

Privacy Policy

Effective as of June 1, 2021

Alpha Omega Publications and Ignite Christian Academy f/n/a Alpha Omega Academy ("AOP", "we", "us", or "our") are owned by Weld North Education LLC and provide online Christian education services to build a strong foundation for achievement. Alpha Omega Publications is online homeschooling curriculum for families seeking to provide home-based education to their K-12 students. Ignite Christian Academy is an online private school that provides individualized education to students in K-12. Students complete online lessons with the support of a personalized team of teachers, advisors, and counselors.

This Privacy Policy describes our practices regarding information we collect through our websites, including <https://www.aop.com/>, <https://www.ignitechristianacademy.com/>, and any other interactive features or services owned or controlled by AOP that post a link to this Privacy Policy (each, a "Service" and collectively, the "Services"), as well as any information we collect offline and combine in our databases. Certain features discussed in this Privacy Policy may not be offered on each Service at any particular time.

Note about Children: As required by applicable law and our Terms of Service, children under the age of 13 in the U.S. (and a higher age if required by the applicable law in another country) may only use our Services with the express prior consent of a parent or legal guardian.

1. What is this policy?

WE FULLY DESCRIBE OUR PRIVACY PRACTICES BELOW IN THIS PRIVACY POLICY. THIS SUMMARY PROVIDES AN OVERVIEW OF SOME IMPORTANT INFORMATION REGARDING OUR USE AND SHARING OF YOUR INFORMATION. PLEASE READ THE ENTIRE PRIVACY POLICY VERY CAREFULLY. BY USING ANY SERVICE, YOU AGREE TO BE BOUND BY THIS PRIVACY POLICY IN ITS ENTIRETY AND ARE ALSO SUBJECT TO THE APPLICABLE TERMS OF SERVICE.

1.1 Information Collection/How We use Your Information: Information that we collect is primarily used to communicate with you and to provide and maintain access to AOP's Services. Please review the "**What information does AOP Collect?**" and "**How does AOP use the information it collects?**" sections of this Privacy Policy for a full description of the information we collect, including Personal Information (as defined below), and how we use that information.

1.2 Information Sharing: Remember that if you create a Profile (as defined below) or share Personal Information with other users on the Services, your information may be visible to others. Note that we do not share your Personal Information with third parties for their marketing purposes; however, we may share your Personal Information under certain limited circumstances. For more details, please review the section below entitled "**Will AOP share any of the information it collects?**"

1.3 Third Parties: We work with third parties who provide us with certain services such as address validation, shipping cost calculations, payment processing, cloud hosting services, analytics providers, assessment providers, and who otherwise allow us to provide and improve the Services.

2. What information does AOP collect?

Information Shared with Us

2.1 Registration and Other Information You Provide. The Services may collect "**Personal Information**" (which is information that can reasonably be used alone or in combination with other reasonably available information, to identify or contact a specific individual). Personal Information includes, but is not limited to, user (including child and parent/guardian) data, metadata, and user content. This may

include a name, e-mail address, physical address, password, or usage information. Any information combined with Personal Information will be treated as Personal Information.

2.2 Your Account

Parent User Account: The following information is collected about the adult account user:

- First Name
- Last Name
- Physical Address
- E-mail Address
- Phone Number
- Payment Information (Note that AOP does not store such information within our systems or network. Such information is stored directly with a third party or, if given directly, deleted immediately afterward.)
- Username
- Password

Child Users: Note that children do not create their own accounts but may access online curriculum Services through an account created for them by the adult users. Certain information about children is collected through such account as listed below.

- First Name
- Last Name
- Username
- Password
- Grade Level

Additional information about a child user may be collected through a user account for Ignite Christian Academy such as:

- Picture
- Date of Birth

2.3 Third Party Services and Information Third Parties Provide About You

The Services may permit interactions between the Services and a third-party feature or service. These third parties may provide us with information about you. Similarly, if you publicly post information on a third-party platform, such as a social media site that references AOP or one of the Services, your post may be published on our Services in accordance with that third party's terms. These features may collect your IP address or other unique identifier and which page you are visiting on our website and may also set a cookie to enable the third-party feature to function properly. When you use a third-party feature through the Services, the third party may also have access to information about you and your use of our Services. Your interactions with third-party links and features are governed by the privacy policies of the third parties.

The information we collect is subject to this Privacy Policy. The information collected and stored by the third party remains subject to the third party's privacy practices, including: whether the third party continues to share information with us, the types of information shared, and your choices with regard to what is visible to others on that third party website and service. The third party may allow you to remove the application or feature (in which case we will no longer collect information about you through the application or feature), but we may retain the information previously collected in compliance with all applicable laws.

Information We Collect Automatically

2.4 Usage Information. Like other websites and online services, we and our analytics providers, vendors and other third-party service providers may automatically collect certain "Usage Information" whenever

you access and use the Services. Usage Information may include: the browser and operating system you are using, the URL that referred you to our Services (if applicable), the search terms you entered into a search engine that lead you to our Services (if applicable), all of the areas within our Services that you visit, the time of day you used the Services, and other information. We may use Usage Information for a variety of purposes, including to select appropriate content to display to you and to enhance or otherwise improve the Services and our products.

In addition, we automatically collect your IP address or other unique identifier ("Device Identifier") for any computer, mobile phone or other device (any, a "Device") you may use to access the Services. A Device Identifier is a number automatically assigned to the Device used to access a Service, and our servers identify your Device by its Device Identifier. Some mobile service providers may also provide us or our third-party service providers with information regarding the physical location of the Device used to access a Service, internet service provider (ISP), date and time of visit, browser language, browser type, referring and exit pages and URLs, amount of time spent on particular pages, which parts of our Services you use, which links you click, search terms, operating system, traffic and related statistics, keywords, and/or other general browsing or usage data. Usage Information is generally non-identifying, but if we associate it with you as a specific and identifiable person, we treat it as Personal Information.

2.5 Cookies. Like many other websites and apps, we use "cookies" (a small file sent to your computer by a website or device to allow the website or app to store information which uniquely identifies you) or other similar software to collect data in order to assist our users and provide them with a more personal experience visits in our Website or apps. For example, cookies help our systems recognize you if you return to our Services shortly after exiting them. You can always disable cookies at your browser or device's settings, but please note that if you do so, some (or all) of the features and functionality of our Services may not be available to you.

2.6 How We Respond to Do Not Track Signals: Please note that your browser setting may allow you to automatically transmit a "Do Not Track" (DNT) signal to websites and online service you visit. DNT is a privacy preference that users can set in certain web browsers to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. However, we do not recognize or respond to browser-initiated DNT signals, as the internet industry is still working to determine what DNT means, how to comply with DNT, and how to create a common approach to responding to DNT. To find out more about "Do Not Track", please visit <http://www.allaboutdnt.com>.

3. How does AOP use the information it collects?

We may use information about you (including Personal Information, the information you provide in your Profile, User Content, and Usage Information) for the following purposes:

3.1 To Provide the Services. We use your Personal Information to: verify your registration, allow you to participate in features we offer, and contact you regarding the Services.

3.2 To Operate the Websites. Your personal information may be used to tailor content, recommendations and offers we display to you, both on the Services and elsewhere online, as well as to maintain or improve our Services.

3.3 To Send Marketing Communications. We may send marketing communications to current users. Additionally, anyone may sign up to receive communications from us regarding new or existing offerings or other materials that may be of interest, including offers and materials from our related platforms. Anyone who receives these communications may unsubscribe at any time by clicking on the unsubscribe link in any e-mail. Children under the age of 18 are prohibited from signing up for marketing communications will be unsubscribed if we become aware of a child under the age of 18 signing up to receive these communications. Children will not receive any marketing on their accounts.

3.4 To Create Anonymous Data for Analytics. We may make information anonymous (by excluding information that makes it personally identifiable to you), then use that anonymous data for our lawful business purposes.

3.5 For Compliance, Fraud Prevention, and Safety. We use your Personal Information as we believe is necessary or appropriate to (a) enforce our terms and conditions; (b) protect our (and your) rights, privacy, safety or property; and (c) protect, investigate, and deter against fraudulent, harmful, unauthorized, unethical, or illegal activity.

3.6 To Comply with Law. We use your Personal Information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process (such as to respond to subpoenas or requests from government authorities).

3.7 With Your Consent. In some cases, we may ask for your consent to collect, use, or share your Personal Information, such as when required by law or agreements with third parties.

Please note that information submitted on the Services via a "Contact Us" or other similar function may not receive a response. We will not use the information provided via these functions to contact you for marketing purposes unrelated to your request unless you agree otherwise.

4. Will AOP share any of the information it collects?

AOP does not share your Personal Information with third parties for their marketing purposes. AOP may share non-Personal Information (such as aggregate or de-identified user statistics, demographic information and Usage Information) with third parties.

We also may share your Personal Information with third parties with your consent (if permissible under applicable law), as disclosed at the time you provide us with information, and as described below or otherwise in this Privacy Policy:

4.1 Service Providers. We will share your Personal Information with third parties to provide services to us or you in connection with the Services. These disclosures will be subject to confidentiality obligations that limit their use and disclosure. For example, we may provide your Personal Information to companies that provide services to help us with our business activities, communicate with students and parents, send our e-mails, or offer customer service. Consumer payments are primarily processed and stored via third party services and we only receive the last four digits of the credit card number used for such transaction. If credit card information is provided directly to us, we will only retain such information for as long as is necessary for our legitimate business purposes.

4.2 Administrative, Legal Reasons & Academic Integrity Investigations. We may also disclose your information, including Personal Information as follows: (i) in response to a subpoena, court order, or when otherwise required by law; (ii) in response to bankruptcy proceedings; (iii) to defend our rights; (iv) in response to a request from law enforcement; (v) to provide information to a claimed owner of intellectual property who claims that content you have provided to us infringes on their rights; (vi) upon request of or as otherwise authorized by an academic institution connected to an investigation into academic integrity; (vii) to protect and/or defend any applicable Terms of Service or other policies applicable to the Services; or (viii) to protect the personal safety, rights, property or security of any organization or individual.

We may also use Device Identifiers (including IP addresses) to identify users and may do so in cooperation with copyright owners, Internet service providers, wireless service providers or law enforcement agencies in our discretion. These disclosures may be carried out without your consent or without notice to you.

4.3 Business Transitions. AOP may share Personal Information with its parent company, subsidiaries and affiliates, and investors primarily for business and operational purposes so long as any recipient agrees to comply with this Privacy Policy and applicable law with regard to such Personal Information. In the event that AOP goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, a bankruptcy, or another corporate change (including, without limitation, during the course of any due diligence process) your information, including Personal Information, will likely be among the assets transferred.

You will be notified via e-mail and/or by a prominent notice on the Services of any completed change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information. This Privacy Policy will become binding upon the new owner of the information until amended.

4.4 Testimonials. We may display personal testimonials of satisfied users or other endorsements on our Services. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us.

5. How does AOP work with third parties?

5.1 Third-Party Advertising. AOP does not currently use any user data to target advertisements or marketing on behalf of third parties. We do not mine user data for any purposes other than those agreed to by the parties. Data mining or scanning of user content for the purpose of advertising or marketing to children or their parents is prohibited.

5.2 Third-Party Providers. We work with third-party providers to provide us with services such as payment processing and to provide us with information regarding traffic on the Services, the features used when visiting the Services, and other information regarding the use of the Services.

5.3 Third-Party Content, Links to Other Sites, and AOP Content Found Outside of the Services. Certain content provided through the Services may be hosted and served by third parties. In addition, the Services may link to third party websites or content over which AOP has no control and which are governed by the privacy policies and business practices of those third parties.

Please also note that AOP content may be included on web pages and websites that are not associated with us and over which we have no control. These third parties may independently collect data. **AOP is not responsible or liable for the privacy practices or business practices of any third party.**

For more information about data we receive from third parties, please refer to Section 2.3 above.

6. What happens if I access AOP's services through a mobile device?

If you use the Services through a mobile device, you agree that AOP may store and use certain information for security purposes (for example, for user verification or authentication).

7. How does AOP protect children's information?

Protecting the privacy of young children is especially important to AOP. For this reason, we created certain features designed to help protect Personal Information relating to children who are less than 13 years of age or older if required by applicable law ("Child Users").

AOP does not knowingly permit children under 13 to use our Services without prior, express consent from a parent or legal guardian, except as permitted under the Children’s Online Privacy Protection Rule (“COPPA”). If we learn that Personal Information of a child under 13 has been collected on our Services without prior parental consent, we will take appropriate steps to delete this information. If you are a parent or guardian (“Parent”) and discover that your child under the age of 13 (or a higher age if required by applicable law) has a registered account with our Services without your consent, please contact AOP to request that we delete that child’s personal information from our systems.

7.1 How Does a Parent Consent to Their Child’s Use of the Services? During the registration process, a Parent must consent to this Privacy Policy and our collection of data from their child. In compliance with COPPA, we verify that a Parent is in fact providing such consent by charging a credit card at the time of registration.

If a user is initially participating through a free trial, we may not collect credit card information at the time of registration. In such event, the parent will be required to verify their consent using another method. Specifically, a parent registering to participate using a free trial will receive an email with a verification code or link in order to complete the registration process. Access to the services will be prohibited until the verification is complete. If the parent abandons the registration process without providing the verification and does not return to complete the process within seven days, all data collected will be deleted in the ordinary course. During the term of the free trial, all data collected will only be used for internal purposes. Following the free trial period, the parent will be required to provide a credit card (at which time the charging of that credit card will be used as the verification of the parent’s consent and data can be used for any reason as set forth in this Privacy Policy). If the parent chooses not to extend the use of the Services after the end of the free trial period, all data collected will be deleted in the ordinary course.

7.2 How Does a Child Use the Services? Child Users can access our online curriculum Services through an account created by their Parent.

7.1 What Children’s Information is Visible to Others? No child’s information is made available or visible to the public through AOP. Parents may view their children’s information at any time by logging into their account. A child’s teachers, counselors, and advisors at Ignite Christian Academy may see that child’s information. Ignite Christian Academy school administrators may see information about all children enrolled at the school.

8. How does AOP protect and store my information?

AOP takes data security very seriously. AOP takes commercially reasonable technical, physical, and administrative security measures designed to protect the Personal Information submitted to us, both during transmission, upon receipt, and at rest. These measures vary depending on the sensitivity of the information at issue and include the following:

- We store your information in a database that is regularly backed up.
- Users can access and retrieve only their own information.
- For audio/visual recordings, data is encrypted and users can view only their own information.
- We periodically review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We continually develop and implement features to keep your personal information safe - for example, all traffic to and from our application is over secure, encrypted protocols (SSL/TLS).
- We ensure passwords are stored securely using encryption and salted one-way hashing.
- Administrators are knowledgeable of security practices and harden the infrastructure with necessary patches.
- Our technical infrastructure is designed to prevent unauthorized access to protected information at multiple points in every transaction.

Please note that no method of transmission over the Internet, or method of electronic storage, is completely secure. Therefore, while we strive to use commercially reasonable means to protect your Personal Information, we cannot guarantee its absolute security.

8.1 How will AOP Handle a Data Breach or Security Incident? In the event AOP becomes aware of a data breach impacting your Personal Information, we will provide notification in compliance with all applicable laws. For example, we may post a notice on our homepage or elsewhere on the Service and may e-mail you at the e-mail address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

AOP has procedures in place that are designed to stop threats to your personally identifiable information, to restore Services to full functionality, and to document and take proactive steps to ensure that any incident cannot be repeated. AOP will also preserve necessary evidence for investigation by security professionals and law enforcement as appropriate. In the unlikely event of an unauthorized disclosure of records, AOP will follow its internal procedures, which articulate how to report the problem to internal and external stakeholders. The notification process includes any information that can identify which customers and children may have been impacted, the data that may have been accessed, AOP's process to inform affected customers, and steps to prevent the incident from happening again as appropriate.

In the unlikely event of an unauthorized disclosure of Data, AOP has implemented a process for responding to incidents and notifying affected individuals (and, if applicable, law enforcement personnel.)

If you have any questions about security on our Services, you can contact us at privacy@aop.com.

9. How can I opt-out of sharing, providing, or receiving certain information?

9.1 Providing Personal Information: You can always decline to share personal information with us, or even block all cookies. However, it's important to remember that many of AOP's features may not be accessible, or may not function properly (for example, we may not be able to remember your language preferences for you) without this functionality.

9.2 E-mail Communication: You can opt-out of receiving further communications by clicking the unsubscribe button at the bottom of any e-mail from us. AOP may continue to send you Service-related e-mails as we believe necessary to provide the Services but will never knowingly e-mail children.

10. How can I access and manage my Personal Information?

You may be able to review the information you provided to us on a Service and make any desired changes to the information, or to the settings for your account on that Service, by logging in to your account for that Service and editing or deleting the information. Note that certain accounts may have limitations regarding the ability to delete information. Even after information is deleted, we may maintain it in backup or archive form unless (i) you request permanent deletion or (ii) the account is terminated.

11. What communications will I receive from AOP and how do I limit them?

AOP may post notices on the homepage of our website and/or may send users information by e-mail. You may choose to stop receiving certain e-mails from AOP by using the unsubscribe button at the bottom of the AOP e-mail. However, we reserve the right to send you information on our behalf and on behalf of third

parties in connection with providing the Services. If you no longer want to receive information from us, you will need to close your account for that Service.

12. How do I close my account?

If you have an account and you wish to close your account with one of our Services, please contact us, and we will remove your Personal Information and Profile, if applicable, from the active databases for the Service(s) you request. Please let us know which Service(s) you wish to close and, if applicable, send your request using an e-mail account that you have registered with AOP under your name. You typically will receive a response to a request sent to this account within five business days of our receiving it.

13. How long does AOP keep my information?

Upon termination of your account, AOP will take commercially reasonable steps to delete any Personal Information, excluding information relating to messages you sent to active users, from our live databases in a reasonable amount of time. You understand and agree that AOP may continue to have Personal Information in archive files or similar databases. You further agree that AOP has no obligation to delete aggregated or de-identified information. AOP may retain and use aggregated and de-identified information for any purpose consistent with laws and regulations.

Even if your account is closed, information may remain in backup or archive records and we may retain certain data relevant to preventing fraud or future abuse or for legitimate business purposes, such as analysis of aggregated, non-personally identifiable or de-identified data, account recovery or if required by law. All retained data will continue to be subject to the applicable privacy policy for the Service.

14. How will AOP notify me of changes to this policy?

We will notify you of material changes to the Privacy Policy on our Website and/or by e-mail, and will make efforts to notify customers of material changes that impact the treatment of data collected through our Services.

AOP may update this Privacy Policy at any time and any changes will be effective upon posting. Upon any update, the date at the top of this policy will be updated. In the event that there are material changes to the way we treat your Personal Information, you are responsible for regularly reviewing this Privacy Policy and your AOP account for notice of such modifications. Your continued use of the Services following an update to this Privacy Policy will constitute your acceptance of the updated Privacy Policy.

15. What if I am a resident of California?

If you are a resident of the state of California, you have certain data protection rights. AOP aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Information. This section describes how we collect, use and share Personal Information of California residents in operating our business, and their rights with respect to that Personal Information. For purposes of this section, "Personal Information" has the meaning given in the California Consumer Privacy Act of 2018 ("CCPA") but does not include information exempted from the scope of the CCPA.

Your Rights

In certain circumstances, you have the following data protection rights:

- **Information.** You can request the following information about how we have collected and used your or your child's Personal Information during the past 12 months:

- The categories of Personal Information that we have collected.
- The categories of sources from which we collected Personal Information.
- The business or commercial purpose for collecting and/or selling Personal Information.
- The categories of third parties with whom we share Personal Information.
- Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third-party recipient.
- Whether we've sold your Personal Information, and if so, the categories of Personal Information received by each category of third-party recipient.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out of sales.** We do not currently sell Personal Information. If we plan to sell your or your child's Personal Information, you will be notified and you can opt-out. In addition, if you direct us not to sell your Personal Information, we will consider it a request pursuant to California's "Shine the Light" law to stop sharing your personal information covered by that law with third parties for their direct marketing purposes.
- **Opt-in.** We do not currently sell Personal Information. If we know that you are younger than 16 years old, we will ask for your permission (or if you are younger than 13 years old, your parent's or guardian's permission) to sell your Personal Information before we do so.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination in the form of legally prohibited increases in the price or decreases in the quality of our Services.

How to Exercise Your Rights

You may exercise your California privacy rights described above as follows:

- **Right to information, access and deletion.** You can request to exercise your information, access and deletion rights by:
 - emailing privacy@aop.com
 - calling us toll-free at: 1- 800-622-3070 (Alpha Omega Publications)
1-800-682-7396 (Ignite Christian Academy)

We reserve the right to confirm your California residence to process your requests and will need to confirm your identity to process your requests to exercise your information, access or deletion rights. As part of this process, government identification may be required. Consistent with California law, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester's valid government-issued identification, and the authorized agent's valid government issued identification. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

Personal information that we collect, use and share

The chart below summarizes how we collect, use and share Personal Information by reference to the categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Policy.

Categories in the chart refer to the categories described above in the general section of this Privacy Policy.

We have not sold your personal information in the preceding 12 months.

Category of personal information (PI)	PI we collect	Source of PI	Business/ commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose	Categories of third parties to whom we “sell” PI
<u>Identifiers</u>	<ul style="list-style-type: none"> • Contact data • Identity data • Data about others 	<ul style="list-style-type: none"> • You • Public sources • Business partners 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Advertising partners • Professional advisors • Authorities and others • Business transferees 	None
<u>Commercial Information</u>	<ul style="list-style-type: none"> • Contact data • Identity data • Transaction data • Communications • Marketing data 	<ul style="list-style-type: none"> • You 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Professional advisors • Authorities and others • Business transferees 	None
<u>Financial Information</u>	<ul style="list-style-type: none"> • Financial data 	<ul style="list-style-type: none"> • You • Public sources • Business partners 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Advertising partners • Professional advisors • Authorities and others • Business transferees 	None
<u>Online Identifiers</u>	<ul style="list-style-type: none"> • Device data • Identity data 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Professional advisors • Authorities and others • Business transferees 	None
<u>Internet or Network Information</u>	<ul style="list-style-type: none"> • Device data • Online activity data 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Professional advisors • Authorities and others • Business transferees 	None
<u>Geolocation Data</u>	<ul style="list-style-type: none"> • Device data 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Professional advisors • Authorities and others • Business transferees 	None
<u>Inferences</u>	<p>May be derived from your:</p> <ul style="list-style-type: none"> • Device data • Online activity data 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Professional advisors • Authorities and others 	None

				<ul style="list-style-type: none"> • Business transferees 	
<u>Professional or Employment Information</u>	<ul style="list-style-type: none"> • Contact data • Identity data • Data about others 	<ul style="list-style-type: none"> • You • Public sources • Business partners 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Advertising partners • Professional advisors • Authorities and others • Business transferees 	None
<u>Protected Classification Characteristics</u>	We do not intentionally collect this information, but it may be revealed in identity data or other information we collect	<ul style="list-style-type: none"> • You • Public sources • Business partners 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Advertising partners • Professional advisors • Authorities and others • Business transferees 	None
<u>Education Information</u>	<ul style="list-style-type: none"> • Educational data of program use, progress, etc. • Grade Level • Academic Progress • Online activity data 	<ul style="list-style-type: none"> • You • Public sources • Business partners 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Advertising partners • Professional advisors • Authorities and others • Business transferees 	None
<u>Physical Description</u>	<ul style="list-style-type: none"> • We do not intentionally collect this information, but it may be revealed in identity data or other information we collect 	<ul style="list-style-type: none"> • You • Public sources • Business partners 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Advertising partners • Professional advisors • Authorities and others • Business transferees 	None
<u>Biometric Information</u>	<ul style="list-style-type: none"> • We do not intentionally collect this information, but it may be revealed in identity data or other information we collect 	<ul style="list-style-type: none"> • You • Public sources • Business partners 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Advertising partners • Professional advisors • Authorities and others • Business transferees 	None
<u>Sensory Information</u>	<ul style="list-style-type: none"> • We do not intentionally collect this information, but it may be revealed in identity data or other information we collect 	<ul style="list-style-type: none"> • You • Public sources • Business partners 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & Operations 	<ul style="list-style-type: none"> • Affiliates • Advertising partners • Professional advisors • Authorities and others • Business transferees 	None

<u>Medical Information</u>	<ul style="list-style-type: none"> We do not intentionally collect this information, but it may be revealed in identity data or other information we collect 	<ul style="list-style-type: none"> You Public sources Business partners 	<ul style="list-style-type: none"> Service delivery Research & development Marketing Compliance & Operations 	<ul style="list-style-type: none"> Affiliates Advertising partners Professional advisors Authorities and others Business transferees 	None
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16. What if I do not live in the U.S.?

Consent to Transfer

The Services are operated in the United States. If you are located outside of the United States, please be aware that information we collect will be transferred to and processed in the United States. By using the Services, or providing us with any information, you fully understand and unambiguously consent to this transfer, processing and storage of your information in the United States, a jurisdiction in which the privacy laws may not be as comprehensive as those in the country where you reside and/or are a citizen.

Important Information for Users in the European Economic Area

The following information only applies to users in the European Economic Area (EEA), provided that we are the controller of your personal information as described below.

Controller

If you use the Services through your employer, school or another organization, that organization is the controller of your personal information and all questions or requests regarding your rights under European data protection legislation (including the rights described under Your rights below) or the processing of your personal information, should be directed to the organization. AOP is the organization's processor and uses your personal information only as instructed by the organization and to the extent necessary to comply with applicable law.

If you do not use the Services through an organization, AOP is the controller of your personal information and can be reached using the contact details in "How can I contact AOP with questions" section.

Legal bases for processing

We process your personal information on the following legal bases:

<i>Processing purpose</i>	<i>Legal basis</i>
<i>To provide the Services.</i>	Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to requesting the Services.
<i>To operate the websites. To send marketing communications. To create anonymous data for analytics. For compliance, fraud prevention, and safety.</i>	These processing activities constitute our legitimate interests. We consider and balance the potential impact on our rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where your data protection interests override these legitimate interests (unless we have your consent or are otherwise required or permitted to by law).

<i>To comply with law</i>	Processing is necessary to comply with our legal obligations.
<i>With your consent</i>	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated at the time consent is requested.

Your Rights

You may ask us to take the following actions in relation to your Personal Information that we hold:

Access. Provide you with information about our processing of your personal information and give you access to your personal information.

Correct. Update or correct inaccuracies in your personal information.

Delete. Delete your personal information.

Transfer. Transfer a machine-readable copy of your personal information to you or a third party of your choice.

Restrict. Restrict the processing of your personal information.

Object. Object to our reliance on our legitimate interests as the legal basis of our processing your personal information, where that processing adversely impacts your legal rights.

You may send us these requests by contacting us at privacy@aop.com. We may request information from you to help us confirm your identity and process your request. Applicable law may require or permit us to reject part or all of your request. If we reject your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including to continue providing the Services to active users you sent information to and for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

17. How can I contact AOP?

If you have questions or comments about this Privacy Policy, please contact us via e-mail at privacy@aop.com or by mail at 8860 E. Chaparral Road, Scottsdale, Arizona 85250, Attn: Legal Department.