# Privacy Policy

Last Updated: May 1, 2025

# INTRODUCTION

At Scholar Education ('Scholar Education', 'we', or 'us'), we respect your privacy and are committed to protecting it as described in this privacy policy ('Policy' or the 'Privacy Policy'). This policy describes the types of information we may collect from you or that you may provide when you use our product, Scholar Education ('the product', 'the service', 'the website', 'the app', or 'product'), and our practices for collecting, using, maintaining, protecting, and disclosing that information. Your use of the Product and Services and any information you provide on the Services are subject to the terms of this Privacy Policy, which is incorporated into and subject to our Terms of Service.

# Types of Data Collected

| Category | Data Collected | Purpose For Collection |
| --- | --- | --- |
| Personal Data | Name, Email, Phone Number | Account management |
| Usage data | Product Interactions, Usage Data | Developer Notifications, Security and Compliance, Analytics, App Functionality |
| Identifier data | Device ID, Digital User ID | Security and Compliance, Developer Notifications, Analytics, App Functionality |

| Student related information | Student data, assignments, and Coursework content | App functionality |
| --- | --- | --- |

# Data Collection

For the purpose of this policy, Personal Information is defined as information that identifies, relates to, or could reasonably be linked with or describes an individual or household, either directly or indirectly. We limit the data we collect to what is necessary to provide our Services. This includes Personal Information you provide directly to us, as well as Personal Information collected automatically and from third-party sources, as further described below.

- Data you provide to us: To use our Products and Services, you need to create an account. Administrators and teachers can sign up with their email address, Classlink, or Clever. During account creation, we collect information necessary to establish and manage your account, such as your name, email address, and phone number. We also collect information about classes and students, including rostering data that teachers or administrators input into the product. Additionally, we collect information that users voluntarily provide through the Scholar Education services. This includes student data and educational materials uploaded by teachers or administrators, and any information entered into the product by student users.
- Data from third party sources: We allow teachers and administrators to add information about students and classes directly into the product manually or via third party tools such as Clever and Classlink. The data collected from these tools and all student records are used solely for the purposes of delivering the service. Data shared through these tools is governed by agreements between Scholar Education and the respective schools or districts.
- Data collected automatically: When you use our services, we may use cookies and similar technologies to deliver the services and better understand how you use the product. For more information on cookies and similar technologies, please see the Cookies and Similar Technologies section below. We do not use cookies for behavioral or personalized advertising.

# Data Collection Purposes

We limit the data we process and collect from users of the product and students to only what is required to deliver the services. We use the collected data for the following purposes:

- Service delivery (such as provide, operate and improve the service and our business, review, screen and monitor user created content)

- Security and safety
- Research and analytics of our service
- Compliance with applicable laws
- Send communications and help you use the service better

Scholar Education is a digital learning platform powered by AI, offering personalized learning to students and teacher-facing insights to support instruction. Students may use the platform to receive feedback and tutoring. All student data is processed solely for the purpose of delivering the service.

Students may use the product to receive personalized learning feedback and tutoring for their coursework. In doing so, they may enter information about their assignments and engage in school work directly in the product. All student information provided to us is not used for any purpose other than providing the service.

When students use Scholar Education through their school, their accounts are established and managed by the school. Teachers may assign work and lessons to students via the service. Beyond the delivery of lessons and educational content from teachers to students, the service does not facilitate social interactions between users. All platform users are registered through their school accounts. Furthermore, the service does not allow interactions between non-authorized users, nor does it enable external sharing or posting of information. To support the safety and educational experience of student users, we review and monitor chat content within our platform.

The service is free from any advertising including any contextual or personalized advertising. Additionally, we do not collect or process personal information for the purpose of tracking for personalized advertising.  We may contact administrators or teachers directly to provide guidance on how to better utilize the product and to inform them about our services.

# How We Use the Data We Collect

As part of providing our services, we may share data with third party vendors who process information to help us provide our services. This includes analytics and app functionality. We establish contractual limitations with third party vendors that restrict the extent and purposes for which they may process any personal information we disclose to them. These third parties are permitted to process personal information solely on our behalf and in accordance with our instructions. They are also required to implement and maintain security measures that provide a level of protection equivalent to those we uphold. You can view the vendors we use to process data, and the purposes for which they are used to provide our product, below.

- Clarity (https://clarity.microsoft.com/privacy): Product analytics

- UserGuiding (https://userguiding.com/privacy-policy): In-app onboarding and walkthroughs for user training

- OpenAI (https://openai.com/enterprise-privacy/): Large language model powering AI functionality

- AWS (https://aws.amazon.com/privacy/): Cloud infrastructure for hosting, storage, and compute operations

- Sentry (https://sentry.io/privacy): Application performance monitoring and error tracking

- LangFuse (https://langfuse.com/privacy): AI prompt management

Scholar Education shares only the necessary information with our AI service providers to deliver our AI features. We do not use your personal data to train our AI. Scholar Education only works with AI partners that respect our privacy agreements and maintain our data privacy standards.

For the avoidance of doubt, we never sell personal data from our service and we do not share data with third parties for their own marketing, advertising purposes, or creating advertising profiles.

The product does not include features that enable users to publicly display the personal information they provide to us or that we collect. Please be aware that this Privacy Policy does not govern information users may choose to post or share through other platforms or services.

If Scholar Education is involved in a merger, acquisition, or bankruptcy, your information may be transferred to a new entity. We will ensure that any acquiring third party receiving your personal information provides security safeguards consistent with this Privacy Policy. We will inform you if such a transfer occurs, and you have the right to request the deletion of your data before it is transferred to the acquiring party.

We may disclose information, including personal information, if we have a good faith belief that doing so is necessary to comply with the law, such as complying with a subpoena or other legal obligation.

# Your Choices

To use our Products and Services, users are required to create an account. During the account creation process, we will collect certain information to establish and manage your account effectively. Your account enables you to personalize your experience, monitor your activities, and control your personal data and any information you provide to us. Certain

account controls may be accessible only to account administrators. When a student account is provided and set up by their school or teacher, the school or its designated account administrator controls the management of the account and can review and restrict the student's usage of the services.

When student data is provided to us through a third party tool such as Classlink or Clever, access, modification, or deletion of that data may be managed through those tools. We recommend contacting the school or district that administers your student's data for any such requests. Data added via ClassLink or Clever is managed within those systems.

We do not contact parents, teachers, or administrators for our own direct marketing. However, we may contact administrator or teachers users directly to provide guidance on how to better utilize the product and to inform them about our services. You can stop receiving email communications from us by clicking "unsubscribe" in such communications or contacting us directly. We make every effort to promptly process all unsubscribe requests.

# Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or other online services that are not associated with us. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage our users to read the privacy policies of each website and application with which they interact.

Third-party login is supported for authentication into our Product or Services. When you choose to log in to our services using third-party authentication, such as single sign on or other external identity providers, we collect certain information from your chosen third-party platform. By opting for third-party login, you grant us permission to access and use this information for the purpose of creating and managing your account.

# Cookies and Similar Technologies

Our Product may use cookies or similar technologies to help you personalize your online experience. A cookie is a text file that is placed on your device browser that stores preferences to facilitate and enhance your experience. For example, if you register with our Product or Services, a cookie helps our product to recall your specific information on subsequent visits. For clarity, we do not use third-party cookies on our service for personalized advertising or to track users and display personalized advertisements on other third-party websites or services. You can find a list of the types of first and third party cookies we use below:

Necessary Cookies: Our Products and Services rely on these cookies to function. They handle essential tasks like security and keeping you logged in. While you can adjust your browser settings to block them, please note that this may prevent some parts of our site from working correctly.

Preference cookies — Also known as "functionality cookies," these cookies allow a website to remember choices you have made in the past, like what language you prefer, or what your username and password are so you can automatically log in.

Analytics cookies — These cookies collect information about how you use a website, like which pages you visited and which links you clicked on. Their sole purpose is to improve how our website functions.

We use cookies or similar technologies from the following third parties:

- Google tag manager (https://support.google.com/tagmanager/answer/9323295): Analytics
- Microsoft Clarity  (https://clarity.microsoft.com/privacy): Analytics
- Sentry  (https://sentry.io/privacy/): Error tracking & application performance monitoring

We do not track our users across third party websites to provide targeted advertising and therefore do not respond to Do Not Track (DNT) signals from web browsers.

Most browsers let you remove or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, you may not be able to access all features of the services or they may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit https://allaboutcookies.org/how-to-manage-cookies.

# Security

We are dedicated to safeguarding the security of information obtained through the services, including personal information. When we collect information from you, we implement reasonable and appropriate administrative, technical, and physical safeguards to help protect it from unauthorized access, use, or disclosure. For example, all data is encrypted during transmission and at rest. Furthermore, we provide multi-factor authentication options to our users to enhance the security of their accounts.

While we implement robust security measures, please be aware that no system is completely secure, and we cannot guarantee absolute security of your information.  In the

event of a data breach, we will make reasonable efforts to notify affected users in accordance with applicable laws and regulations. Scholar Education aligns with industry standards, including SOC 2 practices.

We maintain a data retention policy to establish clear guidelines on the lifecycle management of our data, ensure compliance with legal and regulatory requirements, and demonstrate a commitment to responsible and transparent data management practices within our organization. Personal Data that we collect will be deleted when it is no longer necessary to provide you with our services. We will delete personal data upon account cancellation or termination. If you would like to delete or terminate your account, you can submit a request by contacting us at tech@joinscholar.com. When we enter into a direct agreement with a school or school district, our data retention and deletion practices  are governed by the requirements set forth by our contract with that institution.

We may retain your Personal Data for a period extending beyond the duration of your account in certain circumstances, such as to resolve disputes or to meet our legal and compliance responsibilities. Anonymized data, which can no longer be linked to you, may be retained for longer periods.

# Privacy Rights

Except as otherwise provided, this section applies to residents of states where they have privacy laws applicable to us that grant their residents the rights described below.

For purposes of this section, "personal information" has the meaning given to "personal data", "personal information" or similar terms under the applicable privacy laws of the state in which you reside. Please note that not all rights listed below may be afforded to all users and that if you are not a resident of the relevant states, you may not be able to exercise these rights. In addition, we may not be able to process your request if you do not provide us with sufficient detail to allow us to confirm your identity or understand and respond to it.

In some cases, we may provide a different privacy notice to certain categories of residents of these states, such as job applicants, in which case that notice will apply with respect to the activities it describes instead of this section.

Verification: Upon receipt of your request, we will initiate the identity verification process to confirm that you are the individual for whom we hold information in our system. This verification procedure necessitates your cooperation in supplying relevant information, allowing us to compare it with the details you previously furnished. Depending on the nature of your request, we may request specific information to align with our existing records, or we may reach out to you using a previously provided communication method (such as phone or email). In certain situations, alternative verification methods may be employed based on the circumstances.

Any personal information disclosed in your request will solely be utilized for the purpose of confirming your identity or validating your authority to make the request. We will make every effort to minimize the need for additional information for verification purposes. However, should it be impossible to verify your identity with the existing information in our records, we may request additional details to ensure security and prevent fraud. Any supplementary information you provide for verification will be promptly deleted upon the completion of the verification process.

Authorized Agents: Your authorized agent may be able to make a request on your behalf. However, we may need to verify your authorized agent's identity and authority to act on your behalf. We may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your rights on your behalf, the information we request to verify your identity, and confirmation that you have given the authorized agent permission to submit the request.

- Correction: You can request that we correct inaccurate personal information that we have collected about you.
- Deletion: You can request that we delete your personal information. Please note that once we process a deletion request, we may be unable to provide access or support to any past products or services.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the personal information or where certain exemptions apply. If we decline your request, we will tell you why, subject to legal restrictions. Be advised that any student data that we process on behalf of schools will remain under the control of the respective school. To request access to, modification of, or deletion of student records, please contact the school that maintains those records directly.

Exercising your rights: If you would like to access, modify, correct, or delete your data from our services please contact us at tech@joinscholar.com.

You have the option to opt-out of specific tracking activities related to targeted advertising, also referred to as interest-based advertising. According to the CCPA, this involves the 'sharing' of your personal information with advertising partners. Please note that Scholar Education does not share user information with advertising partners or track users of the platform for this purpose.

You have the right to opt out of the sale or sharing of your personal information with third parties. You also have the right to request details about the personal information we have

disclosed to a third party for a business purpose. Please note that we do not sell or share data with third parties for their own direct business purposes.

# Children's Privacy Notice

We comply with the U.S. Children's Online Privacy Protection Act (COPPA) and Family Educational Rights and Privacy Act (FERPA), and describe our practices regarding the processing of personal information for users under the age of 13 below. Our service is designed to be used by teachers, administrators, and students in an educational context. As part of our services, we may process student records and data from children 13 years of age and under, as provided to us by schools, teachers, and directly from students.

**COPPA Compliance**

When we provide services on behalf of a school, the school provides consent for Scholar Education to collect and process information from students under the age of 13 as permitted by the Children's Online Privacy Protection Act. As described in the notice we provide to schools, we collect, maintain, use and share student records only for authorized educational purposes.

We are committed to protecting the privacy and data of students and children and do not require more information about students or children than is reasonably necessary to provide the service. In addition:

- We collect, maintain, use and share student records only for an authorized educational purpose.
- We do not use or disclose student records for targeted advertising or any other commercial purposes unrelated to education.
- We do not build a personal profile of a student other than to deliver our service.

Student records that we process on behalf of schools and educators will remain under the control of the respective school. To request access to, modification of, or deletion of student records, please contact the school that maintains those records directly.

**FERPA Compliance**

Scholar Education acts as a "School Official" under the Family Educational Rights and Privacy Act (FERPA). We process Student Data on behalf of educational institutions and only for authorized educational purposes. Student Data may include educational records as defined by FERPA and remains under the control of the school. We do not use Student Data for any purpose other than providing our Services and in accordance with agreements with Educational Institutions. If a parent or eligible student requests to review, amend, or delete their data, they should contact their school directly. Scholar Education will support the school in fulfilling these requests.

# Changes To This Privacy Policy

Scholar Education reserves the right to change this Privacy Policy.  If we make material changes to this Privacy Policy, we will notify you as required by applicable law and we will update the date of this Privacy Policy and post it on the services.

In addition to updating this Privacy Policy and its effective date, we will seek your consent if we implement changes or modifications to our data collection practices as required by applicable law.

# HOW TO CONTACT US

If you have questions on concerns regarding this Privacy Policy, please contact us using contact information below.

Email: tech@joinscholar.com