

ATIVION CHILDREN'S PRIVACY NOTICE

Impero Solutions, Inc. dba Ativion or ContentKeeper Technologies LLC (collectively, "Ativion"), understands the importance of personal information and privacy of children. This Ativion Children's Privacy Notice ("Notice") describes additional details about how Ativion will collect, use, access, store, disclose, and otherwise process personal information from an individual under the age of 13 ("Child" or "Children"). In this Notice, "Service" means Ativion's Wellbeing, Classroom, Education Pro, Backdrop, ContentKeeper, StudentKeeper: Filter, StudentKeeper: Classroom and other related services (collectively, "Services"). Ativion makes use of the personal information collected in order to provide the Services to a school where the child attends ("Schools") as agreed in their given Orders, and for no other commercial purpose.

1. Information Ativion Collects from Children.

Ativion collects and maintains any personal information of Children received through the Services. Below are instances where we may receive Children's personal information from the Schools and how we will provide parents/guardians with notice and seek verifiable parental consent. If we learn that we have collected or received personal information from a child without verifiable consent from a parent or guardian, we will delete that information and seek parental consent. The information collected by Ativion varies by product and by School based on the specific implementation and selected usage.

- **Contact Information.** To participate in our Services, we ask children and their parent(s) or guardian(s) to set up an account through your School.
- **Account Information.** We may collect the child's name, gender, grade level, account username, password. We will also require the child to provide the parent or guardian's email address for notifications to be sent from our Services.
- **Wellness Information.** keyword detection and monitoring, online activity logging, context capture (screenshot/video recording), self-submitted student information about their wellness.
- **Geolocation Information.** We collect the geolocation information when a Child accesses our Services to provide the correct language and time zone for our Services.
- **Activity and Usage Information.** We collect children's Service usage information to identify inappropriate behavior or activities, Service utilization rates, internet usage, and technical issues, including monitoring of device activity and usage. We may also analyze such activity (including active applications, browser activity, and usage patterns) to generate indicators of student engagement or attentiveness for display to educators as an assistive classroom management tool.

- **Course Participation and Testing Information.** Some of our Services will collect the child’s name and identity, test scores, curriculum completion, active viewing of current device usage, messaging and live chat content. Monitoring of devices and usage to identify restricted use or inappropriate behavior.
- **Communication Information.** Some of our Services require teachers to communicate directly with the children enrolled in classes through communication tools. Our personnel are trained to avoid discussing or collecting personal information from Users and engaging in inappropriate communications.
- **Student Profile Information.** Some of our Services, such as Backdrop or StudentKeeper: Classroom will use personal information to create a student profile that will include demographic information, welfare history, medical history, sibling identity, home address, persistent identifiers, student images.
- **Device Information.** We collect information about the user’s devices including last known IP address, hardware system information (PC or Macintosh), operating system, and web browser information, and system preferences which includes language and accessibility settings.

Ativion notes that Children *cannot* make their information publicly available, although they can provide information to teachers and the School using the Services.

2. Reasons for collecting and using children’s information

Ativion uses the collected personal information solely for the purposes of providing the websites and Services to the School, in accordance with the agreement with the School, applicable law, our Privacy Policy and all related privacy notices available at www.ativion.com/legal/.

3. Who Do We Disclose or Share Information.

Ativion may share or disclose personal information collected from children with the following categories of entities for the following reasons:

- **Schools.** We will disclose children’s personal information to the Schools for the purposes outlined in “Reasons for collecting and using children’s information.”
- **Affiliates.** We may share children’s personal information to our affiliates to provide the child and Schools with our Services.
- **Suppliers and Service Providers.** Ativion may utilize subcontractors and its Affiliates to assist it in the delivery of the Services, including for purposes of storing personal information

received through the websites and Services. As of the date of this Notice, Ativion utilizes Microsoft's Azure Cloud and/or Amazon Cloud to host elements of the websites and Services.

- **Government authorities and law enforcement agencies.** We may be required to provide information: (1) as required by law, (2) based on government agency requests, or (3) upon request by valid legal process, such as subpoenas or court orders, issued by a court of competent jurisdiction.

4. Parental Choices and Controls.

Ativion handles all requests relating to its provision of the Services. Schools, parents or guardians may review the information we have collected from their children, refuse to permit further collection of personal information from their child, and request the deletion of the collection information. If you are a parent and have concerns, we suggest that you contact your child's School or teacher so that they can respond directly to your concerns. Ativion will respond to any inquiries from a School directed to: support@ativion.com. Please note that request, change or deletion of personal information on an account may result in the termination of your child's account with our Service. Ativion may engage in validation procedures, including relaying your request to the School, in order to protect collected information from Unauthorized disclosure or deletion.

For more information, see our Education Privacy Notice found at: www.ativion.com/legal/FERPA.

5. Frequently Asked Questions.

- **Does Ativion Use or Share the Information for Commercial Purposes Not Related to the Provision of the Services Requested by the Customer?** No. Ativion only collects and uses personal information collected from students for the use and benefit of the School and for no other purpose. This enables Schools to obtain consent directly from parents. We require that Schools provide administrative contacts Authorized to consent on behalf of parents and implement identity management controls to ensure that the School officials are providing the consent (and not a student pretending to be a teacher, for example).
- **Does Ativion Enable the School to Review and Have Deleted the Personal Information Collected From Their Students?** Yes. Schools remain directly in control of the majority of information collected by the Services and are the primary administrator of such data. Where Ativion's Services also collect usage data or similar analytics which are presented to the School, Ativion will provide will delete such information upon the School's request, which may necessitate termination of the Services.
- **What Measures Does Ativion Take to Protect the Security, Confidentiality, and Integrity of the Personal Data that it Collects?** Ativion implements administrative, technical, and physical access controls designed to protect the security, confidentiality, and integrity of the Personal Data (as defined by the GDPR) it collects at the locations in which

such data or systems are stored. As a global provider of educational technology services and solutions, Ativion takes data security and privacy seriously and complies with the EU General Data Protection Regulation (the “GDPR”) where applicable. The controls required to comply with the GDPR are implemented throughout Ativion’s service delivery model. For more information please see the UK-EU GDPR Notice: www.ativion.com/legal/GDPR/. For student records, we abide by the Family Educational Rights and Privacy Act (FERPA) and state education laws concerning student records. For more information regarding student records and parent’s bill of rights to student records, please review our Education Privacy Policy at www.ativion.com/legal/FERPA