complete, current, and otherwise reliable with regard to its intended use.

If an individual becomes aware that information we maintain about that individual is inaccurate, or if an individual would like to update or review his or her information, the individual may contact us using the contact information below. The individual will need to provide sufficient identifying information, such as name, address, birth date, and telephone number. We may request additional identifying information as a security precaution. In addition, we may limit or deny access to personal information where providing such access would be unreasonably burdensome or expensive in the circumstances, or as otherwise permitted by the Safe Harbor Agreement.

#### *Accountability and Enforcement*

RLI has established a program to monitor our adherence to the Principles and to address questions and concerns regarding our adherence. This program will include a statement, at least once a year, signed by an officer of RLI, verifying that this policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented, and accessible. We encourage interested persons to raise any concerns with us using the contact information below.

RLI will endeavor to resolve all disputes relating to this policy that cannot be resolved through our internal processes. In the event that RLI or authorities of competent jurisdiction determine that we did not comply with this policy, RLI will take appropriate steps to address any adverse effects and to promote future compliance.

RLI personnel who violate our privacy policies may be subject to disciplinary process.

#### **Amendment**

RLI may amend this policy from time to time by posting a revised policy on this Website. If we amend the policy, the new policy will apply to personal information previously collected only insofar as the rights of the individual affected are not reduced. So long as RLI adheres to the Safe Harbor Agreement, RLI will not amend our policy in a manner inconsistent with the Principles.

#### **Contact Information**

For further information, please contact us.

Renaissance Learning, Inc  
ATT: Privacy Officer  
P.O. Box 8036  
Wisconsin Rapids, WI 54495

Or

E-mail: [PrivacyOfficer@renlearn.com](mailto:PrivacyOfficer@renlearn.com)