

Transition Curriculum Inc. DBA NextUp Privacy Policy

This Privacy Policy ("Policy") applies to all products that make up the NextUp Suite, (Lessons Portal, Student Business Platform, Job Application Simulator, and all other sections under the <https://nextup.work> and <https://transitioncurriculum.com> domains), and Transition Curriculum Inc. DBA NextUp ("Company") and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to the Company include <https://transitioncurriculum.com>, <https://nextup.work>, https://nextupportal.herokuapp.com/admins/sign_in. The Company's application is an education application. By using the Company application, you consent to the data practices described in this statement.

Privacy Compliance Certification

The Company has iKeepSafe FERPA Compliance certification.

Certification achieved Nov 21, 2024.

Collection of your Personal Information

In order to better provide you with products and services offered, the Company may collect personally identifiable information, such as your:

- First and last name
- Mailing address
- Email address
- Phone number
- Employer
- Job title

The Company may also collect anonymous demographic information, which is not unique to you, such as your:

- Age
- Gender
- Race

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide certain personal information to us when you elect to use certain products or services. These may include: (a) registering for an account; (b) entering a sweepstakes or contest sponsored by us or one of our partners; (c) signing up for special offers from selected third parties; (d) sending us an email message; (e) submitting your credit card or other payment information when ordering and purchasing products and services. To wit, we will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. We also may gather additional personal or non-personal information in the future.

Use of your Personal Information

The Company collects and uses your personal information in the following ways:

- to operate and deliver the services you have requested
- to provide you with information, products, or services that you request from us
- to provide you with notices about your account
- to carry out the Company's obligations and enforce our rights arising from any contracts entered
- to notify you about changes to our policy and data collection practices or any products or services we offer or
- in any other way we may describe when you provide the information
- for any other purpose with your consent.

The Company may also use your personally identifiable information internally to inform you of other products or services available from the Company, this data will not be used by any third party or company for the purpose of advertising.

We are a comprehensive transition curriculum consisting of weekly lesson videos, lesson plans, supplemental activities, assessments, and more. NextUp equips teachers with the tools and resources to enhance student post-secondary success in employment, education, and independent living. The data necessary to operate the product include Student's First and Last name, Email Address, Grade and Graduation Class.

Sharing Information with Third Parties

The Company does not sell, rent, or lease its customer lists to third parties.

The Company may share data with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to the Company, and they are required to maintain the confidentiality of your information.

The Company may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on the Company or the site; (b) protect and defend the rights or property of the Company; and/or (c) act under exigent circumstances to protect the personal safety of users of the Company, or the public.

Third-Party Subprocessors

We do work with vendors, subprocessors, and other partners to help us provide the Service and the NextUp Website by performing tasks on our behalf. We may need to share or provide information (including Personal Information) to them to help them perform these business functions, for example database management services, database hosting, and fulfilling product orders. These subprocessors have limited access to your Personal Information to perform these tasks on your behalf, and are contractually bound to protect and use it only for the purpose for which it was disclosed and must adhere to confidentiality and security obligations in a way that is consistent with this Privacy Policy.

Security of your Personal Information

The Company secures your personal information from unauthorized access, use, or disclosure. The Company uses the following methods for this purpose:

- Devise (account authentication)
- Heroku mTLS (mutually-authenticated, secure, and compliant mutual) connection

We strive to take appropriate security measures to protect against unauthorized access to or alteration of your personal information. Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet that are beyond our control; and (b) the security, integrity, and privacy of any and all information and data exchanged between you and us through this site cannot be guaranteed.

Security as to Personally Identifiable Information:

The security of your data, including personally identifiable information, is important to Us. User accounts are protected by a password. Users are required to protect the confidentiality of their passwords.

We will endeavor as best as We can in accordance with applicable rules, regulations and laws to maintain appropriate electronic and managerial policies and procedures to ensure that your data, including personally identifiable information, is kept secure in accordance with commercially reasonable information technology standards.

If NextUp becomes aware of a systems security breach by an unauthorized party or that any user data was used for an unauthorized purpose, we will comply with relevant state and other data breach laws. We will notify users of any breach resulting in unauthorized release of data electronically, at minimum, and without unreasonable delay so that you can take appropriate steps. The notification will include: date of the breach, the types of information that were subject to the breach, general description of what occurred, and steps NextUp is taking to address the breach.

Choices and Product Support:

*If the parent or legal guardian of a Student wants to review the information that NextUp has collected about the Student or learn more about the Service(s) the Student is participating in, **he or she should directly contact** the Student's School.*

***If Schools wish to access, modify or delete** other personal information that they have provided to NextUp, please contact us at NextUp@TransitionCurriculum.com for assistance.*

We will retain your information for as long as your account is active or as needed to provide you services. Please contact us if you wish to cancel your account or request that we no longer use your information to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

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
- Direct any service providers to delete your personal information from their records.

Please note that we may not be able to comply with requests to delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public eye. All student PI used for these purposes will be aggregated or de-identified.
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with this policy and our terms of service.

Children Under Thirteen

The Company does not knowingly collect personally identifiable information from children under the age of 13. If you are under the age of 13, you must ask your parent or guardian for permission to use this application. If any data is unknowingly collected from a child under the age of 13, appropriate parental consent will be sought out or the data will be anonymized or deleted if requested.

Email Communications

From time to time, the Company may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. In order to improve our services, we may receive a notification when you open an email from the Company or click on a link therein.

If you would like to stop receiving marketing or promotional communications via email from the Company, you may opt out of such communications by clicking on the the unsubscribe button..

External Data Storage Sites

We may store your data on servers provided by third-party hosting vendors with whom we have contracted.

Changes to This Statement

We may revise our Privacy Policy from time to time. You can see when the last update was by looking at the "Last Updated" date at the top of this page. We won't reduce your rights under this Privacy Policy without your explicit consent. If we make any significant changes, we'll provide prominent notice by posting a notice on the NextUp Service and notifying you by email (using the email address you provided) within 30 days before the change takes effect, so you can review and make sure you know about them.

We encourage you to review this Privacy Policy from time to time, to stay informed about our collection, use, and disclosure of personal information through the Service and NextUp. If you don't agree with any changes to the Privacy Policy, you may terminate your account. By continuing to use the Service or the NextUp after the revised Privacy Policy has become effective, you acknowledge that you accept and agree to the current version of the Privacy Policy.

Change of Control:

Over time, NextUp may grow and reorganize. We may share your information, including personal information with affiliates such as a parent company, subsidiaries, joint venture partners or other companies that we control or that are under common control with us, in which case we will require those companies to agree to use your personal information in a way that is consistent with this Privacy Policy.

In the event of a change to our organizations such that all or a portion of NextUp or its assets are acquired by or merged with a third-party, or in any other situation where personal information that we have collected from users would be one of the assets transferred to or acquired by that third-party, this Privacy Policy will continue to apply to your information, and any acquirer would only be able to handle your personal information as per this policy (unless you give consent to a new policy). We will provide you with notice of an acquisition within thirty (30) days following the completion of such a transaction, by posting on our homepage and by email to your email address that you provided to us. If you do not consent to the use of your personal information by such a successor company, subject to applicable law, you may request its deletion from the company.

In the unlikely event that NextUp goes out of business, or files for bankruptcy, we will protect your personal information, and will not sell it to any third-party.

Contact Information

The Company welcomes your questions or comments regarding this Policy. If you believe that the Company has not adhered to this Policy, please contact the Company at:

Transition Curriculum Inc. DBA NextUp
311 E. Main Street, Suite 512
Galesburg, Illinois 61401

Email Address:
nextup@transitioncurriculum.com

Phone Number:
309-790-3727

Effective as of November 11, 2024