Breezin' Thru Inc.

Privacy Policy & Terms of Service

1. Who We Are

Breezin' Thru Inc. provides two online programs for learning music theory and composition, Breezin' Thru Theory and Breezin' Thru Composing. Breezin' Thru Inc. is committed to protecting your privacy and providing a safe online experience for all. The websites, BreezinThru.com, BreezinThruTheory.com and BreezinThruComposing.com are owned and operated by Breezin' Thru Inc.

2. Breezin' Thru Student Records and Assessment

Breezin' Thru Theory's auto assessed drills are a formative type of assessment. Students are encouraged to try again until they have 100% before they submit results. It's all about drill and practice, and that is the only data we collect.

We separately provide printable summative & diagnostic tests for teachers to use and administer to their students, but **no data on** summative/diagnostic assessment is ever collected or stored by us.

3. Privacy

- a. Breezin' Thru does not collect or store student email addresses, phone numbers, or other personal or sensitive information.
- b. For students 13 and older, if a teacher selects to use the Access ID option, they may also select a setting that allows students to activate and retrieve their ID with an email address. These email addresses are NOT stored by Breezin' Thru, and under no circumstances is data of any kind shared with any third party.

4. Login Process

All school purchases come directly from the school, teacher or district representative. We do NOT have any contact with students.

- a. Teachers and students access Breezin' Thru via our website.
- b. Teachers can choose from the following options for logging in: SSO with Google Classroom, Rostering with Clever, or Breezin' Thru's regular login system.
- c. For the Breezin' Thru's Login Option:
 - i. We create and provide teachers with 2 login codes. One that is used only by the teacher(s) and another one that is universal and used by all students.
 - ii. Teachers set up "course names" so that when students go to login into Breezin' Thru, they enter the universal "Breezin' Thru" student login, and choose a class name which has been set up by the
 - iii. teacher.
 - iv. If the district policy does not want student names to be used, teachers can direct students to use numbers or aliases. They can also select the setting that directs students to have an Access ID created.
 - v. Student Access IDs are set up the first time students log in and do not require an email address. They can be retrieved if forgotten, by the teacher.
 - vi. Teachers however, may select the option to have students aged 13 and older, use their email address to retrieve their access ID. Student email addresses are never stored by Breezin' Thru.
 - vii. Student drill results are housed on our secure server and not shared with any third party.

5. Terms of Service

Breezin' Thru® will be used under the following conditions:

- 1. The student log in code is used solely by the institution's subscribing students.
- 2. Subscribing students may access and use it per the description outlined in the plan purchased by the institution as indicated on the invoice.
- 3. Teachers can access the resources at any time for lesson prep and student tracking.
- 4. Teachers may not share the teacher access code with any student and must keep it secure.
- 5. Permission is not granted to post files or login information on a public website.
- 6. Permission is not granted to reproduce or use any materials after the subscription end date.
- 7. All Breezin' Thru subscriptions are annual in nature. These subscriptions cover the school year from July 1 through to June 30, regardless of when a school starts and how much it is used.
- 8. Once access has been sent there are no refunds.

6. Institutional Teacher and User Collected Data

Breezin' Thru Inc. collects and stores the following teacher which is used to provide support and notifications of upgrades, events and renewals.

- 1. Teacher or User First and Last Name
- 2. Email address
- 3. School Name and Address.
- 4. School Phone Number

7. Individual Homeschool User Collected Data

Breezin' Thru Inc. collects and stores the following for Homeschool personal accounts. The user must agree that an adult or person over the age of 13 is providing the information.

- 1. Homeschool User First and Last Name
- 2. Email address
- 3. Mailing Address,
- 4. Phone Number

8. Data Storage

Breezin' Thru Inc. has a secure, dedicated managed server hosted at Host Papa in Burlington ON Canada. All data is encrypted in transit. The student-identifying data we store is minimal and is encrypted in transit and at rest utilizing a multi-layered security approach, including SSL encryption, DDoS protection and Web Application Firewalls (WAF). It is backed up daily as a preventative measure should the unlikely event of a disruption and data loss occur.

9. Incident Protocol

Our system is monitored 24/7 for outages and potential data breaches. In the unlikely event that a data breach with unauthorized disclosure of sensitive data occurs, we will take immediate action to prevent or mitigate such disclosure. The following security incident plan is as follows:

- 1. If, and as soon as Breezin' Thru Inc. becomes aware of any issue that could result in the unauthorized disclosure of sensitive data, we will immediately take any actions possible to prevent or mitigate the disclosure.
- 2. Once our initial preventative actions are implemented, Breezin' Thru will then assess the Security Incident and determine if there was a confirmed Security Breach, defined as a confirmed unauthorized disclosure of sensitive data. If there was a Security Breach, we will assess what data was disclosed and to whom.
- 3. In the case of a Security Breach, affected users and Data Owners will, as soon as possible, be notified of the details of the disclosure.
- **4.** After notification, Breezin' Thru will work to address any security vulnerabilities illuminated by the incident to prevent future incidents.