



PRIVACY POLICY, CHILD PRIVACY AND PARENTAL CONSENT STATEMENT

Last modified June 7, 2007

This privacy policy explains how Insight Schools, Inc. (herein referred to as “Insight” or “we”) collects, uses, shares, and protects general and personal information collected online at <http://www.insightca.net> (the “site”). This policy only applies to information that we collect through the site and does not apply to information that we may collect from you in other ways (for example, this policy does not apply to information that you may provide to us over the phone, by fax or through conventional mail). In addition, please note that this policy does not apply to your child’s educational records—those records are protected by the *Family Educational Rights and Privacy Act* (“FERPA”) with which we are committed to comply.

Privacy Policy

General Information. *General* information is not specific to you and cannot be traced in any way to you. We collect general information from visitors to the site (such as the time of day the site is accessed, the name of the Web page from which you entered our Web site, which pages you visit on our Web site, and how much time you spend on each page). We use this information to monitor and improve our Web site and for internal analysis. In particular, we use IP addresses to analyze trends, administer the Web site, and gather information for aggregate use and generate information in aggregate form (such as statistics relating to the number and frequency of visitors). Insight uses general information only in ways that do not identify you, the specific user, meaning that it is never linked to personal information.

Personal Information. *Personal* information (sometimes called “personally identifiable information”) is specific to you and includes your email address, name and mailing address. The only personal information collected through the site is information you voluntarily supply to us. In order to improve our site and to better serve you, Insight may share your personal information with its subsidiaries, affiliates, legal successors and trusted third parties (“Third Parties”). From time to time, Insight may also contact you about updates or special offers. If you do not want your personal information to be shared to Third Parties, or you do not wish to be contacted beyond our initial response to your request for more information,

please send an email indicating your preferences to our Student Service Department at studentservices@insightschools.net.

To the extent Third Parties assist Insight and/or its affiliates in the provision of online products or services, those vendors are provided the minimum amount of data required to perform the tasks for which they have been engaged, have no independent rights to such data, and have agreed to adhere to this Privacy Policy.

Cookies. When you access the site, Insight's computers may place a small text file on your computer (called a "cookie"). *Cookies cannot be used to run programs or deliver viruses to your computer.* The cookie (1) assigns a unique identifying number to your Web browser, allowing the site to recognize your browser (but not otherwise identify you) and (2) passively tracks activities on the site. Data collected from our cookies is general information and used only in the aggregate; our cookies do not access, collect or reveal any personal information or other data stored on your computer. Our cookies do not contain personal information about the parent(s) or children enrolled in Insight's virtual education program.

We will not share or sell non-aggregated information contained within cookies to any third party.

You also have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our sites or have some of our services on the sites function properly. If you choose to decline cookies, you may not be able to access the site.

Links. The site may contain links to other Web sites, chat rooms or other resources that we provide for your convenience ("Linked Sites"). Linked Sites are not under the control of Insight, and Insight is not responsible for the content available on any Linked Site. Such links do not imply our endorsement of material on any Linked Site and we expressly disclaim all liability with regard to your access to such Linked Sites. Access to any other Web sites linked to the Sites is at your own risk.

Message Boards and Chats. We may offer message boards and chat rooms to you, the parent(s), on our sites. Please be aware that anyone may read your postings on a message board or in a chat room. Furthermore, any information which you submit to be posted to a message board or in a chat room, including your information from your account information page and Member ID, will be disclosed and available to all users of that message board or chat room, and is therefore no longer private. We cannot guarantee the security of such information that you disclose or communicate online in public areas such as message boards

and chat rooms, and you do so at your own risk. We reserve the right to monitor the content of the message boards only and to republish your postings from message boards or chat rooms elsewhere on the Web or otherwise in any format.

Data Security. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place commercially reasonable physical, electronic, and managerial procedures to safeguard and secure the information we collect. We also use Secure Sockets Layer (SSL) protocol on your account information pages to protect sensitive personal information.

Child Privacy Policy and Parental Consent Statement

General Compliance with Laws. Insight wants to protect the safety of children using the site. We comply strictly with applicable laws and regulations, including the *Children's Online Privacy Protection Act of 1998*, for the protection of children's online privacy, and in general we do not:

1. collect *online* contact information from children under the age of 13 without prior parental notification and consent which will include an opportunity for the parent to prevent use of the information and the child's participation in the related activity. Without prior parental consent, online information will only be used to respond directly to a child's request and will not be used for other purposes.
2. collect personally identifiable *offline* contact information of a child under age 13 without prior parental consent.
3. unless otherwise disclosed to children and their parents during the information collection process, Insight does not provide any personally identifiable information, regardless of its source, to any third party for any purpose whatsoever concerning our students or visitors under 13 years of age.
4. give children under age 13 the ability to publicly post or otherwise distribute personally identifiable contact information without prior parental consent.
5. entice any child by the prospect of a special game, prize, or other activity, to divulge more information than is needed to participate in the activity.

You must be 13 years of age or older to enroll using the Insight Online Enrollment System. If you or your student is under the age of 13, please contact

us to find out about enrolling. Please call 1-800-670-5391 or email us at info@insightca.net.

Insight Policies for Children Under the Age of 13. Insight encourages parents and guardians to spend time online with their children and to participate together in online activities. No information should be submitted or posted through our services by any student or visitor under 13 years of age without the consent of his or her parent or guardian.

In addition to the general policies above:

1. When necessary to protect a child's privacy online, we may request a child to choose a screen name and secret password in registering to use our services. When a student or visitor under age 13 registers with us, he or she is required to provide the email address of a parent or guardian so that we can send that parent or guardian an email alerting them to the registration. In order for the child to use the service for which the child registered, the parent or guardian must validate the registration, as described in the alerting email. In the alerting email, we will inform the parent what we intend to do with the information the child has provided, and we will inform the parent how to review or delete the information.

2. We will not retain a child's email address without a parent's permission. No information collected from students or visitors under 13 years of age is used for any marketing or promotional purposes whatsoever. The only exception to this rule is for the registration process for contests or promotions (and in that case, we will specifically state how we will use the information, and the information collected is used only for the specific contest or promotion). Although students and visitors under 13 years of age may be allowed to participate in some contests and promotions, if such a person wins, notification and prizes shall be sent to the parent or guardian identified in the initial registration process. Publication of names, ages or images for contest winners under age 13 requires explicit parental or guardian consent. We do not allow students or visitors less than 13 years of age to be listed in any student or visitor directory or to receive direct marketing communications or to be sent third-party offers.

Parents' Right to Review or Delete Information. A parent may review the information a child has submitted to us by sending us a written request addressed to Insight Schools, Inc.; 309 SW 6th Ave., Suite 820, Portland, OR, 97204. The request must include the name and address of the child, the child's password and any other information that will allow us to verify that writer is the parent of the child whose information is being requested.

In addition, a parent can instruct us to *delete* a child's information at any time and can also instruct us not to collect any more personal information from the child by sending us a written request addressed to Insight Schools, Inc.; 309 SW 6th Ave., Suite 820; Portland, OR, 97204. Parents should be advised, however, that a

deletion request may prevent the child from participating in certain activities. A parent who has a question about our child privacy policy may telephone us at 1-866-800-0017.

Please be advised that the deletion of certain of your personal information may result in your children no longer being able to be enrolled in an Insight online program.

Changes in this Policy and to Insight

Insight may change its privacy policy from time to time in its sole discretion, and if our privacy policy changes, we will change this statement and post those changes here to keep you informed about how we treat your personal information. Feel free to check our privacy statement for current updates whenever you visit this site. If all or part of Insight is sold, merged or otherwise transferred to another entity the personal information you have provided at the site may be transferred as part of that transaction or process. We will take steps to assure that the personal information is used in a manner consistent with the privacy policy under which it was collected. FERPA protects your children's educational records, in the event of such a transaction or transfer.