

INTERNATIONAL SCHOOLS SERVICES, INC. PRIVACY POLICY

Date of Last Revision: January 9, 2012

1. SCOPE

International Schools Services, Inc. (ISS) has created this Privacy Policy in order to inform you how ISS utilizes the personal information that you may submit via our website (www.iss.edu) ("Site") and other non-personal information collected by means of the Site's technology.

ISS uses the personal and non-personal information gathered on this Site (and as described in this policy) for the primary purposes of providing and improving on the diversified educational services offered to the international community. ISS is committed to maintaining the highest level of integrity when handling your personal information, including the adoption of privacy practices intended to uphold legitimate and professional business standards as well as applicable law pertaining to the management of personal information.

By using or accessing this Site (and all subsequent online sites launched in affiliation with ISS), you agree to the terms and practices of our Privacy Policy. In particular, you are expressly and affirmatively consenting to our use and disclosure of the information you provide to us each time you visit this Site. ISS Privacy Policy is incorporated by reference into ISS Terms and Conditions of Service ("Terms") for this Site.

Please take a moment to become familiar with our privacy practices as contained in this Privacy Policy and to review our policy periodically since it may be updated from time to time in accordance with our internal policies and/or regulatory requirements updates.

2. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

ISS gathers information via its website that can be categorized as either (1) Personal information that you provide to us upon requesting information or entering into an agreement related to any of ISS online initiated services; and (2) non-personal, demographic, or behavioral information collected through technology, which includes tracking or behavioral information collected as you utilize ISS' website.

Personal Information That You Provide Us

ISS does not collect personal information via its website unless you choose to provide it to us. **Personal information** is generally defined as information that identifies (whether directly or indirectly) a particular individual, such as the individual's name, postal address, email address, and telephone number. The personal information requested in various areas of our Site is necessary in order for ISS to facilitate the delivery of ISS services that you have selected online or to provide you with additional information related to a particular ISS service as requested by you. When anonymous information is directly or indirectly associated with personal information, this anonymous information is also treated as personal information.

- ***ISS Candidate Application Portal (for Overseas Employment)***

ISS uses personal information submitted via ISS Candidate Application Site for the primary purpose of making a candidate's personal information and other job application information available to prospective employers or their recruiters seeking educational professionals. Personal information may be also useful to the prospective employer for administrative and management purposes, including in determining the candidate's housing considerations, availability for filing more than one open position by dual or "team" candidates, international employment or VISA requirements, and other prudent and legitimate business recruitment services considerations.

Examples of personal information collected via ISS Candidate Application Site include the following: User's ID information, name, title, gender, postal address, country of residence, email address, telephone number, contact information, marital status, number of children, date of birth, professional credentials such as certifications, work experience, third-party reference information, and other resume or background type information such as awards received, languages utilized, professional associations, outside activities, hobbies, and additional skills.

ISS does not request that applicants submit as part of the overseas employment application process personal information such as social security numbers, driver's license information, or complete VISA identification numbers in order to promote online security.

- **ISS "Other Services" Site Portals**

When requesting additional information on ISS' Site related to any of ISS other services such as starting, managing, supplying, and/or staffing a school, and ISS World Language Initiative program, ISS may request a variety of personal information online, such as the user's name, title, mailing address, phone number, email address, contact preferences, additional information concerning their interest, and current employment information for the primary purposes of being able to contact parties interested in ISS services and providing tailored information and applicable materials.

- **Billing and Credit Card Information**

Certain of ISS services are fee-based and ISS will therefore collect payment information from you such as credit card numbers and billing addresses. ISS does not store personalized credit card information for future billing purposes.

Non-Personal Information Collected Using Technology

- ISS also collects **non-personal information** which is generally defined as data in a form that does not permit direct association with any specific individual. ISS may collect, use, transfer, and disclose non-personal information for any purpose.
- Examples of non-personal information include "**demographic information**" which is not unique to you in the sense that it refers to selected population characteristics such as your zip code or postal code, age, preferences, gender, and race or ethnicity.
- In addition, ISS collects **behavioral information** regarding how you use our sites, the areas of the site you visit, what services you access, and information about your computer hardware and software including your Internet Protocol (IP) address, geolocation, browser and operating system type, domain names, access times and referring web site addresses. This information is necessary for analyzing the use of resources, troubleshooting problems, preventing fraud, and improving our services.
- ISS also utilizes "**cookies**" (small pieces of data we store for an extended period of time at the location from where you access our Site) to make the Site easier to use and to protect both you and ISS. Cookies enable us to serve secure pages to our users without asking them to sign in repeatedly. ISS sets cookie durations to minimum requirements in order to enhance reasonable user experience. ISS treats information collected by cookies and other technologies as non-personal information. However, to the extent that IP addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Some of the advertisements included on ISS' Site, delivered or serviced by third-party companies, do not currently place or recognize cookies, Web beacons or other technologies to track certain non-personal information about our Site users.
- As is true of most websites, ISS gathers some information automatically and stores it in **log files**. This information includes IP addresses, browser type and language, Internet service provider (ISP), referring and exit pages, operating system, date/time stamp, and clickstream data. ISS may use this information to understand and analyze trends, to administer the site, to learn about user behavior on the site, and to gather demographic information about our user base as a whole.
- ISS may also from time to time utilize third parties resources in order to undertake **analytics technologies** for purposes of providing ISS with information, reports and analysis about the usage and browsing patterns of users of ISS' website and services. Information tracked and analyzed is typically non-personally identifiable statistical information from our visitors and service users on ISS' Site.

3. HOW DO WE USE THE INFORMATION WE COLLECT ABOUT YOU?

- **Facilitating ISS Services Requested By You**

As stated above, the personal information requested in various areas of our Site is intended for the primary purposes of providing you with additional information related to a particular ISS service as requested by you as well as the delivery of ISS services that you have selected online.

- **Communication of Important Notices**

From time to time, we may use your personal information to send important notices, such as communications about changes to our terms, conditions, and policies, or administrative notices that may directly or indirectly impact aspects of ISS various services. Because this information is important with regard to your interaction with ISS, you may not opt out of receiving these communications.

- **Communication of Promotional Announcements**

ISS may also use your personal information to inform you of ISS' latest service or product announcements and upcoming events which may or may not be targeted to your interests. By accepting this Privacy Policy, you expressly agree to receive this information. You may opt out of receiving any promotional announcements which may not be critical to your understanding or continuation of selected services by sending an e-mail to compliance@iss.edu.

- **Development and Improvement of Services**

From time to time, ISS may also use personal and non-personal (demographic, behavioral, or statistical information) for internal purposes such as data analysis or auditing to help us develop and improve our products, services, content, advertising, and overall client relationships.

4. WITH WHOM DO WE SHARE THE INFORMATION WE COLLECT ABOUT YOU?

- **ISS' E-mail and Spam Policy**

ISS does not share, sell, rent, swap, or authorize any third party to use your e-mail address for commercial purposes without your permission in accordance with the terms and conditions of the specific services procured by you.

- **ISS' Staffing & Recruitment Services**

Utilization of ISS' Staffing and Recruitment Services allows candidates/applicants seeking overseas employment to make available their personal information, including resume information, to international school recruiters around the world who can access, use, and store the candidate's personal information in accordance with their own internal privacy practices and policies. Although the recruitment school and recruiters are from time to time encouraged by ISS to safeguard the confidentiality of all candidate information (*whether the information is on-line, on a computer screen, printed, faxed, e-mailed, or contained in data storage devices or CD's*), ISS cannot control how such authorized users view, store or transfer information once downloaded from ISS' candidate database, which may also result in the receipt of unsolicited messages from third parties for which ISS is not responsible.

Furthermore, although ISS strives to provide a safe, secure environment by attempting to limit access to candidate personal information database to legitimate users (via commercially reasonable physical, technical, and administrative controls to protect that information), we cannot guarantee that unauthorized parties will not gain access since no method of transmission over the internet or method of electronic storage is 100% secure. ISS will notify candidates of any confidentiality breaches in the use of their personally identifiable information that we become aware of in accordance with applicable law.

- **Other Third Parties (Service Providers)**

ISS may also share your personal and non-personal information with other third parties or companies who assist ISS in the rendering of its services, such as with providing hotel and travel accommodations related to ISS sponsored events, fulfilling purchase orders and the delivery of educational products, and conducting research related to improving our customer service, products, and related advertising. These companies are also obligated to protect your personal information and may be located wherever ISS operates.

- **Compliance with Legal Requests**

It may be necessary for ISS to disclose specific user information in order to comply with the law or legal process, to cooperate with or seek assistance from governmental authorities within or outside your country of residence, and/or to protect the interests or safety of ISS or other users of ISS' Site.

In addition, personal information we have collected may be passed on to a third party in the event of a reorganization, merger, or sale of a transfer of ownership or assets or a bankruptcy of ISS. Such disclosures may be made with or without your consent, and with or without notice.

5. THIRD PARTY WEBSITE LINKS

ISS' Site may contain links to other websites over which we have no control. ISS is not responsible for the privacy policies or practices of other web sites to which you choose to link from our Site. We encourage our users to be aware when they leave our Site to read the privacy policies of any website that collects personal information.

6. HOW WE PROTECT YOUR INFORMATION (DATA SECURITY)

ISS uses reasonable efforts to protect the privacy of the personal information of our users gathered on this Site through appropriate physical, technical and administrative procedures. Here are some examples on how we safeguard the personal information we collect:

- Credit Card Security - ISS employs encryption for secure credit card transactions. ISS does not retain processed credit card information for purposes of conducting future credit card transactions.
- Personal Identification Numbers - ISS does not store or request (via ISS' online sites or through e-mail) personal identification numbers such as social security numbers, drivers' license numbers, or Visa identification numbers.
- Usernames & Passwords - ISS does not share usernames and passwords with anyone and strongly recommends that our users don't share them either. ISS will also never send an email requesting a user's username or password.
- Anti-virus Protection – ISS uses anti-virus protection to help us detect and prevent viruses.
- Firewalls – ISS' firewalls help block unauthorized access by individuals or networks.
- Secure Socket Layer Technology – When a user enters sensitive account information on this Site (like username and password), the information is encrypted using secure socket layer technology (SSL).
- Log-off Procedures – ISS automatically logs users out of their secure session after a period of inactivity to help protect against others seeing or using their online accounts.
- Various Internal Controls – ISS maintains other various internal system and administrative controls to deter and monitor for potential fraud.

7. HOW YOU CAN PROTECT YOUR PERSONAL INFORMATION

Some helpful tips related to protecting your personal information from being used improperly or illegally as in the case of identity theft, domestic or international scams or frauds are as follows. Please take a moment to familiarize yourself with the following information in order to further protect your personal information from being used improperly.

- ***Fictitious Websites/E-mails – Mimicking Authentic Schools & Educational Services***

Some ways that lawbreakers are intent on stealing your personal information and your money is by creating fictitious websites that look like real company websites. A link to the fictitious or “spoofing” website may be sent to you as a link in an email. Such emails are typically referred to as “phishing” emails that are intended to acquire private or sensitive data from personal computers for use in fraudulent activities.

Teachers seeking overseas employment have been approached by various unethical individuals or fraudulent entities running scams and requesting money. These individuals/entities claim to be a reputable school (or assume the identity of an existing, reputable school) and ask teachers and/or administrators seeking overseas employment to send them money to assist in the payment of a work visa, interview or application fees, plane tickets, or other recruitment related costs. Please know that no legitimate school will ask any teacher or administrator to pay them to obtain a job and/or work visa. If you are requested by an international school to send money to cover such costs, you are probably the target of an elaborate scam. Be aware that these fraudulent activities seem to be becoming more frequent. Do not send money or pass on banking information to any school seeking professionals to come work with them. All international candidates are urged to be diligent in investigating potential schools during the recruiting process and prior to signing a contract.

It is important to use extreme caution if you have been asked for private information or money in general. It is important to make sure you that you have properly identified who is making the request and why the information being requested is necessary. If you're suspicious of any request, you should directly contact the organization whose name is used in making the request, to confirm that the request is valid.

- ***Creation & Protection of Site Usernames and Passwords***

It is recommended that you utilize passwords that are easy to remember, but hard for others to guess. Using a combination of upper case and lower case letters, along with numbers and special characters, where allowed, can make passwords more secure. Names, birthdays and common phrases are easy for others to guess. In addition, it is recommended that you never write down or store your passwords in a file on your computer; don't share your

username and password with others, especially via various sites or through e-mail; and to utilize different usernames and passwords for various online sites (to be changed periodically).

- **Use of Personal Information on Social Networking Sites**

Social networks such as Facebook, Twitter, LinkedIn and MySpace allow users to share their personal information online. However, important personal information such as your social security numbers (including the last 4 digits), date of birth, personal phone number, home address, or where you were born should be kept to yourself.

- **Handling of Suspicious or Fraudulent Use of Personal Information**

If you feel that you are a victim of on-line fraud or identity theft, you should contact your local law enforcement authority for additional information.

It is also advised that you change your password and any other authentication information and monitor your account activity frequently if you think you've provided personal or account information in response to a fraudulent website or e-mail.

If you are aware of any information or activities that may be perceived as suspicious, unethical, or illegal related to this Site or our organization, International Schools Services, Inc. ("ISS"), please contact us at compliance@iss.edu. Please also contact us if you have any questions related to any of ISS' services.

For additional information related to deterring and reporting identity theft, see the United States Federal Trade Commission's website at <http://www.ftc.gov/bcp/edu/microsites/idtheft/>.

8. HOW CAN I ACCESS, CHANGE, OR UPDATE MY PERSONAL INFORMATION?

The personal information you may have submitted or posted on-line is directly linked to the type of ISS service that you have chosen to initiate or procure on-line. Users are encouraged to contact one of ISS service representatives related to accessing, reviewing, changing, or updating personal information since a service file may have been established with regard to the personal information collected. Users may utilize the Site's contact information or e-mail dropdowns related to a particular ISS Service line to request such information or by contacting us directly by phone (609-452-0990) or via fax (609-452-2690). Users should specify the type of ISS service originated in order to be connected with a service agent most familiar with the type of personal information collected and with credentials to modify information as requested.

9. OTHER INFORMATION

- **Children**

We do not knowingly collect personal information from children under 13. If we learn that we have collected the personal information of a child under 13 we will take steps to delete the information as soon as possible.

To respect the privacy of children and to comply with the Children's Online Privacy Protection Act, the Services are not available for children under the act of 13. Our Site is a general audience site that is not designed nor intended to collect personal information from children under the age of 13. If you are under 13 years old, you should not request any information nor provide any Personal information to this Site.

- **California Privacy Rights**

California law permits its residents to request and receive information about a business' disclosure of certain categories of personal information to other companies for their use in direct marketing. If you are a California resident and a user of ISS' Site, you can request a copy of this information from ISS by sending an email to compliance@iss.edu or a letter to the Chief Compliance Officer, 15 Roszel Road, Princeton, N.J. 08543-5910 USA. Please include your name and email address in email requests, and your name and postal address in mail requests.

10. CHANGES TO THIS POLICY

Users are encouraged to review our Privacy Policy periodically since it may be updated from time to time in accordance our internal policies and/or regulatory requirements updates. Users are subject to the complete terms of the most recently updated privacy policy at the time this Site is visited.

11. QUESTIONS AND CONCERNS

If you have any questions or concerns about ISS' Privacy Policy, please contact us by physical mail: Attention: Chief Compliance Officer, 15 Roszel Road, Princeton, N.J. 08543-5910 USA or by e-mail at compliance@iss.edu.