

2HR Learning, Inc. and its affiliates and subsidiaries, including but not limited to Legacy of Education, Inc. dba Alpha (collectively, “the Company”, “we”, or “us”) respects your privacy. This Privacy Policy (“Privacy Policy”) describes the ways we collect information from and about you and/or your children (collectively, hereinafter referred to as “you”/ “your”), what we do with the information, and your privacy rights. By utilizing the laptop issued by us (when applicable), accessing our website, or using any applications, mobile apps, in-school physical devices (ie., RFID or Bluetooth location devices) or other technological products or services that are made available to you in connection with the Company (the “Company Technology”), you agree to the terms of this Privacy Policy in addition to any other agreements we might have with you.

This Privacy Policy applies to personal data processed by the Company in conjunction with use of the Company Technology, and discloses information concerning data collection, usage and sharing about you as a user of the Company Technology. This Privacy Policy specifically describes such activities about an applicant, student, or child in Section 13 and has additional information about parents in Section 14, including rights of parents with respect to children under the age of 13.

IMPORTANT:

The educational success of the Company Technology relies on extensive data collection and analysis in order to assist with achieving the results desired from the Company Technology. Similar to the use of data collection and analysis in professional sports to improve and gain a performance edge, we may use every available lawful means in order to improve a student’s performance. The data collection and processing described in this Privacy Policy and utilized as part of the Company Technology are integral to the experience and a necessary part of the overall program. Some specific examples of possible data collection and analysis:

- Test Scores: Academic and cognitive test scores prior to and during the program are collected, tracked and analyzed.
- Recordings: All group, 1:1 and online meeting sessions may be recorded with audio and/or video, including interactions on Zoom or any similar system.
- Activity Tracking: Screenshots, including browser, screen or computer activity, will be taken while a student is working. Keyboard and mouse activity will also be tracked. Webcams, computer microphones and online meeting tools may be used to record the student as part of the Company Technology. In the pro sports analogy, this is game film which allows analysis, instruction and improvement of both learning and instruction.
- Productivity Gamification: Productivity may be tracked in order to display a leaderboard to users, or provide rewards, and the purchase or other history related to the redemption of those rewards may be tracked and analyzed.
- Biometrics: Biometric data, information and identifiers may be collected to analyze and improve learning, or as part of assessments, evaluation and testing.
- Geolocation: Students and guides on school premises at 1201 Spyglass Drive, Austin, TX and 201 Colorado Street, Austin, TX will have a RFID, Bluetooth, or similar tracking

technology device utilized to track locations in the school building, analyze children's social skills, and for student safety.

- Marketing: You may choose to take part in marketing videos or photos for the Company's websites, social media and other online and offline properties or media describing their interactions with the Company. You may also appear in videos or photos if you are participating in on campus or group activities. You expressly give permission for the Company and any such media to use your image or likeness in any digital media format (e.g., photo, video, website, email and web-related publications) or associated format (photo or screenshot for a physical newsletter referencing the online media) in connection with the purposes described above, without payment, including the right to digitally alter the image, and release any and all copyright ownership or claims. For clarity, this release and permission also extends to your child.

We intend to proceed with additional data collection in the future, or in specific student cases, which may involve the use of additional software, hardware, or mobile phone applications/usage. For example, if a student has poor sleep habits impacting learning, sleep tracking using an iPhone or activity tracker may be implemented in order to analyze and suggest improvements. Or if students are taught meditation in order to encourage a focused state of mind, a headband monitor and app may be used to collect data for analysis.

We provide certain options to opt-out of data collection that may be sensitive, and may provide additional or different options to opt-out of data collection in the future. Nevertheless, if you exercise an option to opt-out of particular data collection on your student's computer, your student may still be subject to recording on another device where the parent has not exercised the right to opt-out, in particular while at school (when applicable) in the proximity of a large number of device cameras and microphones.

Our intent is to utilize the Company Technology now and in future iterations to leverage data and technology to its fullest in order to put your student in the position to learn, which may include automated analysis and actions as a result of the processing of this data. If you do not wish to put data and technology to work in this manner, please explore alternative options for your education.

1. Our Collection of Parent, Student and Your Information

Personal Data. The information we collect may include your personal data, such as your name, contact information, IP addresses, information concerning your education and usage of the Company Technology, and other data that may identify you.

We collect personal data about you at several different points, including but not limited to the following:

- As described above in the examples of the importance of the Company Technology;
- When we engage in educational instruction or correspond with you;
- When you use the Company Technology, including but not limited to when you register as an user of Company Technology and an account is created for you;

- When you schedule a tour with us, you may need to provide your name and your child's name, and your email address and phone number;
- When you enroll in any newsletter or other periodic communication;
- When you contact us for help;
- When the Company Technology captures analytics data or sends error reports;
- When you choose to provide materials or information as part of the Company Technology; and as described in Section 13 (Children's Privacy) and Section 14 (Parental Rights).

2. Information Collected Automatically or From Others

Automatic Data Collection. We may collect certain information automatically when you use the Company Technology. This information may include your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, geolocation, details about your browser, operating system or device, location information, Internet service provider, pages that you visit before, during and after using the Company Technology, information about the links you click, and other information about how you use the Company Technology. Information we collect may be associated with accounts and other devices. Company Technology may collect precise geolocation information in accordance with applicable law.

In addition, we may automatically collect data regarding your use of Company Technology, such as the types of content you interact with and the frequency and duration of your activities. Unless contrary to applicable law or contractual agreement, we may combine your information with information that other people provide when they use Company Technology.

Cookies, Pixel Tags/ Web Beacons, Analytics Information, and other technologies. We, as well as third parties that provide content, or other functionality on the Company Technology, may use cookies, pixel tags, local storage, RFID, Bluetooth, and other technologies ("Analytics Systems") to automatically collect information through the Company Technology. Analytics Systems are essentially small data files placed on your computer, tablet, mobile phone, or other devices that allow us and our partners to record certain pieces of information whenever you visit or interact with Company Technology.

Cookies. Cookies are small text files placed in visitors' computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Company Technology may not work properly.

Pixel Tags/Web Beacons. A pixel tag (also known as a web beacon) is a piece of code embedded in the Company Technology that collects information about users' engagement on the Company Technology. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular item.

Analytics. We may use analytics as part of the Company Technology, including without limitation Google Analytics, a service for the analysis of technology usage that is provided by Google, Inc. Google Analytics and other analytics uses cookies to allow us to see how you use the Company

Technology, so we can improve your experience. Google's ability to use and share information collected by Google Analytics about your visits to the site is restricted by the Google Analytics Terms of Use available at <http://www.google.com/analytics/terms/us.html> and the Google Privacy Policy available at <http://www.google.com/policies/privacy/>. You can prevent Google Analytics from recognizing you on return visits to the site by disabling cookies in your browser. If you prefer to not have data reported by Google Analytics, you can install the Google Analytics Opt-out Browser Add-on available at <https://tools.google.com/dlpage/gaoptout>. For information about other analytics services used, please contact us using the contact information below.

Information from Other Sources. We may obtain information about you from other sources, including through third party services and organizations to supplement information provided by you. For example, the Company Technology may collect information about you from third-party learning applications and compile that information as part of the Company Technology. Additionally, if you access Company Technology through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made public via your privacy settings. Information we collect through Company Technology may include your name, your user identification number, your user name, location, gender, birth date, email, profile picture, and your contacts stored in that service. This supplemental information allows us to, among other things, verify information that you have provided to us and to enhance our ability to provide you with appropriate information as part of the school and Company Technology.

Third Party Information You Submit. If you submit any personal data about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their personal data in accordance with this Privacy Policy.

Children's Privacy and Parental Rights. As further described in Section 13 (Children's Privacy) and Section 14 (Parental Rights) and above in the description of the importance of the Company Technology.

The capabilities for data collection of certain Company Technology (i.e., student computers) are further described below. The Company collects the data from students' computers to help deliver the minimum learning commitment.

Website and App Activity: Monitors the URL of each website and the apps that a student accesses to help our system identify and categorize the activities a student is performing (e.g., how many minutes per day are spent learning math or browsing at off-topic/non-learning sites). For some learning applications, it also records student answers and grades which are forwarded to our back-end systems to help track student progress through lessons. Websites are also blocked to prevent their use and encourage focused learning.

Screen Recording: Records screenshots and continuous video of screen activity which our system can review to help identify learning behaviors (e.g., we can watch a student's process as they try to solve a problem to help understand why they answered incorrectly) or cheating. These screenshots and recordings are monitored 24×7 to implement lockdowns and send desktop notifications when violations occur.

Keyboard and Mouse Activity: Monitors keyboard/mouse activity to determine if the student is idle. The exact keystrokes entered are not captured.

System Audio: Records system audio (sounds coming from programs/websites running on the computer) to add context to the screen recordings which our system can review to help identify problems. Sometimes the screen recordings alone are insufficient to understand what is happening as a student learns, for example when an on-screen character is “speaking” to the student or a reading app is reading aloud.

Web Camera: Records continuous webcam video which our system can review to help identify eye contact and body language to help detect engagement and focus issues, as well as identifying environmental distractions. Without this, we may not be able to tell the difference between academic and non-academic struggles. The webcam also allows our system to verify that the student is not cheating during exams/assessments and to help identify learning behaviors.

Microphone Audio: Records microphone audio to provide coaching insights when students are reasoning through problems out loud (which is also a recommended technique for some students to help create focus). Our system can advise students to talk through their solutions to help with asynchronous coaching (so our system can later review their work and provide guidance without having to be on a live Zoom call). Our system can also use microphone audio to help identify distractions in a student’s environment, as well as listening to coaching instructions or other inputs a student is getting from another person in the room (for beneficial or distracting purposes, or also potential cheating).

Parents and students, and other visitors to the school, should understand that there is no expectation of privacy while at the school, at a minimum, because of the number of cameras and microphones on computers that may be recording.

Web Camera and Microphone Audio Monitoring Option - At School or Everywhere

If you select “At School”, device data collection from the web camera and audio microphone will only occur when your child’s computer is connected to the school network or your child is otherwise at school. This means we will monitor the device during school hours or while engaged in school-related activities at school. If you select data collection from the web camera and microphone audio “everywhere”, device data collection from the web camera and microphone audio will occur at all times, both during school hours and outside of school. This option allows us to provide deeper insights into your child’s learning habits and environment, even when they are working from home or in other non-school settings.

3. Our Use of your Personal Data

The Company may use information that we collect about you to:

Fulfill educational objectives, such as:

- Delivering the educational services by way of the Company Technology;
- Managing our relationship with you and provide you with support and other assistance;

- Communicating with you by email, postal mail, telephone or mobile devices about your education, the Company and the Company Technology;
- Undertaking activities to verify or maintain the quality or safety of the Company and the Company Technology;
- Managing the Company and the Company Technology, and allowing you to register for events or other opportunities.
- Analyze and improve the Company Technology pursuant to our legitimate interest, such as utilizing the information to improve your education, detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Performing research and analysis about your use of, or interest in, Company Technology or content offered by others, and short-term, transient use, such as contextual customization;
- Undertaking research for educational and technological development and demonstration;
- Improving, upgrading or enhancing Company Technology or the applications, offerings and services of our service providers;
- Verifying your identity, preventing fraud and for the safety of the students;
- Debugging of the Company Technology to identify and repair errors that impair existing intended functionality; and
- Enforcing our terms and legitimate interests.

Provide you with additional content and educational opportunities, such as:

- Developing and displaying content and educational materials tailored to you as part of the Company Technology;
- Analysis of social interactions and skills;
- Auditing of the Company and the Company Technology relating to interactions, transactions and other compliance activities; and
- Performing functions you consent to or that are otherwise described to you at the time of collection.

As further described in Section 13 (Children's Privacy), Section 14 (Parental Rights) and above in the description of the importance of the Company Technology.

Use De-identified and Aggregated Information. We may use personal data and other data about you to create de-identified and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access Company Technology, or other analyses we create.

Share Content with Others. Company Technology may offer various tools and functionalities to share with other users.

4. Our Disclosure of Parent, Student and your Personal Data to Third Parties

We may share your personal data with third parties only in the ways that are described in this Privacy Policy.

Affiliates and Service Providers. We may provide your information to affiliated entities within our corporate group, as well as with vendors who perform functions on our behalf; such parties provide hosting and maintenance services, virtual infrastructure, payment processing, analysis and other services for us.

Independent Contractors. We may utilize independent contractors subject to confidentiality obligations as an alternative to employees.

Business Partners. We may share your data with any parent Company, subsidiaries, joint ventures, and other entities under a common control or third-party acquirers;

Disclosure for Merger, Sale or Other Asset Transfer. We may allow a potential acquirer or merger partner to review our information, although we would restrict their use and disclosure of this data during the diligence phase;

Disclosure to Protect Us or Others. As required by law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement applicable to the Company; or when we believe, in our sole discretion, that the disclosure of personal data is necessary to prevent physical harm or financial loss; to report suspected illegal activity or to investigate violations of our agreements or the Company policies; to enforce our terms and conditions, to protect the security or integrity of our products and services.

Based on Consent. When you give us permission to do so.

Children's Privacy and Parental Rights. As further described in Section 13 (Children's Privacy) and Section 14 (Parental Rights) and above in the description of the importance of the Company Technology.

Please note that these third parties may be in other countries from you.

Potential for Other Users to Contact You. To the extent that a given application supports personal messaging functionality or email between and among users of the Company Technology, you may receive personal messages from other users. You may be able to disable this functionality by using the unsubscribe and other disabling instructions in the given application.

Prohibited Disclosures. We will not sell personally identifiable information of children or parents to third parties. Furthermore, we will not disclose any information for behavioral targeting of our students.

5. Our Security Measures to Protect your Personal Data

The Company uses industry-standard technologies when transferring and receiving data exchanged between the Company and other companies to help ensure its security. The Company Technology has security measures in place to help protect information under our control from the risk of accidental or unlawful destruction or accidental loss, alteration or unauthorized disclosure or access. However, “perfect security” does not exist on the Internet. Also, if the Company Technology contains links to other sites, the Company is not responsible for the security practices or the content of such sites.

6. Our Use of Automatic Collection, Links and Other Technologies

Automatic Collection Technologies. We, as well as third parties on the Company Technology, may use Analytics Systems to automatically collect information through Company Technology. Our uses of these Analytics Systems fall into the following general categories:

Operationally Necessary. This includes Analytics Systems that may allow for the identification of irregular site behavior, prevent fraudulent activity and improve security or that are essential to allow you to make use of our functionality;

Performance Related. We may use Analytics Systems to assess the performance of Company Technology, including as part of our analytic practices to help us understand how students use the Company Technology;

Functionality Related. We may use options or other systems that allow us to offer you enhanced functionality when accessing or using Company Technology. This may include identifying you when you sign into Company Technology or keeping track of your specified preferences, interests, or past items viewed, or location tracking (for RFID or Bluetooth devices);

Targeting Related. We may use first party or third-party Analytics Systems to deliver content, including content determined relevant to you, on Company Technology.

Website Links. We may create links to other websites. Additionally, many other sites that are not associated with or authorized by the Company may have links leading to our site. The Company cannot control the material in connection with these links and we are not responsible for any content appearing on these sites. You are subject to the privacy practices of that third party. We encourage you to ask questions before you disclose any personal data to others.

App Links. Company Technology may provide you with a link to other, third-party sites and applications. Such third-party sites will have their own data collection practices and policies. Please review the privacy policy for such sites and exercise caution in providing information that personally identifies you. We have no responsibility, access, or control over the data collection practices and policies of such third-party sites and applications. You will use such sites and applications at your own risk and outside of the scope of this Privacy Policy. The provision of such applications is done on an “As Is” basis, with no endorsements or representations.

Cross-Device Tracking. Your browsing activity may be tracked across different websites and different devices or apps. For example, we may attempt to match your browsing activity on your mobile device with your browsing activity on your laptop. To do this our technology partners may share data, such as your browsing patterns, geo-location and device identifiers, and will match the information of the browser and devices that appear to be used by the same person.

Notice Regarding Third Party Websites, Social Media Platforms and Software Development Kits.

Company Technology may use third parties to present or serve content and technology, software or services. These third parties may gather information concerning the content delivered, your use of the Company Technology, and other information in connection with their services and your usage.

We may use third party software, APIs and software development kits (“SDKs”) as part of the functionality of Company Technology. The software, APIs and SDKs may allow third parties including analytics and advertising partners (to the extent disclosed) to collect your personal data for various purposes including to provide analytics services and content that is more relevant to you. For more information about our use of third-party software, APIs and SDKs, please contact us as set forth below.

Company Technology may include publicly accessible or private websites, blogs, forums, social media pages, and private messaging features. To the extent permitted by applicable law, by using such Company Technology, you assume the risk that the personal data provided by you may be viewed and used by third parties for any number of purposes. In addition, social media buttons such as Twitter and LinkedIn (that might include widgets such as the “share this” button or other interactive mini-programs) may be utilized as part of the Company Technology. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on our site. Your interactions with these features apart from the Company Technology are governed by the privacy policy of the Company providing it.

This Privacy Policy does not cover certain uses of information that such third parties may have collected from you or the methods used by the third parties to collect that information. To the extent permitted by applicable law, we do not endorse, screen or approve and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

7. Data Retention

Information will be maintained for the period required to achieve the purpose for which the information was collected. We will follow a data retention schedule which may retain some permanent academic school records indefinitely and deidentify or destroy other records according to a retention schedule that ranges from graduation / disenrollment to 4-5 years later. Information that is transitory and not needed to fulfill a long term purpose will be deidentified or destroyed sooner. The Extended Capabilities data collection is subject to its own limited retention period, except with separate and explicit permission from the parent for use of specific data.

8. International Transfers of your Personal Data

Information about you may be stored and processed in the United States, European Economic Area, or any other country in which our agents, contractors or service providers maintain facilities, and by accessing our websites and using our mobile apps, software and Company

Technology, you consent to the transfer and/or or access of your information outside of your country.

9. Accuracy of Personal Data

We do our best to ensure that the personal data we hold, and use is accurate. We rely on you to disclose to us all relevant information and to inform us of any changes.

10. Your Access to your Personal Data and Deletion Upon Request at Departure

Reasonable access to your personal data may be provided upon request made to the Company at the contact information provided below. If access cannot be provided within a reasonable time frame, the Company will provide the requesting party a date when the information will be provided. If for some reason access is denied, we will provide an explanation as to why access has been denied. We may charge a reasonable fee in advance for copying and sending the information requested.

If you would like us to delete any personal data held about you when you complete your education or otherwise choose to depart the Company, we will do so on request unless (i) we need to hold the information as required by applicable law, (ii) the information is held pursuant to a reasonable retention schedule and the information concerns academic records related to the education of the student, and (iii) it is aggregated and de-identified information as set forth in the Privacy Policy.

11. Your Choices

In certain circumstances we offer those who provide personal data a means to choose how we use the information provided. Where you have consented to the processing of your personal data, you may withdraw that consent at any time and prevent further processing by contacting us as described below. Even if you opt out, we may still collect and use non-personal data regarding your activities on Company Technology and for other legal purposes as described above.

Extended Capabilities of Student Computers (what happens in the environment). Parents can choose whether the web camera and microphone audio of their child's computer are collected at all times, at school (when applicable), or parents can refuse the extended data collection. The extended data is retained for a limited time except with separate and explicit permission from the parent for use of specific data. Note: A decision to opt-out does not prevent a child from being recorded on the camera or microphone of another student. It is expected that due to the number of cameras and microphones, at school (when applicable) in particular, all children will be recorded at least some times.

Marketing. You may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of our marketing emails. Note that you will continue to receive transaction-related emails regarding the Company or the Company Technology. We may also send you certain non-promotional communications regarding us and Company Technology, and you will not be able to opt out of those communications (e.g., communications regarding the Company or Company Technology or updates to our terms or this Privacy Policy).

We process requests to be placed on do-not-mail, do-not-phone and do-not-contact lists as required by applicable law.

Mobile Devices. We may send you push notifications through our mobile application. You may at any time opt-out from receiving these types of communications by changing the settings on your mobile device. We may also collect location-based information if you use our mobile applications. You may opt-out of this collection by changing the settings on your mobile device.

“Do Not Track.” Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers, except to the extent required by applicable law.

Cookies and Interest-Based Advertising. You may stop or restrict the placement of Analytics Systems on your device or remove them by adjusting your preferences as your browser or device permits. The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy, at

www.networkadvertising.org/managing/opt_out.asp, <http://www.youronlinechoices.eu/>, <https://youradchoices.ca/choices/>, and www.aboutads.info/choices/. To separately make choices for mobile apps on a mobile device, you can download Digital Advertising Alliance’s AppChoices application from your device’s app store. Alternatively, for some devices you may use your device’s platform controls in your settings to exercise choice.

Please note you must separately opt out in each browser and on each device. Advertisements on third party websites that contain the AdChoices link may have been directed to you based on information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt out of the advertising partners’ use of this information for interest-based advertising purposes.

12. Your Privacy Rights

If you live outside Texas, depending on where you reside, or in the future as privacy laws change, or based upon the Children’s Online Privacy Protection Act (“COPPA”) for children under 13 years of age, you may have the right to exercise additional rights available to you under applicable laws, including as applicable:

Right of erasure. You may have a broader right to erasure of personal data that we hold about you. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations, among other things.

Right to object to processing. You may have the right to request that we stop processing your personal data, including the right to opt in or opt out of the sale of your Personal Data to third parties, or to stop sending you marketing communications.

Right to restrict processing. You may have the right to request that we restrict processing of your personal data in certain circumstances. For example, where you believe that the personal data we hold about you is inaccurate or unlawfully held.

Right to data portability. In certain circumstances, you may have the right to be provided with your personal data in a structured, machine readable and commonly used format and to request that we transfer the personal data to another data controller without hindrance.

If you would like to exercise any of the above rights, or others that apply to you, or you believe that we should honor such rights in your case, please contact us utilizing the contact details in the “Contacting Us” Section below. We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

In some cases, our ability to uphold these rights for you may depend upon our obligations to process personal data for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the Company Technology. Where this is the case, we will inform you of specific details in response to your request.

13. Children’s Privacy

The Company Technology and other activities involve the collection and maintenance of personal data about children under 13, as well as other personal data of students, through use of the Company Technology. It is operated by: the Company, 1201 Spyglass Dr., Austin, TX 78746. Please contact your school

(privacy@alpha.school / contact@gt.school / privacy@2hr.school) with any questions about the collection, use and sharing of children’s personal data, and specifically the personal data of children under 13 years old, including requesting a list of our service providers acting as sub-processors.

The information collected about children under 13, as well as other personal data of applicants and students, includes: name; email; password; phone number; IP address; cookie identifiers; geolocation; standard browser data such as pages visited, duration on each page, and productivity/idleness; analytics data; any personal data or information provided in response to assessments or tests; any personal data or information captured by browser or screen tracking in connection with the student’s use of their browser or operating system; any personal data contained in messages, posts or videos; any information required in student profiles; any information collected by third-party learning applications; any purchase history in connection with the debit cards used for financial rewards; phone usage (in connection with data tracked by the mobile app); any information provided in student emails or support requests; and other personal data as described in Section 1 (Our Collection of Your Information) and Section 2 (Information Collected Automatically or From Others).

The information about children under 13, as well as other personal data of applicants and students, is or may be used for: student assessment and testing, account creation, user verification, deliver and improve the Company Technology, display of student profiles to other users, provide financial rewards, productivity monitoring and gamification, transactional emails, share content between users, user interaction, customer support, user communication, prevent fraud; community discussions and networking; display of a leaderboard for students in connection with learning app usage and other activity; detect security incidents; maintain safety; analytics; respond to legal inquiries; terminate accounts; or other usage disclosed in Section 3 (Our Use of your Personal Data).

The information about children under 13, as well as other personal data of applicants and students, is disclosed to: the Company affiliates, service providers and vendors (including for the purposes of coaching, user engagement, communication, financial rewards, hosting, support, analytics and other internal purposes), other authorized users with whom the child or student shares and/or communicates, recipients of child or student emails; government and/ or legal requestors as required by law or in connection with child usage, others as necessary (based on the appropriate consent of the parent/ legal guardian), and other cases as described in Section 4 (Our Disclosure of your Personal Data to Third Parties).

Information may also be disclosed in connection with efforts by the Company, service providers/vendors, or others, to improve education and learning, provided that appropriate privacy protections for the information are in place. For example, a vendor may aggregate information provided or made available by the Company for use, research, or study by the Company and third-parties.

No child or student personal data is made available to the public by us without your consent or disclosure in this Privacy Policy. Children can make their personal data available to other authorized users, teachers/staff/guides or email recipients as part of the Company Technology.

The parent of a child under 13 or a student (for certain student information, subject to an applicable data protection law) can review or have deleted the personal data held by the Company Technology and refuse to permit its further collection or use. A parent may do so by notifying the Company through any designated contact mechanism (i.e., an administrator) and/or notifying us through the contact information below.

14. COPPA, Parental Rights and Data Collection about Parents

In addition to the information in Section 13, in connection with children under the age of 13, parents (including legal guardians) have specific rights under the Children Online Privacy Protection Act (COPPA). These rights with respect to children under the age of 13 include:

- Direct notice to parents and obtain verifiable parental consent, with limited exceptions, before collecting personal data online from children;
- Give parents the choice of consenting to the collection and internal use and sharing of a child's information as required by COPPA;
- Provide parents access to their child's personal information to review and/or have the information deleted;
- Give parents the opportunity to prevent further use or online collection of a child's personal information as required by COPPA;
- Not condition a child's participation in an online activity on the child providing more information than is reasonably necessary to participate in that activity.
- When you agree to terms referencing this Privacy Policy, or consent to this Privacy Policy through use of the Company Technology, you expressly agree to the collection of personal data and other information as described herein and in accordance with applicable data protection laws.

- Parents may have additional rights under federal, state and local laws concerning this data. Please contact us using the contact information below to exercise any such rights that apply to you.
- To the extent not covered elsewhere, the Company also collects personal data or other information about parents, including without limitation, name, contact information, account verification details, financial payment details, consent requirements, and other information reasonably necessary in connection with the Company Technology.

15. Intellectual Property Policy

Software updates, their related technology and services may be covered by one or more United States (“US”) and non-US patents. A listing that associates patented products included in the Software, Software updates, their related technology and services with one or more patent numbers is available at <https://markings.ipdynamics.ai/esw> (hereinafter, the “Patent Notice”). The association of products-to-patent numbers in the Patent Notice may not be an exclusive listing of associations, and other unlisted patents or pending patents may also be associated with the Software. Likewise, the patents or pending patents may also be associated with unlisted products.

16. Changes to our Privacy Policy

The Company may amend this Privacy Policy at any time by posting a new version online. It is your responsibility to review this Privacy Policy periodically as your continued use of the Company Technology represents your agreement with the then-current Privacy Policy. If applicable data protection law requires additional affirmative consent from you for a new collection, use and disclosure of personal information, we will contact you to secure such consent.

17. Contacting Us

To contact us for questions or concerns about our privacy policies or practices please reach out to your school (privacy@alpha.school / contact@gt.school / privacy@2hr.school).