



## LearnSafe PRIVACY POLICY

**Effective: January 1, 2018**

LearnSafe is a web based platform owned and operated by Slate XP, Inc. that enables schools to identify, track and address at-risk computer behaviors, facilitating compliance with the Children's Internet Protection Act (CIPA) and creating a safe school culture. This policy describes the information we may collect from our school customers ("users") and their students, and how we protect the privacy of that information.

By accessing or using LearnSafe, you agree to the terms of this Privacy Policy.

### **Information You Provide**

In order to use LearnSafe, we ask authorized school employees to provide us with a screen name and the name of their school. We use this information to create the user account, provide the services, and provide access credentials to LearnSafe so that users may view the LearnSafe platform and address potentially problematic student behaviors. We also use this information to create user credentials to the LearnSafe support portal, where users may submit questions related to technical or other difficulties using LearnSafe.

Users may also store notes about at risk issues on the LearnSafe platform.

Providing the services includes collecting the student or user names, school-issued student ID number, school names, Internet Protocol (IP) address, browser type, machine model, webpages viewed and activity on the webpages for students in the school. This information is monitored and sorted based on policy criteria provided by the school, for the purpose of identifying for the school at-risk computer behavior.

### **Information We Collect Automatically**

When you visit LearnSafe, our servers automatically record information sent from your browser ("Log Data"). Log Data may include information such as your computer's Internet Protocol ("IP") address, pages of LearnSafe that you visit, the time spent on those pages and access times and dates. We use this information to monitor, analyze use of and administer LearnSafe and to better tailor it to your needs. To collect this information, we use technological tools including:

### **Cookies**

A cookie is a small data file sent from a Web site or application and stored on your computer or device. Cookies allow us to recognize your browser and recognize it when you return to LearnSafe, and to remember your login information. Cookies also allow us to serve certain LearnSafe features, to better understand how you interact with LearnSafe, and to monitor aggregated usage by Members. You can set your browser to detect some cookies, to stop accepting cookies or to prompt you before accepting a cookie. If you do not accept cookies, however, you may not be able to use all features of Slate XP. To learn more about browser cookies, including how to manage or delete them, look in the Tools, Help or similar section of your Web browser, or visit [allaboutcookies.org](http://allaboutcookies.org).



We use third party service providers to assist us in collecting and understanding Log Data.

By using LearnSafe, you agree to our use of these tracking technologies.

### **How We May Use Your Information**

We do not sell or rent personally identifiable information.

We use and disclose personal information for the following purposes:

- To create user accounts and to provide the services
- To investigate a suspected violation of our Terms of Service, suspected fraud or other unlawful activity;
- As may be required by law or by a court order, in which case, where legally permitted, we shall attempt to notify you and work with you to seek to limit the scope of the required disclosure;
- To our third party service providers to allow them to provide LearnSafe features on our behalf;
- In the event of a reorganization, merger, sale, bankruptcy or other business change, in which case your information will remain subject to the terms of this Privacy Policy; and
- With your consent and as permissible under applicable laws and regulations.

We deidentify information in accordance with the requirements of applicable law, and we may use deidentified information, including aggregated deidentified information as described above and to improve LearnSafe, to demonstrate the effectiveness of LearnSafe, including in our marketing materials, and to develop and improve educational products and services.

### **Third Party Service Providers**

We may employ third party companies and individuals to facilitate delivery of LearnSafe, to provide certain features on our behalf, such as customer service, maintenance services, database management, web analytics and improvement of LearnSafe, or to assist us in analyzing how LearnSafe is used.

### **How You Can Access and Modify Your Information**

You may review, update, correct or delete personal information in your account by sending a request to [support@slatexp.com](mailto:support@slatexp.com).

### **Data Retention**

We may retain your information for as long as your account is active or as needed to provide you the Service and comply with applicable law and/or our contractual obligations. If you would like us to delete your records in our system prior to termination of your agreement, please contact [support@learnsafe.com](mailto:support@learnsafe.com) or [info@learnsafe.com](mailto:info@learnsafe.com). We will delete your records within 30 days of receipt of your written request.

We will retain aggregated, deidentified information for the purposes described above.



### **Security**

Slate XP is concerned with safeguarding your information. We strive to provide commercially reasonable practices, including administrative, technical, and physical safeguards, including encryption of data in transit, firewalls, access controls and additional measures to protect the confidentiality, availability, and integrity of your data and in alignment with requirements of applicable regulation.

No method of transmission over the Internet, or method of electronic storage, is 100% secure, and we are not responsible for security incidents not reasonably within our control. You are responsible for managing the sharing of your user name and password, and for notifying us in the event that you know or suspect that your account credentials are no longer secure.

### **Updates To This Privacy Policy**

As we continue to develop LearnSafe, we may make changes to this Privacy Policy. The “last updated” date at the top of this policy indicates when it was last revised. We will also post a notice within LearnSafe, and provide other notifications as required by law. If we make material changes to this Privacy Policy, we will notify our primary business contact via the email address we have in our records, and changes will become effective when accepted by that contact on behalf of their authorized employees. Non-material changes will become effective when posted in LearnSafe.

### **Contact Information**

For additional information regarding our privacy practices, please contact us at:

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