

CHILDREN'S EDUCATIONAL PRIVACY STATEMENT

This Children's Educational Privacy Statement (the "Statement") describes the personal data that ALE International and its affiliated entities (collectively, "ALE," "we," "us," or "our") collects, uses, or discloses from students under the age of 18 when they receive educational services from schools and other organizations that use ALE's Rainbow Classroom to provide educational services to children. This Statement supplements ALE's Privacy Statement and applies only if the account settings selected by a school or organization confirm that it provides educational services to children under 18.

What personal data does ALE collect from students?

Personal data is any information from or about an identified or identifiable person, including information that ALE can associate with an individual person. We may collect or process on behalf of schools or other organizations providing educational services the following categories of personal data when a student uses or interacts with Rainbow Classroom to receive educational services, such as when they join their classroom or meet with their teacher on Rainbow Classroom:

- **Profile and Participant Information.** Name and email address. A student may also choose to provide a profile picture and nickname.
- **Contacts** The email address is the only contact information collected, to be used as the login ID.
- **Settings.** Communication preference settings such as microphone, audio, and video settings on the device of choice
- **Device Information.** Information about the computers, phones, and other device types students use when accessing Rainbow Classroom sessions.
- **Lesson, Meeting, and Messaging Content.** If the school or educational organization chooses to record lessons or meetings to Rainbow Cloud, ALE will store these recordings on behalf of the school or organization. The recordings may contain a student's voice and image, messages, Q&A, or other content (such as a presentation or whiteboard) shared by a student during a meeting or webinar. ALE employees do not access this content unless the school or educational service directs us to do so, or as required for legal, security, or safety reasons.
- **Rainbow Classroom Usage.** Information about how students and their devices interact with Rainbow Classroom, such as when they join and leave a meeting, whether they send messages, and with whom they message

How do we use student personal data?

ALE employees do not access lesson, meeting, or messaging content (specifically, audio, video, files, and messages) unless directed by an account owner, or as required for legal, safety, or security reasons, as discussed below. ALE uses personal data collected from students to conduct the following activities:

- **Provide Educational Products and Services.** To provide products, features, and services for schools and other organizations to use when providing educational services to children, including to customize the product and safety features and settings for a school environment. This may also include using personal data for customer support, which may include accessing audio, video, files, and messages, at the direction of the school or organization.
- **Authentication, Integrity, Security, and Safety.** To authenticate accounts and activity, detect, investigate, and prevent malicious conduct or unsafe experiences, address security threats, protect school and public safety, and secure Rainbow Classroom.
- **Legal Reasons.** To comply with applicable law or respond to valid legal process, including from law enforcement or government agencies, to investigate or participate in civil discovery, litigation, or other adversarial legal proceedings, and to enforce or investigate potential violations of our Terms and Conditions and/or policies.

ALE uses advanced tools to automatically scan content such as virtual backgrounds, profile images, and files uploaded or exchanged through chat, for the purpose of detecting and preventing violations of our Terms and Conditions and policies and illegal or other harmful activity, and its employees may investigate such content where required for legal, safety, or security reasons.

How do we share student personal data?

ALE does not disclose student's data to third parties, except where required for legal, security, or safety reasons.

What student information do schools see and share on Rainbow Classroom?

Depending on their policies and settings and how they use Rainbow Classroom to provide educational services, the school or organization providing educational services may be able to see or to share the following personal data from students who join meetings or lessons on their account. The school or other organization's use and disclosure of student information is subject to the school or educational organization's policies, not ALE's. ALE does not enable children to make personal information publicly available through the use of Rainbow Classroom.

- **Student Usage and Content.** Depending on their settings, the school or other organization providing educational services—and the people they designate—can access (i) information about how students and their devices interact with the school or educational organization's account, and (ii) information about the participants who joined classrooms or meetings on their account (including participant name, display name, email address, and participant ID).
- **Teachers, Hosts, and Participants.** Teachers, hosts, and other participants in a classroom or meeting may be able to see students' email, display name, and profile picture, as well as content and information shared by students during a

meeting and webinar. Depending on settings implemented by the school or educational organization, teachers, hosts, and participants also may be able to record or save classroom or meeting content, audio transcripts, messages sent to everyone or to them directly, and files, whiteboards, or other information shared during a classroom or educational meeting.

In the United States, before choosing to install third party-apps that may be used by children under the age of 13, schools or educational organizations must obtain parent or guardian consent to the third-party app's data practices. By installing any third-party app, these schools or other educational organizations agree to obtain such parent or guardian consent and must themselves consent to the disclosure of students' personal information to the third-party app when installing the app.

How is student information reviewed and deleted?

A school or other educational organization may review and delete a student's information, if in compliance with any applicable law, from their administrator dashboard. If you are a parent or student, please contact your school or other educational organization to access any personal information, limit a student's access to Rainbow Classroom features or services, or delete personal information or the student's entire profile. A school or other educational organization may also take steps to prevent a student from receiving educational services through the use of Rainbow Classroom on its account in the future, such as by deleting the student's profile from the school or other educational organization's account and limiting the student's access to Rainbow Classroom.

How can we be contacted?

If you are a parent or guardian:

- Contact your school administrator if you have questions about the school's management of its ALE account, the school's use of your child's information, third-party apps approved by the school who may have access to your child's information, or your privacy rights relating to education records
- Contact ALE using the below contact information if you have questions regarding this Statement, or ALE's use of student information.

If you are an administrator for an organization providing educational services to students under 18 years of age, contact ALE about the information in this Statement using the contact information below.

FERPA Officer
ALE USA Inc.
salvatore.zoida@al-enterprise.com
(747) 388-7468

You can also contact us by writing to the following address:

ALE USA Inc.
Attention: Legal, FERPA Officer
26801 W. Agoura Road
Calabasas, CA 91301

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