Lightbox Learning Inc. User Privacy Policy

Lightbox Learning Inc. ("Lightbox Learning Inc.," "we," or "us") understands that privacy is tremendously important to our online visitors to our website ("Website Visitors"), to schools who use our Service ("Schools"), and to students whose information we may access on behalf of a School ("Students"). Lightbox Learning Inc. provides a platform that enables Schools to securely use content for Classroom or Library applications. As we describe below, Schools decide which data is integrated with Lightbox Learning Inc., and Schools are responsible for determining whether data is ever shared with others through Lightbox Learning Inc. This privacy policy applies to our websites https://lightboxclassroom.com, https://openlightbox.com and https://av2books.com and to the Lightbox Learning Inc. platform (our "Service") and describes the steps we take to protect your data.

Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms of Use.

1. HOW WE COLLECT AND USE INFORMATION
We collect the following types of information:

Information about Schools: We ask for certain information when a School administrator registers a School with Lightbox Learning Inc., or if the administrator corresponds with us online, including a name, school name, school district, school email address and/or account name and password, phone number, message content, and information relating to the School's information systems. We may also retain information provided by a School if the School sends us a message, posts content to our website or through our Service, or responds to emails or surveys. Once a School begins using the Lightbox Learning Inc. Service, we will collect content and information provided by the School through the School's use of the Service and we will keep records of activities related to the Service. We use this information to operate, maintain, and provide to the features and functionality of the Service, to analyze and improve our Service offerings and functionality, and to communicate with our Schools and website visitors.

Student Data: Through the course of providing its Service to a School, Lightbox Learning Inc. does not have access to personally identifiable information about students ("Student Data"). Lightbox Learning Inc. does not receive Student Data from the School, and never collects data with the Student directly.

We consider Student Data to be confidential and do not collect personal, identifiable data about the Student. The only data Lightbox Learning Inc. collects is anonymized usage data on the number of resources used on a building or district basis. Lightbox Learning Inc. does not collect individual data about students, only aggregate usage data per school or district, which

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represents the usage for all users at a school, without any personally identifiable information, and it is not for any purpose other than to provide usage reports on the School's behalf, in accordance with contractual agreements with the School. Our collection, use, and disclosure of Usage Data is governed by our Terms of Use, our Additional Terms of Use for Schools, and/or any other agreement with the School, by the provision of the Family Educational Rights and Privacy Act (FERPA), the Children's Online Privacy Protection Act (COPPA), Student Online Personal Protection Act (SOPPA), and applicable state laws which relate to the collection of Student Data. If you are a Student or parent, please contact your School if you have questions about the School's use of technology service providers like Lightbox Learning Inc.

Information collected through technology: Like most websites and online services, we automatically collect certain types of usage information when you visit our Services, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, web beacons, file information and similar technology (collectively, "tracking technologies"). For example, we collect information about your device and its software, such as your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, mobile device, and other such information. We also collect information about the way you use our Service, for example, the pages visited, the links clicked, whether the Service is accessed from multiple devices, and other usage actions taken on the Service. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service.

Cookies and related technology allow us to provide you with a better user experience. For example, we may use the data collected through cookies to: (a) remember information so that a user will not have to re-enter it during subsequent visits; (b) provide custom, personalized content and information; (c) to provide and monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and usage on our website and our Service; (e) diagnose or fix technology problems; (f) help users efficiently access information after signing in, and (g) otherwise to plan for and enhance our Service.

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) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the Service, as some features and services on our Service may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it.

Third Party Tracking: We do not permit third party advertising networks to collect information about your use of our website and Service over time and across websites for the purpose of serving targeted advertising and we will never use Student Data for targeted advertising.

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Student privacy is very important to us. Student Data is not collected, and usage data is used only for usage reporting at the direction of the School.

2. HOW WE SHARE YOUR INFORMATION

Lightbox Learning Inc. only shares information in a few limited circumstances, described below. We do not rent or sell information for marketing purposes and we will never share or sell Data with third parties for marketing purposes.

Who we may share information with:

We share information within the Service as needed to perform the Service and/or at the direction of the School. For example, Usage Data, will be shared between and among authorized School users such as teachers and School administrators. This sharing will depend on the settings and functionality selected by the School.

We may share usage information with our trusted third party service providers who perform technology services on our behalf (e.g. web hosting and analytics services), but strictly for the purpose of carrying out their work for us. Contractors and service providers who may have access to Usage Data in the course of performing their services are subject to confidentiality and data security requirements.

We may be required to share information with law enforcement or other third parties when compelled to do so by court order or other legal process, to comply with statutes or regulations, to enforce our Terms of Use, or if we believe in good faith that the disclosure is necessary to protect the rights, property or personal safety of our users.

We may share information in an aggregated and/or anonymous form that does not reasonably identify an individual or School. For example, we may use and share aggregate or anonymized data to study and improve our Service, user functionality, and product offerings.

In the event of a change of control: If we sell, divest or transfer our business, we will not transfer personal information of our customers unless the new owner intends to maintain and provide the Service as a going concern, and provided that the new owner has agreed to data privacy standards no less stringent than our own. In such case we will provide you with notice and an opportunity to opt-out of the transfer of Usage Data.

How Student Data is shared: Student Data is not collected, so Student Data is not available to be shared by Lightbox Learning Inc. Please remember that this Privacy Policy applies to the Lightbox Learning Inc. Services, and not other services or third party applications, which may have their own privacy policies. Schools should carefully read the privacy practices of each third party application before agreeing to engage with the application through the Service.

We store our data in the United States and we take strong measures to keep data safe and secure.

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3. HOW WE STORE AND PROTECT YOUR INFORMATION

Storage and processing: Any information collected through the Service is stored and processed in the United States. If you use our Service outside of the United States, you consent to have your data transferred to the United States.

Keeping information safe: Lightbox Learning Inc. maintains strict administrative, technical, and physical procedures to protect information stored in our servers, which are located in the United States. Access to information is limited (through user/password credentials and two factor authentication) to those employees who require it to perform their job functions. We use industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process and sign-up information. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls to building and files.

Incident plan for security breach: In the event that Usage or Customer Data is accessed or obtained by an unauthorized individual, Lightbox Learning Inc. shall provide notification to the Customer within a reasonable amount of time of the incident, and not exceeding forty-eight (48) hours. The Lightbox Learning Inc. Security Breach Incident Plan is available by request by contacting us at support@openlightbox.com. No Student Data is collected by Lightbox Learning Inc., so in the event of a security breach, no Student Data could be compromised.

4. YOUR CHOICES ABOUT YOUR INFORMATION

Account information and settings: Schools may update account information and modify Services by signing into the administrator account. Schools and other website visitors can opt-out of receiving promotional email from us by clicking on the "unsubscribe" feature at the bottom of each email. Sorry, you cannot unsubscribe from Service-related messaging.

If you have any questions about reviewing or modifying account information, contact us directly by visiting our Help Center.

Access to Student Data: No Student Data is provided or collected by Lightbox Learning Inc.

How long we keep Usage Statistics: Following termination or deactivation of a School account, Lightbox Learning Inc. may retain profile information and content for a commercially reasonable time for backup, archival, or audit purposes. We may maintain anonymized or aggregated data, including usage data, for analytics purposes. If you have any questions about data retention or deletion, please contact us by visiting our Help Center.

We do not collect any information from students.

5. CHILDREN'S PRIVACY

Lightbox Learning Inc. does not knowingly collect any information from students or children. Because Lightbox Learning Inc. collects and uses non-student specific Usage Data at the direction of and under the control of a School, Lightbox Learning Inc. relies on each School to provide appropriate notice to parents of the School's use of third party service providers such as

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Lightbox Learning Inc., and for the Schools to provide consent, if necessary, and authorization for Lightbox Learning Inc. to collect Usage Data, as permitted by the Children's Online Privacy Protection Act (COPPA), Student Online Personal Protection Act (SOPPA), and applicable state laws which relate to the collection of Student Data. Please contact us at support@openlightbox.com if you have any questions or concerns about our policies.

6. LINKS TO OTHER WEB SITES AND SERVICES
We are not responsible for the practices employed by websites, applications or services linked to or from our Service. We recommend that the School review the privacy policies of other applications before authorizing a third party to access data through the Service.

7. HOW TO CONTACT US
If you have any questions about this Privacy Policy or the Service, please contact us by visiting our About US page at www.openlightbox.com, or by using the Feedback tab at the bottom of the page at www.openlightbox.com, or emailing us a support@openlightbox.com.

If a Student contacts Lightbox Learning Inc. with a question about our Service, we will collect personal information from that Student only as necessary to respond to the Student's request and direct the Student to contact the Student's School, and we will then delete or anonymize the personal data of the Student after providing our response.

8. CHANGES TO OUR PRIVACY POLICY
Lightbox Learning Inc. may modify or update this Privacy Policy from time to time so you should review this page periodically. Click here to see all changes to this Privacy Policy. If we change the policy in a material manner, for example if we seek to use personal information in a materially different way than we had previously, we will provide at least 30 days notice to the Schools so that you have sufficient time to evaluate the change in practice. Of course, you can always opt-out by deleting your account before the changes take effect.