PRIVACY STATEMENT

This Privacy Statement is incorporated in, and subject to, the Terms of Use and Service for MPO Solutions, LLC "Freedom Run". This Privacy Policy explains how information is collected, used and disclosed by MPO Solutions in connection with your use of our websites and mobile applications that link to this Privacy Policy (each "service"; collectively, "services"). Please refer to those terms for definitions of words with initial capitals letters that are not otherwise defined in this Privacy Statement. MPO Solutions encourages you to read this Privacy Statement carefully.

For purposes of this Privacy Statement, references to "You" or "Your" mean (i) you in your individual capacity, (ii) your company, which may be a school or school district, and students, employees, representatives and agents of Your school or school district that are registered with MPO Solutions and that have a valid security identification and password to access and use the Freedom Run Resources (collectively the "**Authorized Users**").

As noted in the Terms of Use, MPO Solutions provides its customers with a range of educational resources, including, but not limited to, (i) Freedom Run TEEKS aligned educational-based applications (collectively the "Licensed Applications"), (ii) Freedom Run Internet Web site (the "Web Site"), currently located at www.freedom-run.com, (iii) account information regarding the Licensed Applications and the Web Site, (iv) materials and documentation (including, but not limited to, downloadable lessons, practice, videos, images, glossary, teacher guide) available from the Web Site (collectively the "Downloadable Materials"), the Licensed Applications, and the Web Site. Any and all of the foregoing resources (including, but not limited to, the Licensed Applications, the Web Site, and the Downloadable Materials), together with any other resources made available, are collectively referred to as the "Resources".

1. The Information We Collect and How We Use It

Throughout this Privacy Policy, we use the term "Personal Information" generally refers to any data that could potentially identify a specific individual. While You have access to the Resources, MPO Solutions may collect the following Personally Identifiable Information about You:

- ✓ Your first and last name
- ✓ Teachers and administrators only – Your contact information, such as email addresses, name and last name
- ✓ Your school and school district
- ✓ Any identification numbers issued by Your school and/or Your school district to You, including teacher email, administrator email, and student numbers.
- ✓ Security information, such as usernames, passwords, and password hints.

- ✓ Browser information, such as browser version, IP address, and the presence of various plug-ins and tools; Resource-related responses submitted by You, including, but not limited to responses to interactive activities and assessments.

- ✓ Resource use results, but only to the extent that such results identify one or more (i) students, (ii) teachers, (iii) classrooms within an identified school, (iv) grades within an identified school or school district or (v) schools (collectively "Identifiable Use Results"). Identifiable Use Results do not include Resource use results for school districts that do not identify a specific school.

Personal Information does not include "De-identified Information," which is any data or information that cannot be traced back to an individual (except for Identifiable Use Results, as defined above). For example, a table listing the number of students in each grade at a specific school using a particular Resource would not be Personally Identifiable Information.

MPO Solutions does not sell Personally Identifiable Information to any affiliated entity or any third-party, nor does it use such information for any sort of behavioral advertising. However, MPO may use and disclose Personally Identifiable Information for a range of educational, compliance and quality assurance purposes.

MPO Solutions may use Personal Information for the following purposes:

- ✓ To provide status reporting notices to teachers and administrators about the Resources (e.g. – an email prompting a teacher to log in to see his or her students' latest assessment results)

- ✓ To internally analyze data regarding the use of the Resources.

- ✓ To track students' usage of the Resources over time, including performance metrics collected over multiple school years.

- ✓ To send You (**teachers and administrators only**) updates, promotional/advertising materials, and newsletters related to the Resources and products and services or to otherwise market specific services or offers to You. If You want to stop receiving promotional/advertising/ marketing materials, You will have the option to unsubscribe;

- ✓ To respond to Your questions or comments; and

- ✓ To customize content within the Resources, to improve the Resources' content and functionality and to develop new products and updates.

MPO Solutions may <u>disclose</u> Personally Identifiable Information to the following individuals or entities under the following circumstances:

- ✓ To MPO employees who need to access the Personally Identifiable Information to perform their jobs.

- ✓ To third parties, including contractors, vendors, and service providers, that assist with the production, implementation or servicing of the Resources, but only after receiving satisfactory assurances from each third-party that its data privacy and security protections are at least as stringent as those of MPO Solutions.

- ✓ To Authorized Users as determined by each school or school district at issue. Generally, but subject to determination by the school at issue or the school district at issue,

    1. a teacher may only see the Personal Information of the students in the teacher's classroom.

    2. a principal may only see the Personal Information of those students and teachers in the principal's school, and

    3. a school district-level administrator may only see the Personally Identifiable Information of those students and teachers in the administrator's school district.

- ✓ To third parties, and solely for educational purposes, when MPO Solutions has the consent of the school or school district at issue, including Identifiable Use Results that identify specific individual students if MPO Solutions has received a written acknowledgement from the school or school district that it has obtained the student's consent to such disclosure;

- ✓ When MPO Solutions believes that sharing Personally Identifiable Information is reasonably necessary in order to (i) protect or defend the legal rights, interests, property, safety, or security of MPO Solutions its employees or contractors, or the public, (ii) protect or defend against, or otherwise address, fraud, security, or technical issues, (iii) comply with, or respond to a law, regulation, legal request, legal process, legal requirement, judicial proceeding, or court order, or (iv) investigate a possible crime, such as fraud or identity theft;

- ✓ In connection with an actual or potential sale, purchase, acquisition, merger, reorganization, bankruptcy, liquidation, dissolution, or similar transaction or proceeding of or involving MPO Solutions, but only to the extent that the purchasing, acquiring or successor entity agrees to implement data privacy and security protections with respect to Personal Information.

MPO Solutions is permitted to <u>use</u> and/or <u>disclose</u> Personal Information about You when has Your consent. MPO Solutions does not need Your consent to use De-identified Information.

Access or Change Personal Information

Each school and/or school district is permitted via functionality made available by the Resources to determine what Personal Information (if any) is accessible by Authorized Users and to which Authorized Users in particular. In certain circumstances, a school and/or school district may be entitled to permit one or more Authorized Users to change Personally Identifiable Information. Any requests by Students to access and/or change Personal Information must be made to the school and/or school district in the first instance, and these entities will maintain a record of all such access and amendment requests and of any actual changes made. To the extent that a student makes a direct request to MPO Solutions to access and/or amend Personal Information, MPO Solutions will forward that request to the school and/or school district for response.

Data Retention

Unless required by law to maintain certain information for a longer period of time, MPO Solutions retains Personal Information only for as long as a student's school and/or school district maintains a subscription. Once a subscription is cancelled or otherwise terminated, MPO Solutions will typically retain any Personally Identifiable Information related to that Resource for sixty days after cancellation/termination to allow for temporary lapses in subscription services, at which point that information is destroyed. Personal Information may also be destroyed at any time at the request of the school and/or school district.

Website and Resource Security

MPO Solutions recognizes its responsibility to protect the Personal Information that You entrust to it. MPO Solutions uses a variety of secure techniques to protect Your information, including secure servers, firewalls, access limitations on servers and password protections that guard against unauthorized access. Additionally, the information that You send via the Website, including student usage information and passwords, may be encrypted, a process used to scramble information and make it extremely difficult to read if wrongly intercepted. Personal Information is stored on a secure database, and access to this information is password protected. **Use of "Cookies"**

"Cookies" are small pieces of information that some websites store on Your computer's hard drive when You visit them. This element of data is a piece of text, not a program, that contains information identifying a user. When a user revisits a Website, his or her computer automatically "serves up" the cookie, eliminating the need for the customer to reenter the information. Like many other websites, MPO Solutions uses cookies for this purpose.

Most web browsers automatically accept cookies but allow You to modify security settings so You can approve or reject cookies on a case-by-case basis. At a minimum, Your web browser must allow temporary cookies that are not stored on

Your hard disk to log into the Website. Please refer to the "Help" file of Your Internet Browser either to learn how to receive a warning before a cookie is stored.

Third Party Sites

The Website may contain links to or reference third party websites and resources (collectively "**Third Party Sites**"). These Third Party Sites are not controlled by MPO Solutions and, therefore, are not subject to this Privacy Statement. You should check the privacy policies of these individual Third Party Sites to see how Your personally identifiable information will be utilized by them before providing any personally identifiable information. Please be aware that these Third Party Sites may collect personal information about You and may also send you "cookies." MPO Solutions is not responsible for the content or practices of any linked Third Party Sites, and MPO Solutions provides these links solely for access to the educational videos.

Changes to This Privacy Policy

MPO Solutions may change this Privacy Statement at any time without advance notice. However, if the Privacy Statement changes, MPO Solutions will post an updated version on the Website, and the revision date will be posted at the bottom of the page. If this occurs, You will be required to re-acknowledge review of the revised Privacy Statement before you can continue using the Resources.

Who can I contact if I have questions about this Privacy Statement?

If You have any questions about this Privacy Statement or any privacy questions or concerns, You may contact MPO Solutions using the information below:

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