ClassCraft Privacy Policy

Classcraft Studios Inc. ("Classcraft") takes the privacy of its students, teachers and parents seriously. Classcraft is committed to protecting users' privacy while providing a personalized and valuable learning experience.

Classcraft has taken the <u>Student Privacy Pledge</u> as a public commitment for the responsible collection and use of student data. Among other things, we have committed to only collect student information that is needed for authorized education/school purposes, or as authorized by the parent/student, to not sell student personal information, to not use student information for behavioral targeting of advertisements to students and to not retain student personal information beyond the time period required to support the authorized educational/school purposes. The complete Student Privacy Pledge can be read at <u>studentprivacypledge.org</u>. Classcraft has developed this Privacy Policy to let users know in general terms about Classcraft's personal information management practices, including what personal information is collected and how it is processed and used. If users have any questions about our Privacy Policy they may contact Classcraft at <u>support@classcraft.com</u>.

The School Environment

As Classcraft is designed to be played in groups, much of the information collected about the teachers and students is intended to be shared. Classcraft stores the following information that the teacher and students may choose to share with their class, colleagues or school administration:

- Student or teacher's name;
- Student or teacher's email address;
- Student or teacher's game activities;
- School and class information;
- Teacher-generated content (for example: posts, assignments, quizzes, etc.);
- Messages and comments within the game.

It is understood that the teacher is both the game master and the teacher and that game related or class related activities, information or communications may be visible to teachers, students and others who are physically in the classroom. Furthermore, some information will be available to other teachers and school or district administrations (see "Classcraft User Access Privileges" below). Collectively, the classroom, teachers, and school and district administration are referred to in the document as the School Environment. The sharing of the above information is therefore also subject to the privacy policies of the relevant educational institutions. If users have any questions about the sharing of this information Classcraft would recommend that users contact the relevant educational institutions.

Classcraft has taken all precautions to make sure that this data will not be shared outside the School Environment except as outlined in this Privacy Policy.

Collected Information

Personal Information

Classcraft collects personal information for the following purposes:

- Logging in to the application;
- Sales and invoicing;
- Operating the game;
- Communicating within the game;
- Handing-in assignments and completing tasks within the application;
- Participating in teacher forums;
- Contacting customer support;
- Marketing and understanding user behavior (teachers and parents only).
  The information collected for **TEACHER** accounts may include:
- Email address;
- Shipping and billing address;
- Referral data should teachers refer Classcraft to other teachers;
- Browser and device types;
- School and class information;
- Purchase and payment details;
- Game play data;
- Teacher-generated content (for example: posts, assignments, quizzes, etc.);
- Messages and comments within the game;
- Connected teacher accounts if the teacher is connecting to other teachers;
- Assignment grades;
- User activity (for example: logins, pages viewed, account setup steps completed, etc.).
  The information collected for **PARENT** accounts may include:
- Email address;
- Shipping and billing address;
- Browser and device types;
- Purchase and payment details;
- Game play data;
- Messages within the game;
- User activity (for example: logins, pages viewed, account setup steps completed, etc.).
  The information collected for **STUDENT** accounts is limited to:
- Username (this is optional, if the teacher so chooses);
- Email addresses (this is optional, if the teacher so chooses);
- First and last name (this is optional, if the teacher so chooses);
- Associated classes, teachers and parents;
- Game play data (for example: awarding or removing of XP, AP, HP, GP, customization of their avatars and the use of powers in the game, training of pets, etc.);
- Assignment grades (this is optional, if the teacher so chooses);
- Messages and comments within the game;
- Student-generated content (for example: assignments, quiz answers, etc.).
  Classcraft does not collect the following data:

- Physiological biometric data;
- Information on free or reduced lunch status;
- User's contact lists or friends lists.

Cookies

Cookies are small data files that are commonly stored on your device when you use websites and on-line services. They are widely used to make websites work, or to work more efficiently, as well as to provide reporting information and assist with services or personalization. There are also other technologies that are similar to cookies, which may store small amount of data on your device ("local storage").

Classcraft uses the following types of cookies and local storage (collectively called "Cookies" herein):

- *Performance and functionality Cookies*: These Cookies are not essential, but help us to personalize and enhance your user experience. For example, they may help us to remember your preferences and prevent you from needing to re-enter information more than once, or to remember your id and password so that you do not have to enter them each time you use our services.
- *Advertising Cookies*: These Cookies use information about your visit, such as the pages you visit, your use of our services or your response to ads and emails so that we can deliver a user experience that is more relevant to you. Advertising cookies are NEVER used for targeting of advertisements to students.

If you wish to disable the use of Cookies, you may do so from your browser preferences menu of your browser software by either turning off Cookies or by using your browser's privacy mode when using our services.

What Does Classcraft Do With the Collected Information?

Collected information is used for the following purposes:

- To allow the teacher to manage and play the game;
- To allow classmates to play the game;
- To enable class related activities such as classroom content, assignments, and communications;
- To allow parents to play the game with their child(ren);
- To allow teachers, students and parents to compare individual student performance against aggregate results from within that student's class;
- For software support purposes;
- For billing purposes, and
- For marketing purposes (teachers and parents only).

Classcraft does not share personally identifiable information outside the School Environment, except for those purposes stated within this document, without first obtaining the express written consent of the individual.

By default, students can see game events for other students in their class from within their account. The teacher can restrain the information visible to other students: on a per class basis, they can hide the reasons for gaining and losing points and also limit visibility to a student's teammates only (for the purpose of being able to play the game).

Parents who login to the game are not granted access to personally identifiable information of any student other than their child.

Collected information in aggregate form, whereby individual users are not identifiable, is used for the following purposes:

- For statistical purposes;
- For research;
- For strategic development and business management;
- For marketing purposes related to Classcraft; and
- For customer support purposes.

Classcraft User Access Privileges

Teachers are granted access to student data for the students in their classes and to parent data for the students in their classes. With the multiclass option, teachers from the same school can see the name, username and character class of students who are in classes that are linked to theirs, but do not have access to other student information outside of their own class. The school administrators may also have access to this data.

Students are granted access to their personal data, their team game play data, all content posted by their teacher in the classroom content system, comments of other students in the classroom content system, as well as any data that is displayed by the teacher in front of the whole class. By default, students can see game events for other students in their class from within their account. The teacher can restrain the information visible to other students: on a per class basis, they can hide the reasons for gaining and losing points and also limit visibility to a student's teammates only (for the purpose of being able to play the game).

Parents are granted access to data related to their child, their child's teacher and to aggregate data for their child's class.

Postings in the teacher forums include the teacher name and photo and are available publicly. Postings to the teacher forums should not be considered private communications.

Student Records

Student records are the property of and under the control of the school, school district and/or the teacher. Students can access their student records by logging in to their student account. Parents of students under the age of 18 can access their child's information via the parent account, by logging in using their child's account, by

contacting the teacher or by contacting Classcraft at support@classcraft.com. Corrections of any erroneous information should first be brought to the attention of the teacher. In the event that the teacher is unable to make the correction, parents should advise Classcraft at support@classcraft.com, who will then work with the teacher or school to facilitate correction of any erroneous information.

Third parties are not granted access to personally identifiable information or educational records or other student records except as provided in this Privacy Policy, or after first obtaining the express written consent of the parent or student over 18 years of age. No parties, including Classcraft, will be allowed to engage in targeted advertising of any sort directed towards the students.

Should there be any unauthorized disclosure of a student's records, Classcraft will notify the teacher, parent and student via email within 3 days following discovery of the unauthorized disclosure.

Deletion of Student Records

The following student records are retained for a period of no more than 12 months after the last entry was made to the student account in the game:

- Student game play information, such as XP, HP, AP, GP, and all related data including dates, descriptions, and point values;
- Student behavioural analytics, including points, descriptions and dates;
- Student assignments and all comments and posts by the student in the classroom content system; and
- Any other student information that may not be used by the student in future years. Student avatars and pets, along with the student account information are retained for a period of no more than 36 months following the last entry made to the student account in the game. This is because students playing Classcraft in subsequent years will still have access to their avatars and pets during those future classes, to a maximum of 36 months. Parents and students over the age of 18 can request to have their account, or the account of their child, and related information deleted from the Classcraft database by advising Classcraft at support@classcraft.com.

Deletion of Parent and Teacher Records

Parent records will be retained for a period of no more than 36 months following the last entry made to one of their children's student accounts. This time period has been selected to facilitate streamlined registration for Classcraft throughout their child's education.

Personal data of teachers and any data not already deleted that is related to a teacher's classes will be deleted 5 years after their account has become inactive.

Security Policy

Classcraft uses industry standard methods to protect its customer's data against unauthorized use or access, alteration, unlawful or accidental destruction or loss. It

should however be noted that 100% guarantee cannot be made due to constant advances in virus and hacking technology. Classcraft can therefore not be held responsible for data loss or alteration. A full copy of the Classcraft Security Policy can be obtained upon request to support@classcraft.com.

Links and Third Party Integration

Classcraft websites may contain links to other websites. Classcraft tries to only link to websites that share Classcraft's high standards of decency, fairness and integrity. Classcraft tries to make sure that these links are safe for everyone, but the privacy and data collection practices on any linked websites are entirely separate from Classcraft and are not covered by this Privacy Policy. Other websites, which may contain material not suitable for children, may also link to Classcraft websites without Classcraft's knowledge or consent. Classcraft does not necessarily endorse any outside websites and Classcraft has no responsibility for the content, policies or actions of these websites.

Third Party software may be integrated with Classcraft (such as Google Classroom, Microsoft, Facebook or Twitter). Classcraft has no responsibility for the content, policies or actions of these websites and they are entirely separate from Classcraft and are not covered by this Privacy Policy.

Classroom Content

Teachers and students may make postings in various sections of Classcraft. Common examples of this would be links to videos hosted by YouTube or Vimeo, links to Wikipedia or other reference material, and so on. It is the responsibility of the teacher to ensure that this content is appropriate and free from links to sites which may compromise the privacy of their students. Classcraft does not monitor the classroom content and has no responsibility for this content. The Classcraft software has features within it to allow teachers to monitor and control all content posted by the students in their class. Furthermore, students may flag inappropriate comments from within Classcraft and their teacher will be automatically notified.

Changes to and Access to Personal Information

Users have access to their personal information via their Classcraft user account.

Users may also request a copy of their personal information in writing by sending a written request to support@classcraft.com. The following information has to be provided:
- First and last name;
- Email;
- Phone Number;
- Class name and school;
- Student name and/or user id and/or username;
- Teacher name.

The user will then be contacted by a member of the Classcraft team for verification purposes.

Users can also correct and update their personal information using the same procedures described above.

Change of Control

In the event that all or a portion of Classcraft or its assets are acquired by or merged with a third party, personal information that we have collected from users would be one of the assets transferred to or acquired by that third party. This Privacy Policy will continue to apply to your information, and any acquirer would only be able to handle your personal information as per this policy (unless you give consent to a new policy). We will provide you with notice of an acquisition within thirty (30) days following the completion of such a transaction, by posting on our homepage, or by email to your email address that you provided to us. If you do not consent to the use of your personal information by such a successor company, you may request its deletion from the company.

In the unlikely event that Classcraft goes out of business, all user information will be securely deleted within 12 months of the date of going out of business.

Disclosure of Information to Satisfy Legal Obligations

Classcraft may disclose personal information if we have a good faith belief that doing so is necessary to comply with the law, such as complying with a subpoena or other legal process. We may need to disclose personal information where, in good faith, we think it is necessary to to protect the rights, property, or safety of Classcraft, our employees, our community, or others, or to prevent violations of our our Terms of Service or other agreements. This includes, without limitation, exchanging information with other companies and organizations for fraud protection or responding to government requests.

Changes and Updates to the Privacy Policy

This Privacy Policy is effective as of November 1, 2016 and is version 1.3. Classcraft may, at its sole discretion, update, revise, modify and supplement from time to time this Privacy Policy. Should we make modifications to this policy or the related User Agreements, we'll post a notice that you will receive when you login to the game and/or we will send an email directly to you with a copy of the new documents. Classcraft's updated Privacy Policy and User Agreements will also be posted on Classcraft's public facing website. Classcraft asks users to review the updated Privacy Policy and/or User Agreements before continuing to use our services. If users do not accept the updated Privacy Policy users can cancel their subscriptions in accordance with the Teacher License Agreement, Student Terms of Use and/or Parent Terms of Use. The user's continued use of the services provided by Classcraft after the updated

Privacy Policy takes effect will constitute user's acceptance of the updated Privacy Policy.

Consent to the Gathering and Processing of Information

By accepting the Teacher License Agreement, Parent Terms of Use and/or Student Terms of Use users are expressly giving Classcraft a special declaration that users have decided by their own free will to grant Classcraft specific authorization to collect, process and use the personal information stipulated in this Privacy Policy and to use such information in accordance with what is stipulated in this Privacy Policy. Users are further declaring that users are aware of the purpose for Classcraft collecting, processing and using such information, how the processing will be conducted, how users' privacy will be protected and that users are authorized to withdraw their consent.

Contact

Classcraft's service to its users and users' trust is of utmost importance to Classcraft. If users have any questions about this Privacy Policy, users should contact Classcraft at support@classcraft.com.