



PRIVACY POLICY

EFFECTIVE MAY 14, 2020



TITAN
SCHOOL SOLUTIONS

TITAN School Solutions, Inc. (“TITAN”, “we” or “us”) offers certain products and services aimed at K-12 school districts (the “Services”) that may be accessed through TITAN’s website located at <https://www.titank12.com> and all associated sites linked to <https://www.titank12.com> (collectively, the “Sites”) or TITAN’s mobile applications (the “Apps” and collectively with the Sites, the “TITAN Properties”).

We understand the importance of privacy to the schools and school districts that subscribe to our Services (the “Clients”) and to the teachers, students and parents whose information we may access on behalf of the Clients (collectively, the “Users”, “you” or “your”). This privacy policy describes our practices for the collection, use and protection of your information through the Services and TITAN Properties.

INFORMATION WE COLLECT DIRECTLY

School Information

We collect certain information when a Client administrator seeks to register school for the Services or corresponds with us such as a contact person’s name, school name, school district, school email address, account name and password, phone number and information relating to the school’s information systems. Once a school begins using the TITAN Service, we will store information provided by the school and collect certain information through the school’s use of the Services. We use this information to operate, maintain and provide the Services, to analyze and improve our Services, and to communicate with our Clients and Users.

User Information

While providing the Services to a Client, we may collect personally identifiable information about the Users such as first and last name, gender, e-mail and mailing addresses, payment information (“User Information”). The nature of User Information we collect depends on the Services that a Client has subscribed for and we use such information only for the purposes of providing those Services. Such information is generally provided to us by the Clients. However, we also collect User Information directly from you when you voluntarily provide it to us, such as information that you provide by filling in forms on our Services, including information provided at the time of registering to use our Services, downloading the Apps, making payments or requesting

further services relating to the Services or your use of the Services. We also retain records and copies of your correspondence (including email addresses) if you contact us and details of transactions you carry out through our Services.

INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES

As you interact with our Services and the TITAN Properties, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns. For example, we collect information about your device and software, such as your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser and mobile device or your account, and other such information. Some of this information may constitute your personal information under applicable law, even though it may not directly identify you. We use this information to improve our Services and deliver a better and more personalized service.

Data Collection Technologies.

The technologies for data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Services and TITAN Properties. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Services or TITAN Properties.
- **Other Technologies.** TITAN Properties and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us,

for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

- **Stored Information and Files.** TITAN Properties also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts and address book information.



HOW WE SHARE YOUR INFORMATION

Except as set forth in this Privacy Policy, we do not trade, share, rent, sell or give away your personal information to third parties. For avoidance of doubt, we do not rent or

sell information for marketing purposes and we will never share or sell User Information with third parties for marketing purposes. We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

Disclosing Personal Information

We may disclose personal information that we collect or you provide as described in this Policy:

- to fulfill the purpose for which you provide it;
- to our subsidiaries and affiliates;
- 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;
- for any other purpose disclosed by us when you provide the information; or
- with your consent.

We may also disclose your personal information:

- to comply with any court order, law or legal process, including to respond to any government or regulatory request;
- to enforce or apply our terms of Services and other agreements, including for billing and collection purposes; or
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others.

Change of Control Transaction

If we sell, divest or transfer our business, we will not transfer User Information unless the new owner intends to maintain and provide the Services as a going concern, and provided that the new owner has agreed to data privacy standards no less stringent than set forth in this Policy. In such case we will provide you with notice and an opportunity to opt-out of the transfer of personally identifiable User Information.



HOW WE STORE AND PROTECT YOUR INFORMATION

We take appropriate security measures to protect against unauthorized access to, or unauthorized alteration, disclosure or destruction of,

users' information. We restrict access to your personally identifying information to employees who need to know that information in order to operate, develop or improve our services and the Website. Our servers are protected by firewalls and are physically located in secure data facilities to further increase security. We use Secure Socket Layer (SSL) technology for mutual authentication, data encryption and data integrity. While no computer is 100% safe from outside attacks, we believe that the steps we have taken to protect your personal information drastically reduce the likelihood security problems to a level appropriate to the type of information involved. If you have any questions regarding which measures and

techniques we use, feel free to contact us.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

DATA RETENTION PERIOD

TITAN will retain your data for the term of service in which our Client utilizes the TITAN Service. Upon our Client's termination of service, TITAN may retain your data for up to 90 days for administrative purposes relating to the termination. After that, your data will be promptly deleted and removed from the TITAN Service, unless TITAN has an independent legal obligation to preserve your data.

INTEGRITY

We aim to keep our information about you as accurate as possible and encourage you to promptly update your information if it changes. You may, at any time, request us to update, modify or delete any inaccuracies in your information by contacting us at privacy@titank12.com.

COMPLIANCE WITH DATA PRIVACY LAWS

Family Educational Rights and Privacy Act

We shall comply in all respects with the Family Educational Rights and Privacy Act (FERPA) and all other state and federal laws applicable to the security and confidentiality of pupil records. TITAN will designate and train responsible individuals on ensuring the security and confidentiality of pupil records and TITAN will establish and validate that security protocols that are in use at their facilities or leased facilities meet or exceed the stated and expected security surrounding FERPA which include firewalls, intrusion detection, web based security and authentication protocols. In addition, TITAN will provide such information reasonably requested by You in order for You to verify TITAN's compliance with FERPA and such

other state and federal laws applicable to the security and confidentiality of pupil records.

We do not knowingly collect any personal information from children under the age of 13 unless and until our Client has obtained appropriate parental consent for the student to use the Services. If a child wants to use our Services, the child is required to obtain an account from our Client. Before an account is set up for a child, we require our Clients to obtain consent from the parents to consent to the collection, use and disclosure of personal information of the child. Please contact us at privacy@titank12.com, if you believe we have inadvertently collected personal information of a child

under 13 without proper consent so that we may delete such data as soon as possible.



STUDENT PRIVACY PLEDGE

TITAN is committed to safeguard student privacy and is a signatory of the K-12 School Service Provider Pledge to Safeguard Student Privacy located at <https://studentprivacypledge.org/privacy-pledge/>.

LINKS TO OTHER WEBSITES AND SERVICES

Please remember that this Policy applies to the Services and TITAN Properties only, and not other websites or third party applications that may be linked via our Services or TITAN Properties, which may have their own privacy policies. You should carefully read the privacy practices of each third party application before agreeing to engage with the application through the Services or TITAN Properties. We assume no responsibility

or liability for the privacy practices of any vendor or operator of third party sites or applications.

CHANGES TO OUR PRIVACY POLICY

We may modify or update this Privacy Policy from time to time so you should review this page periodically. The changes will be effective immediately upon notice or posting, and we will update the effective date of this Policy upon such posting; provided, that if we make a material change to the policy, we will provide a reasonable advance notice to our Clients so that they have sufficient time to evaluate the change in practice. Your use or continued use of the Services or TITAN Properties following the effective date of any change to the Policy will be deemed to be your acceptance of the changed Policy.



CONTACT INFORMATION

If you have any questions about this Policy, you may contact us at the following addresses:

TITAN School Services, Inc.

19900 MacArthur Blvd

Suite 1000

Chief Privacy Officer

privacy@titank12.com