



GoSchoolBox 's Commitment to Your Privacy

Last Updated: December 20, 2023

GoSchoolBox ("Company" or "we" or "us" or "our") provides an online platform for organizations to streamline and automate their tutoring solutions. We've written this Privacy Policy to help you understand how we collect, use, and share your information and to help you understand the privacy rights you can exercise.

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1. What This Privacy Policy Covers

This Privacy Policy covers personal information that we process on our Services. When we say "**Services**," we mean our website applications and other offerings. The types of personal information we may collect (directly from you or from Third Party sources) depends on the nature of the relationship that you have with us. We endeavor to collect only that information that is relevant for the purpose of providing the Services.

An Important Note: This Privacy Policy doesn't apply to any of the personal information of students that our customers may collect or process themselves outside of the GoSchoolBox platform. As discussed in Section 2.B., we receive information about students from our third-party Business Partners. If you are a parent or student, please reach out to our Business Partners (e.g. your local school district) if you have any questions about how they may handle your data outside of their engagement with GoSchoolBox.

2. Personal Information We Collect

GoSchoolBox collects different categories of personal information depending on how you interact with us, our Services, and applicable law. As you'll read below, we collect the information you give us, the information we automatically receive when you use our Services, and information from other sources like third-party organizations.

- A. **Our Audience.** We collect information that you give us directly, such as:

- **Account Creation.** We may collect information when you create an account like name or email address.
 - **Purchases.** Most of our Business Partners do not enable purchases through the Services. But, any payments made via our Services are processed by third-party payment processors. We don't directly collect or store any payment card information entered through our Services, but it may receive information associated with your payment card information (e.g., your billing details).
 - **Your Communications with Us.** We may collect personal information like your email address, phone number, or mailing address when you communicate with us (for example, when you ask us about our Services, register for our newsletter, reach out for customer or technical support, or apply for a job).
 - **Surveys.** We may reach out to you with surveys. If you participate, you may be asked to provide personal information.
 - **Interactive Features.** We and users of our Services may collect personal information that you make available through our interactive features (e.g., messaging and chat features).
 - **Sweepstakes or Contests.** We may collect personal information you provide for our sweepstakes or contests. In some jurisdictions, we're required to publicly share information about sweepstakes and contest winners.
 - **Conferences, Trade Shows, and Other Events.** We may collect your personal information when we attend conferences, trade shows, and other events.
 - **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess potential business opportunities.
 - **Job Applications.** We may post job openings and opportunities on our Services. If you submit your application, CV and/or cover letter for one of these postings, we'll collect and use your information to assess your qualifications.
 - **Information Collected from Other Sources.** We may get information about you from other sources, including third-party organizations. For example, if you access our Services through a third-party application, like an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you've made available via your privacy settings.
- B. **Students.** We may receive information about you from other sources, including through your school district, teachers, tutors, or other sites to which your parent gives us access, and third-party services and organizations. Additionally, if you access third-party services to log in to the Services or to share information with us, we may collect information from these third-party services. We may also collect information that you give us directly, such as:
- **Interactive Features.** We and users of our Services may collect personal information that you make available through our interactive features (e.g., messaging and chat features, video recording, etc.).

C. **Information Collected Automatically.** If you interact with our Services, we may collect some information from you automatically.

- **Automatic Data Collection.** We may collect information automatically when you use our Services, like your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information related to your use of our Services, like pages you visit before, during and after using our Services, the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services. In addition, we may collect information that other people provide about you when they use our Services.
- **Location Information.** We may collect precise location information, like your address or school address.
- **Cookies, Pixel Tags/Web Beacons, and Other Technologies.** We and third parties that provide content, advertising, or other features on our Services may use cookies, pixel tags, local storage, and other technologies ("Technologies") to automatically collect information through your use of our Services.
 - **Cookies.** Cookies are small text files placed in device browsers that store preferences and enhance your experience.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. A pixel tag allows us to record, for example, that you've visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that let you access our Services, applications, and tools required to identify irregular website behavior, prevent fraudulent activity and improve security or that let you use our features;
- **Performance-Related.** We may use Technologies to assess our Services' performance, including to help us understand how people use our Services (see Analytics below);
- **Functionality-Related.** We may use Technologies to give you better functionality when accessing our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences or items viewed;
- **No advertising or targeting.** We do not advertise to our customers or eventual users through our website applications. We are committed to staying compliant with data protection laws including, but not limited to, the Children's Online

Privacy Protection Act of 1998 (“COPPA”) and the Family Educational Rights and Privacy Act (“FERPA”).

See Section 5 below to understand your choices for these Technologies

D. Third-Party Data Subprocessors. We collaborate with a series of third-party data subprocessors to enhance and support the services we provide to our customers. Below is a table outlining the third-party entities we engage with in connection to the Company platform services. This table details the specific activities carried out by each entity and notes if their involvement is pertinent to particular services or regions. GoSchoolBox has evaluated the data privacy and security practices of these providers to ensure that they meet the expectations of GoSchoolBox in meeting the data privacy, security, and deletion expectations it holds for its customers.

Entity Name	Category	Description
Amazon Web Services	Database and Cloud Compute	AWS (Amazon Web Services) is the foundational platform for hosting our web application servers and services. AWS serves as a pivotal solution in our data management infrastructure, ensuring that all customer data is encrypted both in transit and at rest. We place a high emphasis on data governance, leveraging the AWS security features to enforce stringent access controls. This ensures that only authorized and qualified personnel have the ability to access and handle customer data to ensure high standards of data integrity and confidentiality.
Amplitude	Analytics and Logging	GoSchoolBox uses Amplitude for capturing user-specific behavior events on its platform. User PII data such as first name, last name, and email address is sent to Amplitude as a data subprocessor in order to record when users have taken certain actions, such as joining a tutoring session, on the GoSchoolBox platform. Other device-related information such as users’ IP address, operating system, browser type, non-precise geographic location, technical information about device and date and time stamps associated with actions on the GoSchoolBox platform. GoSchoolBox has thoroughly reviewed Amplitude's data security practices, confirming they align with our expectations for a trusted service, and we have established robust measures to manage data deletion requests, ensuring prompt removal of user data from Amplitude upon any verified user or authorized request, maintaining our strict data privacy standards.
Coralogix	Logging	GoSchoolBox uses Coralogix for infrastructure monitoring to ensure the stability and performance of our web services supporting our customer-facing features. GoSchoolBox does not transmit or store any User PII data on Coralogix.
DataDog	Logging	GoSchoolBox uses DataDog as a logging and application performance monitoring service to monitor the stability and performance of the services GoSchoolBox runs for its

		customers. General device-related information such as operating system, browser type, non-precise geographic location, technical information about device and date and time stamps associated with its service performance events. User PII data is not transmitted to nor stored in DataDog.
Google Analytics	Analytics	GoSchoolBox captures generic deidentified platform information on how users navigate through the GoSchoolBox website. General device-related information such as operating system, browser type, non-precise geographic location, technical information about device and date and time stamps associated with visits to the GoSchoolBox web application. User PII is not sent to nor stored in Google Analytics.
Heroku	Cloud Compute	GoSchoolBox leverages Heroku for hosting its web application servers, where Heroku acts as a transmitter and processor of user data during secure socket connections to the GoSchoolBox website. We ensure all data transmitted between Heroku-hosted services and downstream services is fully encrypted in transit.
Hubspot	Customer Support	GoSchoolBox uses Hubspot conversation inbox and ticket tracking to track customer inquiries, complaints, and disputes. GoSchoolBox does not send or store Student PII data via this service.
Lessonspace	Videoconferencing	GoSchoolBox utilizes Lessonspace to facilitate secure videoconferencing sessions between students and tutors through the GoSchoolBox virtual tutoring platform. For ease of identification during these sessions, users' first and last names are shared with Lessonspace. Additionally, if a tutoring program associated with a Session chooses to enable the recording feature, these lesson recordings are retained for a maximum of 30 days, after which they are permanently deleted to ensure privacy and data security.
Mongo Atlas	Database and Cloud Compute	GoSchoolBox employs MongoDB Atlas as the central transactional database for the GoSchoolBox platform, managing vital data including user profiles, session details, attendance records, and other platform activities. We utilize MongoDB Atlas to guarantee encryption of our customer data, both in transit and at rest, ensuring data security and integrity.
Twilio & Sendgrid	Notifications	GoSchoolBox employs Sendgrid and Twilio for sending timely email and SMS notifications to users, such as reminders about upcoming platform sessions. In this process, we share user email addresses, regarded as PII, with Sendgrid and Twilio for effective message delivery. We ensure prompt removal of this data from Sendgrid following any user or authorized request for data deletion, maintaining our strict data privacy standards.

3. How We Use Your Information

We use your information for various business purposes, including to provide our Services, for administrative purposes, and to market our Products and Services.

A. Provide Our Services

We use your information to fulfill our contract with you and/or provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas and features of our Services;
- Answering technical support requests;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing your financial information for products or Services purchased;
- Processing applications if you apply for a job posted on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We may use your information for various administrative purposes, such as:

- Pursuing interests like direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity and prosecuting people responsible for that activity;
- Measuring interest in our Services;
- Transient use,
- Enhancing our Services;
- Developing new products and Services;
- Ensuring internal quality control;
- Verifying users' identities;
- Debugging to repair errors with our Services;
- Auditing related to interactions, transactions, and other compliance activities;
- Enforcing our agreements and policies; and
- Complying with our legal obligations.

C. Marketing and Advertising our Products and Services

GoSchoolBox is a trusted steward of personal data. Data received from its customers is used for the purposes of providing educational services, and such data will not be sold or shared with 3rd-parties for their marketing purposes.

We may use personal information to tailor the products and services we market to you. We may give you these materials as permitted by applicable law.

If you have any questions about our marketing practices or if you'd like to opt-out of the use of your personal information for marketing, you may contact us at any time via the methods described below.

D. Other purposes

We also use your information for other purposes as requested by you or as permitted by applicable law.

- **Consent.** We may use personal information for other purposes that we'll tell you about when you provide the information, or with your consent.
- **Automated Decision Making.** We may engage in automated decision-making, including tutor and student pairing suggestions. The company's processing of your personal information won't result in a significant decision based only on automated processing unless that decision is necessary because of a contract we have with you, we have your consent, or we are permitted by law to engage in this automated decision-making. If you have questions about our automated decision-making, you can contact us via the methods described below.
- **De-identified and Aggregated Information.** We may use personal information to create de-identified and/or aggregated information, like de-identified demographic information, de-identified location information, information about the device you use to access our Services or other analyses.

4. How We Share Your Information

We share your information with third parties for various business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction.

A. Disclosures to Provide our Services

- **Program and Community Partners.** We share information within the Service as needed to perform the Service and/or at the direction of the Customer, oftentimes your relevant School or District. For example, information including Student Directory-Level information, will be shared by and between authorized School users such as teachers and School administrators and will be shared with third parties such as specific Program Providers as directed and authorized by the School or District administrator(s). This sharing will depend on the settings and functionality selected by the Customer.
- **Service Providers.** We may share your personal information with our third-party service providers who help us provide our Services (for example, by giving us IT support, hosting, payment processing, customer service, and related services).
- **Business Partners.** We may share your personal information with business partners to give you a product or service you've requested. We may also share your personal information with business partners that we jointly offer products or services with.

- **Affiliates.** We may share your personal information with our company affiliates if allowed by our partners.
- **APIs/SDKs.** We may use third-party Application Program Interfaces ("APIs") and software development kits ("SDKs") as part of our Services. An example of an API we use is the LessonSpace API to streamline the uploading of curriculum to videoconferencing tabs. For more information about our use of APIs and SDKs, please contact us via the methods described below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to others if we, in good faith, think doing so is appropriate to comply with law enforcement or national security requests and legal processes, like a court order or subpoena; protect your, our, or others rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we're involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of that transaction, as permitted by law and/or contract.

5. Your Privacy Choices and Rights

Your Privacy Choices. The privacy choices available to you are set by applicable law and described below.

- **Email and Telephone Communications.** If you get an unwanted email from us, you can opt-out of future emails by clicking the unsubscribe link at the bottom of the email. You'll continue to receive transaction-related emails regarding products or Services you've requested. We may also send you certain non-promotional communications about us and our Services, and you won't be able to opt-out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Policy).
- **Text Messages.** You can opt-out of receiving text messages and email notifications about upcoming sessions on the website by turning off those options in the account settings section of your dashboard.
- **"Do Not Track."** Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. We don't respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

Cookies for Essential Functionality: GoSchoolBox utilizes cookies solely for the purpose of ensuring ongoing optimal performance of our website. These cookies are critical for the site's operation and without them, GoSchoolBox would not be able to provide an optimal user experience. We do not use cookies for internet-based advertising purposes.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Access Personal Information** about you, including (i) confirming whether we're processing your personal information; (ii) accessing or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you've provided to us, or asking us to send that information to another company (the "right of data portability");
- **Request Correction** of your personal information where it's inaccurate or incomplete. In some cases, we may provide self-service tools that let you update your personal information;
- **Request Deletion** of your personal information;
- **Request Restriction** of or **Object** to our processing of your personal information; and
- **Withdraw your Consent** to our processing of your personal information

If you'd like to exercise any of these rights, please contact us via the methods described below. We'll process these requests in compliance with applicable laws.

6. Security of Your Information

We take steps to make sure your information is treated securely and in compliance with this Privacy Policy. Unfortunately, no system is 100% secure, and we can't ensure or warrant the security of any information you provide to us. We've taken appropriate safeguards to require that your personal information will remain protected and require our third-party service providers and partners to have appropriate safeguards as well.

To the fullest extent allowed by applicable law, we don't accept liability for unauthorized disclosure.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically about security, privacy, and administrative issues related to your use of our Services. If we learn of a security system breach, we may try to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

7. International Data Transfers

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, in the United States or other countries, which may have data protection laws that are different from the laws where you live. We work hard to safeguard your information in a manner that's consistent with applicable laws.

8. Retention of Personal Information

We store the personal information we collect for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws!

9. Supplemental Notice for California Residents

This Supplemental California Privacy Notice only applies to our processing of personal information subject to the California Consumer Privacy Act of 2018 ("CPA"). The CCPA gives California residents the right to know what categories of personal information the Company has collected about them and whether Company disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information below:

Category of Personal Information Collected by Company	Category of Third Parties Information is Disclosed to for a Business Purpose
<p>Identifiers. A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.</p>	<ul style="list-style-type: none"> ● Government entities ● Service providers ● Business Partners
<p>Internet or other electronic network activity Browsing history, search history, information on a consumer's interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> ● Government entities ● Service providers ● Business Partners
<p>Geolocation data Physical location or movements.</p>	<ul style="list-style-type: none"> ● Business Partners ● Government entities ● Service providers ● Business Partners
<p>Sensory data Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<ul style="list-style-type: none"> ● Business Partners
<p>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g, 34 C.F.R. Part 99)) Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>	<ul style="list-style-type: none"> ● Business Partners
<p>Inferences drawn from other personal information to create a profile about a consumer Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<ul style="list-style-type: none"> ● Business Partners

"Sales" of Personal Information under the CCPA

For purposes of the CCPA, the Company doesn't "sell" personal information, nor do we have actual knowledge of any "sale" of personal information of minors under 16 years of age.

Additional Privacy Rights for California Residents

Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, please contact us via the methods described below.

Verification. To protect your privacy, we'll take steps to verify your identity before fulfilling your request, we'll ask you to provide enough information so that we can reasonably verify that you're the person we collected personal information about or an authorized representative, which may include checking with our business partners or with your school or institution if said entities provide secure single sign on integrations.

If you're a California resident and would like to exercise any of your rights under the CPA, please contact us via the methods described below. We'll process these requests in compliance with applicable laws.

Accessibility. This Privacy Policy uses industry-standard technologies and follows the World Wide Web Consortium's Web Content Accessibility Guidelines, version 2.1. If you'd like to print this policy, please do so from your web browser or by saving the page as a PDF.

California Shine the Light. The California "Shine the Light" law allows users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties we've disclosed their personal information to (if any) for their direct marketing purposes in the last calendar year, and the type of personal information disclosed to those parties.

10. Supplemental Notice for Nevada Residents

If you're a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties who want to license or sell that Personal Information. You can exercise this right by contacting us at info@goschoolbox.com with the subject line "Nevada Do Not Sell Request" and giving us your name and the email address associated with your account. Please note that we don't currently sell your Personal Information as sales are defined in Nevada Revised Statutes Chapter 603A.

11. Children's Information

Protecting children's privacy online is very important to us. Our Business Partners obtain consent directly from parents to authorize us to receive and collect student information. We may also take additional steps to get the parent's verifiable consent before collecting any information from a child. If you are a parent or guardian and wish to review information collected from your child, or have that information modified or deleted, you may contact us as described below. If we become aware that a child has provided us with personal information in violation of applicable law, we'll delete any personal information we've collected, unless we have a legal obligation to keep it, and terminate the child's account.

12. Other Provisions

Third-Party Websites/Applications. The Services may contain links to other websites/apps and other websites/apps may reference or link to our Services. These third-party services aren't controlled by us. We encourage you to read these services' privacy policies. We don't endorse or screen and aren't responsible for, the privacy practices or content of these other websites or applications. You give third-party websites and apps your personal information at your own risk

Changes to our Privacy Policy. We may update this Privacy Policy from time to time. If there are any material changes to this Privacy Policy, we'll notify you as required by applicable law. You understand and agree that you'll be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

13. Contact Us

If you have any questions about our privacy practices or this Privacy Policy, or you'd like to exercise your rights as described in this Privacy Policy, please contact us at:

GoSchoolBox Inc.
Attn: Privacy Officer
Email: info@goschoolbox.com
Mailing address: 1975 Farndon Avenue
Los Altos, CA 94024