

## **Hero Privacy Policy (effective November 1, 2014)**

Hero K12 (“PlascoTrac”, “Hero” or “us” or “we”) is providing you with this Privacy Policy (“Privacy Policy”) because we understand that you are concerned about privacy and we are committed to protecting the privacy of persons who visit our Web site (“Visitors”), persons who register to use the Services, or otherwise use the Services, as defined below (“Customers”), and persons who register to attend our corporate events (“Attendees”). This Privacy Statement describes Hero K12’s privacy practices in relation to the use of our Web site and the related applications and services, including subscription services, offered by Hero (the “Services”).

It is our policy of to respect your privacy and the privacy of all users. We value the trust you place in us and we want to ensure that you understand what information we gather about users of our Web site, how we use it, and the safeguards we have in place to protect it.

By using our Web site, you agree that you have reviewed and understood our Privacy Policy to your full satisfaction, that you accept and are subject to this Privacy Policy, and we are permitted to collect and use user information as set forth below. This Privacy Policy applies to all personally identifiable information collected or submitted on our Web site.

### **1. Web site covered**

This Privacy Policy covers the information practices of our Web site that links to this Privacy Policy, including: <http://www.herok12.com> and all sub-domains such as: <http://access.heropowered.com>; <http://setup.heropowered.com>; <http://support.herok12.com>; (collectively referred to as “The Hero Web site” or “our Support site” or “our Web site”).

The Hero Web site may contain links to other Web sites. The information practices or the content of such other Web sites is governed by the privacy policies of such other Web sites. We encourage you to review the privacy policies of such other Web sites to understand their information practices.

## **2. Information we collect**

When expressing an interest in obtaining additional information about the Services or registering to use the Services, Hero requires you to provide us with personal contact information, such as name, school name, address, phone number, and email address (“Required Contact Information”). When purchasing subscriptions for the Services, we may require you to provide us with financial qualification and billing information, such as billing name and address, credit card number, and the number of employees within the organization that will be using the Services (“Billing Information”). Hero may also ask you to provide additional information, such as number of students, number of employees, or type of school/district (“Optional Information”). Required Contact Information, Billing Information, and Optional Information about Customers are referred to collectively as “Data About Hero Customers”, or in the case of Attendees, “Data About Hero Attendees”.

As you navigate our Web site, we may also collect information through the use of commonly-used information-gathering tools, such as cookies and Web beacons (“Web Site Navigational Information”). Web Site Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, and the actions you take on our Web site (such as the Web pages viewed and the links clicked).

## **3. Use of information collected**

We use Data About Our Customers to perform the Services requested. For example, if you fill out a “Contact Me” Web form, we will use the information provided to contact you about your interest in the Services.

We also use Data About Hero Attendees to plan and host corporate events, host online forums and social networks in which event attendees may participate, and to populate online profiles for Attendees on our Web site. Additional information on our privacy practices with respect to Data About Hero Attendees may be found in additional privacy policies on the event Web sites, as the case may be.

We may also use Data About Hero Customers and Data About Hero Attendees for marketing purposes. For example, we may use information you provide to contact you to further discuss your interest in the Services and to send you information regarding us, its affiliates, and its partners, such as information about promotions or events.

Hero uses Web Site Navigational Information to operate and improve our Web site. We may also use Web Site Navigational Information alone or in combination with Data About Hero Customers and Data About Hero Attendees to provide personalized information about Hero.

#### 4. Web Site Navigational Information

**Cookies, Web Beacons and IP Addresses.** Hero uses commonly-used information-gathering tools, such as cookies and Web beacons, to collect information as you navigate our Web site (“Web Site Navigational Information”). This section describes the types of Web Site Navigational Information used on our Web site and how this information may be used.

**Cookies.** Hero uses cookies to make interactions with our Web site easy and meaningful. When you visit our Web site, Hero’s servers send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself to Hero, either by responding to a promotional offer, opening an account, or filling out a Web form (such as a “Contact Us” or a “Free Trial” Web form), you remain anonymous to us.

Hero uses cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. Please note that if you disable your Web browser’s ability to accept cookies, you will be able to navigate our Web site, but you will not be able to successfully use the Services.

The following sets out how Hero currently uses or may use in the future different categories of cookies and your options for managing cookies’ settings:

Type of Cookies	Description	Managing Settings
Required cookies	Required cookies enable you to navigate our Web site and use its features, such as accessing secure areas of the Web site and using Hero Services.	Because required cookies are essential to operate our Web site and

	<p>If you have chosen to identify yourself to Hero, we use cookies containing encrypted information to allow us to uniquely identify you. Each time you log into the Services, a cookie containing an encrypted, unique identifier that is tied to your account is placed on your browser. These cookies allow us to uniquely identify you when you are logged into the Services and to process your online transactions and requests.</p>	<p>the Services, there is no option to opt out of these cookies.</p>
<p><b>Performance cookies</b></p>	<p>These cookies collect information about how Visitors use our Web site, including which pages visitors go to most often and if they receive error messages from certain pages. These cookies do not collect information that individually identifies a Visitor. All information these cookies collect is aggregated and anonymous. It is only used to improve how our Web site functions and performs.</p> <p>From time-to-time, Hero engages third parties to track and analyze usage and volume statistical information from individuals who visit our Web site. Hero may also utilize Flash cookies for these purposes.</p>	<p>To learn how to opt out of performance cookies using your browser settings <a href="#">click here</a>.</p> <p>To learn how to manage privacy and storage settings for Flash cookies <a href="#">click here</a>.</p>
<p><b>Functionality cookies</b></p>	<p>Functionality cookies allow our Web site to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of Hero’s Services after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize.</p>	<p>To learn how to opt out of functionality cookies using your browser settings <a href="#">click here</a>. Note that opting out may impact the functionality you receive when visiting</p>

	<p>Hero uses local shared objects, also known as Flash cookies, to store your preferences or display content based upon what you view on our Web site to personalize your visit.</p>	<p>Hero.</p> <p>To learn how to manage privacy and storage settings for Flash cookies <a href="#">click here</a>.</p>
<p><b>Targeting or Advertising cookies</b></p>	<p>From time-to-time, Hero may engage third parties to track and analyze usage and volume statistical information from individuals who visit our Web site. Hero sometimes uses cookies delivered by third parties to track the performance of our advertisements. For example, these cookies remember which browsers have visited our Web site. The information provided to third parties does not include personal information, but we may re-associate this information with personal information after we receive it.</p> <p>Hero also contracts with third-party advertising networks that collect IP addresses and other information from Web beacons (see below) on our Web site, from emails, and on third-party Web site. Ad networks follow your online activities over time by collecting Web Site Navigational Information through automated means, including through the use of cookies. They use this information to provide advertisements about products and services tailored to your interests. You may see these advertisements on other Web site. This process also helps us manage and track the effectiveness of our marketing efforts.</p> <p>Third parties, with whom we partner to provide certain features on our Web site or to display advertising based upon your Web</p>	<p>To learn more about these and other advertising networks and their opt-out instructions, click <a href="#">here</a> and <a href="#">here</a>.</p> <p>To learn how to manage privacy and storage settings for Flash cookies <a href="#">click here</a>.</p>

	browsing activity, use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored.	
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**Web Beacons.** Hero uses Web beacons alone or in conjunction with cookies to compile information about Customers and Visitors’ usage of our Web site and interaction with emails from us. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Web site tied to the Web beacon, and a description of a Web site tied to the Web beacon. For example, Hero may place Web beacons in marketing emails that notify us when you click on a link in the email that directs you to our Web site. Hero uses Web beacons to operate and improve our Web site and email communications.

**IP Addresses.** When you visit our Web site, we collect your Internet Protocol (“IP”) addresses to track and aggregate non-personal information. For example, Hero uses IP addresses to monitor the regions from which Customers and Visitors navigate our Web site.

Hero also collects IP addresses from Customers when they log into the Services as part of our “Identity Confirmation” and may collect them in connection with our “IP Range Restrictions” security features.

## 5. Public forums, referrals, and customer testimonials

Hero may provide bulletin boards, blogs, or chat rooms on our Web site. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. PlascoTrac is not responsible for the personal information you choose to submit in these forums.

Customers and Visitors may elect to use our referral program to inform friends about our Web site. When using the referral program, we request the friend’s name and email address. Hero will automatically send the friend a one-time email inviting him or her to visit our Web site. Hero does not store this information.

PlascoTrac may post a list of Customers, testimonials and video testimonials on our Web site that contain information such as Customer names and titles. PlascoTrac obtains the consent of each Customer prior to posting any information on such a list or posting testimonials.

## **6. Sharing of information collected**

**Service Providers.** We may share Data About Hero Customers and Data About Hero Attendees with our contracted service providers, such as our cloud services providers and developers so that these service providers can provide services on our behalf. Hero may also share Data About Hero Customers with our service providers to ensure the quality of information provided. Unless otherwise described in this Privacy Policy, we do not share, sell, rent, or trade any information with third parties for their promotional purposes.

**Hero Affiliates.** We may share Data About Hero Customers with affiliates of the Plasco ID companies. For example, we may need to share Data About Hero Customers for customer relationship management purposes.

**Business Partners.** From time to time, Hero may partner with other third party companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service from Hero, we may share Data About Hero Customers collected in connection with your purchase or expression of interest with our joint promotion partner(s). Hero does not control our business partners' use of the Data About Hero Customers we collect, and their use of the information will be in accordance with their own privacy policies. If you do not wish for your information to be shared in this manner, you may opt not to purchase or specifically express interest in a jointly offered product or service.

Hero does not share Data About Hero Attendees with business partners unless: (1) you specifically opt in to such sharing via an event registration form; or (2) you attend one of our events and have your attendee badge scanned by a business partner. If you do not wish for your information to be shared in this manner, you may choose not to opt in via event registration forms and elect not to have your badge scanned at our events. If you choose to share your information with business partners in the manners described above, your information will be subject to the business partners' respective privacy policies.

**Billing.** Hero uses a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use Billing Information except for the sole purpose of credit card processing on our behalf.

**Compelled Disclosure.** Hero reserves the right to use or disclose information provided if required by law or if we reasonably believes that use or disclosure is necessary to protect the rights, property, or safety of Hero or others and/or to comply with law, a judicial proceeding, court order, or legal process.

**Sale of Business.** If Hero is sold or disposed of as a going concern, whether by merger, sale of assets, sale of equity, change of control, or otherwise, your information collected by us, including any related database of Hero, could, in whole or in part, be sold as part of that transaction. In the event Hero goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personal information will likely be among the assets transferred.

## **7 Communications preferences**

Hero offers Visitors, Customers, and Attendees who provide contact information a means to choose how we use the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the “update information” or by clicking on the “unsubscribe” links located on the bottom of our marketing emails. Additionally, you may send a request specifying your communications preferences to [marketing@herok12.com](mailto:marketing@herok12.com). Customers cannot opt out of receiving transactional emails related to their account with Hero or the Services.

## **8. Correcting and updating your information**

Customers may update or change their registration information by editing their user or organization record. To update a user profile, please login to <http://access.heropowered.com> with your Hero username and password and click “Setup.” To update an organization’s information, please login to <http://setup.heropowered.com> with your Hero username and password and select “Organization Setup.” To update Billing Information or have your registration information deleted, please email [support@herok12.com](mailto:support@herok12.com) or call (800) 396-1615. To discontinue your account and to have information you maintained in the Services returned to you, please email [support@herok12.com](mailto:support@herok12.com) or call (800) 396-1615. Requests to access, change, or delete your information will be handled within 30 days.



## **9. Customer Data**

Hero Customers may electronically submit data or information to the Services for hosting and processing purposes (“Customer Service Data”). Hero will not review, share, distribute, or reference any such Customer Service Data except as provided in the Hero subscription agreement or other written agreement, or as may be required by law. In accordance with the Hero subscription agreement or other written agreement, PlascoTrac, and its service providers under limited circumstances, may access Customer Service Data only for the purpose of providing the Services, preventing or addressing service or technical problems, at a Customer’s request in connection with customer support matters, or as may be required by law.

## **10. Security**

Hero uses robust security measures to protect Customer Service Data from unauthorized access, maintain data accuracy, and help ensure the appropriate use of Customer Service Data. When the Services are accessed using Internet Explorer version 7.0 or later, Firefox version 2.0 or later, or Safari version 3.0 or later, Secure Socket Layer (.SSL.) technology protects Customer Service Data using both server authentication and data encryption. These technologies help us provide that Customer Service Data is safe, secure, and only available to the Customer to whom the information belongs and those to whom the Customer has granted access. Hero also implements a security method based on dynamic data and encoded session identifications, and Hero hosts its Web site in a secure server environment that uses firewalls, intrusion detection systems, and other technology to prevent interference or access from outside intruders. Hero also offers additional security features within the Services that permit Customers to configure security settings to the level they deem necessary. Customers are responsible for maintaining the security and confidentiality of their Hero usernames and passwords.

Because we use the Services to maintain Data About Hero Customers and Data About Hero Attendees, this information, which is stored in the Services, is secured in the same manner as described above for Customer Service Data.

Keep in mind however, that no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

We cannot enforce or control the security of the computers, electronic devices, or electronic communication method that a user may utilize to send e-mails and submit information to us over the Internet. Users are responsible for ensuring that the computers, electronic devices and electronic communication methods users utilize will provide adequate security for communicating with us. To protect user privacy and security, a Web site user must keep his or her password confidential. We are not responsible for the disclosure or interception of your information before we receive it.

## **11. Changes to this Privacy Policy**

PlascoTrac reserves the right to change this Privacy Policy. If our information practices change at some time in the future, we will post the Privacy Policy changes to our Web site to notify you of these changes and provide you with the ability to opt out of these new uses. We will provide notification of the material changes to this Privacy Policy through our Web site at least thirty (30) business days prior to the change taking effect. Any revised Privacy Policy will only apply prospectively to personal information or non-personal information collected or modified after the effective date of the revised policy. You should periodically review the Privacy Policy available at our Web site for revisions. Use of our Web site after revision of the Privacy Policy signifies your consent to the revised Privacy Policy. This policy statement was last updated November 2014.

## **12. How to Contact Us**

Questions regarding this Privacy Statement or the information practices of our Web site should be [directed here](#) or by mail:

Hero K12 Privacy at 15675 NW 15th Avenue - Suite A, Miami, FL 33169