

# PRIVACY POLICY

The Clinical Assessment group of NCS Pearson, Inc. has adopted the following Privacy Policy applicable to Personal Information that it may receive from Qualified Customers, Test Administrators, and their Examinees in connection with tests and testing services provided through this site.

## Definitions

For purposes of this Privacy Policy, the following definitions apply:

- “Qualified Customer” means a qualified clinician, professional, clinic or institution, which has an agreement with Pearson to use this site for administration, scoring or reporting of certain assessments and complies with Pearson’s Terms and Conditions of Sale and Use, Software License, and meets Pearson’s Qualifications to Purchase.
- “Pearson” or “we” means NCS Pearson, Inc.
- “Personal Information” means all personally identifiable information that we collect, receive or process with respect to Test Administrators and Examinees. Additional information about the Personal Information we collect or receive is found in the Collection and Use of Personal Information section of this Privacy Policy.
- “Test Administrator” means a Qualified Customer or an individual designated and authorized by the Qualified Customer to coordinate and manage the assessment and scoring process and/or receive assessment test results and reports.
- “Examinee” means an individual who is assigned or administered a clinical assessment by a Test Administrator.
- “You” means a Test Administrator or a Qualified Customer authorized to use this site.

## Site Access

Qualified Customer access to this site is restricted by password to Test Administrators designated and authorized by the Qualified Customer. The Qualified Customer authorizes the level and extent of access provided to each Test Administrator. Examinees assigned to take a clinical assessment through this system may be provided with access to the assigned assessment administration window only by, and under the supervision of, an authorized Test Administrator.

## Collection and Use of Personal Information

In providing tests and testing services through this site, we collect or receive Personal Information from Examinees, as well as Test Administrators. Certain Examinee Personal Information is provided to us by the Test Administrator; and other information is provided to us by the Examinee. Test Administrator Personal Information is provided to us by the Qualified Customer and the Test Administrator. We use Personal Information in order to administer and score the tests and provide test results to the Qualified Customer and authorized Test Administrators. We will handle and treat all Personal Information collected and received by us through this system in the manner outlined in this Privacy Policy.

- **Test Administrator Personal Information Collected.** The Personal Information that we collect, receive or process with respect to a Test Administrator through this site may include: name, phone number, mobile phone number, email address, Pearson qualification level, log-in ID and password.
- **Examinee Personal Information Collected.** The Personal Information that we collect, receive or process with respect to Examinees may include: first name, last name, Examinee ID (as assigned by a Test Administrator), date of birth, gender, race/ethnicity, handedness and home language. In addition, depending upon the particular clinical assessment, a wide range of additional demographic information may be collected, including, but not limited to: clinical history; education history and issues; work and employment status, history and issues; health conditions; medications; employment status; marital status; family information and history; and living arrangements. Through this system, we collect and score the responses to the clinical assessment questions and derive raw scores and test scaled or percentile scores. The Qualified Customer and the Test Administrator assigning and administering tests are responsible to obtain all legally required consents from Examinees and, if applicable, their parents or guardians, for the collection and processing of data through this site.
- **Aggregation of Non-Person-Specific Data.** We may statistically aggregate in non-person-specific form test responses and other information collected in the testing process for research, quality control, operations management, security and marketing purposes and to enhance, develop or improve tests and testing processes. This non-identifiable data may be provided to researchers, test developers and our contractors.
- **Transfer of Information.** In addition to providing Examinee Personal Information to the Qualified Customer who has administered or assigned the clinical assessment to the Examinee and its authorized Test Administrators, we may disclose Personal Information in the following situations: (a) in response to a subpoena, court order or legal process, to the extent permitted and required by law; (b) to protect the security of a Test Administrator, Examinee or a Qualified Customer, or the security of other persons, consistent with applicable law; (c) to address actual or suspected fraud or other illegal activities; (d) in connection with a sale, joint venture or other transfer of some or all of the assets of NCS Pearson, Inc.; (e) to our contractors or

agents, who are committed or obliged to protect the privacy of Personal Information in a manner consistent with this Privacy Policy.

## **Protection of Personal Information**

We take reasonable precautions and employ reasonable security safeguards to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration or destruction. These precautions include physical security, administrative safeguards and encryption. Test Administrators are responsible for safeguarding their user identification and passwords, and to change passwords periodically. In the event a Test Administrator becomes aware of a possible compromise of a password, the Test Administrator is responsible to change the password immediately.

Test Administrators and Qualified Customer are responsible for security of all copies of test results, data and reports printed on paper or downloaded to their computer systems. Test Administrators and Qualified Customer are urged to employ encryption and other security measures to protect computer systems used to store any test results and reports prepared through this system.

## **Information Access and Correction**

Test answers are not subject to change by anyone after the test report has been generated. Through this site, an authorized Test Administrator has the capability to access and correct Personal Information otherwise collected through this system.

## **Retention of Information**

Through this system, the Qualified Customer can establish the time period parameters for retaining Examinee test data and Examinee Personal Information on this system. The Qualified Customer has the flexibility to delete Examinee test data and Examinee Personal Information at any time.

## **Information Received from Internet Service Providers**

This website receives information that is automatically generated by a user's Internet service provider (ISP). This information may include the IP address (a number automatically assigned to a computer by the ISP), the associated URLs, domain types, the browser type used to access our site, the country, state and telephone area code, the location of the ISP's servers, the pages of our site that the user views, any search terms entered on this site, and the user's website address and email address. This information may be collected for system administration purposes, to gather broad demographic information and to monitor the level of activity on the site. NCS Pearson does not link IP addresses to personally identifiable information; however, we reserve the right to link IP addresses and other information supplied by the ISP to personally identifiable information in order to protect the integrity of our system and for security purposes.

## **Cookies**

Cookies are small text files that a website transfers to your computer's browser. We use cookies to measure traffic patterns, personalize content and control security. The cookies we use supply non-personally identifiable information, but they may identify your computer, browser and Internet specifications.

## **Google Analytics**

We use Google Analytics to obtain web trend information about user interaction with this site. We use this information for system administration purposes and to identify problems and improve service. While Google Analytics collects and reports information on an anonymous basis, Google Analytics uses cookies and collects IP addresses to gather web trend information. For further information about Google Analytics, and for links to Google's Privacy Policy and an opt-out tool for Google Analytics, go to <http://www.google.com/intl/en/analytics/privacyoverview.html>.

## **Transmission of Information**

Data collected and received by us in connection with the delivery of assessments may be transmitted to the United States, Canada and other countries. The computer servers for this site are currently based in Canada. The Internet is a global environment. By using this site and sending information to us electronically, you consent to transborder and international transmission of any Personal Information collected or processed through this site.

## **Links to Other Sites**

This site may contain links to other websites on the Internet that are owned and operated by third parties, or by NCS Pearson or its affiliates. The information practices of those websites are not covered by this Privacy Policy, but by their own terms and policies, which you should read carefully. These other sites may send their cookies to users, collect data or solicit personal information. This Privacy Policy applies only to information collected or processed through this site. This Privacy Policy is not intended to apply to other Pearson websites or other types of information, which may be subject to different privacy policies.

## **Changes to This Privacy Policy**

We reserve the right to change the terms of this Privacy Policy from time to time by posting an updated Privacy Policy. We encourage you to review this Privacy Policy from time to time for any changes or updates.

## **Resolution of Concerns and Issues: How to Contact Us**

If you have difficulty in using the functionality of this system to manage data, including Personal Information, please contact us at 800-249-0659. If you have questions or concerns about this Privacy Policy or how we handle Personal Information, please contact us at 800-249-0659. We will endeavor to address your questions and concerns.

Effective Date: November 2, 2011