

AI Transparency Statement

Vision

We envision a world where the responsible use of artificial intelligence (AI) empowers educators and students to help every learner succeed.

Teaching and learning are challenging. Like any technology, AI should make those tasks easier, but it must be used responsibly and ethically in order to realize its profound benefit to education. As we continue to discover more research-driven opportunities utilizing AI to address instructor and student challenges, we are committed to upholding our seven guiding principles.

1. **We are transparent and accountable in how we ethically use AI.**
2. **We keep humans at the center of AI oversight and control.**
3. **We educate people about AI safety and the risks of unethical use of AI.**
4. **We strictly observe data privacy and security principles.**
5. **We do not introduce or reinforce biases or inequalities.**
6. **We continuously learn from experts to improve AI safety and ethics.**
7. **We use research-driven principles that support the human learning experience in our products and services.**
8. **We design and use AI with sustainability in mind—measuring its impact, improving efficiency, and aligning with our carbon neutrality and net zero goals.**

Our Commitment to Using AI in our Educational Products

1. **We are transparent and accountable in how we ethically use AI**

Our commitment to transparency is foundational, ensuring clarity about the AI tools in our educational products. We approach the use of AI in our products holistically across the organization bringing in expertise and voices from Product, Data Science, Learning Science,

Marketing, Sales, Editorial, and Legal to align our AI practices with industry standards, as well as legal requirements.

2. We keep humans at the center of AI oversight and control

We are dedicated to keeping human oversight at the forefront of our AI development, reflecting our commitment to ethical technology use. When AI is used in our product, we provide feedback mechanisms and monitoring for users to inform us of AI performance. We leverage in-house subject matter experts in the disciplines we support to regularly review AI responses and performance and we periodically brief our AI advisory board on AI performance.

3. We educate people about AI safety and the risks of unethical use of AI

Empowering individuals with the knowledge to use AI safely, ethically, and responsibly is key to how we envision the use of AI in our products. We provide valuable education through public webinars, internal training, and open-access AI communities. These resources help both our team and our customers confidently understand and engage with AI technologies. We will continue to evaluate and update our ethics training to keep pace with the quickly evolving AI landscape.

Please note, all of our product features leveraging AI are in support of student learning, instructor teaching, and are designed to only be used for the specific educational purpose provided, like tutor support. We do not provide any generative AI product features designed to encourage student cheating. We also take measures to mitigate users circumventing our proprietary AI prompts.

4. We strictly observe data privacy and security principles.

We protect user information with comprehensive data privacy and security measures. Our comprehensive privacy and security programs reflect industry standards and legal requirements and are assessed and updated regularly. For details about our data handling practices, please see our [Privacy Notice](#).

See below in AI Features in our Products for additional data handling details for each applicable listed product.

5. We do not introduce or reinforce biases or inequalities.

We have established a robust and rigorous framework to guide our product and technology teams in the ethical implementation of AI tools and mitigate unintended consequences in educational settings. We have and will continue to develop evaluation tools to ensure that AI responses remain accurate and fair. We conduct thorough human reviews of statistically sampled AI outputs to refine our systems continuously. We will thoroughly assess the value and

risk of proposed AI features to our product with proofs of concept testing to gather real-world feedback from educators and students to inform future product development.

6. We continuously learn from experts to improve AI safety and ethics.

As a learning organization, we are committed to continuously learning about how to improve our use of AI from the voices of instructors, students, institutional representatives, data privacy experts, and AI safety advocates. We have used and will continue to use what we learn to establish best practices in supporting student learning with our products.

7. We use research-driven principles that support the human learning experience in our products and services.

8. We design and use AI with sustainability in mind—measuring its impact, improving efficiency, and aligning with our carbon neutrality and net zero goals.

At Macmillan Learning, we know that the promise of AI in education must be matched by a commitment to sustainability. That's why we're focused not just on adopting and developing with AI, but on using it responsibly—measuring its impact, improving its efficiency, and applying it where it can make the most meaningful difference for learners and educators.

We're actively tracking our AI energy use so we can make smarter, more informed decisions, and Macmillan remains a carbon neutral company.

We recognize that the environmental impact of AI is a shared concern across the education community, and while we don't have all the answers yet, we're committed to transparency, accountability, and continuous progress. Together, we can balance the power of innovation with the responsibility of sustainability—and ensure that AI supports a better future for both students and the planet.

AI Features in our Products

Shared Considerations for Macmillan Learning's AI Features

All AI Features included in Macmillan Learning products (Achieve, iClicker) adhere to our comprehensive privacy and security programs. For additional details about our data privacy practices, please see our [Privacy Notice](#).

Do Macmillan Learning's AI Features rely on third-party systems?

Yes, all features, except those indicated below, leverage OpenAI's GPT family of models. OpenAI describes its data privacy and security practices in the OpenAI Security Portal at

<https://trust.openai.com/> and Enterprise Privacy at OpenAI at <https://openai.com/enterprise-privacy/>. We may consider other models over time, which will conform to similar behavior and safeguards.

How are the AI Features initially trained? Macmillan Learning's features use the most appropriate up-to-date model. See <https://deploymentsafety.openai.com/> for specifics on OpenAI's training practices. Note: No user data from the use of Macmillan Learning's products are used to train the LLM.

How are Macmillan Learning's AI-powered tools evaluated for accuracy, reliability, and fairness?

All of our AI features are evaluated through a combination of internal expert review, automated analysis, and both internal and external benchmarking to ensure they provide helpful, reliable, and fair outputs. We also use both human and automated methods to randomly sample and evaluate outputs for accuracy and appropriateness. We compare the precision and accuracy of results from new models with those previously used to ensure improved efficacy prior to adoption. We regularly consult external benchmark studies that assess model performance on criteria such as factual accuracy, instructional alignment, and potential bias. While we take significant steps to reduce errors and bias, occasional inaccuracies or inappropriate outputs may still occur due to the nature of large language models. To support continuous improvement, we also rely on instructor and user feedback to identify areas for refinement.

What customer personal data is input into the AI Features?

All AI features are designed to work without any personal data from the user. Where an open input is offered, we provide notice to users not to input personal information.

Is customer data from the use of the AI Features used to improve the third-party large language model (LLM)?

No, customer data from use of the AI feature is not used to train or improve the third-party LLM. De-identified customer data is only used to improve Macmillan Learning's product(s) or AI feature(s).

How will Macmillan Learning use the data from the AI Features?

In addition to using the data to provide the feature to the user, Macmillan Learning may use the data for internal operational purposes, and to analyze the outputs in de-identified form to improve the AI feature and other Macmillan Learning products, as permitted by our contracts with customers. For additional details about our data privacy practices, please see our [Privacy Notice](#).

What shared responsibilities do users have when engaging with AI features?

Users should refrain from using AI-generated content to bypass academic integrity policies and from inputting personal, sensitive, or identifiable information into open input fields. Attempting to circumvent system prompts or model behavior through prompt engineering or injection is strictly prohibited. Our AI tools are intended to support, not replace human judgment. Users should always critically review AI-generated output before use.

Where is the data processed by the AI system stored?

All OpenAI servers are US based. Macmillan Learning data is deleted from OpenAI servers at regular intervals.

Do the AI features include autonomous or agentic AI?

No, Macmillan Learning's AI Features do not currently include any autonomous or agentic AI. These are systems that can independently set goals, initiate actions, or execute tasks in the background with minimal or no human oversight. All AI Features are generative: they produce output only in response to an explicit request initiated by a user. No AI Feature acts on its own initiative, schedules or triggers itself.

Instructor Administrative Support

These features are available to all instructors; their use is optional and must be actively selected. They are designed to generate course content and support instructor workflows, serving to support, not replace, instructor judgment. Instructors are responsible for reviewing all AI-generated output for alignment with course objectives and revising as needed before use. Instructors can flag outputs, which are then evaluated by the Macmillan Learning team to help refine the features.

Instructors are encouraged to consider institutional policies when deploying these features.

I. Achieve

A. Question Creator Tools

What are the Question Creator Tools?

Within all Achieve assessments, these tools use generative AI to help instructors create new questions from existing content. Instructors can select **Create More Like This** to generate new multiple-choice assessment questions based on the selected Achieve questions. Additionally, the **Import Tools** option in the custom questions area uses AI to instantly generate questions from an imported file or pasted text, or import existing questions directly from another file.

What does the third-party LLM have access to?

To provide an effective question creation experience, the AI Question Generator Tools send the following pieces of data to the third-party LLM provider, none of which contains personal data:

- ✓ A proprietary set of instructions and rules to guide the LLM in how it should respond to the request.
- ✓ The AI-Assisted Item Generator includes the metadata of the source question, including the item topic, title, description, difficulty, Bloom's taxonomy, and Webb's Depth of Knowledge.
- ✓ Import tools include the uploaded file or pasted text.

B. Short-Form Writing Creator

What is the Short-Form Writing AI Creator?

The **AI Creator** is a set of tools that helps instructors create high-quality, engaging writing prompts along with clear, concise rubrics that reflect their learning goals. When creating short writing prompts, instructors can request suggestions to enhance their own writing according to authentic assessment principles such as critical thinking and real-world relevance. During rubric creation, the Creator can review the prompt and suggest rubric criteria that align with the implied learning goals and expectations. The instructors retain full control and can edit or reject any suggestions.

These features are available as independent settings within Achieve short-form writing assessments and must be actively enabled by the instructors prior to student submissions.

What does the third-party LLM have access to?

The Short-Form Writing AI Creator sends the following pieces of data to the third-party LLM provider, none of which contains personal data:

- ✓ A proprietary set of instructions and rules to guide the LLM in how it should respond to the request.
- ✓ The instructor-entered writing prompt to enhance the prompt.
- ✓ The complete short-form writing assessment prompt to generate the rubric.

C. Content Creator for Pages

What is the Content Creator for Pages?

The Content Creator for Pages helps instructors create high-quality course materials more efficiently by using AI to generate content directly within Macmillan Learning's Instructor Pages authoring tool. When instructors are building or editing a page, they can use a built-in conversational assistant to request new content to add to the page.

What does the third-party LLM have access to?

To provide an effective content creation experience, the Content Creator for Pages tool sends the following pieces of data to the third-party LLM provider, none of which contains personal data:

- ✓ A proprietary set of instructions and rules to guide the LLM in how it should respond to the request, including an instructor persona.
- ✓ Course information including course title and ISBN if template associated with a textbook.
- ✓ The instructor's interaction with the chatbot.

D. Summaries for Goal Setting and Reflection Surveys (GRS)

What are the Summaries for GRS?

Summaries for Goal-Setting and Reflection Surveys (GRS) is an AI-powered analysis tool that allows instructors to receive an aggregated summary of student responses to specific open-ended GRS survey questions. The summaries surface shared experiences and class-wide patterns in seconds, making it easier for instructors to understand student mindsets and offer targeted support without reading every individual response. Instructors should review individual summaries as directional insights rather than definitive assessments of individual student thinking or sentiment.

What does the third-party LLM have access to?

The AI Summaries for GRS tool sends the following pieces of data to the third-party LLM provider, none of which contains personal data:

- ✓ A proprietary set of instructions and rules to guide the LLM in how it should respond to the request.
- ✓ The survey question.
- ✓ All responses to the survey question for the entire course, without any student information.

II. iClicker

A. iClicker Question Creator

What is the AI Question Creator?

iClicker's AI Question Creator utilizes generative AI technology to assist educators in creating engaging and effective questions for their students.

The feature is available in all iClicker instructor accounts

What does the third-party LLM have access to?

To provide an effective question creation experience, the Question Creator sends the following pieces of data to the third-party LLM provider, none of which contains personal data:

- ✓ A proprietary set of instructions and rules to guide the LLM in how it should respond to the request.
- ✓ The content of the instructor's requested topic and question style preferences for question creation.

Student Learning and Engagement

These tools are available in select courses and disciplines and must be explicitly enabled or assigned by an instructor. Grounded in Macmillan Learning's instructional content, including assessment and textbook materials, they are designed to supplement student understanding. To maintain educational quality and student privacy, features undergo routine evaluation by subject matter experts, and student interactions are continuously and anonymously monitored to ensure appropriate learning support.

I. Achieve

A. AI Tutor

What is the AI Tutor?

The AI Tutor, provides students with assistance on homework problems in Achieve assessments. The AI Tutor uses generative AI to generate responses to questions sent by the student to the tutor. The tutor is designed to guide students through their questions by stimulating critical thinking, self-reflection, and self-driven learning. Before students attempt a homework question, the AI Tutor will offer limited assistance to help them get started. When students make an incorrect attempt to answer a homework question, they can then invoke the chat feature of the AI Tutor, which enables students to chat with the tutor to get help with their specific misconceptions on specific concepts in the homework question.

The AI Tutor is currently offered in most STEM and economics courses. When enabled, student use is optional and ungraded.

What data does the third-party LLM have access to?

To provide an effective experience, the AI Tutor sends the following pieces of data to the third-party LLM provider, none of which contains personal data:

- ✓ A proprietary set of instructions and rules to guide the LLM in how it should respond to the request.
- ✓ The content of the homework question.
- ✓ The student's response to the homework question.
- ✓ The student's interaction with the chatbot.

B. Guided Quiz Review (BETA)

What is the Guided Quiz Review?

In Achieve quiz assessments with the Multi-Take setting enabled (allowing students to take the assessment multiple times), the Guided Quiz Review analyzes each student's correct and incorrect responses alongside question metadata (including title, description, topic, and learning objective) to generate a clear, aggregated review plan. The plan also includes access to an AI chatbot, primed to discuss the assessment's topics and share effective study strategies based on the summary. When enabled in the course and assignment by the instructor, students can choose whether or not to use the AI-generated analysis and chatbot. When enabled, student use is optional and ungraded.

Guided Quiz Review is currently offered in most biology and psychology courses as well as the Ready+ assignment in chemistry and physics courses.

What does the third-party LLM have access to?

To provide an effective experience, the assessment sends the following pieces of data to the third-party LLM provider, none of which contains personal data:

- ✓ A proprietary set of instructions and rules to guide the LLM in how it should respond to the request.
- ✓ The content of the quiz questions.
- ✓ The student's responses to the questions.
- ✓ The metadata associated with the questions (topic, title, learning objective).
- ✓ The student's interaction with the chatbot.

C. Achieve Course Coach (BETA)

What is the Achieve Course Coach?

Course Coach is an AI learning companion available to students within Achieve. Currently in beta for General Chemistry, it provides personalized, course-aware support by drawing on

textbook concepts to help students prepare for exams, reinforce connections between ideas, and build on their existing knowledge. The Course Coach offers many different features, including mini review quizzes, coach guidance with chat, study plans, and guided lessons. When enabled, student use is optional and ungraded.

What data does the third-party LLM have access to?

To provide an effective experience, the Course Coach sends the following pieces of data to the third-party LLM provider, none of which contains personal data:

- ✓ A proprietary set of instructions and rules to guide the LLM.
- ✓ The student's interaction with the chatbot.
- ✓ The concepts associated with the textbook.
- ✓ The student's inputs into the onboarding, including their area of specialization.
- ✓ Student performance associated with each concept.

Partner Features in Achieve

No customer data from the use of any of Macmillan Learning's educational products is used to train third-party AI systems.

I. Selective Translation in VitalSource

What is Selective Translation in Vitalsource?

VitalSource Bookshelf is a third-party platform for distributing, accessing, consuming and engaging with digital textbooks. While offered as a standalone e-reader, it has also been integrated into many of Macmillan Learning's Achieve courses to provide ebook display and tools.

"Translate" is a feature that allows users to translate a short passage of selected text (up to 1,500 characters) into their preferred language. It is

available for select VitalSource titles that are integrated into Macmillan Learning's Achieve product, but its use is optional and must be actively selected by students.

Selective Translation uses a back-translation methodology across 37 languages, in which source text is translated into the target language and then converted back into English for comparison. We use a combination of human and automated review to score translations across multiple dimensions, including semantic accuracy, fluency, terminology consistency, and educational tone, to ensure outputs meet quality standards across all supported languages.

Is VitalSource involved in AI processing?

No, the Translate feature is deployed within VitalSource Bookshelf, but the AI processing is handled entirely by Macmillan Learning's own AI service, powered by OpenAI.

What does the third-party LLM have access to?

Selective Translation sends the following pieces of data to the third-party LLM provider, none of which contains personal data:

- ✓ The student's content selection from within the textbook.
- ✓ The student's language choice.