



Monarch Teaching Technologies
“Vizzle”
Privacy Policy

Effective Date: December 1st, 2020

Monarch Teaching Technologies, Inc. (“MTT,” “we,” or “us”) is in the business of providing to school districts, schools, teachers, parents, and students its Vizzle proprietary learning software and materials through its Website, mobile application, web pages, and website application, which includes, without limitation, all associated computer software, functionality, reporting tools, features, media, printed materials, and "online" or electronic documentation (collectively, the “App”). This Privacy Policy (the “Policy”) applies solely to personal information collected through the App whether accessed via computer, mobile device, or other device (collectively, “Device”). MTT takes very seriously the privacy of our individual teachers, students, parents, and school district administrators (individually, a “User” and collectively “Users”) who utilize the App. Transparency is of the utmost importance when it comes to privacy and data collection, and this Privacy Policy contains explanations regarding the types of personal information collected, how that information may be used or disclosed, and how to access, correct or change the information.

COLLECTION AND USAGE OF DISTRICT INFORMATION

As you interact with MTT, there may be opportunities for you to provide us with your information. Additionally, we may collect certain information about you as further described below.

The categories of information that MTT collects about you may include, but are not limited to:

1. Identifiers/Contact information (such as name, address, city, state and ZIP code, email address, telephone number, unique personal identifier, online identifier, IP address).
2. Demographic information;
3. Payment information;
4. Information about your connected devices (such as mobile phone, computer, or tablet) and how you interact with our products, services, apps, and websites (such as IP address, browser type, unique device identifier, cookie data, and associated identifying and usage information);

We obtain the categories of personal information listed above from the following categories of sources:

1. Directly from you as described herein;
2. Indirectly from you (for example, through information we collect in the course of providing services and products);
3. Directly and indirectly from activity on the App; and



4. From third parties that interact with us in connection with the services and products we provide.

The App provides a platform that enables schools and/or school districts to securely assign lessons to students, and allow parents, teachers, and school district administrators to track a student's progress towards meeting certain Goals and Objectives (defined below).

Through the App we collect the following types of personal information for each User type.

School District Administrators: We ask for certain personal information when a school district administrator (such as a director of curriculum, technology administrator, principal, or other school district representative authorized by his or her respective school district to manage that school district's administration of the App) registers a school or school district with MTT. This personal information includes, but is not limited to, first and last name, school name, school district, school email address, account name and password, and phone number. We may also use and retain personal information provided by a school district administrator, if the school district administrator contacts us with regards to our App or other services, or responds to emails or surveys.

Teachers: When a teacher registers to use the App, MTT may use and retain limited personal information, including first and last name, school and/or school district, email address, and account name and password.

Parents: When a parent registers to use the App, MTT may use and retain limited personal information, including first and last name, school and/or school district, email address, and account name and password.

Students: When a student registers to use the App (to create a student profile), MTT may use and retain limited personal information, including first and last name, school and/or school district, and account name and password. However, a last name is not required to use the App. If the student so desires, an initial could be used instead of the full last name. Most students also have goals and objectives entered into the App that tie directly to his or her respective Individualized Education Program ("Goals and Objectives"). Moreover, some teachers will customize material in the App that is presented to students ("Custom Materials"). Custom Materials includes, but may not be limited to, creating material that identifies a student's favorite colors, persons, places, or toys, as well as any images, audio, and video that are of the student or a student's relatives, or of a student's favorite things.

MTT regards all Users' personal information to be confidential. MTT never sells any user information to any third-party. We use information we have collected about you and your devices to:

1. To provide the App and other products and services and maintain customer relationships;
2. To improve the quality, safety, and security of our products and services;



3. To administer your account(s);
4. To operate our websites and the App;
5. To develop new products and services;
6. To provide customer support and service;
7. To provide information;
8. For research, evaluation of use, and troubleshooting purposes;
9. For marketing and analytics purposes in a de-identified format;
10. To customize and improve communication content; and
11. To comply with legal, regulatory, or contractual requirements.

MTT does not typically receive student personal information from a student, and instead receives student personal information from the student's school district administrator, teacher, or parent. Each school and/or school district must confirm to MTT that it has obtained the appropriate parental consents, as needed, before the student is permitted to access the App. MTT has direct access to student personal information only as requested and directed by the school and/or school district, or for support or troubleshooting purposes, and access to this personal information is only for the purposes of supporting the App on the school's and/or school district's behalf. MTT will never directly access and view student personal information for any other purpose. **Any data used in a student profile is used strictly for educational purposes.**

Students and/or parents should contact their teacher or school district administrator with any questions about the school's use of technology service providers like MTT. In the case that either a student, teacher, or parent contacts MTT about the App, we will collect personal information only as necessary to respond to the request, and forward the request to the respective school district administrator.

We may automatically collect certain types of usage information when Users use the App. This information includes a User's IP Address, Operating System version, characteristics of the browser or device, and interactions with the system (including, but not limited to, pages viewed, lessons copied, lessons played, login duration, and what help videos have been accessed).

MTT uses;

CACHE:

Like many websites, MTT utilizes browser caching to improve the performance of the application. Types of data stored in a browser's cache may include - but is not limited to - images, audio files, video files, and lesson data needed in order to properly display lessons to the user. We may also store user responses to lessons in the web cache: This is done so that if a user loses internet connectivity during lesson interaction, we can upload their responses when connectivity is restored.

COOKIES:



Like many websites, MTT uses “cookies” on the App to improve its performance and enhance your experience. A cookie is a small text file which is placed on your device. Cookies help to analyze web traffic and allow web applications to respond to you as an individual. The web application can then tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. Cookies are used solely to provide services and for MTT to understand user interaction and usage.

The cookies that are used on the App can be broken down into the following categories:

- Persistent Cookies - This type of cookie is saved on your device for a fixed period and is not deleted when the browser is closed. Persistent cookies are used where we need to remember who you are for more than one browsing session. We utilize a persistent cookie when a user clicks our “Remember Me” checkbox (optional), so that a User’s account name and password are remembered for the next visit to the App.
- Performance or Analytical Cookies - Performance cookies are used to analyze how the App is used and to monitor its performance, which allows us to improve your experience in using the App. These cookies help us to tailor the content of the App to reflect what the App Users find most interesting and to identify when technical issues with the App arises. We may also use this data to compile reports to help us to analyze how the App is used, what the most common issues, are and how we can improve the App.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies. However, please be aware that if you disable or reject cookies, some features and services on the App may not work properly because we may not be able to recognize and associate you with your account(s).

The latest version of the VizZle Web application (nextgen.govizzle.com) runs on HTML5-based technology, and utilizes Intercom’s services (a third-party) to help onboard and assist certain users in the application. Intercom’s service agreement is listed below. **Intercom services are not enabled for student logins, and we never provide any student information to Intercom.**

Use of Intercom Services: We use third-party analytics services to help understand your usage of our services. In particular, we provide a limited amount of your information (such as your email address and sign-up date) to Intercom, Inc. (“Intercom”) and utilize Intercom to collect data for analytics purposes when you visit our website or use our product. Intercom analyzes your use of our website and/or product and tracks our relationship so that we can improve our service to you. We may also use Intercom as a medium for



communications, either through email, or through messages within our product(s). As part of our service agreements, Intercom collects publicly available contact and social information related to you, such as your email address, gender, company, job title, photos, website URLs, social network handles and physical addresses, to enhance your user experience. For more information on the privacy practices of Intercom, please visit <http://docs.intercom.io/privacy>. Intercom's services are governed by Intercom's terms of use which can be found at <http://docs.intercom.io/terms>. If you would like to opt out of having this information collected by or submitted to Intercom, please contact us.

Each of MTT's users is identified internally as a Student or a Teacher. Only Teachers interact with Intercom. If a Student logs into MTT's platform, Intercom is never initiated and no Student personal information is ever sent to Intercom.

We utilize additional third-party services for hosting, analytics, and SSO. A list of third parties is provided below.

List of Third Party Sites:

- Amazon Web Services, Inc.
- Google Inc.
- Salesforce
- WordPress
- Clever

Passive Information Collection and Use

We passively collect and use information in a variety of ways, including:

- Through your browser and Device: Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type, screen resolution, operating system version, and Internet browser type and version. We collect Device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).
- Pixel tags, web beacons, clear GIFS, or other similar technologies: These may be used in connection with some web pages to, among other things, track the actions of Users and compile statistics about usage and response rates.
- IP Address: Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a User visits the App, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many websites. We use IP Addresses for purposes such as calculating usage levels, helping diagnose server problems, and administering the App.



How We Use and Disclose Information

We may disclose personal information we collect or you provide as described in this Policy. The information may be disclosed for a business purpose to the following categories of third parties:

- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To our affiliates for related business purposes.

We use and disclose personal information you provide to us as described to you at the point of collection, such as when you (1) register for a user account, (2) submit payment or credit card information, (3) submit your name and e-mail address to receive product updates and marketing information, and (4) send e-mail messages or feedback, or transmit other information by e-mail. When you elect to engage in such activities, we may ask that you provide us personal information, such as your first and last name, mailing address (including zip code), e-mail address, mobile telephone numbers, and payment information.

We also use and transfer personal information from or about you:

- To respond to your inquiries and fulfill your requests, such as to send you documents you request or e-mail;
- To send you important information regarding our relationship with you or regarding the App, changes to our terms, conditions, and policies, and/or other administrative information;
- For our business purposes, such as marketing new products and services, data analysis, audits, developing new products or services, enhancing our App, improving our products and services, identifying usage trends, and determining the effectiveness of the App;
- To our third party service providers who provide services such as website hosting and moderating, mobile application hosting, data analysis, infrastructure provision, credit card processing, IT services, e-mail services, marketing services, auditing services, and other services, in order to enable them to provide services; and
- When we otherwise have your consent.

In addition, we use and disclose personal information collected as we believe to be necessary or appropriate: (a) as permitted by applicable law, including laws outside your country of residence; (b) to comply with any legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our Terms of Use; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. We may also use and disclose personal information collected through this Site in other ways, with your prior consent.



MTT will not distribute or otherwise disclose any personally identifiable information (“PII”) (as defined below) to any third party without the prior written consent of an applicable customer. MTT does not sell PII to third parties. MTT shall ensure that any third party that handles PII agrees to comply with this Agreement. If we ever transferred any student PII to a third party, we would only do so after verifying that those third parties adhere to the same standards that MTT follows when it comes to student PII.

Limits on Confidentiality

By using the App and sharing your personal information with us, you will have opted-in to our collection, disclosure and use of your personal information under this Privacy Policy.

We may use your personal information for the purposes of sending you registration information for the App, maintaining your account, customizing the App and/or material, processing your communications, and communicating with you about the App. We may also use personal information for auditing, research and analysis to operate and improve MTT’s technologies and services.

Further, when you send email communications to MTT, we may retain those communications in order to process your inquiries, respond to your requests and improve our services.

Student personal information is used by MTT only for educational purposes and under the direction and discretion of the school, school district administrator, teacher, and/or parent(s).

We may also share your personal information in any of the following circumstances:

- (i) Student personal information. We may provide access to student personal information to authorized school district administrators, teachers, and parents within the student’s school district and/or school.
- (ii) Security. Due to the existing legal, regulatory and security environment, MTT may disclose aggregate level and/or personal information about its Users to protect the rights, property or safety of MTT, our customers, or the public, to prevent fraud or imminent harm, and in connection with providing for the security of our computer systems, computer network, telecommunications network, products and services.
- (iii) Sale or Transfer of Business. We may sell or otherwise transfer your personal information to a successor of MTT in connection with an asset sale, acquisition, merger, consolidation, divestiture, stock sale, purchase of part or all of the assets of the business, or other corporate transaction, or by way of assignment (whether by operation of law or otherwise) in connection with any such or similar transaction or in connection with the administration of a bankruptcy estate. In the case of such an event, MTT’s systems,



technology, intellectual property, and data, including personal information, will become the property of the successor. If the successor has a Privacy Policy that does not adhere to the standards set forth by MTT in this document, then users will have a choice to continue to send information to the successor entity or have their information deleted.

MTT may also facilitate the sharing of student personal information with Third Party Businesses when instructed and authorized to do so on behalf of the school district, school, or a parent. If this sharing occurs, this Privacy Policy applies to the App only and not to other services or third party applications. School districts, schools and parents should understand the privacy practices of any third party application or service prior to authorizing the sharing of any personal information.

STORING AND PROTECTING PERSONAL INFORMATION

Any personal information collected through the App is stored and processed in the United States. Any customers that reside outside of the United States consent to have personal information transferred to the United States.

MTT protects your personal information by using safeguards that MTT believes are appropriate to the sensitivity of the information. We maintain certain administrative, technical and physical safeguards to help protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of your personal information. Each of our employees, subcontractors, or business partners who have access to your personal information is informed about our Privacy Policy for protecting personal information.

MTT undertakes substantial efforts to protect the confidentiality of the personal information and other information it has collected about individual Users and, except as otherwise set forth in this Privacy Policy, we will not intentionally disclose this information to anyone outside MTT.

Except as otherwise set forth in this Privacy Policy, we restrict access to your personal information to employees, subcontractors, or business partners who need to know that information in order to perform their jobs or duties and provide services to you. We review our data collection, storage and processing practices and security measures, as well as physical security measures intended to guard against unauthorized access to systems where we store personal information, on a periodic basis.

If you use an account name and password to access the App, you are solely responsible for maintaining the secrecy of your password and/or account information. To ensure effectiveness of your password, we recommend that you do not disclose your account information or password to anyone. Data residing on MTT's server is password protected, and account access is provided only to Authorized Users. However, the safety and security of your data also depends on you.



You should not upload or send to MTT sensitive information via email, as this is not secure. You are also responsible for keeping account usernames and passwords confidential. Please notify MTT if you become aware that data has been lost, stolen, or used without permission; MTT may disable access to an account in order to prevent an unauthorized third party from obtaining access to said account.

Account deactivation and data destruction:

Authorized Users may use the materials and content and the Confidential Information on this website solely for their personal use. Accessing, using, copying, distributing, disseminating and/or changing Confidential Information is subject to your underlying agreement with MTT and your compliance with this Agreement. Failure to comply with your underlying agreement with MTT or this Agreement may subject you and/or your company to immediate termination of access rights to this website and its accompanying materials and content and/or any other actions MTT may deem appropriate.

CHOICES ABOUT YOUR STUDENT INFORMATION

Your personal information is kept as accurately and completely as is necessary for the purposes for which it is to be used. You have the right to access, update, modify, amend or correct errors in your personal information directly through the App or by contacting MTT by email at support@MTT.com.

The App also features an administrative console that provides school district administrators and teachers the ability to access certain personal information by signing into the administrator console. Upon the expiration of the teacher, school or district license, based upon purchase data all PII related to the students associated with said license will be de-identified within 45 days of expiration. Customers will be notified of this pending action, and will have the option to receive an export of student activity and information, provided it is requested within 30 days of contract expiration.

Student personal data is provided and controlled by each student's respective school district administrator(s), teacher(s), and/or parent(s). If you have any questions about reviewing, modifying, or deleting personal information of a student, please contact the appropriate school district administrator, teacher, or parent.

Even after you have consented to MTT's collection and use of your personal information and submitted personal information to MTT through the App, you may opt-out of having your personal information collected or used by MTT by contacting MTT at support@MTT.com. However, by opting out you will no longer be able to use the App. Please note that in order to fulfill certain obligations, we may need to continue sending you notices or other important information concerning any services you request.

Anonymized\de-identified or aggregated data may be maintained, including usage data, for analytics and utilization statistics.



MTT does not permit any use or promotion of online behavioral targeting of advertisements (online behavioral advertising (OBA) is a form of online advertising that uses behavioral targeting to display certain ads and personalized content (e.g. product recommendations) to use at the student access level.

If you have any questions about how your personal information is managed, retained, or deleted, please contact support@MTT.com

FERPA and COPPA

Users may be subject to the provisions of the federal law known as the Family Educational Rights and Privacy Act (“FERPA”) the Children’s Online Privacy Protection Act of 1998 (“COPPA”). User’s use of the App and MTT’s use and/or transmission of student personal information as a result of User’s use of the App may be subject to the provisions of FERPA. In pertinent part, FERPA affords students certain rights with respect to their educational records. Such rights include the right to consent to disclosures of personal information contained in students’ educational records to third parties except in situations where FERPA (and its regulations) permit such disclosure without students’ consent. Users shall comply with all federal and state laws, including, without limitation, FERPA, respecting the disclosure of students’ personal information contained in student records. Users shall only transmit student personal information via the App in order to develop, validate or administer lessons, administer student aid programs, and/or improve instruction.

YOUR RIGHTS OVER YOUR INFORMATION

California Privacy Rights

The California Consumer Privacy Act (the “CCPA”) grants users of our App that are California residents certain rights in regards to our collection of personal information. These rights include:

- The right to request the disclosure of (1) the categories of personal information that have been collected; (2) the categories of sources from which the personal information was collected; (3) the business or commercial purpose collection or selling personal information; (4) the categories of third parties with whom the business shares personal information; and (5) the specific pieces of personal information MTT has collected;
- The right to request the deletion of their personal information that has been collected; and
- The right to opt-out of the sale of their personal information

Under the CCPA, a data subject may only make a personal information request twice in a



12-month period. MTT will respond to such personal information request(s) within 45 days of receiving the personal information request. To exercise your rights as described herein, you may submit a verifiable consumer request by either contacting us via the contact methods provided in the CONTACT US section below or by visiting our website. MTT will not discriminate in any way against any users of the APP that exercise their rights provided by law.

Your Right To Complain

If you have a complaint as to our use of your information, you may file a complaint with us, the California Attorney General, any other governmental agency, and/or a judicial body. A complaint may be submitted directly to MTT by utilizing one of the contact methods described in the CONTACT US section below.

COMPLIANCE WITH LOCAL LAWS

This Privacy Policy is meant to guide MTT with respect to personal information collected from or about you by the App. While this Privacy Policy applies to personal information generally, the local laws, rules and regulations of jurisdictions that are applicable to MTT (“Local Laws”) may require standards which are stricter than this Privacy Policy and, in such event, MTT will comply with applicable Local Laws. Specific privacy policies may be adopted to address the specific privacy requirements of particular jurisdictions.

CONTACT US

If you have any questions about this Privacy Policy or the App, please contact us at support@govizzle.com or at 800.593.1934.

CHANGES TO OUR PRIVACY POLICY

MTT may modify or update this Privacy Policy from time to time. If we change the policy in a material manner, we will provide 30 days of notice so that there is sufficient time to evaluate the change in policy. We will provide this notice via email to administrators, as well as an in-app message to our non-student users (teachers, parents, and administrators). The most current version of the policy can be found at: <https://www.monarchtt.com/privacy-policy/>

Users will be prompted to review and acknowledge your consent to this Agreement if any revisions have been made before using this website and its accompanying materials and content. If you have questions regarding this Agreement, please contact MTT customer support at 888.593.1934. By using this website and its accompanying materials and content, you, whether an Authorized User or other visitor to this website, are agreeing to be bound by the then-current version of this Agreement.



CONSENT:

YOUR KNOWLEDGE AND CONSENT ARE REQUIRED FOR THE COLLECTION, USE, OR DISCLOSURE OF YOUR PERSONAL INFORMATION. BY SUBMITTING YOUR PERSONAL INFORMATION TO MTT, YOU HEREBY CONSENT TO MTT'S COLLECTION, USE DESTRUCTION AND DISCLOSURE OF SUCH PERSONAL INFORMATION. IF YOU DO NOT CONSENT TO THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY, YOU SHALL NOT SUBMIT SUCH INFORMATION TO MTT.