

MITTIN Privacy Notice

Effective November 1, 2022

Overview

This Privacy Notice (Notice) describes and applies to Michigan Transition to Independence (MITTIN, us, we or our) platform, software, website, and any other scenarios where you provide information to us or communicate with our representatives (collectively, the Services), including how we use that information and under what circumstances we disclose the information. References to you are to the school or educational institution (collectively, schools) and references to user is to the students who use the Services.

PLEASE READ THIS ENTIRE NOTICE CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES. BY USING THE SERVICE, YOU UNDERSTAND THAT THE TERMS OF THIS NOTICE APPLY TO INFORMATION ASSOCIATED WITH THE SERVICES.

Schools, educational institutions and users should also read our Terms of Use, which also apply to the Services. They are available at [Terms of Use](#). Capitalized terms not defined in this Notice are defined in the Terms of Use.

NOTE: WHILE OUR SERVICES ARE USED BY STUDENTS (REFERRED TO AS USERS), WE CONTRACT WITH THE SCHOOL, NOT THE USER WHO ATTEND THAT SCHOOL. IF YOU ARE A SCHOOL, THIS NOTICE AND THE TERMS OF USE CONTROL. IF YOU ARE A USER, THIS NOTICE AND THE TERMS OF USE APPLY, BUT YOUR PRIMARY POINT OF CONTACT AND THE ENTITY WHO WILL HAVE INFORMATION ABOUT YOUR USE IS THE SCHOOL. WE CAN ASSIST USERS WITH TECHNICAL PROBLEMS AND GENERAL QUESTIONS. HOWEVER, REQUESTS ABOUT YOUR PERSONAL INFORMATION SHOULD BE DIRECTED FIRST TO YOUR SCHOOL.

The information we collect and how we collect it

When you use the Services, we receive and collect certain information.

Information You Submit to MITTIN

To use the Services, schools, educational institutions and users will need to agree to our Terms of Service and download our software. Depending on how schools and users are downloading the software, schools and users may need to provide personal information with the third party facilitating the download. There are methods of downloading the software that do not require schools and users to provide personal information. Providing personal information to obtain the software is not required. However, in the event schools and users utilize a service that does require personal information, it may include the user's name, the user's email address, telephone number and payment information. To determine whether personal information is required by the third party (such as the Play Store), review the privacy notice and other information provided by that service provider.

In addition to the information described above, we may also collect: (i) information about the use of the Services and performance during the use of the Services; (ii) to the extent necessary, user name or identification; (iii) information provide when reporting a problem with the Service; (iv) records and copies of correspondence (including email addresses), if a school, educational institution or user contact us; (v) responses to voluntary surveys; and (vi) any other information submitted to us.

We also temporarily store information about game play in the Service on the device on which the Services are being run. This includes user performance over time (by recording the number of errors and actions users make during each playthrough), which specific errors or actions were made, the time users spend playing a task, whether users utilize built in accommodation features and if so, which ones and how many times. The game will keep a history of all this information from the various playthroughs so that each user may be compared to one another to determine growth or decline in regard to performance within the game. All tracked data is saved locally and is not shared outside of the device in a way that can be used to identify an individual.

Information We Collect Through Automatic Collection Technologies

Some information is automatically received and sometimes collected from schools or users when schools or users use the Services. Some of this information is collected only at certain times or in certain circumstances (for example, when using the website). This information may include information: (i) the name of the domain and host from which schools or users access the Internet, including the Internet protocol (IP) address of the device schools or users are using and the IP address; (ii) the type and version of Internet browser software or application schools or users use and operating system; (iii) the date and time schools or users access the Services; (iv) the length of schools or users stay on the Services; (v) information about the schools or users device, including the device's unique device identifier, mobile network information and device's telephone number; and (vi) demographic information and the languages used by the computer or mobile device. We may also collect general, non-identifying statistical information in connection with the use of the Services. With the possible exception of the IP address, this information is not personal information and cannot be used to individually identify users individually.

We use this information to monitor the usage of the Services, assess performance, ensure technological compatibility, and understand the relative importance of the information provided on the Services. We may also use this data to conduct statistical analyses on usage patterns.

The technologies we use for this automatic data collection may include cookies and similar technology such as a web-beacon (collectively, cookies), which are strings of information that can be stored on a user's device and is used to recognize the user upon return to the Services or this webpage. We use this type of technology to help us track how the Services is being used and interacted with, provide for preferences and improve service going forward. The cookies may be either session (only during the current session) and persistent (remains beyond current session). Visitors of the Website who do not wish to have cookies or similar technologies on their devices may opt out by either setting their privacy settings or choosing not to use the website or Services.

Do Not Track Requests and Signals

Do not track requests and signals are settings on some web browsers alerting websites that the visitor does not want to be tracked. Compliance with these requests and signals is optional and many websites do not follow these requests and signals. Along with many other websites, this website does not honor do not track requests or signals.

How we use and share information

We may disclose personal information that we collect or schools or users provide as described in this Notice in connection with the following:

- With our partners. MITTIN is a collaborative project between Michigan Association of Administrators of Special Education (MAASE), Michigan Council for Exceptional Children (MCEC), Great Lakes Reality Labs (GLRL) and Public Policy Associates (PPA). Information is sometimes shared among these entities in order to maintain, improve and provide the Services.
- To process, complete or otherwise act upon or respond to the schools or users request or reason for submitting that information.
- To register and/or verify the school or user in connection with Services.
- To communicate with the school or user about the request or reason for submitting the information.
- To provide additional information to the school or user about our Services.
- To contractors, service providers, and other third parties we use to support our business.
- To our subsidiaries, affiliates and advisors.

Sale and transfer of information to third parties.

We do not sell, lease or otherwise profit from the transfer of personal information to third parties. Except where we otherwise obtain express permission, we share personal information with third parties only under the limited circumstances stated below:

- With the school or district from which users are receiving an education.
- In response to judicial or other governmental subpoenas, warrants and court orders served on us in accordance with their terms, or as otherwise required by applicable law, including governmental oversight or reporting.
- To protect our respective rights or property, to enforce the provisions of this Notice and the Terms of Use, as well as to prevent harm to one or more individuals.
- If our respective businesses or assets thereof are sold or offered for sale to another company or person(s), either partially or as a whole if a petition for relief under the United States Bankruptcy Laws is filed by or against any one of us, or if any one of us becomes subject to an order of appointment of a trustee or receiver.
- If the school or user communicate with us, we will share the correspondence, with employees, volunteers, representatives or agents asked to address the correspondence.

Data security

MITTIN strives to employ reasonable security procedures to preserve privacy and to protect personal information. MITTIN will notify schools or users in the event it becomes aware of any unauthorized access to personal information.

User individual privacy rights

Some jurisdictions provide individuals with certain rights regarding their personal information. We honor applicable laws providing users with right or protections regarding a user's personal information. To exercise any individual rights provided for under applicable law, please write us at: 2425 E. Grand River Ave, Suite 1, Lansing, MI 48912 or email us at mittin.org. We may require users to verify their identity, and even provide additional information to help verify identity, before exercising individual rights.

Links to third-party websites and applications

If users click on links within the Services that take users to third-party websites or applications, users will be subject to the third parties' privacy policies. We are not responsible for the actions or accessibility of any third-party websites or applications. We encourage users to read the posted privacy policy of any and every website or application users visit. Any links within the Services are for convenience and do not constitute an endorsement unless otherwise specified.

Personal information about children

Our Services are intended to be used for educational purposes in association with an educational institution, in most circumstances, the user's school district. Under the Children's Online Privacy Protection Act (COPPA) and Family Educational Rights and Privacy Act (FERPA), the user's school district is required to consent to and provide users with more detailed information regarding the use of our Services. This is sometimes referred to as the *in parentis loci* or school administrator exception.

Users outside the United States

The data protection and other laws of the United States and other countries might not be as comprehensive as those in other countries. The Services is currently intended only for use within the United States and United States territories. By using the Services as well as communicating with a MITTIN users consent to personal information being transferred to our facilities (located within the United States) and to the facilities of those third parties with whom we share it as described in this Notice.

Changes to this notice

This Notice was last modified on the date first written above. If we change our Notice, except as noted in the preceding section, we will post those changes within the Services. Schools and users are responsible for periodically visiting this Notice to check for any updates.

Questions, comments and contact information

If schools and users have questions or concerns regarding our Notice, contact us at 2425 E. Grand River Ave, Suite 1, Lansing, MI 48912 or at mittin.org.