

Privacy Policy for Users of Pre-K–6 Learning Platforms

Introduction

ORIGO provides educational materials and related services, via a set of online learning platforms. We have created our learning platforms to assist educators in providing personalized and rewarding online educational experiences to their students. We believe that transparent and strong privacy practices foster these experiences, and we provide this privacy policy in that spirit.

This privacy policy governs our privacy practices with respect to all personal information that our users submit (school administrators, teachers and students), or that we collect in connection with our learning platform at origoslate.com and slate.origoeducation.com. This policy also applies to the ORIGO Education app, NumFu.

For purposes of this Privacy Statement, the Websites and the Apps are collectively referred to as the “Website,” and the term “Website” means one or more of the Websites and/or Apps.

PLEASE READ this Privacy Statement before you use the Website. Your use of the Website signifies that you have read and agree with all of the terms of this Privacy Statement and consent to the collection and use of your personal information by ORIGO, as described in this Privacy Statement. If you do not agree with any part of this Privacy Statement, do not use the Website. If you are acting on behalf of an entity, you represent that you have full authority to bind your entity to this Privacy Statement. If you do not have such authority, do not use the Website.

We are committed to the effective stewardship of customer information, to safeguarding privacy, and to information security. ORIGO Education is a responsible steward of personally identifiable information, which may be gathered when we provide educational resources. ORIGO Education is committed to meet all federal guidelines regarding educational privacy.

1. HOW WE COLLECT INFORMATION

We limit our collection of personal information to no more than is reasonably necessary for the user to participate in our learning platform. Personal information may be provided by you to us in several ways, including but not limited to: when you register through the Website; fill out and submit a form to provide feedback regarding the products and services we offer; request guest passes and free trials; sign up to receive from us our newsletter or other information; and post content that will be viewed by other Website users. (This last activity is beyond our control, and we shall have no responsibility for or liability regarding the protection or security of such information.) Once an Educational Institution begins using the Website, we will keep records of activities related to the Website.

Information about Schools

We ask for certain information when an administrator registers their institution with ORIGO, including name, school name, school district, business address, school email address and/or account name and password, phone number and information relating to the school's information systems.

Information about Teachers

We collect registration information from a teacher when the teacher activates the teacher's account, which may include the teacher's first and last name, business address and phone number, email address, grade level, teaching position and username.

Information about Students

ORIGO may have access to personally identifiable information about students ("Student Data") in the course of providing its services to a School. This data may include the student's first and last name, school email address, username and other information which may include gender, race, and ethnicity; also included in Student Data is student homework, assignments, test results and other exchanges over our learning platform. We consider Student Data to be confidential and do not use such data for any purpose other than as specifically described in this policy. ORIGO receives Student Data only from the School and never interacts with the student directly. ORIGO has access to Student Data only as requested by the School and only for the purposes of performing services on the School's behalf. If you are a student or parent, please contact your School if you have questions about the School's use of the technology service.

Information collected through technology

We automatically collect certain types of usage information when visitors use our Website. We may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets us help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Website (e.g., the pages you view, the links you click and other actions you take on the Website), and allow us to track your usage of the Website over time. We may collect log file information from your browser or mobile device each time you access the Website. Log file information may include anonymous information such as your web request, Internet Protocol ("IP") address, browser type, information about your mobile device, number of clicks and how you interact with links on the Website, pages viewed, and other such information. We do not allow third party advertising networks to collect information about the users of our Service.

2. HOW WE USE INFORMATION

We use collected information to operate, maintain, and provide the features and functionality of the website, to analyze our Website offerings and functionality, and to communicate with our Schools and Website visitors. Once a School begins using the Website, we keep records of activities related to the Website.

Personal Information

Personal information is used to communicate with school administrators and teachers about the applicable subscription account or transactions with us; to send information about our learning platform's features and, where applicable, changes to these features; to personalize our learning platform's content and experiences for students, teachers, and other users of the platform; and to detect, investigate and prevent activities that may violate our policies or be illegal.

Information collected through technology

We use or may use the data collected through cookies, log files, and device identifiers to: remember information so that a user will not have to re-enter it during subsequent visits; in an effort to ensure that our Website will appear and function appropriately on your computer; provide custom, personalized content and information; provide and monitor the effectiveness of our Website; monitor aggregate metrics such as total number of visitors, traffic, and usage on our Website; diagnose or fix technology problems; and help users efficiently access information after signing in. ORIGO Education does not behaviorally target students.

3. HOW WE SHARE YOUR INFORMATION

ORIGO Education shares personal information only in a few limited circumstances, described below. We do not rent or sell information for marketing purposes.

Who we may share information with

We may share information with those that provide us with technology services (e.g. web hosting and analytics services), but strictly for the purpose of carrying out their work for us. Our corporate partners share our privacy principles. We may share school and teacher information with them where we deem it would enhance your ORIGO product experience. We may also share information when we believe in good faith that disclosure of your information is necessary to protect our rights and those of others; to protect your safety or the safety of others; to investigate fraud or to respond to a government, judicial or other legal request; or to comply with the law.

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 Website 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 personally identifiable Student Data.

How Student Data is shared

In addition to the actions described above, ORIGO may facilitate the sharing of Student Data with third parties, though only when instructed and authorized to do so on behalf of the School. The third parties with whom we work share our privacy policy principles and are legally obligated to keep your personal information confidential.

4. HOW WE STORE AND PROTECT YOUR INFORMATION

Storage and processing

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

Keeping information safe

ORIGO Education maintains strict administrative, technical, and physical procedures to protect information stored in our servers. Access to information is limited (through user/password credentials) 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. User Information, such as that required for access to the system in the form of log in information, is encrypted in transmission and at rest. Student data recorded as a function of using the online resources is used only for purposes authorized by the educational institution, teacher, or parent. We protect the security, privacy, confidentiality, and integrity of such information from risks such as unauthorized use or inappropriate disclosure. However, please be aware that no data transmissions can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit or otherwise provide to us, and you do so at your own risk. Please notify us of any unauthorized use of your account or any suspected breach of security.

5. YOUR CHOICES ABOUT YOUR INFORMATION

Account information and settings

Schools may update account information and modify services by signing into the administrator account. You cannot unsubscribe from service-related messaging.

Access to Student Data

Student Data is provided and controlled by the Schools. If you have any questions about reviewing, modifying, or deleting personal information of a student, please contact your School directly.

Deleting or disabling cookies

You may be able to disallow cookies on your browser. Please look for instructions on how to delete or disable cookies and other tracking/recording tools on your browser's technical settings. You may not be able to delete or disable cookies on certain mobile devices and/or certain browsers. Disabling cookies may disable many of the features available on the Website, so we recommend you leave cookies enabled.

How long we keep User Content

Following termination or deactivation of a School account, we may retain personally identifiable information and automatically collected Information in our databases until you ask us to remove your information from our databases, unless applicable laws require otherwise. Note that even after you ask us to remove your information from our databases, it may be impossible to remove some information, such as information tracked in our web server log files and information that may reside in backup files. ORIGO may retain profile information and content for a commercially reasonable time for backup, archival, or audit purposes, and to comply with any applicable law, rule, regulation, or guideline; to prevent fraudulent activity; to protect ourselves against liability; and to allow us to enforce our contractual or other rights and to pursue available remedies and limit any damages we may sustain. Any and all Student Data associated with the School will be deleted promptly. We may maintain anonymized or aggregated data, including usage data, for analytics purposes.

Your Access and Opt-Out Rights

If you are an educator who has provided us with personal information about your students, you may review or revise that information at any time by logging into your account and accessing your classroom portal. You may also choose to opt out of email messages and newsletters from us. To opt out, simply click on the "unsubscribe" button that appears on emails or contact us at info@origomath.com. If you are a parent or legal guardian of a minor child, you may also have the right to access certain information about your child. To do so, we request that you contact your School or district, which may access your child's information through their classroom portal.

6. ABOUT THIS POLICY

Severability

If any part of this Privacy Statement is determined to be invalid or unenforceable pursuant to applicable law, then the invalid or unenforceable provision will not affect the validity and enforceability of any other provision.

Changes to Policy

ORIGO may amend this Privacy Policy from time to time. When we do, we will notify you by updating the date of this Privacy Policy and posting it on this page of our site. We will also notify you of any material changes to this Privacy Policy upon log in. You will be asked to consent to the change prior to continuing to use the service.

Contact

We reserve the right to contact you for non-marketing purposes relating to your use of the Website or purchase of our products.

If you have any comments or questions about this Privacy Statement please contact us at info@origomath.com

Policy Update

Last updated October 25, 2017