



PMC Privacy Policy

Effective Date: 10/01/2024

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1. Introduction

By using our services, you, the user of our services, the Early Childhood Program, or Early Childhood Program district (“Early Childhood Program,” “you,” “your”), are declaring that you have read and understand this Privacy Policy. If you are acting on behalf of an entity, you represent and warrant that you are at least eighteen (18) years old and have the authority, the right, and the capacity to legally bind the entity and have read and understand this Privacy Policy.

This policy will be reviewed annually, and as needed, to accurately reflect current and relevant federal and state laws.

The Pyramid Model Consortium, Inc (“PMC”) is, a 501(c)(3) nonprofit corporation with its primary office located at 400 W. Broadway St. Ste #101-507 Missoula, MT 59802.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and our information practices, meaning how and why we collect, use, disclose, sell, share, store, and retain your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint or request.

We collect, use, and are responsible for certain personal information about you. When we offer goods and services to individuals in the European Economic Area (EEA), we are subject to the EU General Data Protection Regulation (EU GDPR), which applies across the entire European Union. For California consumers, although we are a non-profit, we may be subject to the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA). We are responsible as a “processor” of personal information for the purposes of the GDPR. We are responsible for your personal information as a “service provider” under the CCPA/CPRA.

We respect your privacy and are committed to keeping secure any information we obtain from or about you. This Privacy Policy describes our practices with respect to Personal Information we collect from or about you when you use our website, applications, and services (collectively, “Services”).

Key Terms and Definitions:

We, us, our	Pyramid Model Consortium 400 W. Broadway Street Ste 101-507 Missoula, Montana 59802 (217) 390-0403 rob.corso@pyramidmodel.org
Our representative	Martin Rogers Worden Thane P.C. mrogers@wordenthane.com 406-721-3400 wordenthane.com/about/martin-rogers Intellectual Property/Litigation/Software
Our data security contact	Summer Edwards Summer.Edwards@pyramidmodel.org 406-210-8371
Personal information	Any information relating to an identified or identifiable individual

Special category personal information	Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, health, sex life, or sexual orientation
Sensitive Personal Information	Data revealing social security numbers, identification numbers, precise geolocation, racial or ethnic origin, religious beliefs, union membership, health, sex life, sexual orientation, and similar sensitive data
Sensitive Personal Information - Biometric Information:	Data from physiological, biological, or behavioral characteristics used to establish identity

2. Personal Information We Collect

We may collect and use personal information, including sensitive personal information and special categories of personal information as follows:

Personal information you provide is done so at your discretion. It is your right to opt out of providing these details to us (see section 4 for more details).

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)	<ul style="list-style-type: none"> ● Real name (first and last) ● Email ● Mailing/physical address ● Phone number ● Date of birth
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, their name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information	<ul style="list-style-type: none"> ● Real name (first and last) ● Email ● Mailing/physical address ● Phone number ● Date of birth ● IEP/IFSP status ● Early childhood program name ● Classroom name

Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account	<ul style="list-style-type: none"> ● Username ● Email Address
Characteristics of protected classifications under California or federal law	<ul style="list-style-type: none"> ● Race ● Ethnicity ● Gender ● Dual Language Learner ● IEP/IFSP status
Professional or employment-related information	<ul style="list-style-type: none"> ● Name (first and last) ● Date of hire ● Date of separation ● Classroom assignments ● Caseload assignments ● Job functions ● Leadership team role ● Training topics completed ● Training completed date
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA)	<ul style="list-style-type: none"> ● IEP/IFSP status ● Dual language learner status ● Reports of child behaviors ● Developmental assessment scores ● PII (as listed in Identifiers Section) ● Demographics (as listed in Identifiers Section) ● Early childhood program name ● Classroom name
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	<ul style="list-style-type: none"> ● IEP/IFSP status ● Dual language learner status ● Reports of child behaviors ● Developmental assessment scores ● PII (as listed in Identifiers Section) ● Demographics (as listed in Identifiers Section)
Racial or ethnic origin, religious or philosophical beliefs, union membership, or citizenship or immigration status	<ul style="list-style-type: none"> ● Race ● Ethnicity
PMC Website usage information upon your consent	<ul style="list-style-type: none"> ● Session statistics ● Approximate geolocation ● Browser and device information ● Pseudonymous cookie IDs ● Pseudonymous advertising IDs

<p>Personal information we receive automatically from your use of the Services (PIDS)</p>	<ul style="list-style-type: none"> ● Log Data: Internet Protocol address, browser type, settings, date and time of request, interaction with Services. ● Usage Data: Content viewed or engaged with, features used, actions taken, time zone, country, access dates and times, user agent, device type and connection. ● Device Information: Device name, operating system, device identifiers, browser type.
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3. How and Why, We Use Your Personal Information

Under data protection laws, we can only use your personal information if we have a proper reason for doing so, for example:

Why:

- To comply with our legal and regulatory obligations and protect rights and property.
- For the performance of our contract with you or to take steps at your request before entering into a contract
- For our legitimate interests or those of a third party
- To provide products and services to you
- To perform under our contracts with your state and local education agencies and where there exists a valid and lawful basis for processing your personal information
- For our legitimate interests or those of a third party
- Verify your identity for regulatory, legal, and financial purposes
- Manage, analyze, and improve our Services
- Communicate with you
- Provide customer service and technical support
- Prevent fraud and misuse of the Services
- Protect IT systems and networks.
- Set up and provide PIDS;
- Analyze and improve PIDS;
- Respond to an Early Childhood Provider’s and/or Authorized Program Personnel’s requests and to provide related support;
- Administer and troubleshoot PIDS;
- Send information to an Early Childhood Program and Authorized Program Personnel about how to use PIDS and other important updates;
- Send email or text information or alerts as part PIDS to an Early Childhood Program and/or Authorized Program Personnel;
- Notify an Early Childhood Program and Authorized Program Officials about new features or Offerings that may be of interest to them, and, similarly notify other Authorized Early Childhood Program Personnel of new features or Products that may be of interest to them when residents of the United States or otherwise as permitted by law;

- Help prevent fraud and to enforce the legal terms that govern PIDS;
- To comply with applicable law and protect our and others' rights, safety and property;
- Follow further instructions of an Early Childhood Program; and

How:

Data is collected by:

- We collect information from you when you choose to provide it to us, for example, for you to obtain an account you have to provide us with certain information including: name, username, email address.
- Accessing PMC's website and entering information in the "contact us" form
- We collect information from your use of the services, for example, we automatically collect and store certain information about the services you use and how you use them
- Entering data into the Pyramid Model Implementation Data System (PIDS) national database. Data is entered by any user of PIDS who is granted access to enter data into PIDS. Typical users include:
 - Early childhood professionals
 - Pyramid Model coaches
 - Program leadership teams
 - Professional Pyramid Model trainers
 - Community leadership teams
 - State leadership teams
 - State PIDS application administrators

We do not sell Early Childhood Program Information and/or Cookie Information or share it for cross context behavioral advertising.

In accordance with our contractual obligations, we use Personal Student Information and Parent/Guardian Information to:

- Provide, improve and analyze PIDS and for legitimate educational purposes of the Early Childhood Program;
- Enforce the legal terms that govern our PIDS;
- Comply with applicable law and protect our and others' rights, safety and property; and
- Follow further instructions of an Early Childhood Program.

At all times, Personal Student Information is the property of and under the control of the Early Childhood Program, or as required by applicable law, Personal Student Information is the property of and under the control of the applicable eligible student, parent, or guardian.

We do not sell Personal Student Information. We do not use Personal Student Information to target advertisements or market to students or anyone else, to amass a profile about a K-12 educational student for a non-educational purpose, or for any purposes prohibited by the Family Educational and Privacy Rights Act (20 U.S.C. § 1232g; 34 CFR Part 99.3) ("FERPA"), California Business & Professions Code section 22584 ("SOPIPA"), and California Education Code section 49073.1. We will not use Personal Student Information

for any purpose other than those required or specifically set forth in this Product Privacy Policy, our, DPA, or any other agreement between an Early Childhood Program and PMC.

COPPA governs the collection of certain information from children under the age of 13 (“child” or “children”). For more information about COPPA and generally protecting children’s online privacy, please visit the Federal Trade Commission [COPPA FAQs](#). PIDS provides users the functionality and security measures needed to comply with COPPA.

4. Disclosure of Personal Information

In certain circumstances we may provide your Personal Information to third parties without further notice to you, unless required by law.

- **Vendors and Service Providers:** For business operations and service performance, including for providing services to you, your parents or guardian, or our state or local educational agencies.
- **State Education Agencies:** In order to provide end users with access and technical support for products, PMC may share personal information with authorized State Education Agencies (SEAs).
- **Business Account Administrators:** Access and control over business accounts.
- **Affiliates:** We provide access to or share your information with current or future consulting companies including our Affiliates, such as AXIOM IT Solutions, Adversis Cybers Security Consultants, American Institutes of Research.
- **Authorized Program Personnel Access:** Each Early Childhood Program determines which Authorized Early Childhood Program Personnel have access to the Early Childhood Program’s account with PIDS and their permission levels.
- **Third Parties Supporting Our Offerings:** We may share information with our service providers that assist us in performing business-related functions that support our Offerings. Information about third party service providers utilized by PIDS is available in the PIDS Help and Support Section. When we employ another company to perform a function of this nature, we provide them with the information that they need to perform their specific function.
- **With Early Childhood Program Permission or at Early Childhood Program Direction:** We may disclose information, including Personal Student Information, to third parties pursuant to an Early Childhood Program’s instruction or with an Early Childhood Program’s permission. For example, if an Early Childhood Program chooses to integrate PIDS with another third-party company’s products or services, then we will share information as instructed. With your permission, we may also share or disclose your name and other content through a testimonial video or quotation.
- **Legal Requirements:** We may disclose certain information if we believe in good faith that doing so is necessary or appropriate to comply with any law enforcement, legal, or regulatory process, such as to respond to a warrant, subpoena, court order, or other applicable laws and regulations.
- **Business Transfer:** We may disclose certain information we collect (set forth above), in connection with or during negotiations of any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. If such transfer is subject to additional mandatory restrictions under

applicable laws, we will comply with such restrictions. The successor entity will be subject to all applicable federal and state laws, including student privacy laws. In connection with such a transaction, we will also work to ensure that the successor entity has a commitment to student privacy.

- **De-Identified Information:** We may use, share, or disclose De-Identified information (as that term is defined in our EULA) for various purposes such as product development, research, and marketing, in compliance with relevant laws. For example, we may use aggregate, anonymous data to publish an e-Book on implementing Pyramid Model in Early Childhood Programs.

5. Your Rights

Depending on your location, you may have certain statutory rights in relation to your Personal Information. In the European Economic Area and California under the GDPR and CCPA/CPRA you have these rights:

California Consumers: Your Rights Under the CCPA/CPRA. You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to exercise free of charge:

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know, and request disclosure of:</p> <ul style="list-style-type: none"> • The categories of personal information we have collected about you, including sensitive personal information • The categories of sources from which the personal information is collected • The categories of third parties to whom we disclose personal information, if any –and– • The specific pieces of personal information we have collected about you <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a
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	<p>manner that would be considered personal information –or–</p> <ul style="list-style-type: none"> ● Provide the personal information to you more than twice in a 12-month period
<p>Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose</p>	<p>In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> ● The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared –and– ● The categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose <p>You have the right to opt-out of the sale of your personal information or sharing of your personal information for the purpose of targeted behavioral advertising. If you exercise your right to opt-out of the sale or sharing of your personal information, we will refrain from selling or sharing your personal information, unless you subsequently provide express authorization for the sale or sharing of your personal information.</p> <p>PMC does not sell or share personal information collected via this site.</p>
<p>Right to Limit Use of Sensitive Personal Information</p>	<p>You have the right to limit the use and disclosure of your sensitive personal information to the use which is necessary to:</p> <ul style="list-style-type: none"> ● Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services ● To perform the following services: (1) Helping to ensure security and integrity to the extent the use of the

	<p>consumer's personal information is reasonably necessary and proportionate for these purposes; (2) Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, if the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business; (3) Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business; and (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business –and–</p> <ul style="list-style-type: none"> ● As authorized by further regulations <p>You have a right to know if your sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.</p> <p>To limit the use of your sensitive personal information, you may choose to not enter or anonymize that information upon request by this site. This site includes options for users to limit sensitive personal information, if it is asked. Anonymizing means that PII will be hidden or coded by the system.</p>
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Right to Deletion

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records –and–
- Delete your personal information from our records –and–
- Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort

Please note that we may not delete your personal information if it is reasonably necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes
- Debug to identify and repair errors that impair existing intended functionality
- Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law
- Comply with the California Electronic Communications Privacy Act
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics

	<p>and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent</p> <ul style="list-style-type: none"> ● Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us ● Comply with an existing legal obligation –or– ● Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information
<p>Right of Correction</p>	<p>If we maintain inaccurate personal information about you, you have the right to request us to correct that inaccurate personal information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.</p>
<p>Protection Against Retaliation</p>	<p>You have the right to not be retaliated against by us because you exercised any of your rights under the CCPA/CPRA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> ● Deny goods or services to you ● Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties ● Provide a different level or quality of goods or services to you –or– ● Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services <p>Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information. We may also offer loyalty,</p>

	rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection of personal information, the sale of personal information, or the retention of personal information.
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EEA Data Subjects: Your Rights Under the EU GDPR:

Right to Be Informed	The right to know or be notified about the collection and use of your personal information.
Right to Access	The right to be provided with a copy of your personal information (the right of access). Parents may request information about the information we have collected from their child by contacting us at support@pyramidmodel.org .
Right to Rectification	The right to require us to correct any mistakes in your personal information.
Right to be Forgotten	The right to require us to delete your personal information—in certain situations.
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g., if you contest the accuracy of the data.
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used, and machine-readable format and/or transmit that data to a third party—in certain situations.
Right to Object	The right to object: <ul style="list-style-type: none"> • At any time to your personal information being processed for direct marketing (including profiling) In certain other situations to our continued processing of your personal information, e.g., processing carried out for our legitimate interests.
Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing

	(including profiling) that produces legal effects concerning you or similarly significantly affects you.
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For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the EU General Data Protection Regulation.

How to Exercise Your Rights

If you would like to exercise any of your rights as described in this Privacy Policy, you can do so by emailing support@pyramidmodel.org.

Please note that you may only make a CCPA/CPRA-related data access or data portability disclosure request twice within a 12-month period.

- If you choose to contact us directly by email, you will need to provide us with:
 - Enough information to identify you [(e.g., your full name, address and customer or matter reference number)]
 - Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill) –and–
 - A description of what right you want to exercise and the information to which your request relates
- We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.
- Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

The General Data Protection Regulation (GDPR) is a European Union (EU) law that gives individuals control over their personal data. The GDPR provides data subjects, or individuals whose data is processed, with the following rights:

- **Right to access:** Data subjects can request and view copies of their personal data.
- **Right to rectification:** Data subjects can request that inaccurate or outdated personal information be corrected or updated.
- **Right to erasure:** Data subjects can request that their personal data be deleted.
- **Right to restrict processing:** Data subjects can request that processing of their data be restricted.
- **Right to data portability:** Data subjects have the right to data portability.
- **Right to object:** Data subjects have the right to object.

- **Right not to be subject to a decision based solely on automated processing:**
Data subjects have the right not to be subject to a decision based solely on automated processing.

6. Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology. For further information, visit allaboutcookies.org.

How do we use cookies?

Our Company uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website
- Not for advertising purposes

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in.

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

7. Child Data

As part of our Services, we collect child information, provided we have a lawful basis for doing so. Because the information we collect is mostly child information, the child information we collect, how we collect it, and what we do with it is set forth in this privacy policy. You can choose to revoke this consent at any time at which time those records would be automatically electronically anonymized. You can choose to provide some information and opt out of providing other information.

Parents have a right to review the information we have collected about their children and students, respectively, and to delete it, and to tell us to stop using it. To exercise these rights, you may contact us at support@pyramidmodel.org or directly contact your child's Early Childhood Program. You will be required to authenticate yourself as the child's parent

to receive information about that child. Please note that copies of information may remain in cached or archived form on our systems after you request us to delete it.

Because your Program is utilizing PIDS, on behalf of itself and its Affiliates, PMC is providing you with information about how we collect and use the personally identifiable information of students under thirteen (13) years of age, as set forth in the [Children's Online Privacy Protection Act](#) ("Disclosure"). We are providing this Disclosure to you as an official authorized to act on behalf of your School.

PMC will not knowingly collect, use, or disclose any Personal Student Information without a School's verifiable consent or in accordance with applicable school policy.

8. Links to Other Websites

Our Service may contain links to Third Party Sites not operated by us. Their privacy practices and policies govern the information you share with them.

Lists of subprocessors may be found on associated web pages. In the Pyramid Model Implementation Data System, a subprocessor list can be found in the help and support section. This information can also be requested by submitting a ticket to PIDS help desk from the log in page. PMCs website lists subprocessors on the Privacy and Security page: <https://www.pyramidmodel.org/privacy-and-security/>.

9. Keeping Your Personal Information Secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Measures include:

- Strong access controls, including strong password policies and Role-Based Access Control (RBAC)
- Implement and adhere to information security policies
- Account security features in our applications
- Regular software security assessments
- Usage of antivirus software
- Usage of disk encryption to protect data
- Conducting regular security audits

10. Retention

We keep your personal information while you have an account with us or while we provide services and in accordance with PMC's Data Destruction Policy. Data collected in PIDS is stored anonymously in PMC's databases indefinitely. Data stored is automatically stripped

of all identifying information automatically so that the data remaining may no longer be traced back to a program, classroom, professional, or child.

11. International Users

Your Personal Information may be processed and stored in the European Union, the United States, or other jurisdictions.

Legal basis for processing: Performance of a contract, legitimate interests, consent, compliance with legal obligations.

Data transfers: Appropriate safeguards will be used for transferring Personal Information.

Data security: Contact - **Summer Edwards, 406-210-8371,**
summer.edwards@pyramidmodel.org

12. Changes to the Privacy Policy

We may update this Privacy Policy from time to time. Updated versions will be posted on this page.

13. How to Contact Us or Exercise Your Rights

Please contact support@pyramidmodel.org if you have any questions or concerns not addressed in this Privacy Policy.