

# DBQ Online Privacy Policy

## **PLEASE READ THE FOLLOWING CAREFULLY**

The DBQ Project (“DBQ”) is providing you this Site and Services, which may be delivered to you through the Internet via your browser. By using this Site, you represent that you are an Authorized User as defined in a DBQ Subscription Agreement or Terms of Use policy and that you consent to our collection, storing and processing of information gathered on the site in accordance with this privacy policy

This privacy policy (“Privacy Policy”) discloses how we collect, protect, use and share information gathered on this Site. Your use of this Site is further subject to our terms of use posted on this Site (“Terms of Use”) and this Privacy Policy.

YOU SHOULD REVIEW THIS PRIVACY POLICY ON A REGULAR BASIS. DBQ RESERVES THE RIGHT TO REVISE THIS PRIVACY POLICY AT ANY TIME, INCLUDING TO ADDRESS NEW ISSUES OR REFLECT CHANGES TO OUR SERVICES. SUCH REVISIONS BECOME EFFECTIVE IMMEDIATELY UPON NOTICE TO YOU. NOTICE MAY BE GIVEN BY ANY MEANS INCLUDING, BUT NOT LIMITED TO, POSTING THE REVISED PRIVACY POLICY ON THIS SITE. YOUR USE OF THIS SITE SUBSEQUENT TO OUR REVISION SHALL BE DEEMED TO CONSTITUTE ACCEPTANCE BY YOU OF THE REVISED TERMS. NO MATERIAL CHANGE TO THE COLLECTION, PROTECTION, USE, AND SHARING OF STUDENT DATA WILL BE MADE WITHOUT THE EXPRESS WRITTEN AGREEMENT OF THE SUBSCRIBER.

### **Information Collected and How It Is Used**

DBQ collects the first and last name of the student, along with their email address, for the sole purpose of establishing student/teacher accounts, which will enable student access to the DBQ Online materials. DBQ also collects Teacher First Name and Last Name, email address, school and district to allow teachers to access DBQ Online materials.

Subscriber acknowledges that it is DBQ’s policy to comply with the Children’s Online Privacy Protection Act (COPPA). It is the Subscriber’s responsibility to comply with COPPA and with any consent provisions that may be applicable to them under COPPA. Subscriber further warrants and represents that it will diligently safeguard the personal information of each student having access to DBQ Online and that Subscriber will not post or otherwise communicate personal information of students on the DBQ Online.

During your use of the Site you may generate certain content in the course of teaching or studying the DBQ Materials (“User Content”) and DBQ may store and link such User Content to your account. DBQ Online is interactive. Our platform allows students and teachers to share their content by downloading answers and notes and essays to a text format outside of DBQ Online. We do not monitor, review, or exercise any control over the resources used when using the Service, including the legally downloaded materials which contain student and teacher driven content. Accordingly, this Privacy Policy does not govern personal information on the downloaded materials since it is outside of DBQ Online’s platform. We encourage you to avoid including personally identifiable information about yourself or others in downloads that will be shared or

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that can become public, and we encourage teachers to talk with their students about not including sensitive personal information in any resource or lesson used on the Service.

Only Teachers and Administrators can submit a “contact us” form from The DBQ Online site when needing technical assistance. Any questions about usage and technical support questions should go through the teacher.

Student Records. Please also note that DBQ does not maintain any student records for more than one school year. All student accounts and content, including any grading information, are permanently deleted each year as part of DBQ's annual student and class reset.

## **Third-Party Analytic Services**

DBQ may use a third-party service, such as Google Analytics, to collect anonymous visitor data on the Site. If DBQ uses a third-party service to collect such information from the Site, the third-party service will not collect any personally identifying information from users of the Site. DBQ may use the third-party service to collect anonymous visitor information like IP addresses, browser types (such as Internet Explorer, Chrome, Firefox, Mozilla, Safari and others), the accessing app, or referring pages and websites. DBQ may use the third-party service to collect this non-personally identifiable information for various purposes, including but not limited to: (i) providing anonymous statistical analysis of web page traffic patterns; (ii) administration of our services and servers; (iii) allowing for auditing of our services by third parties; (iv) improving our general services; and (v) ensuring users compliance with our Terms of Use. Such third-party service providers are strictly prohibited from using your personal information for any reason other than providing their services.

## **Cookies and Other Technology Used to Collect Information**

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

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

(a) speed your navigation on the Site, (b) recognize you and your access privileges, (c) track your usage and preferences of the Site, (d) detect the existence of any cookies previously set by our server, and (e) identify certain information on how and when you accessed the Services such as type of browser, operating system, domain names, IP addresses and the like. The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the website of its manufacturer. However, cookies allow you to take full advantage of this Site (disabling cookies may prevent proper functioning of certain parts of the Services), and we recommend that you leave them turned on for DBQonline.com.

DBQ may also use single pixel images, web beacons and other similar technology (collectively “Beacons”) to (a) track your usage of the Site, (b) track response rates to certain activities and promotions within the Site and in marketing campaigns, and (c) identify certain information on

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how and when you accessed the Site such as type of browser, operating system, domain names, IP addresses and the like.

Please contact us with questions at [support@dbqonline.com](mailto:support@dbqonline.com).

## **Sharing of Personally Identifying Information with Third Parties**

We will not share any personally identifying information about you with any third party (a party not affiliated with The DBQ Project) except as otherwise stated herein and in the following circumstances: (i) in response to subpoenas, court orders or legal process, to the extent required and as restricted by law; (ii) when disclosure is required to maintain the security and integrity of this Site, or to protect any user's security or the security of other persons, consistent with applicable laws; (iii) when disclosure is directed or consented to by the user who has inputted the personally-identifying information; (iv) in the event that DBQ itself or any of its subdivisions or units goes through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of its assets, your personal information will, in most instances, be part of the assets transferred; (v) in limited circumstances, DBQ may disclose your email address in order to comply with laws and regulations or (vi) to enforce the Terms of Use.

All data from the DBQ Project is stored on AWS servers.

Please be assured that, absent your express permission, DBQ will not sell, rent, share or disclose your personal information to a third party for that party's commercial use.

## **Parental Monitoring**

DBQ respects the right of parents to view and modify their account information at any time. In the event you wish to delete your account, contact information and any personal information relating to your child or student from DBQ Online, kindly contact us.

## **International Users**

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

## **California Users**

California Education Code § 49073.1 requires that technology services agreements entered into, amended, or renewed by an LEA on or after January 1, 2015 must follow specific requirements. These requirements apply to contracts for services that utilize electronic technology, including cloud-based services, for the digital storage, management and retrieval of pupil records, as well as

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educational software that authorizes a third-party provider to access, store and use pupil records. DBQ's Online Subscription Agreement and this Privacy Policy incorporated therein meet the requirements under California Education Code § 49073.1. The Subscriber is responsible for ensuring compliance with California Education Code § 49073.1.

## **Our Security Practices**

DBQ maintains a security program that is designed to protect the security, privacy, confidentiality and integrity of the student personal information against risks such as unauthorized access or use, or unintended or inappropriate disclosure. This includes use of SSL and secure firewalls. Our site has minimal collection of personal information, and minimal integration with services that could cause any unintended transference of personal information. Please be advised that although we take great measures to ensure the security of the personal information entrusted to us, no company can guarantee that there will never be a security breach. However, in the event a security breach occurs, we will do everything we can to protect personal information. Should a breach occur, DBQ will work with Subscriber to notify parents of all affected student users.

The AWS infrastructure puts strong safeguards in place to help protect Authorized User privacy. All data is stored in highly secure AWS data centers.

If you have any questions or concerns about the Privacy Policy please contact [support@dbqproject.com](mailto:support@dbqproject.com)