

tailorEd Privacy Statement

(Effective - 6/1/21)

Thank you for entrusting Tailor-Ed Systems, Inc. d/b/a tailorEd (“tailorEd” and “we”) with the educational data of your students and your personal information. Holding and protecting this data and personal information is extremely important to us and we take this responsibility seriously. We want you to know who we’re handling your information.

This Privacy Statement covers information we collect when you use our services or our websites (including tailor-sys.com) or otherwise interact with tailorEd unless a different privacy policy or agreement regarding your personal information is provided to you.

Summary

We use your personal information as this Privacy Statement describes. No matter where you are, where you live, or what your citizenship is, we value the protection of your information and provide the same standard of privacy protection to all of our users no matter their country of origin or location.

Section/Topic	Summary of Section/Topic
What information tailorEd collects	tailorEd collects information directly from you for your registration, payment, transactions and user profiles. We also automatically collect from you your usage information, cookies, and device information, subject where necessary, to your consent. tailorEd may also collect the personal information from user’s from third parties. We only collect the minimum amount of Personal Information necessary from you, unless you choose to provide more.
What information tailorEd does not collect	With the exception of information provided to us from clients via contracts/agreements for the aggregation and use or student performance data (for which the contracts/data privacy agreements with those organizations control), we do not knowingly collect information from children under 13, and we don’t collect Sensitive Personal Information.
How we use your information	This section of our Privacy Statement describes the

	ways in which we use your information, including to provide you services, to communicate with you, for security and compliance and to improve our communications and services.
How we share the information we collect	We do not sell your personal information and we do not host advertising. We would only share your information with third parties: (i) with your consent, (ii) with our services providers, and to (iii) to comply with legal obligations.
How you can access and control the information we collect	We provide ways for you to access, alter or delete your personal information.
Our use of cookies	We only use cookies as necessary to provide, secure and improve services.
How we secure your information	We take all measures reasonably necessary to protect the confidentiality, integrity and availability of your personal information and to protect the services on which your information is stored.
Our Global Privacy Practices	We provide the same privacy protections regardless of where users are located.
How we communicate with you	We communicate with you by email. You can control the way we contact you by contacting us.
Resolving Complaints	In the unlikely event that we are unable to resolve a privacy concern quickly and thoroughly, we provide a path for dispute resolution.
Changes to our Privacy Statement	We notify you of material changes to this Privacy statement at least thirty (30) days before any such changes become effective.
Contacting us	Please feel free to contact us if you have any questions regarding our Privacy Statement.

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What information tailorEd collects

"User Personal Information" is any information about one of our users which could, alone or together with other information, personally identify them or otherwise be reasonably linked or connected with them. Information such as a username and password, an email address, a real name, an Internet protocol (IP) address are examples of "User Personal Information."

User Personal Information does not include aggregated, non-personally identifying information that does not identify a user or cannot otherwise be reasonably linked or connected with them. We may use such aggregated, non-personally identifying information for research purposes and to operate, analyze, improve, and optimize our Website and Service.

Information users provided directly to tailorEd

Registration Information

We require some basic information at the time of account creation. When you create your own username and password, we ask you for a valid email address.

Information tailorEd automatically collects from your use of our Site

Usage Information

If you're accessing our Website, we automatically collect the same basic information that most services collect, subject, where necessary, to your consent. This includes information about how you use the site, such as the pages you view, the referring site, your IP address and session information, and the date and time of each request. This is information we collect from every visitor to the Website. This information may include User Personal information.

Cookies

We may automatically collect information from cookies (such as cookie ID and settings) to keep you logged in, to remember your preferences, to identify you and your device and to analyze your use of our service.

Device Information

We may collect certain information about your device, such as its IP address, browser or client application information, language preference, operating system and application version, device type and ID, and device model and manufacturer. This information may include User Personal information.

Information from third parties

tailorEd may collect User Personal Information from third parties but tailorEd does not purchase User Personal Information from third-party data brokers.

What information tailorEd does not collect

With the exception of any information collected specifically by contract through out data analytic work and subject to the data privacy provisions of that contract or a data privacy agreement, we do not intentionally collect Sensitive Personal Information, such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Except as may be part of Services provided to school (and therefore subject to a separate DPA), tailorEd does not knowingly collect information from or direct any of our content specifically to children under 13. If we learn or have reason to suspect that you are a User who is under the age of 13, we will have to close your Account.

How we use your information

We use your information to provide you with an account and offer our services. Your User Personal Information is used to provide you with usernames and access to services.

We will use your email address to communicate with you, if you have asked us to do so, and only for purposes of communications regarding tailorEd and our service offerings.

We may use your User Personal Information to invite you to take part in surveys, beta programs, or other research projects, subject, where necessary, to your consent.

We may use your usage information and device information to better understand how our Users use our site and to improve our Website and Services.

We may use your User Personal Information if it is necessary for security purposes or to investigate possible fraud or attempts to harm tailorEd or other Users.

We may use your User Personal Information to comply with our legal obligations, protect our intellectual property and enforce our Terms of Service and/or Terms of Use.

We limit the use of your User Personal Information to the purposes listed in this Privacy Statement or as otherwise agreed through a contract or data privacy agreement between you and tailorEd. If we need to use your User Personal Information for other purposes, we will ask your permission first. If you would like to know what User Personal Information we have and how we're using it, please contact us at dana@tailored-sys.com.

Our legal basis for processing your information

To the extent that our processing of your User Personal Information is subject to certain laws, tailorEd is required to notify you about the legal basis on which we process User Personal Information. tailorEd processes User Personal Information on the following legal bases:

- Contract Performance - upon account creation or with the execution of a contract, and in accordance with that contract and our Terms of Service.
- Consent - we rely on your consent to use your User Personal Information when you complete a registration/profile, for a research project, beta program or survey and for marketing purposes, where applicable. You may withdraw your consent at any time by contacting us.
- Legitimate Interests - the remainder of processing of User Personal Information we perform is necessary for the purposes of our legitimate interests, for example, for legal compliance purposes, security purposes or to maintain ongoing confidentiality, integrity, availability and resilience of our systems, website and services.
- If you would like to request the deletion of your data on the basis of consent or if you object to our processing of your personal information, please contact us at dana@tailored-sys.com.

How we share the information we collect

tailorEd may share your User Personal Information with third parties under one of the following circumstances:

With your consent

We share your User Personal Information, with your consent, after letting you know what information will be shared, with whom and why.

With service providers

We share User Personal information with a limited number of service providers (like AWS) who process it on our behalf to provide or improve our services and who have agreed to privacy restrictions similar to the ones in our Privacy Statement by signing data protection agreements or making similar commitments. Our subprocessors are as follows:

Subprocessor	Function	Policy
AWS	Host our website	https://aws.amazon.com/privacy/

For legal disclosure

tailorEd strives for transparency in complying with legal process and legal obligations. Unless prevented from doing so by law or court order, or in rare, exigent circumstances, we make a reasonable effort to notify users of any legally compelled or required disclosure of their information. We may disclose User Personal Information or other information we collect about you to law enforcement if required in response to a valid subpoena, court order, search warrant, a similar government order, or when we believe in good faith that disclosure is necessary to comply with our legal obligations, to protect our property or rights, or those of third parties or the public at large.

WE DO NOT SELL YOUR PERSONAL INFORMATION FOR MONETARY CONSIDERATION.

How you can access and control the information we collect

You may contact tailorEd at dana@tailored-sys.com to request copies of your personal information, to correct any inaccuracies in that personal information and to request that the information be deleted. We will respond to all access or correction requests within thirty (30) days. We retain and use your information as necessary to comply with our

legal obligations, resolve disputes, and enforce our agreements, but barring legal requirements, we will delete your full provide (within reason) within sixty (60) days of your request.

Use of cookies

Cookies

We only use strictly necessary cookies. Cookies are small text files that websites often store on computer hard drives or mobile devices of visitors.

We use cookies solely to provide, secure, and improve our service. For example, we use them to keep you logged in, remember your preferences, identify your device for security purposes, analyze your use of our service, compile statistical reports, and provide information for future development. We use our own cookies for analytics purposes, but do not use any third-party analytics service providers.

By using our service, you agree that we can place these types of cookies on your computer or device.

How tailorEd secures your information

tailorEd takes all measures reasonably necessary to protect User Personal Information from unauthorized access, alteration, or destruction; maintain data accuracy; and help ensure the appropriate use of User Personal Information.

We enforce a security information program. Our program:

- aligns with industry recognized frameworks;
- includes security safeguards reasonably designed to protect the confidentiality, integrity, availability, and resilience of our Users' data;
- is appropriate to the nature, size, and complexity of our business operations;
- includes incident response and data breach notification processes; and
- complies with applicable information security-related laws and regulations in the geographic regions where we do business.

In the event of a data breach that affects your User Personal Information, we will act promptly to mitigate the impact of a breach and notify any affected Users without undue delay.

No method of transmission, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

tailorEd's global privacy practices

We store and process the information that we collect in the United States in accordance with this privacy statement. We provide the same high standard of privacy projects, as described within this privacy statement, regardless of a user's country of origins and location. We work diligently to comply with the data privacy laws wherever we do business.

How we communicate with you

We use your email address to communicate with you, if you've said that's ok, and only for the reasons you've said that it's okay. For example, if you contact or support with a request, we will respond to you via email.

tailorEd may occasionally send notification emails about changes in services or policies, new features, requests for feedback or to offer support. We also send marketing emails but you always have the option to unsubscribe to any marketing communications. Please note that you cannot opt-out of receiving important communications from us, such as emails from our support team or system emails.

Resolving Complaints

If you have concerns about the way that tailorEd is handling your personal information, please let us know immediately as we want to help. You may email us at dana@tailored-sys.com with the subject "Privacy Concerns" and we will respond within thirty (30) days.

In the unlikely event that a dispute arises between you and tailorEd regarding our handling of your User Personal Information, we will do our best to resolve it. Depending on where you are a resident, you may have other options for filing complaints with a government agency or local supervisory authority.

Changes to our Privacy Statement

Although most changes are likely to be minor, tailorEd may change our Privacy Statement from time to time. We will provide notification to users of material changes to this Private Statement through our website at least thirty (30) days prior to the change taking effect by posting a notice on our home page or sending you an email.

Contacting us

Questions regarding tailorEd's Privacy Statement or information practices should be directed to us via email at dana@tailored-sys.com.