

Privacy Pledge

Effective as of November 12, 2004

Turnitin is the educational division of iParadigms, LLC, a company that, as a part of its services, must collect and store specific, private information from its users. As such, Turnitin adheres to the privacy principles enforced at all iParadigms, LLC web sites.

Your privacy is important to us. To better protect your privacy we provide this Privacy Pledge explaining our online information practices and the choices you can make about the way your personal information is collected and used. This Privacy Pledge applies to all personally identifiable information collected or submitted on the Turnitin.com web site (the "Site"). To make this Privacy Pledge easy to find, we make it available on our homepage and at every point where personally identifiable information may be requested. Although this Site provides links to third-party web sites, they are not covered by this Privacy Pledge. Turnitin assumes no responsibility for the privacy or security of information you provide to any third party through linked web sites or any other means.

By using this Site, you agree that you have reviewed and understood our Usage Policy and this Privacy Pledge to your full satisfaction, that you accept and are subject to our Usage Policy and this Privacy Pledge, and that Turnitin is permitted to use your personal information as set forth below.

1. Personal Information

Registration

Personal information is requested for registration to our service for the following purposes:

1. To verify the identity of a registrant in relation to their authority to register a specific academic institution.
2. To obtain the most complete contact information for administration of the registrant's account.
3. To inform the registrant of changes in Turnitin's functionality, Turnitin's auxiliary services, and Turnitin's promotions.

Trial

Personal information is requested for trial use of our service for the following purposes:

1. To inform the trial user of changes in Turnitin's functionality, Turnitin's auxiliary services, and Turnitin's promotions.

2. To request trial user's evaluation and recommendations for the Turnitin service.

Paper Submission

Personal information is requested for access to our paper submission web pages for the following purposes:

1. To identify the individual connected to any uploaded manuscript.
2. To provide receipt and confirmation of successful text uploads.

The type of information we request is connected to the above-noted purposes. For example, we collect contact information such as name, IP address, physical address, telephone number, and email address for a registered user in order to facilitate use of the Turnitin service and facilitate customer relations. In addition to the specific uses noted above, Turnitin also uses your personal information to process your requests and transactions, offer or furnish additional products and services, personalize the types of information you receive from Turnitin, assess trends in the use of our Site or purchases of products or services, facilitate market research and statistical studies, develop content and functionality that helps us serve our customers' needs, and improve the service and products we provide. Turnitin may also use your personal information to prevent harm or injury, to prevent fraud, to protect our legal interests, to comply with or respond to legal process, and to comply with applicable laws.

Access to personal information by third parties will only occur via signed or electronic consent by registered users as stated in our registration agreement. This approval includes, but is not limited to, one registered user allowing Turnitin to provide his or her contact information to another registered user for document source analysis tracking. For example, if material uploaded to our database matches material from a later upload, contact information related to the former is given to the latter upload's registered user for follow-up. As we continue to develop our business, we might sell or buy businesses or assets, or Turnitin might be acquired by another company. In any of those circumstances, personal information in our databases may be included among the transferred assets.

2. Cookies

When you visit the Site, we may place a "cookie," a small computer file containing information about the user, on your computer to help us recognize and serve you better when you return. Usage of a cookie is in no way linked to personally identifiable information while on our Site. Once you close your browser, the cookie simply terminates. For instance, by setting a cookie on our Site, you would not have to log in a password more than once, thereby saving time while on our Site. If you reject the cookie, you may still use our Site. The only drawback to this is that you will be limited in some areas of our Site. Cookies also enable us to

track and target the interests of our users to enhance the experience on our Site. Some of our business partners use cookies on our Site (e.g., advertisers). However, we have no access to or control over these cookies.

3. Choice

When you provide personally identifiable information to us, you will be able to choose whether we may disclose such information in a personally identifiable form to a third party or whether the information may be used in personally identifiable form for purposes different from the purposes for which it was originally collected or that you have subsequently authorized.

You will have the opportunity to opt-out of receiving communications from us when we first request your personal information. You can also opt out of receiving further communications from us by sending an e-mail to optout@turnitin.com.

You can request removal of your personally identifiable information from our databases by contacting us as noted in Section 12 (Notices) below. To honor your request, we will need the exact information you want removed, and information sufficient for us to identify the type of communication you received from us.

4. Transfer to Unrelated Third Parties

If we transfer personally identifiable information to a third party that is acting as our agent, we will require that the third party agree to confidentiality requirements.

5. Access or Change Your Personal Information

You can access, correct, amend, or delete the personal information that you have provided us at any time via this Site by following these steps:

1. Log in to your account using your user name and password.
2. Click the “user info” link on the navigation bar to open your user profile and view, correct, amend or delete personal information.

6. Security

We have physical, electronic, and procedural safeguards to protect personal information we collect online, including the use of passwords to gain access to your personal information. To protect your privacy and security, you must keep your password confidential. However, even with such measures, no one is able to guarantee that unauthorized third parties will not be able to bypass these measures or otherwise capture information you provide over the Internet.

7. Data Integrity

We will take reasonable steps to see that the personal information in our systems is relevant for its intended use, accurate, complete, and current.

8. Children's Privacy

Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information at our Site from those we actually know are under the age of 13, and no part of our Site is structured to attract anyone under the age of 13. If it comes to our attention that we have received personally identifiable information from children under the age of 13, we will dispose of the information.

9. Enforcement

Turnitin will conduct periodic reviews of compliance to verify that this Privacy Pledge is accurate, comprehensive, prominently displayed, complete, implemented, and accessible. Any employee who violates this Privacy Pledge may be subject to disciplinary action.

If you feel that Turnitin is not abiding by this Privacy Pledge, you should contact Turnitin as noted in Section 12 (Notices) below. If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you should then contact the BBBOnLine at info@oakland.bbb.org. BBBOnLine will then serve as a liaison with Turnitin to resolve your concerns.

10. Special Rules Applicable to Data Collected or Processed in the European Union

This Privacy Pledge applies to all personally identifiable data that is subject to the European Union's Data Protection Directive 95/46 EC and that is transferred to the United States, even if not collected at this Site. Turnitin has enrolled in the Safe Harbor System established by the U.S. Department of Commerce to meet the requirements of the European Commission's Directive on Data Protection.

Onward transfers will be permitted only to other persons or entities who have agreed to provide a continuing adequate level of protection through participation in the Safe Harbor program or one of the other means permitted under EU Directive 95/46 EC and implementing Member State laws.

If you have any concern or complaint regarding Turnitin's compliance with the Safe Harbor Principles, please contact Turnitin as noted in Section 12 (Notices) below. Turnitin will investigate your concern or complaint and will attempt to resolve the matter with you. If you do not receive acknowledgment of your inquiry

or your inquiry has not been satisfactorily addressed, you should then contact the BBBOnLine at info@oakland.bbb.org. BBBOnLine will then serve as a liaison with Turnitin to resolve your concerns.

11. Changes to this Policy

We reserve the right to make changes to this Privacy Pledge at any time. Please check the Privacy Pledge when you use the Site to ensure that you are aware of any changes in our privacy practices. Our Privacy Pledge will indicate the date it was last updated. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify you via e-mail at the last email address you have provided to us. You will have a choice as to whether or not we use your information in this different manner. If you elect not to allow us to use your information in this different manner, we will continue to use such information in accordance with the privacy policy under which the information was collected.

12. Notices

Please direct all inquiries regarding the Privacy Pledge as follows:

1. Contact us by email at legal@iparadigms.com.
2. In the subject line, type “Turnitin Privacy Pledge.”
3. Specify the exact nature of your inquiry.
4. Provide us with all necessary contact information for follow-up response.

Your privacy is important to us. By participating in the Council of Better Business Bureau’s BBBOnLine Privacy Program we have made a commitment to meet the programs’ strict requirements regarding how we treat your information and have it verified by BBBOnLine. Further information about this program is available at <http://www.bbbonline.org>.