

## Customer Data Privacy Notice

Effective Date: May 9, 2018

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### Introduction

Please note that this notice applies to individuals who visit McGraw-Hill Education (“MHE”) commercial web sites or otherwise interact with us as customers via our web sites, social media, or at events. As a customer, you may also be an educator. Please be sure to review our Educator Privacy Notice regarding our privacy practices for educator PII. Our commercial web sites, such as mheducation.com, are not intended for use by minors below the age of 13. Privacy information for users of our digital learning systems, including those under the age of 13, can be found under the appropriate tabs (Educators, Students, and Parents).

McGraw-Hill Education is a global organization. We follow privacy laws and regulations that are applicable to our company and our services in the areas where we do business. By accessing our web sites or otherwise providing your personal information to McGraw-Hill Education, you acknowledge that we will process your PII in accordance with this notice.

### **Questions? Contact us:**

Any questions or complaints regarding this notice or the collection, use, disclosure, or transfer of PII (as defined below) covered by this notice should be directed to the McGraw-Hill Education Data Protection Officer.

Please direct any questions or complaints to the Data Protection Officer by emailing [privacy@mheducation.com](mailto:privacy@mheducation.com) or calling +1-646-766-3199. If applicable, you may choose to lodge a complaint with your national data protection authority at any time. For local privacy contact information, please contact [McGraw-Hill Education’s Local Privacy Official](#).

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### Privacy Notice

#### **What is Personally Identifiable Information (PII)?**

Personally Identifiable Information, or PII, shall mean any information relating to an identified or identifiable natural person ("data subject") including personal data as defined under applicable local law. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

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#### **What PII do we collect?**

***We collect PII, such as contact information, education details, or payment information, in order to provide you with the product and/or service requested.***

We, or our service providers on our behalf, collect PII and other information when you access and/or submit PII on one of our web sites or interact with us at an event. You are not required to provide PII; however, in order to use certain services, we may need to collect certain PII for that service to function properly (e.g., to finalize your purchase) or for us to provide you with requested information.

Depending on the service or transaction, the PII we collect includes information from the following categories:

1. Name, initials or white page information
  - a. On our consumer web sites, we collect your name, initials or contact information when you create an account or purchase a product on our online store. We also collect your email address. We also collect this information if you connect with us via your social media account as an existing or potential customer.
2. Payment card industry data such as credit card number, billing address, etc.
  - a. If you make an online purchase from us, in addition to your name, we collect payment information through a third party website, which includes billing and shipping addresses and credit card data to process your transaction.
3. Contests and Promotions
  - a. If you participate in a contest or promotion with McGraw-Hill Education, we collect your name, contact information, and other information necessary to enter the contest or participate in the promotion.
4. Communications
  - a. If you choose to communicate with or receive communications from MHE via phone, text, chat, email, or any other platform for technical support, customer service, or other assistance, those interactions may be recorded and monitored to deliver the service or information requested by you.
5. Third Party Marketing Lists
  - a. MHE also purchases and rents marketing lists from various providers including event management companies and education non-profits.

***We automatically collect computer metadata and content to provide, improve, and maintain our products and services.***

When you visit or make transactions on our web sites, we automatically collect certain information from you through the use of cookies, web beacons or other tracking mechanisms. This includes information about your experience such as your IP address, operating systems, pages viewed, and time spent. This allows MHE to collect information about customer usage and online behavior to tailor marketing to areas that may be more appropriate for the customer.

Third parties also collect information automatically from you across websites and over time through the use of their own cookies, web beacons, and tracking mechanisms. This information is used to enable the functions of the site, as well as customize, maintain, and improve our web sites. You may disable cookies via your browser or third party mechanisms. However, some features of our services may not function properly without them. Third party cookies we use include:

- AddThis
- Adobe Test & Target
- Baidu
- DoubleClick
- Eloqua
- Google: Various including AdWord Conversion, Analytics, Tag Manager, etc.
- LivePerson
- Marketo
- Omniture

You can change your Web browser's Internet preferences to disable or delete cookies, although that may affect certain functions on this site. To learn how to manage your cookies, please follow the instructions for your specific browser.

If you wish to opt out of the use of data collected on our site to send you targeted advertising during your visits to other websites, you should adjust your browser preferences to not accept cookies. As an alternative, the following websites will allow you to opt out of the multi-site cookies <http://www.aboutads.info/choices> or <http://youronlinechoices.eu/>.

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### ***How do we use PII and on what legal basis?***

We will use PII to provide the requested service or to process transactions such as information requests or purchases in order to meet our contractual obligations to you.

We will also process your PII to meet our legitimate interests, for example to personalize your experience and to deliver relevant content to you; to maintain and improve our services; to generate and analyze statistics about your use of the services; and to detect, prevent, or respond to fraud, intellectual property infringement, violations of law, violations of our rights or Terms of Use, or other misuse of the services

Except as described in this notice, we limit the use, collection, and disclosure of your PII to deliver the service or information requested by you. We do not collect, use, or disclose PII that is not reasonably related to the purposes described within this notice without prior notification. Your information may be combined in an aggregate and de-identified manner in order to maintain and/or improve our services.

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***Do we use your PII to market to you?***

***Where we are permitted by law to do so, we will send electronic marketing communications to you as a customer, depending on your location, however you always have the option to change your marketing preferences.***

Depending on your location, where legally permissible, MHE uses your PII to provide you with materials that we believe are of interest. This includes information from the platforms on which you choose to communicate with us including email, social media accounts, mobile devices and apps, MHE websites including text/chat functions, and your shopping cart.

In some locations, such as the European Union, we will only send electronic marketing communications to consumers if you provide your consent, however such communications may still be sent directly to businesses without consent. In all instances, you may choose to change your marketing preferences at any time by completing our [Data Request Form](#), clicking the unsubscribe button in any marketing email you receive from us, or by contacting [McGraw-Hill Education's Local Privacy Official](#).

McGraw-Hill Education shares your information with third parties to provide you with marketing from us, however we will not share your PII with third parties for them to market to you on their own behalf.

Please note, whatever preferences you select for marketing, you may still receive some transactional emails related to the services or products you purchase or use.

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***When do we share your PII with third parties?***

***In general, we only share your PII in order to provide, maintain, or improve our products or services, or respond to legal requests.***

1. Co-branded/Other Web Sites and Features – We share your PII with third-party business partners for the purpose of providing services to you and to manage co-sponsored events. Those business partners will be given limited access to the PII that is reasonably necessary to deliver the service, and we will require that such third parties follow the same privacy and security practices as McGraw-Hill Education.
2. Business Transfer – In the event of a sale, merger or acquisition, we will be able to transfer your PII to a separate entity. We will use commercially reasonable efforts to require this entity to use your PII only for authorized purposes and by authorized persons in a manner consistent with the choices customers have made under this notice, and that security, integrity, and privacy of the information is maintained.
3. Agents/Service providers – We hire other companies to perform certain business-related functions on our behalf and according to our instructions. We provide your PII to service providers that host our platform data in the cloud, for example, AWS.

4. Affiliates – McGraw-Hill Education is a global corporation that consists of multiple organizations. We share your PII between organizations within McGraw-Hill Education to provide, maintain, and improve our products and services. A list of the companies within the MHE group is available at the following link: [Legal Entities List](#).
5. Law Enforcement – In the event that McGraw-Hill Education receives a legal demand for customer data from a law enforcement agency, that request will only be honored if:
  - a. The request complies with all laws and clearly establishes the legal need for disclosure.
  - b. The request is related to a specific investigation and specific user accounts are implicated in that investigation.
  - c. Whenever legally permissible, users shall receive notice that their information is being requested.

MHE reserves the right to disclose to third parties non-personally identifiable information about our users and their use of the MHE websites and related services. For example, MHE may disclose aggregate data about the overall patterns or demographics of the users of the MHE websites to third parties.

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#### ***What privacy controls and choices do we offer you?***

***You have the rights to access, export, be informed about, rectify, object to the further processing of, restrict the processing of, and withdraw consent to the processing of, and erase your PII.***

1. Access and rectification: We strive to ensure that information we have about you is accurate and current. You may obtain confirmation as to whether or not PII concerning you exists, regardless of whether PII has already been recorded, and to be communicated such information in a readily understandable form. If you want to review the PII you have provided to us, or believe that the information we have about you is inaccurate, you should make a request by following the instructions below.
2. Choice & Objection to processing: With limited exceptions, you may choose to change how we use your PII at any time by following the instructions below on making a request. However, if the PII is required in order to provide you with the service or process a transaction, you may not be able to opt-out without canceling the transaction or service. You may object, in whole or in part, on legitimate grounds, to the processing of your PII, even where such processing is relevant to the purpose of the collection. In addition, you may choose whether to share information about yourself and the use of our sites with third parties such as social media sites. You can also choose whether to receive marketing messages from us (see your options in our “Do we use your PII to market to you?” section above) and you may object, in whole or in part, to such processing.
3. Restriction of processing: In specific cases (e.g., if you challenge the accuracy of the PII, while this is being checked), you can request a restriction on the processing of your PII, which can only be processed to file or defend claims.

4. Information: You may be informed a) of the source of the PII; b) of the purposes and methods of the processing; c) of the logic applied to the processing, if processing is carried out with the help of electronic means; d) of the identity of the data controller and data processors; and e) of the entities or categories of entities to whom the PII may be communicated and who may have access to such PII in their capacity as data processor(s) or person(s) in charge of the processing.
5. Data portability: You may request that we export your PII from our systems in a readily accessible file type. If completed, this means you will have received a copy of your PII that we have retained as a result of you doing business with McGraw-Hill Education.
6. Withdraw consent: Where we are using your PII with your consent, you may withdraw your consent at any time, though this will not affect the lawfulness of our uses of your PII prior to the withdrawal.
7. Erasure: You may request erasure, anonymization or blocking of PII that have been processed unlawfully, including PII whose retention is unnecessary for the purposes for which it has been collected or subsequently processed, and will obtain certification to the effect that such operations, as well as their contents, have been notified to the entities to whom the data were communicated, unless this requirement proves impossible or involves a manifestly disproportionate effort. At your request, in such instances, we may therefore delete or de-identify your information. However, you should be aware that doing this may limit your use of our services. For example, if you request the deletion of your account within an ecommerce portal, you may be required to re-enter this information should you wish to make another purchase.

To exercise any of your data subject rights, you should fill in a [Data Request Form](#) or contact [McGraw-Hill Education's Local Privacy Official](#).

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#### ***How do we protect your PII?***

***Our IT security team has established industry standard security measures to protect your PII from unauthorized access and use.***

MHE takes reasonable precautions to protect your information. When you submit personal information via the website, your information is protected both online and off-line. MHE utilizes reasonable security measures to protect the security and confidentiality of your PII from unauthorized access and use.

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#### ***How long do we retain your data?***

We will retain your data for the minimum amount of time necessary to accomplish the purpose for which it was collected, and thereafter no longer than is permitted under MHE's data retention policies. We will retain and use your data as necessary to comply with our obligations, resolve disputes and enforce agreements.

For information on the retention period that applies, reach out to the Privacy Office by emailing [privacy@mheducation.com](mailto:privacy@mheducation.com) or calling +1-646-766-3199.

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***When do we store, transfer or process PII internationally?***

***McGraw-Hill Education is a global organization. Depending on your location, and the product or service, your information may be stored and processed within secure data centers at one or many of our locations. MHE has committed to meeting the requirements of local data protection laws, including EU law, to the extent required. If your data is stored locally, then your local laws prevail.***

We recognize and acknowledge current data protection laws in the European Union, Switzerland, and around the world. To comply with privacy laws in the European Union, we have implemented appropriate contracts for the international transfer of PII, on the basis of the standard contractual clauses approved by the European Commission and other international models as required by local law, to provide a legal mechanism for transferring data to MHE locations globally. For more information on the aforementioned model contracts and how to obtain a copy of the contract, please contact the Privacy Office at [privacy@mheducation.com](mailto:privacy@mheducation.com) or +1-646-766-3199.