

## Privacy Policy

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

Your privacy matters to us so whether you are new or a long-time user, please do take the time to get to know our practices – and if you have any questions contact us.

### A. Information we collect

We collect information to provide better services to all of our users. For example, in order to properly complete your ClassKit order, we'll ask for personal information, like your name, email address, telephone number or credit card. This information allows us to create the ClassKit(s), properly bill for that ClassKit(s), and account for those billings to the proper organization sponsoring your ClassKit program.

We will NOT be using information for a purpose other than those that are set out in this Privacy Policy.

### B. Accessing and updating your personal information

Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

### C. Information we share

We do not share personal information with companies, organizations and individuals outside of PCDolphin, Inc. unless one of the following circumstances apply:

- **With your consent**

We will share personal information with companies, organizations or individuals outside of PCDolphin, Inc. when we have your consent to do so. We require opt-in consent for the sharing of any personal information.

- **For external processing**

We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- **For legal reasons**

We will share personal information with companies, organizations or individuals outside of PCDolphin, Inc. if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request.
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of PCDolphin, Inc., our users or the public as required or permitted by law.

We may share aggregated, non-personally identifiable information publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

If PCDolphin, Inc. is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

#### **D. Information security**

We work hard to protect PCDolphin, Inc. and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We encrypt many of our services by using SSL.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to PCDolphin Inc. employees, contractors and agents who need to know that information in order to process it, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

#### **E. Application**

Our Privacy Policy applies to all of the services offered by PCDolphin, Inc. and its affiliates, including services offered on other sites (such as our advertising services), but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other

companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

## **F. Enforcement**

We regularly review our compliance with our Privacy Policy. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## **G. Changes**

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.