

DreamBox Learning, Inc. - Privacy Notice

Last updated on July 11, 2024

This **Privacy Notice** describes the information collection, use, retention and sharing practices of DreamBox Learning, Inc., (“**DreamBox**”, “**we**”, “**us**”, “**our**”) when you interact with us online through our website at www.dreambox.com (the “**Website**”) or through our DreamBox applications: DreamBox Math, DreamBox Reading Park, and DreamBox Reading Plus (collectively, the “**Learning Apps**”) (collectively, the “**Services**”).

OUR ROLE IN DATA PROCESSING

To the extent the General Data Protection Regulation (“**GDPR**”), Regulation (EU) 2016/679, and the UK Data Protection Act 2018 (“**DPA**”) apply (collectively referred to in this Privacy Notice as “EU or UK data protection laws”), the entity responsible for the collection and use (processing) of your personal information is DreamBox Learning, Inc., which, is the data controller. You can contact DreamBox on any of the methods set out below:

US contact details: by email at privacy@discoveryed.com, by telephone at 1-800-323-9084, or by sending a letter to 4350 Congress Street, Suite 700, Charlotte, NC 28209, USA.

UK contact details: email at ukprivacy@discoveryed.com, by telephone on 0800 6 527 527, or by sending a letter to Attn Marissa Jones, 9 Palace Yard Mews, Bath, BA1 2NH, UK.

EU contact details: email at datarequest@datarep.com or by sending a letter to DataRep, St Johannesgatan 2, 4th Floor, Malmö, SE – 211 46, Sweden.

PERSONAL INFORMATION WE COLLECT, WHY AND FOR HOW LONG

We collect personal information, which is information relating to you as an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can be identified, directly or indirectly. As used in this Privacy Notice, “personal information” includes “Personal Data”, as defined under the GDPR and DPA.

We collect personal information as you engage with our Services.

If you are a Teacher User, this includes when you:

- **Sign up as a Teacher User.** When you sign up for the Learning Apps as a Teacher User, we collect, from you, your *identifiers* (name, email address, and phone number (if provided)), your *professional or employment-related information* (school name, address and district, job title), and your *sensitive login details* (password) in encrypted format. If you sign up via Google SSO, we will not collect your password, and your usage of the SSO will be governed by the relevant Google policies. If you add a phone number, we may contact you at the number provided. We use this information to set up your account, manage the account, and to respond to your queries. To the extent the EU or UK data protection laws apply, the legal basis for this

processing activity is the performance of a contract. If you do not provide this information, we will not be able to set up your account. We also use this information to send you, through our third-party email provider, emails necessary to the Services, and if you opt-in to receiving them, marketing emails to provide you additional promotional information about the Services. To the extent the EU or UK data protection laws apply, the legal basis for this processing is your consent. You may withdraw your consent (unsubscribe) at any time by clicking the “unsubscribe” link included at the bottom of each email we send to you. However, we will continue to send you service-related messages. Our communications contain tracking technologies, to analyze whether a predefined action took place by a recipient, such as opening our communications and other engagement metrics such as timestamps, delivery status, whether an email was forwarded, clicks within an email, as well as sender and recipient addresses to better adapt and distribute our communications. When you opt-in to our marketing communications, you will be automatically opted-in to the use of these technologies. You can avoid downloading the pixel by rejecting the download of images in the email. We use this information to understand the effectiveness of the email messages.

- **Use the Learning Apps.** When you use the Learning Apps, we automatically collect, through cookies and similar technologies, your *internet or other electronic network activity information* (usage data (e.g., time stamps)), your *online identifiers* (IP address), and your *usage information* (what topic you are clicking, how you interact with the system). We use this information to create aggregated usage reports and to understand how teachers are using the Learning Apps and to send you messages in the applicable platform. We retain this information for as long as your account exists, unless specified otherwise.
- **Request a demo.** When you request a demo of the Learning Apps, we collect, from you, your *identifiers* (name, email address, telephone number, country), your *professional or employment-related information* (job title), your selected product interest, and any additional information you choose to include in your message. We use this information to schedule and facilitate a demonstration of the Learning Apps. To the extent the EU or UK data protection laws apply, the legal basis for this processing is that it is necessary for the performance of the service requested by you. Please note that if you request a demo of Reading Plus, we will share your information with Reading Solutions, our third-party reseller of Reading Plus for marketing purposes. To the extent the EU or UK data protection laws apply, the legal basis for this processing is your consent. You may revoke your consent at any time with effect going forward by emailing us at privacy@discoveryed.com. For information regarding Reading Solutions’ collection and use of personal information, please see Reading Solutions’ [Privacy Policy](#).
- **Create a Student User account.** Student User accounts are created by a teacher, parent, or guardian. When a Student User account is created, we collect, from the creator of the account, the student’s *identifiers* (name, date of birth, classroom name, class year) and login credentials, and if you are creating a Student User account associated with a Teacher Account, you have the option to also provide additional *identifiers* (email address). We use this information to

create a Student User ID and manage the Student User account. To the extent the EU or UK data protection laws apply, the legal basis for the processing is that it is necessary for the performance of a contract.

Teacher Users can access the following student data associated with Student Users linked to their Classroom: name, grade level, avatar, background themes, demographic data (gender, date of birth, race), usage information, educational progress information (how many lessons they did, assignment history, login credentials, student ID, and alerts and achievements, ongoing assignments, recent achievements, how often the student logs in, rough metrics on how much time they spend in the Learning Apps, and a detailed breakdown of their ability in different areas in the curriculum (including areas needing improvement)).

If you are a Parent/Guardian User, this includes when you:

- **Sign up as a Parent User.** When you sign up for the Learning Apps as a Parent User, we collect, from you, your *identifiers* (name, email address, postal code or mailing address, and telephone number (if provided)), your child's *identifiers* (name, class year, date of birth (if provided)), *protected classifications* (race and gender (if provided)), and *sensitive log-in information* (password). We use this information to create and manage your account, to start your child at a position in the curriculum appropriate for your child's current grade, and to customize reports on your Family Dashboard. To the extent the EU or UK data protection laws apply, the legal basis for this processing is that it is necessary to perform a contract or, if applicable, to comply with legal our obligations. The processing condition for the processing of this sensitive information (race) is, depending on the laws of the relevant member state, the safeguarding of the child's rights (Art. 9(2)(b) GDPR). We may send informational materials to your mailing address.
- **Purchase a subscription.** When you purchase a subscription, we collect, from you or from our third-party payment processor, Stripe, your *identifiers* (name, email address, physical address) and your *sensitive financial information* (credit/debit card number, security code, expiration date). We use this information to process your payment for the selected subscription, using the services of a third-party vendor and only get access to card type, and the last four digits of the card. To the extent the EU or UK data protection laws apply, the legal basis for this processing activity is the performance of a contract. Please see Stripe's [Privacy Policy](#) for information regarding Stripe's collection and use of personal information.

Parents/guardians can view, through the Family Dashboard, information with respect to the Student Users linked to their family account, namely: the student's name and account details, ongoing assignments, recent achievements, how many lessons they did, how often the student logs in, rough metrics on how much time they spend in the Learning Apps, and a detailed breakdown of their ability in different areas in the curriculum (including areas needing improvement). Parents/guardian's also receive a notification each time their student completes a lesson within the Learning Apps.

For Student Users, this includes when the student:

For students under 16 years old, the collection and processing is conditioned on the consent of the parents (or legal guardians).

- **Updates their Student User profile.** When a student updates their Student User profile, we collect, from the student, their avatar *preferences* (visual appearance). We use this information to update the student's Student User profile. A student's avatar selection is viewable by other student's on the Classroom log-in page.
- **Sends feedback to DreamBox.** When a student sends feedback to DreamBox, we collect, from the student, any information the student chooses to include in their message, as well as collect a screenshot of the student's screen and session data. We use this information to troubleshoot technical issues, address concerns related to the product that are included in the feedback, and to improve the product based on such feedback. We do not respond to the student's feedback message.
- **Uses the Learning Apps.** When a student uses the Learning Apps, we automatically collect the student's *internet or other electronic network activity information* (usage data (e.g., time spent on each problem, what items were clicked, how the student answered)), the student's *online identifiers* (IP address), and the student's *education information* (participation history and performance data). We use this information to provide and improve the Learning Apps by: (i) monitoring the progress of the student; (ii) adapting question content and modifying the sequencing of the learning path and/or the level of difficulty of questions the student receives in real time; (iii) creating student diagnostic reports (which are then shared with the student's parent/guardian and teachers); (iv) diagnosing and repairing errors; and (v) allocating prizes/rewards to the student's profile, when earned.

We also receive, from schools, *educational information* (records of diagnostic assessments performed on the students including the name of the test, the score, the date of the test). At their election, schools may also provide *sensitive* demographic data (ethnicity and race), special education status, information regarding assisted lunch, and English language learner (ELL) status. We use this information to correlate this to an individual student's play history in the program in order to optimize the system for better test performance, as well as to aid schools in their advancement of equity efforts and to verify compliance with state, jurisdiction, and school district requirements. We do not share this information other than with the relevant schools. Additionally, we also receive personal information indirectly from schools through our rostering and SSO service provider for purposes of facilitating access to the Learning Apps.

- **Completes a survey.** When a student completes a survey at the end of a lesson, we collect, from the student, their responses to the survey and use this information to improve the product and educational content. To the extent the EU or UK data protection laws apply, the legal basis

for this processing activity is our legitimate interest in identifying common issues with the product or educational content. These surveys are offered randomly to a randomized subset of students after the completion of certain lessons.

- **Messages their teacher.** When a student receives a written communication from their teacher, the student can respond by selecting one of several emojis to communicate their reaction to the teacher’s message. We retain these messages for a period of 90 days.

If you are a website visitor, this includes when you:

- **Contact Customer Support.** When you contact customer support, we collect, from you, your *personal identifiers* (name and email address), your “role” (i.e., school administrator, teacher, family/guardian), and any additional information you choose to include your message. We use this information to respond to your questions or inquiries and to troubleshoot where necessary. To the extent the EU or UK data protection laws apply, the legal basis for the processing of this information is that it is necessary for the performance of the service requested by you.
- **Sign up for our newsletter.** When you sign up to receive our newsletter, we collect, from you, your *identifiers* (email address). We use this information to send you updates and editorial content. To the extent the EU or UK data protection laws apply, the legal basis for this processing is your consent. You may revoke your consent at any time with effect moving forward by clicking the “unsubscribe” link included with each newsletter we send you. Our communications contain tracking technologies, to analyze whether a predefined action took place by a recipient, such as opening our communications and other engagement metrics such as timestamps, delivery status, whether an email was forwarded, clicks within an email, as well as sender and recipient addresses to better adapt and distribute our communications. When you opt-in to our marketing communications, you will be automatically opted-in to the use of these technologies. You can avoid downloading the pixel by rejecting the download of images in the email.
- **Interact with us on social media.** When you interact with our social media pages on social networking websites, such as Facebook, X, LinkedIn, Instagram, and YouTube (each a “**Social Media Page**” and collectively, “**Social Media Pages**”), we collect basic engagement metrics and use it to tailor content and marketing and use it to improve user experience as set forth in this section. Please note that we do not control the use or storage of the information that you have posted to any social networking websites. This information is collected and processed by the social networking websites for their own purposes, including marketing. For more information on how Facebook, X, LinkedIn, Instagram, and YouTube use your personal information, please see [Facebook’s Privacy Policy](#), [X’s Privacy Policy](#), [LinkedIn’s Privacy Policy](#), [Instagram’s Privacy Policy](#), and [YouTube’s Privacy Policy](#).

Facebook, X, LinkedIn, Instagram and YouTube (the “**Social Networks**”) process personal information in the USA where the laws may be less protective than in your country of residence. For example, in accordance with U.S. laws, in certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in other countries may be entitled to access your personal data.

- **Social Media Pages.** When interacting with our Social Media Pages, we collect, from you, your *personal identifiers* (first and last name) and *visual information* (photograph (i.e., profile picture)), as well as any information that you provide when interacting with our Social Media Pages (e.g., commenting, sharing, and rating). We use this information to advertise our products, for events and invitations, and to communicate with users via the contribution and comment function. To the extent the EU or UK data protection laws apply, the legal basis for the processing is our legitimate interest in advertising our products via our Social Media Pages and communicating with users, customers, and interested parties. Because our Social Media Pages are publicly accessible, when you use them to interact with other users, for example by posting, leaving comments or liking or sharing posts, any personal information that you post in them or provide when registering can be viewed by others or used by them as they see fit. The content posted on our Social Media Pages or other public areas of social networking websites can be deleted in the same way as other content that you have created. If at any time you want content posted to be deleted, please email your request to us at privacy@discoveryed.com.
- **Community Management.** We collect, from you, your contact, including "likes", shares, messages and other interactions with the content, in order to analyze and evaluate how our content is perceived, to learn from it, and to improve our public relations efforts. To the extent the EU and UK data protection laws apply, the legal basis for analyzing your content is our legitimate interest in organizing, facilitating, and optimizing communication with our users and the general public. If you object to this processing of your personal information and believe you have an overriding interest, you can submit your objection via email to privacy@discoveryed.com.
- **Events and Photos.** When you register for an event on our Social Media Pages, we collect, from you, your personal identifiers (first and last name, email address, telephone number, physical address, and any other information you provide). We use this information to create and manage the event (e.g., to create the guest list, accreditation and admission control, room and personnel planning, planning the catering) as well as to send you your invitation and notifications about the event. We also use this information for prevention of fraud and defense against legal claims. To the extent the EU or UK data protection laws apply, the legal basis for processing your information to facilitate your attendance is the necessity for the performance of a contract with you. If you do not provide this information, you would not be able to participate in the event. The legal basis for the other uses is our legitimate interest in

fraud prevention. At events for which you have registered, photos and video recordings may be made (possibly by a photographer commissioned by us), in which you may also be shown. If you are the central subject of a recording, the photographer will ask you before the recording/taking the photo whether you agree and consent. We use the photos for our public relations and marketing on our various media/digital media outlets. To the extent the EU or UK data protection laws apply, the legal basis for processing your photos where you are the subject is your consent. You can revoke your consent with effect going forward via email to privacy@discoveryed.com. The legal basis for taking and publishing photos where you are in the background is our legitimate interest in public relations. If you object to this processing of your personal information and believe you have an overriding interest, you can submit your objection via email to privacy@discoveryed.com.

- **Page Insights.** When you visit our Social Media Page, the applicable Social Network records your IP address and other information about your usage behavior on our Social Media Page. The Social Network collects this information through trackers in the browser of your device or via the advertising ID (IDFA from Apple or GAID from Google), when you open the Social Network app through your mobile device (e.g., smartphone or tablet). The Social Network uses this information to provide us with statistical evaluations of the use of our Social Media Page. We receive this information directly from Social Network, in the form of aggregated data and anonymous statistics regarding certain data points, such as: age; gender; city/country; device; inquiries from fans about other Social Media Pages; region and language settings of the users; proportion of men and women; the number of people reached; clicks on posts, "likes" and reactions; comments and shared content; and total video views. We use this information to analyze and improve the advertising campaigns we conduct through our Social Media Pages. We do not collect or process any other personal information in connection with Social Network "Page Insights" function.

To the extent the EU and UK data protection laws apply, we are joint controllers with the Social Network for this processing. For the purpose of the EU and UK data protection laws, the legal basis for this processing is our legitimate interest in statistical evaluation of users on our Social Media Page for the improvement and adjustment of our advertising measures based on the information collected. If you object to this processing of your personal information and believe you have an overriding interest, you can submit your objection via email to privacy@discoveryed.com.

We do not retain this information independently. For information on data protection and the storage period on the Social Network in relation to its Insights function, see the Social Network privacy policy linked above. It has been contractually agreed with the Social Network that the Social Network is responsible for providing you with information about the processing for Page Insights.

- **Information Processed Solely by Social Networks.** We do not know how the Social Networks use personal information for their own purposes, how long the personal information is stored on the Social Networks or whether the Social Networks' data is passed on to third parties. If you are currently logged in to a Social Network as a user, the Social Network automatically collects, through trackers on your device, your Social Network ID or a link between the Social Network ID and the advertising ID (IDFA from Apple or GAID from Google) when you open the Social Network app through your mobile device (e.g., smartphone or tablet). This enables the Social Network to understand that you have visited our Social Media Page along with other social media pages that you have clicked on, whether you clicked on Social Network buttons integrated into websites that partner with the Social Network, and other online interactions that report user data to the Social Network. Based on this data, content or advertising tailored to you can be offered. You can find more information about the personal information collected by Social Networks, how it is used and how long it is stored by visiting the Social Network's privacy policies, linked above.
- **Interact with the Website.** In addition to the personal information you provide directly to us, if you consent to the deployment of cookies and other tracking technologies, we will also collect information from you automatically as you use the Website via cookies, pixels, web beacons, and similar tracking technologies. To the extent the EU or UK data protection laws apply to placement of cookies on our Website, the legal basis for this processing is your consent. You may withdraw your consent at any time with effect moving forward by visiting Your Privacy Choices. To the extent the EU or UK data protection laws apply, the legal basis for the placement and access of strictly necessary cookies is the performance of a contract. These cookies are necessary to provide the Website to you.

We use essential, performance, marketing, and analytics cookies to collect parent and teacher usage, device, and location information (determined through your IP address) when you interact with the Website. We use this information to: (i) enhance user experience on the Website; (ii) conduct analytics to improve the Website; (iii) prevent fraudulent use of the Website and detect unlawful activity; and (iv) diagnosis and repair Website errors, and, in cases of abuse, track and mitigate the abuse. Analytics and advertising cookies may be considered a sale or sharing under the California Privacy Rights Act. To opt out, please visit Your Privacy Choices. To learn more about your privacy choices, please see YOUR INFORMATION CHOICES.

Particular third-party cookies to note on our Website include the following:

- **Google Analytics.** We use Google Analytics to collect information on your use of the Website for its improvement. To collect this information, Google Analytics installs cookies on your browser or reads cookies that are already there. Google Analytics also receives information about you from applications you have downloaded that partner with Google. We do not combine the information collected through the use of Google Analytics with

personal information. Google's ability to use and share information collected by Google Analytics about your visits to our Website or to another application which partners with Google is restricted by the Google Analytics [Terms of Use](#) and [Privacy Policy](#). To prevent your data from being used by Google Analytics, you can download the Google Analytics opt-out browser add-on, which can be accessed [here](#). To opt out, please visit Your Privacy Choices.

- **Adobe Marketo Engage.** We utilize Adobe Marketo Engage to collect information on your interaction with our Website, including your web browsing activity, device information, IP address (which may be used to approximate your general location), the URL of the web page from which you navigate to our Website, the web search you performed that led you to our Website, social media profile information, purchasing history, and whether you clicked on any of our online advertisements. This information is collected via third-party cookies and similar technologies, such as web beacons (also known as tags or pixels) that Adobe Marketo Engage sets on your web browser. We use this information to manage our online content, improve the performance of our Website, and conduct targeted advertising campaigns. Please review Adobe's [Privacy Policy](#) for additional information on how Adobe Marketo Engage uses the information collected. To prevent your data from being used by Adobe Marketo Engage, you may opt out [here](#). To opt out, please visit Your Privacy Choices.
- **Firebase Crashlytics SDK.** We use the Firebase Crashlytics SDK to collect crash report information, including log data, user interactions occurring immediately before a crash occurs, crash counts, and user IDs. We use this information to enable crash reporting and crash management services, as well as share this information with our developers to analyze and prevent subsequent crashes from occurring in the future. Please review [Firebase's Privacy and Security Terms](#) for additional information on how Firebase uses the information collected. To opt out, please visit Your Privacy Choices.
- **Aggregate and anonymize data.** We aggregate and anonymize the data we collect for benchmarking purposes and for internal analytics. We maintain and use this data in deidentified form. We will not attempt to reidentify the data, unless it is necessary to determine whether our deidentification processes satisfy applicable data protection laws.

DreamBox will also use the personal information we collect as described in this section to comply with the law, to efficiently maintain our business, and for other limited circumstances as described in **HOW WE SHARE YOUR PERSONAL INFORMATION**.

DATA RETENTION

Unless otherwise stated in this Privacy Notice, we retain your personal information (i) for as long as the relevant account exists, (ii) until we no longer need your information to fulfill the purposes for which we collected it, or (iii) until we receive a valid request to delete the information, in which

case we will delete or anonymize the information within 30 days after receiving the request. If your account is associated with a school or school district, we will delete the information in your account 90 days after the applicable subscription agreement expires. However, we may need to use and retain your personal information for longer than the periods indicated above for purposes of:

- **Compliance with our legal obligations.** For example, retaining your records for the purpose of accounting, dispute resolution, and compliance with labor, tax, and financial regulations.
- **Meeting our safety and security commitments.** Such as keeping our properties secure and preventing fraud.
- **Exercising or defending legal claims.** We also may need to retain personal information for longer than the periods indicated above in order to respond to legal process or enforceable governmental requests, or to enforce our contracts or [Terms of Use](#), including investigation of potential violations.

HOW WE SHARE YOUR PERSONAL INFORMATION

A. General Sharing

DreamBox shares personal information as described in the **PERSONAL INFORMATION WE COLLECT, WHY AND FOR HOW LONG** section, and generally in the following instances:

- **Within DreamBox.** We share your personal information within DreamBox for the legitimate business purposes of efficiently and effectively providing the Services, such as accounting and customer service support. Access to your personal information is limited to those on a need-to-know basis. To the extent the EU or UK data protection laws apply, the legal basis for this is our legitimate interest in providing the Services more efficiently.
- **With teachers and parents/guardians.** We share students' diagnostic reports (education progress data) with their parent/guardian and teachers.
- **In the event of a corporate reorganization.** In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, acquisition, sale, joint venture, assignment, consolidation, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we would share personal information with third parties, including the buyer or target (and their agents and advisors) for the purpose of facilitating and completing the transaction. We will also share personal information with third parties if we undergo bankruptcy or liquidation, in the course of such proceedings. To the extent the EU or UK data protection laws apply, the legal basis for this is our legitimate interest in carrying out our business operations or, if required by law, consent.

- **For legal purposes.** We share personal information where we are legally required to do so, such as in response to court orders, subpoenas, governmental/regulatory bodies, law enforcement or legal process, including for national security purposes. We may share your information with our legal advisors or auditors to establish, protect, or exercise our legal rights or as required to enforce our terms of use or other contracts or to defend against legal claims or demands. We also share this information with third parties as necessary to: detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person; to comply with the requirements of any applicable law; or to comply with our legal obligations. To the extent the EU or UK data protection laws apply, the legal basis for this processing is compliance with the law or our legitimate interest in complying with non-EU data protection laws to which we are subject.
- **With your consent.** Apart from the reasons identified above, we may request your permission to share your personal information for a specific purpose. We will notify you and request consent before you provide the personal information or before the personal information you have already provided is shared for such purpose. You may revoke your consent at any time with effect going forward by emailing us at privacy@discoveryed.com.

B. Sharing in the Last Twelve (12) Months

For a business purpose. In the preceding twelve (12) months, DreamBox has disclosed the following categories of personal information for a business purpose to the following categories of third parties:

- We have disclosed your *identifiers* to service providers that assist us in providing the Services. These service providers assist us with the following: information technology (“IT”) support; data hosting; data analysis; customer relationship management; mailing; email delivery; professional services (lawyers, bankers, insurers, auditors, accountants); auto-rostering (for subscribed school accounts); purchase and payment; research and reporting; video/phone system; web analytics; and similar services.
- We have disclosed your *internet or other electronic network activity information* collected by cookies to our IT support to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and to identify and repair the Services and platform errors.
- We have disclosed your *internet or other electronic network activity information* collected by cookies to our cookie management provider.

C. Sale of Personal Information

In the preceding twelve (12) months, DreamBox has shared your *internet or other electronic network activity information* collected via cookies and other tracking technologies with our data analytics/advertising providers as described in **PERSONAL INFORMATION WE COLLECT, WHY AND FOR HOW LONG**. To revoke your consent or to adjust your privacy preferences (opt in or out), please visit Your Privacy Choices.

SERVICE PROVIDERS THAT COLLECT OR MAINTAIN INFORMATION FROM STUDENT USERS

For purposes of children and student privacy laws (i.e., COPPA and FERPA), listed below are the names and contact details of the Learning Apps’ service providers that collect or maintain Student Users’ personal information, as well as the purposes for processing and the categories of personal information they process:

Service Provider	Contact Information	Purpose	Personal Information
Amazon Web Services	410 Terry Avenue North, Seattle, WA 98109-5210, ATTN: AWS Legal	Storage	Name; grade; Student ID; username; password; school login code; School ID; usage data (e.g., time stamps); IP address; browser data; device data; progress data (e.g., accuracy, place in the curriculum).
Pendo	301 Hillsborough St, Raleigh, NC 27603, gdpr@pendo.io	Research & reporting; in-product messaging	Visitor ID; Student ID; role; UI interactions (e.g., clicks, page views, navigation patterns); device data
Salesforce	Salesforce Tower, 415 Mission Street, 3 rd Floor, San Francisco, CA 94105 privacy@salesforce.com	Customer support	Student ID; device information

Datadog	620 8 th Ave., 45 th Floor, New York, NY 10018. privacy@datadoghq.com	IT and security; statistics	Student IDs
Skilljar	720 Olive Wy, #700, Seattle, WA 98101 legal@skilljar.com	Analytics; reporting	Name; email address; course enrollment data
Classlink	45 E Madison Ave, Suite 7, Clifton, NJ 07011 help@classlink.com	Rostering; SSO	Name; email address; Student ID; login credentials
Clever	113 Cherry Street, Suite #29434, Seattle, WA 98104 trust@clever.com	Rostering; SSO	Name; email address; Student ID; login credentials
Zoom	55 Almaden Boulevard, Suite 600, San Jose, CA 95113 educationalprivacy@zoom.us	Customer support	Student ID; device identifiers; messaging content

YOUR INFORMATION CHOICES

You have the following choices with respect to your personal information:

- **Opt out of marketing communications.** You may opt out of receiving marketing emails from us by clicking the “unsubscribe” link provided at the bottom of each email we send. Please note that we will continue to send you notifications necessary to the Services.
- **Correct or view your information.** You may send an email to privacy@discoveryed.com to correct or view certain personal information of yours in our possession.
- **Opt out of Google Analytics.** To prevent your data from being used by Google Analytics, you can download the Google Analytics opt-out browser, which can be accessed [here](#).
- **Opt Out of Adobe Marketo Engage.** To prevent your data from being used by Adobe Marketo Engage, you may opt out [here](#).
- **Opt out of interest-based advertising.** All session cookies are temporary and expire after you close your web browser. Persistent cookies can be removed by following your web browser’s directions. To find out how to see what cookies have been set on your computer or device, and how to reject and delete the cookies, please visit: <https://www.aboutcookies.org/>. Please note that each web browser is different. To find information relating to your browser, visit the browser developer’s Website and mobile application. If you reset your web browser to refuse

all cookies or to indicate when a cookie is being sent, some features of our website may not function properly. If you choose to opt out, we will place an "opt-out cookie" on your device. The "opt-out cookie" is browser specific and device specific and only lasts until cookies are cleared from your browser or device. The opt-out cookie will not work for essential cookies. If the cookie is removed or deleted, if you upgrade your browser or if you visit us from a different computer, you will need to return and update your preferences. By clicking on the "Opt-Out" links below, you will be directed to the respective third-party website where your computer will be scanned to determine who maintains cookies on you. At that time, you can either choose to opt out of all targeted advertising or you can choose to opt out of targeted advertising by selecting individual companies who maintain a cookie on your machine. Please note that DreamBox adheres to the Digital Advertising Alliance's self-regulatory principles.

- Network Advertising Initiative (NAI) Opt-Out: https://www.networkadvertising.org/managing/opt_out.asp
 - Digital Advertising Alliance (DAA) Opt-Out: <https://optout.aboutads.info>
 - European Union (EU) /European Economic Area (EEA) Opt-Out: <http://www.youronlinechoices.eu>
 - In general, to disable cookies and limit the collection and use of information through them, you can set your browser to refuse cookies or indicate when a cookie is being sent.
- **Opt out of email tracking.** You can disable this tracking by blocking automatic loading of images in your email.

PARENT/GUARDIAN RIGHTS

Parents and legal guardians at all times have the right to: 1) review their student's personal information maintained by us; 2) require us to correct or delete the personal information; and/or 3) refuse to permit us from further collecting or using the student's information. Please note that these requests should be submitted to the school; we will assist the school in complying with the requests. Access, correction, and/or deletion requests can be exercised via email by emailing us at privacy@discoveryed.com.

YOUR DATA SUBJECT RIGHTS

Individuals in the European Union and United Kingdom are entitled to certain rights under General Data Protection Regulation ("GDPR") and the Data Protection Act 2018 ("DPA"), respectively. To the extent these laws apply to our processing of your personal data, you are entitled to the following rights:

- **Right to access:** For any of the processing described above, you have the right to ask us for copies of your personal data. However, this right has some exemptions, which means you may not always receive all the personal data we process. Applicable exemptions may

include the management information exemption (data that we process for management forecasting or management planning about a business or other activity), or certain instances of ongoing or prior negotiations with the requestor, among others.

- **Right to rectification:** For any of the processing described above, you have the right to ask us to rectify personal data you think is inaccurate or incomplete.
- **Right to erasure:** You have the right to ask us to erase your personal data except when the legal basis for the processing is to fulfill our legal obligations or to carry out a task in the public's interest.
- **Right to restrict processing:** For any of the processing described above, if you believe that your personal information is inaccurate, that our processing is unlawful, or that we do not need your personal information for a specific purpose, you have the right to request that we restrict the processing of this personal information. You also have the possibility to request that we stop processing your personal information while we assess your request. If you object to our processing (per your right to object below), you may also request us to restrict processing of your personal data while we make our assessment.
- **Right to object to processing:** You have the right to object to our processing of your personal data when the legal basis for the processing is pursuant to our legitimate interests by referencing your personal circumstances. This may apply, for example to processing in connection with our social media pages.
- **Right to data portability:** You have the right to ask that we transfer the personal information you gave us from one organization to another or give it to you. However, this right only applies when: (i) you have provided your personal information to us; (ii) the legal basis for the processing is your consent or for the performance of a contract; and (iii) the processing is carried out by automated means. You can invoke this right for the processing of the information we automatically collect from you as you interact with the Website via “cookies”, pixels, and similar tracking technologies. This may also apply in connection with your account information.
- **Right to lodge a complaint:** If you are located in the UK, you have the right to lodge a complaint with the Information Commissioner's Office at: <https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/y> or accessicoinformation@ico.org.uk at their helpline on 0303 123 1113. If you are located in the EU, you have the right to lodge a complaint with the relevant [Supervisory Authority](#).

To exercise these rights, please contact us at privacy@discoveryed.com.

RIGHTS OF CALIFORNIA AND COLORADO RESIDENTS

The California Consumer Privacy Act as amended by the California Privacy Rights Act (collectively, “CCPA”) and the Colorado Privacy Act (“CPA”) entitle California and Colorado residents (respectively) to certain rights. To the extent the CCPA and/or CPA apply to our processing of your personal information, you are entitled to the following rights:

- **Right to Access/Know.** You have the right to request what personal information we have collected, used, disclosed, and sold about you, unless doing so proves impossible or would involve disproportionate effort.
- **Right to Deletion.** You have the right to request the deletion of your personal information that we collect or maintain, subject to certain exceptions. For example, if we are required by law to retain the information that you are asking to be deleted, we would not be able to delete the information until we are legally permitted to delete it.
- **Right to Correct.** You have the right to correct inaccurate personal information that we collect or maintain.
- **Right to Opt Out of Sale/Sharing.** You have the right to opt out of the sale or sharing of your personal information to third parties.
- **Right to Non-Discrimination.** You have the right to not receive discriminatory treatment if and when you exercise your privacy rights under the CPRA.
- **Right to Limit Use of Sensitive Personal Information.** You have the right to limit the use of your sensitive personal information when such use goes beyond that which is necessary for providing the Services or certain other permissible purposes like fraud, customer service or quality control. Sensitive information includes Social Security number, driver’s license number, biometric information, precise geolocation, and racial and ethnic origin.

To the extent the CPA applies to our processing of your personal information, you are also entitled to the following additional rights under the CPA:

- **Right to Opt Out of Profiling.** You have the right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects. However, DreamBox does not process personal information in a manner that gives rise to this right.
- **Right to Know/Appeal inaction.** If you submit a request to exercise any rights under the CPA and we do not take action on your request, we will inform you of our reasons for not taking action. You can appeal by emailing us at privacy@discoveryed.com.

If you are a California or Colorado resident and wish to exercise your privacy rights (as applicable), you may submit a request via email at privacy@discoveryed.com or call toll-free 1-800-323-9084.

Please indicate your state of residence upon submission of your request. You may opt in or out of non-essential cookies at any time by using the toggles in Your Privacy Choices.

For requests submitted via telephone, you must provide us with sufficient information that allows us to reasonably verify you are the person about whom we collected the personal information and describe your request with sufficient detail to allow us to properly evaluate and respond to it. In doing so, we will take steps to verify your request by matching information provided by you with the information we have in our records. If we are not able to verify your identity for access and deletion requests with the information provided, we may ask you for additional pieces of information. If you are a parent or guardian and are inquiring about your child, we will ask you to confirm the name of the child as it appears on the account. If you are an educator, we will ask you for your school name, school zip code, and your role.

Only you, or a person that you authorize to act on your behalf may make a request related to your personal information. If you are an authorized agent making a request on behalf of another individual, you must provide us with signed documentation that you are authorized to act on behalf of that individual.

We will try to act on your request within one month or quicker if local law requires. You will be notified of receipt of your request within 10 days. Occasionally it could take us longer than month if your request is particular complex or you have made a number of requests. In this case, we will notify you and keep you updated.

NOTICE FOR NEVADA RESIDENTS

Certain Nevada consumers may opt out of the sale of “personally identifiable information” for monetary consideration (as defined under Nevada law) to a person who in turn licenses or sells such information to another person. We don’t currently sell or provide your personal information in this manner. However, to opt out of the sale of your personal information in the future, you may submit a request to us via email to privacy@discoveryed.com. Proof of identification may be required before such a request is granted.

INFORMATION SECURITY

DreamBox maintains ISO 27001 certification. We implement appropriate technical and organizational security measures, such as access controls and encryption, to protect the personal information that we collect and maintain from unauthorized access, destruction, use, modification, or disclosure. Additional measures include firewalls, multi-factor authentication via single sign on, malware protection, regular staff training, and robust incident response procedures. However, no security measure or modality of data transmission is 100% secure, and we are unable to guarantee the absolute security of the personal information we have collected from you.

CHANGES TO THIS PRIVACY NOTICE

We may amend this Privacy Notice in our sole discretion at any time. If we do, we will post the changes to this page, and will indicate the date the changes go into effect. We encourage you to review our Privacy Notice to stay informed. If we make changes that materially affect Your Privacy Choices, we will notify you by prominent posting on the Website and/or via email, and obtain your consent, if required.

CONTACT US

If you have any questions or concerns regarding this Privacy Notice, please contact us by email at privacy@discoveryed.com, or by telephone at 1-800-323-9084.