



JUMP Math Privacy Policy

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JUMP Math (“**we**”, “**us**”, or “**our**”) is committed to protecting the Personal Information (as defined below) of its customers, users, members, employees, volunteers, and donors (collectively, “**you**”, “**your**”, or our “**Stakeholders**”). JUMP Math values the trust of our Stakeholders and recognizes that maintaining this trust requires the organization to be transparent and accountable in how it treats the information that individuals choose to share. This Privacy Policy (“**Policy**”) explains how we collect, use, disclose, and protect your Personal Information.

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Scope of this Policy

This Privacy Policy applies to your use of our “**Services**” which include the following:

Our “**Offline Services**”

- In-person services you use when contacting us over the phone or implementing our program in a live setting, like your home, classroom, or other learning facility.

Our “**Digital Services**”

- Our sites, including www.jumpmath.org/ca/, www.jumpmath.org/us/ (collectively, the “**Website**”),
- Our platforms, JUMP MATH Lab (the “**Platform**”) jumpmathlab.org/ca/, and www.jumpmathlab.com.

Accountability

JUMP Math is responsible for Personal Information under our possession and control. We have designated a Privacy Officer to be responsible for our compliance with this Privacy Policy and applicable privacy legislation. JUMP Math will make known, upon request, the title of the person or persons designated to oversee JUMP Math’s compliance with this Privacy Policy.

JUMP Math is responsible for Personal Information in its possession or custody, including information that has been transferred to a third party for processing. JUMP Math shall use contractual or other means to provide a comparable level of protection while the information is being processed by a third party.

JUMP Math shall implement policies and practices to give effect to these principles, including:

- implementing procedures to protect Personal Information;
- implementing an internal process to receive and respond to complaints and inquiries relating to this Privacy Policy;
- training staff and communicating to staff information about the organization’s policies and practices; and
- confirming compliance with all relevant laws.

Categories and Sources of Information We Collect and Process

The following describes the categories of information and data that we collect and process from users of our Services, Stakeholders and other individuals. Please see the Terms & Conditions of Use associated with each of our Platforms for further details on information processing, security and retention related to each Platform.

Categories of Personal Information We Collect and Process

“**Personal Information**” means information, recorded in any form, that identifies an individual or that could be used to identify an individual, but does not include aggregated, anonymized or information that has been de-identified such that it cannot be associated with an individual.

We collect and process different types of Personal Information about individuals who interact with our Services, including:

Contact Data--Information we can use to contact you, such as a person’s full name, home address, telephone number(s), email address(es), and usernames/handles.

Transaction Data--Information about the Services we provide to you and about purchases, donations, or other transactions you make with us for JUMP Math products, merchandise, and resources.

Payment Data-- Financial information such as a person's payment methods and preferences, billing, and banking information (credit card number and expiry date or checking account transfer numbers, whichever payment type the individual prefers in order to process their donation/purchase);

Audio/Visual Data--Recordings and images, such as photographs of JUMP Math donors for use in the organization's public marketing and promotion, as well as audio files and records, such as voicemails, call recordings, and the like.

Identity Data--Information such as your name; address; email address; telephone number; gender; date of birth, age and/or age range; account login details, e.g. username and password, avatar, or other account handles/usernames.

Professional Data--Work history, educational background, references, nationality, criminal record history, and other details for assessment in recruitment processes for employees and volunteers.

Preference Data--Information that helps us to understand more about our users, including language and communication preferences and demographics.

User Content--Unstructured/free-form data that may include any category of Personal Information, e.g. data that you give us in free text fields such as Website user feedback boxes.

Sources of Personal Information We Process

We collect Personal Information from various sources, which include:

Information you provide us--We receive Personal Information when you provide it to us, when you purchase our products or services, complete a transaction via our Services, or when you otherwise use our Services.

Information we collect automatically--We use data collection tools to collect Personal Information about or generated by any device used to access our Digital Services.

Educational Partners--We receive Personal Information from educational partners, such as school districts or schools, who transfer Personal Information to us through their engagement with our Platform.

Service Providers--We receive Personal Information from service providers, such as educational technology companies or cloud service providers, who transfer Personal Information to us and other service providers performing services on our behalf.

Data we create or infer--We (or our service providers operating on our behalf), create and infer Personal Information such as Preference Data or Aggregate Data based on our observations or analysis of other Personal Information processed under this Policy, and we may correlate this data with other data we process about you.

Non-Personal Information

"Non-Personal Information"--means information that is aggregated, anonymized, de-identified or otherwise cannot be linked with any individual.

We collect and process the following types of Non-Personal Information about individuals who interact with our Platforms and Services:

Assessment Data--Service related information for interactive tools, including user assessment reports and assessment information and educational data collected or processed through the Platform. As noted below, all student information, including Assessment data, has been de-identified and hence is considered Non-Personal Information. Assessment Data may be considered student records that may be subject to FERPA or other applicable laws.

General Location Data--Non-precise location data, about the location of the device from which you are accessing the Website or the Platform.

Device / Network Data--Browsing history, search history, and information regarding your interaction with a website, application, (e.g., IP Address, MAC Address, etc.), device characteristics (such as browser/OS version), web server logs, application logs, first party cookies, third party cookies, web beacons, clear gifs and pixel tags.

Data Processing Contexts / Notice at Collection

Platform

We generally process Personal Information when you use or create an account on our Platform. The information we collect varies depending on whether you are an educator accessing the Platform on behalf of our Educational Partners ("**Educator**"), or if you are a student or other user taking assessments on the Platform ("**Student**"). When an Educator creates an account, we may collect Identity Data (e.g. name), Contact Data, and User Content.

We do not collect any Personal Information from Students on our Platforms or through our Services. When an Educator or parent creates an account for a student (a "**Student Account**") they must use a non-identifying student ID number and password such that we cannot identify the Student and thus considered Non-Personal Information. Additionally, when Students take assessments through our Platform, we will collect Assessment Data and associate that data with the Student Account. See **Children's Privacy** below for more information.

Student registration data includes Identity Data that consists only of an anonymized student ID and password, and certain Device/Network data (such as IP address) collected when an Educator creates a Student account. We may collect additional Identity Data (e.g. name), Contact Data, Device/Network Data, and User Content provided by Educators who create an account on our Platform.

When users access and use our Platform, we may collect certain Device/Network Data in connection with logs or similar processes, to direct the user to appropriate website (i.e. Canadian site versus U.S. site), and for our other Business Purposes.

We use the above Personal Information and Non-Personal Information to create and maintain your account and Student Account, to provide the Services, and for our [Business Purposes](#). We may disclose Assessment Data to Educators and our Educational Partners as part of the services we provide.

Please note: certain Personal Information may be retained or further disclosed by our Educational Partners, e.g. for educational or research purposes.

Purchases, Transactions, and Donations

We may process Transaction Data, Identity Data, Payment Data, Preference Data, and Contact Data when you complete a purchase or sale transaction or donation. We do not permanently store your Payment Data, except at your request.

We process this Personal Information as necessary to perform or initiate a transaction with you, process your order, payment, or refund, carry out fulfillment and delivery, document transactions, and for our [Business Purposes](#).

Marketing Communications

We process Device/Network Data, Contact Data, Identity Data, and Preference Data in connection with marketing emails, or similar communications, and when you open or interact with those communications. You may receive marketing communications if you consent and, in some jurisdictions, as a result of registration or a purchase on our Website. We do not send marketing communications to Students if they register an account on our Platform.

We process this Personal Information to contact you about relevant Services and for our [Business Purposes](#). We may also periodically send individuals appeals and updates on current fundraising campaigns. See your rights and choices to [opt out of marketing communications](#).

Website

Generally-- We process Device/Network Data, Contact Data, Identity Data, General Location Data, and Preference Data when you visit our Website. You may also be able to [complete purchases](#), [register for an account](#), or enroll in [marketing communications](#) through our Website.

We use this Personal Information as necessary to operate our Website, such as keeping you logged in, delivering pages, etc., for our [Business Purposes](#), and our other legitimate interests, such as:

- ensuring the security of our Websites; and
- analyzing the use of our Websites, including navigation patterns, clicks, etc. to help understand and make improvements to the Websites.

*Cookies & Other Tracking--*We, and certain third parties, automatically collect and process Identity Data, Contact Data, Preference Data, General Location Data, and Device/Network Data when you interact with cookies and similar technologies on our Websites. We may receive this data from third parties to the extent allowed by the applicable partner. Please note that the privacy policies of third parties may also apply to these technologies and the Personal Information collected through them.

Subject to your rights & choices, we may use this information as follows:

- (i) for “essential” or “functional” purposes, such as to enable certain features of the Services;

- (ii) for “analytics” and “personalization” purposes, consistent with our business interests in analyzing users’ use of the Sites, or use by the Customer on whose behalf you use the Services. We use this data to understand how users use the Service, how the Service performs, how Stakeholders engage with and navigate through the Service, referral sites or URLs, how often they visit our Site, and other similar information, as well as to tailor the Service based on geographic location, and understand characteristics of Stakeholders in certain locations.

Note: Some of these technologies can be used to identify you across platforms, devices, sites, and services.

Employment or Volunteer Opportunities

We process Contact Data, Identity Data, Professional Data, and User Content when you apply or are nominated for an employment or volunteer position.

We use this Personal Information as necessary to process your application or nomination, manage the employment or volunteer relationship, and for our [Business Purposes](#).

Contact Us; Support

We collect and process Identity Data, Contact Data, and User Content when you contact us, e.g., through a contact us form, or for support. If you call us via phone, we may collect Audio/Visual data from the call recording.

We process this Personal Information to respond to your request, and communicate with you, as appropriate, and for our [Business Purposes](#). If you consent or if permitted by law, we may use Identity Data and Contact Data to send you [Marketing Communications](#).

Feedback and Surveys

We process Identity Data, Contact Data, Preference Data, and User Content collected in connection with feedback surveys or questionnaires. We generally process this Personal Information as necessary to respond to your requests/concerns, for our [Business Purposes](#), and other legitimate interests, such as analyzing customer satisfaction.

Business Purposes of Processing

We process Personal Information for several common business purposes, depending on the context of collection, your rights and choices, and our legitimate interests. We generally process Personal Information for the following “**Business Purposes**.”

Service Delivery

We process any Personal Information as is necessary to provide the Services, and as otherwise necessary to fulfil our obligations to you, e.g., to provide you with the information and services you request, to manage our organization, to collect amounts owing to us, to maintain business records for reasonable periods and to satisfy the requirements of Canada Revenue Agency and other regulatory requirements.

Internal Processes and Service Improvement

We may use any Personal Information we process through our Services as necessary in connection with our improvement of the design of our Services, understanding how our Services are used or function, for customer service purposes, in connection with the creation and analysis of logs and metadata relating to service use, and for ensuring the security and stability of the Services. Additionally, we may use Personal Information to understand what parts of our Service are most relevant to users, how users interact with various aspects of our Services, how our Services perform or fail to perform, etc., or we may analyze use of the Services to determine if there are specific activities that might indicate an information security risk.

Compliance, Safety & Public Interest

Note that we may, without your consent or further notice to you, and to the extent required or permitted by law, process any Personal Information subject to this Policy for purposes determined to be in the public interest or otherwise required by law. For example, we may process information as necessary to fulfil our legal obligations, to protect the vital interests of any individuals, or otherwise in the public interest or as required by a public authority. Please see the data sharing section for more information about how we disclose Personal Information in extraordinary circumstances.

Aggregate Analytics

When an individual visits our Website, our organization processes Personal Information as necessary in our creation of aggregate analytics to better understand how our website is used, to make sure our information and dynamic content are served correctly, and to improve the performance of our Websites for our users. The resulting aggregate data will not contain information from which a user may be readily identified.

Personalization

We process certain Personal Information in connection with our legitimate business interest in personalizing our Services. For example, aspects of the Services may be customized to you based on your interactions with our Services and other content. This processing may involve the creation and use of Inference Data relating to your preferences.

Disclosure/Sharing of Personal Information

Educational Partners--We may share your Personal Information with educational partners, such as schools or school boards, in order to provide our Service through our Platform. Participating schools, school boards, or educators are required to sign confidentiality agreements directly with JUMP Math or with third-party researchers who may be conducting studies.

Service Providers--Third-party service providers may be engaged by JUMP Math to perform a variety of functions, including mailing our communications, processing donations, hosting the Platform, fulfilling an individual's order, processing membership information, processing applications or nominations for employment or volunteer positions and providing technical services for our website. These third-party providers may have access to your Personal Information, if needed, to process Personal Information in order to perform the functions for which they are retained. A list of Service Providers will be provided upon request.

Researchers--We may share your anonymized Information with researchers at institutions that partner with our Educational Partners, such as universities, or similar facilities for educational or research purposes. Only anonymized data is shared with third-party researchers for research purposes. Personal information is never shared. For example, certain aggregate Assessment Data may be disclosed on behalf of our Education Partners, in deidentified form, to assess the long-term effectiveness of the Platform, and to improve educational outcomes or teaching approaches for students. Research partners are required to sign confidentiality agreements that outline the terms of participation and data handling prior to engaging with JUMP Math or accessing data, and to maintain similar or better data security and privacy protocols in accordance with local laws. Researchers are responsible for obtaining any necessary consents to collect and transfer personal information required for the study.

Corporate Events--Your Personal Information may be processed in the event that we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Information may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction. In the event of a sale, merger or acquisitions of any JUMP Math Platform, the acquiring company's successors are obligated to have equivalent or better security safeguards in place for Personal Information previously collected. Users will be notified of the situation prior to the transfer of their information to the successor and will be given an opportunity to opt-out of having their personal information/content transferred. Users will be notified of the transfer before it is completed.

Legal Disclosures--In limited circumstances, we may disclose Personal Information, where permitted or required by law, including to comply with a subpoena or warrant, to law enforcement in connection with an investigation, to protect our rights and the safety and security of our employees, and to enforce our agreements and collect debts owed to us. These disclosures may be made to governments that do not ensure the same degree of protection of your Personal Information as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Information to such parties.

With Consent--We may disclose your Personal Information in other circumstances with your consent.

Your Rights & Choices

You may have certain rights and choices regarding the Personal Information we process. Please note, these rights may vary based on the country or state where you reside, and our obligations under applicable law. To submit a request, please contact JUMP Math's Privacy Officer at privacy@jumpmath.org. We may take appropriate steps to verify your identity before responding to your request.

Opt Out of Marketing Communications

We ensure that each e-mail includes an opt-out feature and instructions on how to unsubscribe if you no longer wish to receive future e-mails from JUMP Math. You can unsubscribe using the link included in the e-mail or by sending an e-mail to privacy@jumpmath.org or by telephoning us at **416-596-7716**. Please note that if you unsubscribe from our promotional email communications you may still receive transactional or service-related communications from us.

Cookies and Similar Technology

If you do not want information collected through the use of cookies and similar technologies, you can manage/deny cookies and certain similar technologies using your browser's settings menu. You must opt out of the use of some third party services directly via the third party. For example, to opt-out of Google's analytic services, please see the [Google Analytics Opt-out](#).

Do-Not-Track

Our Services do not respond to your browser's "do-not-track" request.

Safeguards

We protect personal information using safeguards that are appropriate to the sensitivity of the information. These safeguards may include measures to protect against unauthorized access, alteration, disclosure or destruction of personal information. Our staff and volunteers are trained and authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. Safeguards are in place to ensure that the information is not disclosed or shared outside of what is strictly necessary to achieve the purpose for which it was gathered. JUMP Math also takes reasonable measures to ensure the integrity of this information is maintained and to prevent it being lost or destroyed. Despite these measures, since no system or security measure is completely secure, it is possible that personal information may be lost, stolen or accessed without authorization.

In the event of a data breach, JUMP Math has a [Data Privacy Breach Response Protocol](#) in place to manage any incident and will contact any affected individuals regarding a potential breach, as warranted by the severity of the breach, whether it involves student personal information, and in accordance with applicable privacy laws.

Retention of Personal Information

We retain Personal Information for as long as necessary for the fulfilment of the purposes for which it was collected, in accordance with prudent business practices on general document retention, or as otherwise required by law. All data handled within the Platform is classified to ensure appropriate application of security measures and compliance with privacy standards.

Upon deletion of a user account for any of the above reasons, all associated user data will be securely retained in a database backup for a period of 90 days during which the data will not be accessible or recoverable to the user, even upon request. After 90 days, all data will be permanently and irreversibly deleted from all systems with no ability to restore it.

For full details on how we retain personal information, please see our [Data Retention Policy](#).

Children's Privacy

Our Services are not directed at persons under the age 18 in Canada or the US; however, Students under the age of 18 may use our Platform at the request of and/or under the supervision of educators, parents, guardians, or tutors (collectively, "**Responsible Adults**"). We do not knowingly collect or handle Personal Information from such individuals under the age of 18. We only collect anonymized, non-identifiable data relating to Students provided by Responsible

Adults or with the consent of Responsible Adults. JUMP Math encourages parents and guardians to be involved with their children's online usage and to be aware of the activities in which their children are participating.

Third Party Websites

This Privacy Policy does not apply to third party websites, products, or services. Any links provided on our Services to third party websites are provided solely for convenience. The operation and content of such third-party websites is beyond JUMP Math's control, and JUMP Math does not endorse in any manner whatsoever or accept any responsibility for the content or other material that may be contained on such websites, the use of such websites, or any products or services advertised on or sold through any such websites. JUMP Math is not responsible for how such third parties collect, use, or disclose your personal information, so it is important to familiarize yourself with their privacy policies before providing them with your personal information. JUMP Math will not be liable under any circumstances for any damages whatsoever, direct, or indirect, resulting from any use of any third-party website linked to this website. We encourage you to read the privacy policy of every website you visit.

International Transfers

Some of our third-party service providers are located outside of Canada, including in the United States, and Spain, and may be subject to the laws of the foreign jurisdiction in which they are located. These jurisdictions may not provide the same legal protections guaranteed to Personal Information in Canada or other foreign countries. [Contact Us](#) for more information regarding international transfers of data.

How You May Access and Modify your Personal Information or Make a Complaint

Upon request, JUMP Math will provide you with information regarding the existence, use and disclosure of Personal Information that JUMP Math may hold. We will need to verify your identity before providing you with the Personal Information we hold about you and we will respond within the time periods provided for under applicable laws. There is no cost for such access request unless you require copies of records.

In certain circumstances, JUMP Math may not be able to provide you with access to your Personal Information if the information cannot be separated from the Personal Information of others, cannot be disclosed for reasons of security or commercial confidentiality, or is protected by legal privilege. If we cannot provide you with access to your Personal Information, we will advise you of the reasons access is being denied, unless we are prohibited by law from doing so.

You may request to update and change your Personal Information either directly through your account or through JUMP Math at the contact information set forth below. We shall endeavor to correct or complete any Personal Information that you advise us is inaccurate or incomplete.

An individual shall direct all inquiries or complaints involving JUMP Math's handling of Personal Information or compliance with this policy or with applicable privacy legislation to our **Privacy Officer**.

JUMP Math maintains procedures for addressing and responding to all inquiries or complaints from individuals about our handling of Personal Information. We shall investigate all complaints.

The Privacy Officer will respond to all such inquiries or complaints within 14 business days of receipt. The Privacy Officer will make reasonable efforts to resolve all such complaints within 30 days of receipt of the initial complaint. If JUMP Math finds a complaint to be justified, it will take appropriate measures, including, if necessary, amending its policies and procedures.

To access or modify your Personal Information, make a complaint or more information about JUMP Math's Privacy Policy or privacy practices, please contact JUMP Math's Privacy Officer at privacy@jumpmath.org or call 416.596-7716.

Privacy Policy Updates

JUMP Math regularly reviews its privacy practices for its various activities, and updates the Policy, as required. Please check our website for the most up-to-date Privacy Policy. The Privacy Policy posted at any time or from time-to-time on our Websites shall be deemed to be the Privacy Policy then in effect.

All JUMP Math Website and Platform users will be notified directly of any changes to our Privacy Policy and/or Terms & Conditions of Use via email and via other publicly available communications channels, including but not limited to social media, website pop-ups, newsletters, etc. We do not contact student users directly about such changes.

For EEA/UK/Swiss Residents: Lawful Basis for Processing Personal Information

JUMP Math relies on one or more of the following legal grounds (as appropriate) to process Personal Information:

- To enter and perform a contract with you or to perform any steps you require from us before entering into a contract.
- To pursue our legitimate business interests in establishing, managing or concluding our relationship with you.
- Where you have specifically consented to us processing your personal information.
- To comply with our legal obligations and establish, exercise or defend our legal rights.

Where Personal Information is processed with consent, you may (subject to contractual and legal restrictions) refuse to provide your consent, or choose to withdraw your consent, to our processing of your Personal Information by contacting us as described below. Note that if you refuse to consent, or withdraw your consent, to certain processing of your Personal Information, we may not be able to provide certain parts of our services.

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