

VALID UNTIL 10/23/2025

Privacy Policy

At HappyNumbers.com, we highly value your privacy and data protection rights. We acknowledge the significance of safeguarding the personal data we collect and process. This Privacy Policy aims to provide a clear understanding of the personal information we collect and how we use it.

In the Privacy Policy and the Terms of Service, the term “Happy Numbers” (“Company,” “we,” “us,” “our”) refers to all websites (including www.happynumbers.com, happynumbers.com/blog), applications, their features, and content we offer. The services we provide and the information collected are managed by Happy Numbers Inc., a company incorporated under the laws of the state of Delaware, located at 2261 Market Street STE 22178, San Francisco, CA 94114, USA.

By using HappyNumbers.com, you expressly consent to the practices and policies outlined in our Privacy policy. Please note that your use of our services is always subject to our Terms of Service which includes this Privacy Policy.

Date of issue of this Privacy Policy: 05.04.2017

Last updated: 10/15/2024

1. Purpose and Scope

This Privacy Policy addresses our approach to processing your Personal Information. Personal Information includes information that can be used to distinguish or trace an individual’s identity directly or indirectly through linkages with other information.

This Privacy Policy applies to you if you interact with our websites, share your Personal Information with us voluntarily, or receive communications from us. At HappyNumbers.com, we only collect Personal Information we need to ensure that our website works smoothly and efficiently for you.

We collect your Personal Information to ensure you or your child can access, use, and quickly navigate HappyNumbers.com.

2. Personal Information We Collect

The sources of Personal Information we collect can be generally divided into three categories:

- Personal Information you provide to us directly;
- Personal Information about you that we get from third parties, including public records, teachers, district or school officials;
- Information we collect using cookies.

We collect your Personal Information when you create an account on our websites, subscribe to our newsletter, respond to our website surveys, receive product updates, send us an email, or otherwise contact us.

The Personal Information we process includes a child's first/last name, the user's (parent's or teacher's) e-mail, the user's (parent's or teacher's) name, the child's grade level, school, school address (or any other preferred mailing address for communications with school and teachers), the teacher's telephone number, username, password, data on students' performance, and IP address.

District and school officials may provide a child's first/last name, child's grade level, teacher's name, and e-mails, as well as the school, to monitor progress and identify students. Personal Information disclosed to us by districts and schools may be subject to additional regulation and protection measures set in the agreements signed with such districts and schools.

We don't claim ownership over your data and won't exploit it for unrelated marketing endeavors. Additionally, we uphold strict guidelines regarding children's data, refraining from collecting additional Personal Information from them or using your data to market products to minors.

3. Automatic Information

We may automatically collect some information about you and your device when you use HappyNumbers.com, regardless of whether you created an account or just browsing our websites. In this case, Happy Numbers will collect the information through technology such as cookies. The information may include your IP address, type of web browser software, operating system type, and data about your usage (login times, buttons you click on, pages you viewed, etc.). This information is necessary for the operation of the websites, and it also helps us customize your user experience and boost the functionality and user-friendliness of HappyNumbers.com.

4. Use of Cookies and Web Beacons

Like many other websites, HappyNumbers.com uses Cookies to collect information such as your IP address, type of web browser software, operating system type, and data about your usage (login times, buttons you click on, pages you viewed, etc.). When we do so, we process your personal information in compliance with our Privacy Policy.

Cookies are small data files transferred to your computer's hard disk to memorize information like logins and passwords. A cookie typically contains the name of the domain from which it originated, its "lifetime," and a value, usually a randomly generated unique number.

We use both necessary and functionality cookies for the purposes set out below.

Necessary cookies are essential to provide website services and enable core features. They help to authenticate users and prevent fraudulent use of user accounts. Without these cookies, the services you have requested might not be provided, and we only use these cookies to provide you with essential services.

Happy Numbers may use functionality cookies to enable certain features of HappyNumbers.com, speed up and improve user interaction, and remember your choices on our websites.

Please note that you can always choose not to receive a cookie file by enabling your web browser to reject cookies. To do so, you must access the settings menu in your browser's menu bar and search for the term "cookies." Please note that rejecting or deleting cookies might affect certain functions of HappyNumbers.com or all functionality of the services.

Happy Numbers may also collect certain information using web beacons. Web beacons are electronic images that may be used on HappyNumbers.com or in our email communications with parents, teachers, and school officials. They tell us if an email has been opened and acted upon.

If you turn off cookies on your device, we may not be able to provide specific services and support.

5. How We Use Personal Information We Collect

We use the Personal Information for the following purposes:

- To create and manage your account;
- To provide you with Services and information you requested;
- To respond to your requests;
- To personalize your experience;
- To provide support and improve customer service;
- To respond to your questions and comments;
- To send periodic emails with a summary of the activity in your account; if at any time you would like to unsubscribe from receiving any future emails, we provide you with detailed unsubscribe instructions at the bottom of each email;
- To perform security measures and prevent fraud and any potentially prohibited or illegal activities;
- To enforce Terms of Service;
- To meet our legal obligations under applicable laws, such as protecting your rights and privacy.

6. How We Protect Personal Information

Happy Numbers Inc. maintains administrative, technical, and physical safeguards that equal industry best practices, including, but not necessarily limited to, disk encryption, file encryption, firewalls, and password protection. We use encryption technology to protect data in motion and at rest from unauthorized disclosure.

Administrative and Operational Safeguards we use to protect your Personal Information:

Minimizing the Use, Collection, and Retention of Personal Information: We store the minimum information required for the proper functioning of our services. We collect minimum information from single sign-on (SSO) systems such as ClassLink and Clever.

Anonymizing Information: We use a unique tool to prepare databases for test and development environments with complete anonymization of Personal Information. Developers and QA engineers cannot access real personal data throughout the development lifecycle.

Access Enforcement: All employees have personal auditable accounts in all our systems. We use Single Sign-On to grant access to all internal systems. Critical applications, such as the admin panel, have role-based access control for different access levels.

Separation of Duties: We adhere to the principle of minimizing access, which means that, for instance, a content manager can access the BI system with de-identified student problem-solving logs, but they do not have access to the admin panel with Personal Information.

Least Privilege: Our internal systems use a role-based access control model to grant each employee the minimum required access level.

Remote Access: All communication with our servers and systems is encrypted using battle-tested protocols, such as enforced HTTPS with TLS 1.2, SSH, and OpenVPN.

Auditable Events: We collect all change events in our SSO system and admin panel and store them in a database without making any modifications.

Protection of Information at Rest: We store our backups in AWS S3 using the pgBackRest tool with AES-256-CBC encryption. Furthermore, our application servers transparently encrypt Personal Information using a symmetric cipher before storing it in an encrypted database.

Data Backup and Recovery: We continuously back up all production PostgreSQL databases using the pgBackRest tool and retain data for 30 days, including four weekly full backups.

Change Management: Our infrastructure is entirely managed by Infrastructure as Code (IaaS) tools, including a custom in-house CLI tool, Terraform, and Ansible. This means that all the changes can be reviewed through standard development procedures and stored in GitHub.

Password Guidelines

We strive to ensure that your experience with Happy Numbers is one of utmost security and confidence. Your Personal Information is kept safe with a strong password. To ensure no one unauthorized gets into your account or accesses your Personal Information, you should choose a strong password, be careful about who has access to your computer and browser, and always remember to sign off when you are done using your account.

What we will do in case of a data breach

In the event that we become aware of an unauthorized disclosure or data breach:

The district, school officials, and teachers will be notified within 24 hours by email if the teacher account or any related student accounts are affected. The appropriate person in the school or school district who has

purchased the valid school-wide or district-wide Happy Numbers access will be notified by phone. The notification will include the date of the breach, the types of information that were subject to the breach, a general description of what occurred, and steps we are taking to address the breach.

7. Disclosure of Information to Third Parties

We value and protect your Personal Information and your child's Personal Information. We do not sell, trade, rent, or otherwise transfer your Personal Information to unauthorized third parties. Also, we do not share your Personal Information with third parties for marketing purposes.

The subcontractors we may collaborate with to share Personal Information for specified purposes include:

Subcontractors	URL	Purpose
Google Cloud	https://cloud.google.com/	Data storage (USA)
Amazon AWS	https://aws.amazon.com/	Web hosting (USA)
Clever SSO rostering	https://clever.com/	Student rostering (USA)
ClassLink SSO rostering	https://classlink.com/	Student rostering (USA)
Intercom	https://app.intercom.com/	Customer support (USA)
Stripe, Inc.	https://stripe.com/	Payment processing (USA)

To ensure the due course of business, we may disclose Personal Information to our affiliates. Such disclosure is strictly limited to facilitating internal operations, such as data processing, customer support, and improvement of our products and services. Rest assured, any such disclosure is subject to the same level of protection and confidentiality as outlined in this Privacy Policy. We do not authorize our affiliates to use your Personal Information for their own marketing purposes without your explicit consent.

At Happy Numbers Inc., we work with subcontractors to help ensure that all parties follow data protection regulations and standards, such as FERPA, COPPA, CCPA, New York Education Law §3012-c, and New York State Education Law §2-d. We carefully review our subcontractors' terms of service and privacy policies, and if necessary, we will also sign additional agreements and NDAs to make sure everyone is on the same page. Our goal is to maintain strong relationships and compliance with all relevant laws and regulations.

If you have any concerns regarding the privacy of your information and how our subcontractors handle it on our behalf, please feel free to contact Happy Numbers using the contact information provided at the bottom of this page. We will be happy to address any inquiries you may have.

In certain circumstances, we may need to share your Personal Information with third parties for the following reasons:

- We have obtained your consent to share your Personal Information;
- To comply with applicable laws and legal requests if we are legally obliged to respond to subpoenas, court orders, or legal processes;
- If we believe, after careful consideration, that it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, emergencies with potential threats to the data security, violations of Happy Numbers' Terms of Service, or as otherwise regulated by law.

Anonymized Data

We may generate aggregated, de-identified, or anonymized data from Personal Information by eradicating any information with personal identifiers that may lead to an individual being identified ("Anonymized Data").

Happy Numbers may use and share this data with trusted third parties to analyze trends, enhance services, and improve security measures against online threats like phishing and malware. Rest assured, we will always make sure that your identity remains protected when sharing this data.

Business Transfer

We may transfer or otherwise share your Personal Information in connection with due diligence, merger, acquisition, reorganization, or sale of assets. Your consent to this Privacy Policy, followed by your submission of Personal Information, represents your explicit agreement to the transfer.

8. Your Rights

You have the right to inspect and review your Personal Information, request that your Personal Information be corrected, and file a complaint. If you wish to exercise any of these rights, don't hesitate to contact us using the information at the bottom of the page. Please note that to fulfill your request, we may need to obtain further information and documentation, including Personal Information, to confirm your identity and handle your request accordingly. Any additional information provided will be securely stored for legal purposes, specifically as evidence of the individual who submitted the request.

You may review, correct, update, or change your Personal Information anytime by accessing your Happy Numbers.com account. If you would like us to delete your account and your Personal Information from our system, please contact us using the information at the bottom of this page, and we will fulfill your request if we do not have any legal obligation to retain the record.

We store your Personal Information as long as it is necessary to provide the Services. Personal Information linked to your account will be retained until you decide to delete your account or until we no longer require the data to offer our Services.

As soon as the Services are no longer in use by the district or school, we will:

- By default, we will delete all Personal Information, including the back-ups we and our trusted third parties hold, within 60 days after June 30th of the current calendar year;
- Upon request, we will delete any Personal Information within 7 business days from our website and within 30 days from our trusted third parties.

Upon request by the school or district, we can transfer any children's Personal Information to the school, district, or their designated third party.

9. Links to Other Sites

If any section of Happy Numbers contains links to external websites, please note that these websites are not subject to our Privacy Policy. Should you decide to click on a link leading to a third-party website, you will be redirected to that particular website. It is essential to understand that we do not have authority over these third-party websites. We advise you to review their privacy statements to gain a better understanding of their practices regarding the collection, usage, and disclosure of Personal Information.

10. Our Policy Towards Minors

This notice is provided to inform parents, guardians, and educators about our compliance with the Children's Online Privacy Protection Act (COPPA) and the Family Educational Rights and Privacy Act (FERPA). It's our top priority to protect the privacy of children who visit our website. Plus, we are proud to say that we've been awarded the iKeepSafe California Student Privacy Badge for our commitment to protecting your children's privacy.

We truly value the protection of children's Personal Information. We do not knowingly collect any personally identifiable information from children under the age of 13 without obtaining verifiable consent

from their parents or guardians. If we discover that we have collected Personal Information from a child without parental consent, we will promptly delete the information.

We assure you that we value the privacy of student records and will not use any personally identifiable information for targeted advertising purposes. Furthermore, we will strictly adhere to our Privacy Policy and Terms of Service, using the student record information solely for necessary or explicitly authorized purposes.

Parental Consent:

Before children can provide any Personal Information on our website, we require verifiable consent from their parents or guardians. We notify and get consent from parents/guardians to collect and use children's data. We follow the necessary steps to confirm parental consent to set up full accounts. If an organization, school, or district obtains the license to use HappyNumbers.com, alternate verification methods may be used, or the school or district may grant consent.

Parental Rights:

Parents or guardians have the right to review, delete, or refuse further collection or use of their child's Personal Information. They can also request access to any Personal Information we have collected about their child and have it deleted from our records. To exercise these rights, please get in touch with us using the information provided at the end of this Privacy Policy.

11. CCPA Notice

This CCPA Notice for Data Privacy Policy ("Notice") is provided by Happy Numbers Inc. ("we," "us," or "our") to inform you about the collection, use, and disclosure of personal information as required by the California Consumer Privacy Act ("CCPA"). This Notice is intended for individuals residing in California who utilize our website applications or engage in our offered activities.

11.1. Personal Information We Collect:

In the last 12 months, we collected the following categories of Personal Information from our users (as described in Section 2 of our Privacy Policy):

- Identifiers (such as the child's first/last name, the user's (parent's or teacher's) e-mail, the user's (parent's or teacher's, the child's grade level, school, school address, username, password), teacher's telephone number;
- Internet or other electronic network activity information (such as browsing history, IP address);
- Inferences drawn from personal information (such as user preferences);
- Education information regarding the child's grade level;
- Data on students' performance.

11.2. Purpose of Collection:

In the last 12 months, we used the Personal Information we collected for the purposes described in Section 5 of our Privacy Policy.

11.3. Disclosure of Personal Information:

In the last 12 months, we disclosed the personal information we collected to the recipients in the way described in Section 7 of our Privacy Policy.

11.4. Your CCPA Rights:

As a California resident, you have the following rights under the CCPA:

- Right to know: You have the right to request information about Personal Information we may collect, use, and disclose;
- Right to delete: You have the right to request the deletion of your Personal Information;
- Right to opt-out: You have the right to opt out of the sale of your Personal Information. We do not sell personal data of California residents under 18 years old without their opt-in authorization or their parent/guardian's authorization. Opted-in residents can opt out of future sales at any time;
- Right to non-discrimination: We will not discriminate against you for exercising your CCPA rights.

11.5. FERPA and COPPA Compliance:

In addition to CCPA, we comply with the Family Educational Rights and Privacy Act (FERPA) and the Children's Online Privacy Protection Act (COPPA). We take appropriate measures to protect the privacy and security of personal information collected from children under the age of 13 by COPPA requirements. For educational records protected under FERPA, we ensure compliance with the applicable regulations.

11.6. Contact Us:

If you have any questions or concerns regarding our data privacy practices or wish to exercise your CCPA rights, please get in touch with us at:

Happy Numbers Inc.,

2261 Market Street STE 22178

San Francisco, CA 94114

USA

support@happynumbers.com

Phone: +1-800-815-1574

Fax: +1-650-618-8611

Please note that we may require certain information to verify your identity before processing your requests.

We reserve the right to update or modify this CCPA Notice for Data Privacy Policy at any time. Any changes will be posted on our website with the updated effective date.

12. Changes to the Privacy Policy

This Policy may undergo amendments periodically. If any modifications are made to Privacy Policy, we will take the following actions:

- We will update Privacy Policy issue date and place an updated version on this page;
- We will also place an announcement on happynumbers.com for 2 weeks starting from the date of Privacy Policy issue date.

If the changes to Privacy Policy involve the collection of new or additional data, if they reduce the previously mentioned protections regarding student data privacy, or if any other material change in the collection, use, or disclosure practices occurs, we will inform the appropriate person in the school or school district who has purchased valid school-wide or district-wide Happy Numbers access in advance.

13. Jurisdiction and Applicable Law

This Policy and all matters arising out of or related to this Policy shall be governed by the substantive laws of the State of California, USA.

14. Contact Us

If you have any questions or suggestions about this Privacy Policy or your Personal Information, we kindly request you to contact us using the information provided below:

Happy Numbers Inc.,

2261 Market Street STE 22178

San Francisco, CA 94114

USA

support@happynumbers.com

Phone: +1-800-815-1574

Fax: +1-650-618-8611