# PRIVACY STATEMENT Updated May 15, 2018

The following policy governs the NOCTI/Nocti Business Solutions (NBS) online collection of information from users. Specifically, it outlines the types of information that NOCTI/NBS gathers about you while you are using NOCTI/NBS's websites, and the way NOCTI/NBS uses or does not use this information. This Privacy Statement does not apply to any information you may provide to us or that we may collect offline and/or through other means; for example, information collected at a live event, via telephone, electronic chat, or through the mail.

### PROTECTING THE PRIVACY OF CHILDREN

NOCTI/NBS recommends that minors get permission from their parents before sending any information about themselves (such as their names, email addresses, and/or phone numbers) over the Internet or to us. NOCTI/NBS's websites are not directed at children under age 13, and we will not knowingly allow anyone under age 13 to provide us any personally identifying information. NOCTI/NBS's websites are designed for and utilized by teachers, administrators, and government officials.

The information collected about visitors while using NOCTI/NBS's websites falls into two general categories:

Information You Provide to Us. NOCTI/NBS may collect and store information that you voluntarily supply either while on our websites or while responding via email to a feature provided. Examples of this type of information include: information that you electronically submit when you register for services, information that you post, and information contained in search requests or questions that you submit. If you decline to supply or provide NOCTI/NBS with certain information while using our websites, you may not be able to use or participate in some, or all, of the features offered.

Information Automatically Collected. NOCTI/NBS also collects and temporarily stores information that is generated automatically as you navigate through our websites. Standard session tracking cookies are utilized for a browsing session, but they are not saved on NOCTI/NBS's servers. We do not have access to the cookies assigned by partners (via website links) or to any information they contain. Many browsers are set to accept cookies, but you may prefer to set your browser to refuse cookies. It is possible, however, that some areas of our websites will not function properly if you do so.

We automatically collect limited information about your computer configuration when you visit our sites, including the type of browser software you use, the operating system you are running, the resolution of your computer monitor, the website that referred you, and your IP address. We use IP address information for systems administration and troubleshooting purposes. Your IP address does not tell us who you are. We use this information to make our site as useful as we can for as many users as possible.

#### USE AND DISCLOSURE OF INFORMATION

NOCTI/NBS uses the information it collects from you while you are using these websites in a variety of ways, including marketing of our own products to you or for sending messages on behalf of other organizations. We also use the information to customize features and advertising that appear on our websites. We review our users' preferences, demographics, traffic patterns, and other information so that we can better understand our audience and what they want. Tracking user preferences also helps us provide you with more relevant information.

**Information Disclosed in Public Areas.** NOCTI/NBS cannot be responsible for any unauthorized third party use of information that you disclose in a public area on our websites.

**Links and Features Offered in Conjunction with Other Providers.** The NOCTI/NBS websites include links to other websites and provide access to products and services offered by third parties, whose privacy policies we do not control. When you access another website and purchase products or services or conduct other transactions through that website, use of any information you provide is governed by the privacy policy of the operator of the website you are visiting or the provider of such products or services.

**Other Disclosures.** We may occasionally release information about our visitors when release is appropriate to comply with law, or to protect the rights, property, or safety of visitors to our websites. In the unlikely event that NOCTI/NBS, or substantially all of its assets, is acquired by another company, information on our visitors would be among the transferred assets.

Email Communication to our Users. Email may be sent by NOCTI/NBS or our partners acting on our behalf, but only to users that request or agree to receive email messages, such as enewsletters and marketing messages. The email address provided by you, or as updated, may also be used to contact you for any reason, including: (1) your account status, (2) notification of the availability of new content or features, (3) participation in user surveys, (4) notification of existing or prospective products and services offered by us or our partners, and (5) notification of badge eligibility. NOCTI/NBS may also send you email messages in connection with commerce services. These messages include, but are not limited to (1) order confirmations, (2) information about account activity, (3) service updates, and (4) response to customer support requests.

**Data Sharing.** NOCTI/NBS has rigorous security systems and processes in place for the specific purpose of protecting test taker data (student) and accompanying education records in the form of score results. These measures also assist schools using NOCTI/NBS credentials in ensuring compliance with the Family Educational Rights and Privacy Act (FERPA) Federal law guidelines. Refer to NOCTI/NBS's Data Sharing Policy for additional information.

## **HOW SECURE IS THE INFORMATION WE COLLECT?**

Transmission of personal information to our servers uses Secure Sockets Layer (SSL) software to encrypt the information during transmission. All information gathered on NOCTI/NBS's servers

is stored within a controlled database. The database is stored on servers secured behind a firewall; access to the servers is password-protected and is accessible only to authorized personnel. In addition, credit card information is encrypted and only stored temporarily until processing has been completed. We use all reasonable efforts to safeguard the privacy of information.

### **QUESTIONS**

If you have any questions or concerns regarding our Privacy Statement, please direct them to **nocti@nocti.org** or to 500 North Bronson Avenue, Big Rapids, MI 49307 – Re: Privacy Policy.

#### **CHANGES TO THIS PRIVACY STATEMENT**

If we need to change our privacy statement at some point in the future, we will post the changes to this Privacy Statement on this website and update the reference to the effective date to reflect the date of the amendment. By visiting any nocti.org website, you agree that your visit, and any dispute over privacy, is governed by this Privacy Statement and any testing agreements signed by your institution.