

Reading So Lit® Privacy Policy

Last Modified: August 19, 2025

1. Introduction

Barbershop Books, Inc. (“**Barbershop Books**,” “**we**,” “**our**,” or “**us**”) is committed to protecting your privacy and ensuring the security of information shared with us. This Privacy Policy (our “**Privacy Policy**”) explains what information we collect through the Reading So Lit® platform (the “**Platform**”) and related websites, including barbershopbooks.org and app.readingsolit.org (collectively, the “**Websites**”), how we use that information, and the rights and choices available to you.

Please read this Privacy Policy carefully to understand our practices. If you do not agree with the policies and practices described, your choice is not to use the Platform. By accessing or using the Platform, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see **Changes to This Privacy Policy**). Your continued use of the Platform after we make changes is deemed acceptance of those changes.

2. Scope of this Privacy Policy

This Privacy Policy applies to information we collect:

- On the Reading So Lit® Platform and related Websites;
- In email, text, and other electronic messages between you and Barbershop Books;
- When you interact with our applications or services on third-party websites or platforms, if those services include links to this Privacy Policy; and
- From schools, districts, libraries, after-school programs, nonprofit organizations, or other educational partners (“**Institutions**”) that authorize access to the Platform.

This Privacy Policy does not apply to information collected by:

- Us through any other means, including offline or on other websites operated by Barbershop Books or third parties;
- Us or our affiliates or subsidiaries in connection with employment or potential employment; or
- Any third party, including through applications, content, or links that may be accessible from the Platform.

3. Children and Students

The Reading So Lit Platform is designed for use by educators, administrators, caregivers, and students under the supervision of authorized Institutions.

- **Children Under 16:** The Websites are not intended for children under 16 acting independently. No one under 16 may provide information to the Websites without authorization.

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- **Students Under 13:** For students under 13, Institutions are required to secure verified parental consent in accordance with the Children’s Online Privacy Protection Act (COPPA).
- **FERPA Compliance:** When the Platform is used in an educational setting, Barbershop Books serves as a “School Official” under the Family Educational Rights and Privacy Act (FERPA) and processes student information only for authorized educational purposes.
- If we discover that we have collected information from a child under 16 without proper authorization, we will delete that information. If you believe we may have information from a child under 16, please contact us at administrator@readingsolit.org.

4. Information We Collect and How We Collect It

We collect different types of information from and about users of the Platform and the Websites. The categories of information we collect include:

A. Information Provided by Institutions

- Student names, grade levels, class groupings, or IDs;
- Educator and administrator contact details;
- School, district, or program affiliation.

B. Information Generated by Student Use of the Platform

- Student reading preferences, choices, and responses;
- Reading Identity Profile® results;
- Student-generated reflections or content;
- Interaction logs, such as selected multimedia or time spent.

C. Technical Information

- Internet Protocol (IP) addresses and device type;
- Browser type and version;
- Date and time of access;
- Limited usage analytics to improve performance and troubleshoot issues.

D. Information from Parents or Guardians (Optional)

If a parent or guardian creates or is linked to a student account (as permitted by the Institution), we may collect limited contact information to support family engagement.

E. Information Collected Automatically

As you navigate through and interact with the Websites, we may use automatic data collection technologies to collect certain information, including:

- Usage details, logs, and session information;
- Information collected through cookies, web beacons, and similar tracking technologies.

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Cookies and similar technologies are used to improve user experience, measure usage, and support system performance. We do not use cookies or tracking tools to serve targeted advertising to students or create commercial marketing profiles.

F. Information from Third-Party Integrations

To support interoperability and reduce administrative burden, the Platform may integrate with third-party single sign-on (SSO) and rostering services. When enabled by an Institution, we may receive limited Institution Data (such as class rosters or unique identifiers) from these providers to facilitate secure access and account management.

We do not collect personal contact information directly from students. Student access to the Platform is only permitted under the authorization and supervision of an Institution.

5. How We Use Information

We use the information we collect to operate, improve, and protect the Reading So Lit Platform, always in compliance with applicable student data privacy laws, including FERPA and COPPA.

Specifically, we use information to:

- Deliver and personalize the Reading So Lit learning experience;
- Create and update a Reading Identity Profile to support student learning personalization;
- Support educators and administrators in analyzing engagement and responding to student needs;
- Improve the quality, accessibility, and effectiveness of our Platform and content;
- Ensure platform security and prevent misuse; and
- Communicate with authorized users about product features, updates, or support.

We may also use de-identified or aggregated data for research, reporting, or product improvement. De-identified data cannot reasonably be used to identify a specific individual, and we do not attempt to re-identify such data.

Prohibited Uses of Student Information

We do **not** use student information for:

- Selling, renting, or trading student data;
- Marketing or advertising directed to students;
- Creating commercial marketing profiles of students;
- Sharing with third parties for unrelated purposes.

6. How We Share Information

We do not sell, rent, or trade student data. We only share information in limited circumstances, always in accordance with applicable laws and our contractual obligations with Institutions.

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A. With Authorized Educators and Institutions

Student information is accessible only to authorized teachers, administrators, or staff at the Institution that provided access to the Platform. This access enables educators to view a Reading Identity Profile, monitor engagement, and support student learning.

B. With Approved Subprocessors

We work with carefully selected third-party service providers (“Subprocessors”) who help us operate and maintain the Platform. These partners may provide services such as secure cloud hosting, analytics, or performance monitoring. All Subprocessors:

- Are under contract and bound by strict confidentiality requirements;
- May only use data for authorized educational purposes; and
- Must comply with equivalent data protection standards.

We maintain a current list of Subprocessors, available upon request, and notify Institutions in advance of any significant changes.

C. For Legal Compliance or Safety

We may disclose information if required to comply with a legal obligation, such as a court order or valid subpoena. Whenever possible and legally permitted, we will notify the Institution before sharing data.

In cases involving suspected fraud, security threats, or risk of harm, we may share information with appropriate authorities to protect users or the public.

7. How We Protect Information

We take data security seriously and have implemented administrative, technical, and physical safeguards consistent with industry standards (including NIST and ISO frameworks) to protect the information entrusted to us. These measures are designed to prevent unauthorized access, disclosure, alteration, or destruction of data.

Our safeguards include encryption of data in transit and at rest, secure authentication and role-based access controls, continuous monitoring and automated logging, regular security audits and vulnerability assessments, and staff training on privacy and security practices.

In the event of a data breach involving student information, we will notify affected Institutions within 72 hours of becoming aware of the breach and provide support to help Institutions meet any legal or regulatory obligations related to the incident.

While we employ these safeguards, no method of transmission or storage is completely secure. Accordingly, we cannot guarantee the absolute security of information, but we are committed to maintaining and continually improving robust protections for all users of the Platform.

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8. Data Retention and Deletion

We retain student and user data only for as long as necessary to provide services to the Institution or as required by law. When an Institution's agreement with us ends, or upon written request, we will:

- Delete student data within 90 days (or within 30 days if specifically requested);
- Return data in a usable format upon request;
- Provide a certificate of deletion if needed; and
- Continue protecting any data that must be legally retained under this Privacy Policy.

We do not retain student-generated content or personally identifiable information for independent commercial use or marketing.

9. Student and Family Rights

We support student and parent rights to access and control their data in alignment with FERPA, COPPA, and other applicable laws. Because Reading So Lit is only available through Institutions that authorize its use and obtain any required parental consent, all rights must be exercised through the Institution.

FERPA Rights: As a School Official under FERPA, we only access and use student education records as directed by the Institution. Institutions remain responsible for responding to requests to review, correct, or delete student records, or to withdraw consent for further use. We will assist Institutions in fulfilling such requests.

COPPA and Parental Consent: For students under 13, Institutions are responsible for obtaining verified parental consent before a student uses the Platform. Parents may request, through their child's Institution, that we:

- Review their child's information;
- Delete their child's data; or
- Prevent further use of the Platform.

Parents should contact their child's Institution directly to initiate any such request.

10. International Use

The Reading So Lit Platform is intended for use within the United States. If users access the Platform from outside the U.S., they do so at their own discretion and are responsible for compliance with local data protection laws.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in technology, legal requirements, or our services. If we make material changes, we will notify Institutions directly

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using the contact information they provided and post the updated version with a new effective date.

Continued use of the Platform after any update constitutes acceptance of the revised Privacy Policy.

12. Contact Us

If you have questions about this Privacy Policy, our data practices, or your rights, please contact us at:

Barbershop Books, Inc.
Attn: Legal Department
8 W 126th Street, 3rd Floor
New York, NY 10027

Email: administrator@readingsolit.org