

Sandbox Scholar® Privacy Notice

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About Sandbox Scholar and our Privacy Notice

Sandbox Scholar, LLC (“Sandbox Scholar”, “us”, or “we”) feels strongly about protecting your privacy. We understand how important privacy is to you, and we are committed to creating a safe and secure environment for learners of all ages. This Privacy Notice applies to www.sandboxscholar.com, our mobile application(s), our application programming interface (“API”), our online services and any other websites, applications and online services that link to this Privacy Notice (collectively, our “Services”), which are all owned and operated by Sandbox Scholar. This Privacy Notice describes how Sandbox Scholar and its subsidiaries collect, disclose and use information about you, and describes the choices available to you regarding our use of your personal information and how you can access and update this information.

We use the data we collect to create a better experience for users of our Services. Our Privacy Notice describes what information we gather from our members and others who visit and use our Services, how we use that information, and what we do to protect it. By visiting or using our Services, you consent to the information handling practices described in this Privacy Notice.

Your use of our Services and any information you provide on our Services are subject to the terms of this Privacy Notice, which is incorporated into and subject to our Terms of Service. By using the Services, you agree to the handling of your information in accordance with this Privacy Notice. Any capitalized terms used but not defined within this Privacy Notice have the meaning given to them in our Terms of Service.

How we collect and use data

We take the information you provide to us very seriously, and we strive to put you in control of decisions around you and your child’s information. At Sandbox Scholar, the term “Child” means an individual under the age of 13. An “Adult” means an individual age 13 or above. A “Parent” means a parent or a legal guardian.

Sandbox Scholar collects the following information about you and your use of our Services:

1. Personal Information.

When you register for, browse, and/or use our Services, you may provide to Sandbox Scholar what is generally called “personally identifiable information” or “personal data” (such as your full name, email address, or a photograph of yourself) that can be used to identify you. At Sandbox Scholar, we call this data “Personal Information”.

2. Information from Integrated Services like Facebook® or Google®.

If you decide to register through or otherwise grant access to a third-party social networking or integrated service (what we call an “Integrated Service”), such as Facebook Connect or Google, Sandbox Scholar may also collect Personal Information that is already associated with your Integrated Service account. You may also have the option of sharing additional information with Sandbox Scholar through an Integrated Service. If you choose to provide such information, during registration or otherwise, you are giving Sandbox Scholar the permission to use, share, and store it in a manner consistent with this Privacy Notice.

3. Information about your use of our Services and other User-provided Information.

We may collect usage information about your use of certain features on our Services, such as the number of videos you have viewed, and the amount of time spent on each video, and which items you click on. For example, for Adult Users, we may collect information about patterns of usage, order history, and participation in promotions or contests; from Child Users, we may collect information about patterns of usage, which activities a child commences and completes, when a child starts and stops an activity, which areas of the Services the child frequents, the number of questions answered correctly or incorrectly, how many tickets the child earns, what virtual items the child selects to exchange for tickets, and the child's choice of avatar and customization. This enables us to better tailor educational experiences that are most appropriate for you. In addition, we may collect information from any requests you send us via email or by your use of forms on our website.

4. Information obtained from other Users.

We make available certain features on our Services that allow other Users to provide us information about you. This information may include Personal Information. Generally, this occurs when Parents provide information relating to a Child User. For example, a Parent may register an account for their Child and provide us with certain information, such as the Child's user name and birthday. If you submit any information relating to other people in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Notice.

5. Location Information.

We may collect and use information about your location (such as your country) to provide you with tailored educational experiences for your region, but we do not collect the precise geolocation of you or your device. You may be able to change the settings on your computer or mobile device to prevent it from providing us with any location information.

6. Information from Other Sources.

In certain situations, we may obtain information, including Personal Information, from third parties or sources other than our Services. For example, if you donate to Sandbox Scholar via PayPal®, we may obtain your name and mailing address to send a thank you note, or if you apply for a job with Sandbox Scholar via an online recruiting site, we will obtain the information you provide in your application for that purpose. If we combine or associate information from other sources with Personal Information that we collect through our Services, we will treat the combined information as Personal Information in accordance with this Privacy Notice.

We and our third-party service providers also use a variety of technologies, such as cookies (small text files that the Services save on your computer or mobile device), to automatically collect certain technical information from your computer or mobile device over time and across different websites including when you use the Services, such as your browser type, operating system, device type, the page served, your IP address, and the websites you visited prior to visiting the Services. When you download and use one of our specialized programs or Apps ("Apps"), we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.

We and our third-party service providers may use the information collected through these technical methods for a number of purposes, including delivering content, tracking and enhancing our users' experience on the Services, and delivering advertising to visitors of www.sandboxscholar.com when they visit other websites and applications. For example, when you return to the Services after logging in,

cookies help the Services recognize who you are without having to log back in. For more information, see “Sandbox Scholar uses this information in the following ways,” below.

Sandbox Scholar uses this information in the following ways:

Information Collected from Adult Users may be used as follows:

1. To enhance our Services and the services we provide.

Sandbox Scholar uses the information you provide or that we collect to enhance our relationship with you and to operate, maintain, enhance, and provide all of the features and services found on our Services. For example:

- a. Sandbox Scholar remembers your recent activity so we can recommend the most appropriate content for you on your next visit.
- b. If you have given Sandbox Scholar consent, we may use your Personal Information to provide you with information about Sandbox Scholar’s features, services and other offerings that may be of interest to you.
- c. Under certain circumstances and if we obtain your consent (for example, if you submit a testimonial and agree to make it public), we may post your Personal Information on our Services.
- d. Sandbox Scholar uses your information to permit you to register and use the Services, including, for example, to send you communications about Child User progress or your Account, or to allow you to make use of social media sharing through the Parent Section.
- e. Sandbox Scholar uses your information to complete and fulfill your purchase, such as to process your payments, communicate with you regarding your purchase, and provide you with related customer service.
- f. Sandbox Scholar uses your information to respond to your inquiries and fulfill your requests, such as to send you newsletters, retrieve your password, or provide technical support.
- g. Sandbox Scholar uses your information to send you marketing communications that we believe may be of interest to you. While it is never our intention to send any marketing messages to children, if you believe a Child User may have received such a marketing communication, please contact us as described below. You may always choose to stop receiving these marketing messages simply by following the instructions contained in the message. You may not opt out of receiving administrative messages from us regarding your Account.
- h. Sandbox Scholar uses your information to deliver interest-based advertising to you based on your visits to the non-child-directed portions of the Services, including Sandbox Scholar-branded advertising, when you visit third-party websites and applications. We will never use information collected in the child-directed portions of the Services for targeted advertising purposes. We do not currently respond to web browser “do not track” signals, but you may opt out of receiving online interest-based advertising from our interest-based advertising providers by visiting <http://www.aboutads.info/choices>. For more information about web browser “do not track” signals, visit www.allaboutdnt.org.
- i. Sandbox Scholar uses your information to allow you to participate in sweepstakes, contests, and similar promotions and to administer these activities. Some of these have

rules that could contain additional details about how we use and disclose your information.

2. To understand how you and other Users use our Services.

Sandbox Scholar uses all of the information that you provide or that we collect from Users to understand and analyze the usage trends, learning behaviors, and preferences of our Users, to improve the way the Services work and look, and to create new features and functionality. For more information, please see the “Technologies” section, below.

3. To enable your participation in Sandbox Scholar partnership arrangements.

Sandbox Scholar will not share Personal Information with other third-party organizations for their marketing or promotional use without your consent or except as part of a specific program or feature for which you will have the ability to opt-in. You can grant us permission to share your Personal Information with authorized partners, not-for-profit organizations, and other entities that are not affiliated with Sandbox Scholar. In these cases, we will only provide to these third parties the information you have authorized or asked us to share to these third parties. If you participate in special programs, Sandbox Scholar may collect personal information from you to facilitate those programs. Sandbox Scholar may send information or offers to you on behalf of these third parties. For example, if we partner with a not-for-profit organization running a contest in your region and send you an email notifying you of the partnership, we will only share your information with the third party if you opt-in to participate in the contest, and if so, the information we would share would be limited to that needed to facilitate your participation in the contest and enable you to redeem your prize.

Information from Child Users may be used as follows:

1. To measure a Child User’s performance in activities and to adapt a Child User’s learning experience to the Child User’s learning needs.
2. To analyze, provide progress reports on, or provide an assessment of a Child User’s performance.

Information collected from Child Users is never used to market to Child Users.

Information collected from both Adult and Child Users may be used:

1. To allow us to assess and improve the Services, its educational content, and other services we provide, for example, to improve our content and user experience; to research, evaluate, and improve the Services’ educational efficacy; and to inform our understanding of the Services’ user base.
 2. To customize, adapt, and personalize users’ viewing and content-consumption experience, for example by measuring a Child User’s performance in activities and adapting the Child User’s learning path to his or her learning needs.
 3. To maintain and analyze the functioning of the Services.
 4. As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to detect violations of and enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates, including the security of the Services; (f) to protect our rights, privacy, safety, or property, or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
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Data Retention.

Unless we receive a deletion request, we will retain your information for as long as your account is active or as is reasonably useful for operational purposes.

Technical Information.

To provide a personalized learning and high-quality experience for our Users, we may use various technologies that automatically record certain technical information from your browser or device, including standard log files, web beacons, or pixel tags. This technical information may include your Internet Protocol (IP) address, device or browser type, Internet service provider (ISP), referring or exit pages, clickstream data, operating system, and the dates and times that you visit the Website. We do this to better understand how our Users are using our Website so we can improve site functionality and the services we offer you.

Like most websites, whether or not you are a registered member, we may send one or more cookies – small text files containing a string of alphanumeric characters – to your computer. Cookies remember information about your activities on a website and enable us to provide you with a more personalized learning experience. Sandbox Scholar may use both session cookies and persistent cookies. A session cookie disappears automatically after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Website. You can, however, remove a persistent cookie at any time. Please review your web browser “Help” file to learn the proper way to modify your cookie settings. However, without cookies you will not have access to certain services and features on the Website.

Sandbox Scholar uses a variety of third-party service providers, such as YouTube to host our videos or Google Analytics to understand our Website usage. We may allow third-party service providers to place and read their own cookies, web beacons, and similar technologies to collect information through the Website. This information is collected directly and automatically by these third parties, and Sandbox Scholar does not participate in these data transmissions. Sandbox Scholar will, wherever feasible, contractually obligate our third-party service providers to abide by the terms of this Privacy Notice.

Sandbox Scholar also uses Local Storage Objects (LSOs) such as HTML5 to store content information and preferences. Third parties with whom we partner to provide certain features on our site may use LSOs such as HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5 LSOs. Please consult your browser’s “Help” function to learn more.

How we share or transfer data

Sandbox Scholar takes great care to protect the information you provide us. We do not rent or sell Personal Information that we collect from Users with third parties. We also take great measures to restrict any collection or disclosure of Personal Information from children less than 13 years of age.

Sandbox Scholar will disclose User information only as described below:

We provide certain features that may allow you to share information with other Users. For example, you may choose to populate your profile with your name, short biography, and location. Or you may ask questions that are visible to other Users of Sandbox Scholar. Whenever you share information with other Users of our Services, any Personal Information that you choose to include in, or is associated with, such User Postings will be accessible by such Users. As with most online services, once you make your Personal Information available to others in any of these ways, it may be collected and used by the recipients without restriction.

We may share data with social networks at your request.

Some of our Users choose to connect their Sandbox Scholar account with social networks. This functionality is entirely optional. If you have explicitly agreed that we may do so, Sandbox Scholar may disclose your Personal Information through a social network or similar service (like Facebook or Google). To control the information that you share, you have the option of modifying your Sandbox Scholar or social network settings or disconnecting your social network account from your Sandbox Scholar account.

We may share data with third-party applications that you authorize.

Third-party application developers and service providers (commonly known as “App Developers”) may build complementary services for our platform, such as a mobile application for visually-impaired learners to access our resources. You may request we share your information with App Developers by connecting to the application or service and approving access to your Sandbox Scholar account. Sandbox Scholar has taken steps to try to ensure the safety of information accessed by App Developers and requires App Developers to comply with our API Terms of Service and this Privacy Notice.

We may share data to third parties who perform certain services for us.

To third parties who perform certain services for us, such as to process credit cards, administer sweepstakes, or conduct or evaluate research (such as on the educational impact of the Services), provided that the service providers agree to keep the information confidential and to use it only for purposes that are permitted by this Privacy Notice.

We may share data in connection with special programs you participate in.

If you participate in special programs where Sandbox Scholar partners with third parties, Sandbox Scholar may share data collected from or about you with its third party partners to facilitate the program or services being offered.

We may share anonymous or aggregate data to improve our services and learn more about our Users.

In certain occasions, Sandbox Scholar may work with business partners to improve our services or offerings. We may disclose automatically collected and other aggregate non-Personal Information to authorized business partners to conduct research on online education or assist in understanding the usage, viewing, and demographic patterns for certain programs, content, services, promotions, and/or functionality on our Services.

We will share data when required by law.

Sandbox Scholar may also disclose User information if required to do so by law, or if we have a good-faith belief that such action is necessary to comply with local, state, federal, international, or other applicable laws (such as U.S. Copyright law) or respond to a court order, judicial or other government subpoena, or warrant, or administrative request. In some cases, we may make such disclosures without first providing notice to Users.

We may share data in the context of a change of business, including a merger or acquisition.

In the event that Sandbox Scholar is acquired by or merged with a third-party entity, we may transfer or assign the information that we have collected from Users as part of such merger, acquisition, sale, or other change of control.

We may share data when necessary or appropriate to protect Sandbox Scholar or others.

Sandbox Scholar may disclose information that we believe, in good faith, is appropriate or necessary to take precautions against liability; to protect Sandbox Scholar from fraudulent, abusive, or unlawful uses; to investigate and defend ourselves against any third-party claims or allegations; to assist government enforcement agencies; to protect the security or integrity of our Services; or to protect the rights, property, or personal safety of Sandbox Scholar, our Users, or others.

Limitations on Access to your Personal Information by Employees and Authorized Parties.

Sandbox Scholar's employees, agents and contractors must have a legitimate business reason to access Personal Information you provide to Sandbox Scholar. We may share your Personal Information with third-party service providers, including outside contractors or agents who help us manage our information activities, but they may only use your Personal Information to provide us with a specific service and not for any other purpose. Where feasible, Sandbox Scholar will require our third-party service providers to comply with this Privacy Notice.

Your choice and options in our data collection, use, and transfer

You can choose to not provide us with Personal Information.

You may always decline to share your Personal Information with Sandbox Scholar. Registration is not required to access most of our content. If you decline to register, however, Sandbox Scholar will not be able to provide to you certain features and functionalities found on our Services. You may later enable or access those features by providing Sandbox Scholar with the necessary Personal Information.

You can edit or delete Personal Information in our records.

We want you to have access to your information, so that you can help keep it as accurate as possible. If you register and provide Sandbox Scholar with Personal Information, you may update, correct, or delete your account and information at any time by reviewing your profile information and preferences on your account settings page. Parents can modify or delete Child User accounts. If you experience any difficulties in this process, please contact us as described below. When we change or delete any personally identifiable information at your request, we will make good faith efforts to make the changes in our then active databases as soon as reasonably practicable. Changing setting options may not result in immediate changes to the settings, which are subject to our operations and maintenance schedules.

You can disconnect us from Integrated Services.

You may revoke Sandbox Scholar's access to your account on any Integrated Service, such as Google or Facebook, at any time by updating the appropriate settings in the account preferences of the respective Integrated Service. You should check your privacy settings on each Integrated Service to understand and change the information sent to us through each Integrated Service. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Services.

Child Users

Sandbox Scholar is committed to children's privacy.

Protecting the privacy of young children is especially important to Sandbox Scholar. For that reason, we created certain features designed to help protect Personal Information relating to children who are less than 13 years of age ("Child Users"). Sandbox Scholar does not knowingly permit Child Users to register directly for our Services. If Sandbox Scholar learns that Personal Information of a Child user has been collected on our Services without parental consent, then Sandbox Scholar will take appropriate steps to delete this information. If you are a Parent and discover that your Child has a registered account with our Services without your consent, please alert Sandbox Scholar at scout@sandboxscholar.com, put

DELETE PERSONAL INFO in the subject line, and request that we delete your child's personal information from our systems.

How children may register for and use our Services.

Child Users cannot register for a Sandbox Scholar account themselves. If a Child User attempts to register for our Services, Sandbox Scholar will request the email address of that Child User's Parent in order to seek consent from that Parent. No information about Child Users is retained during their registration attempt, except the Parent email address for purposes of seeking consent.

If you are a Parent, you may provide consent for your child's registration by first registering yourself on our Services. Once registered, you can create a restricted account for your Child User, monitor the data on your Child User's account, or revoke a child's permission to use the Services by deleting the account.

Restrictions on Child Users.

Sandbox Scholar attempts to restrict a Child User's access to certain features that could result in disclosure of Personal Information by the Child User. A restricted account limits sharing and displaying private information about the Child User in various ways, including:

- Restricted accounts do not include the Child User's real name or biography section; only the Child User's username is displayed;
- The Parent can edit Personal Information found in the restricted account;
- The profile is not shared publicly, and only the Parent or Guardian can see the user's profile;
- The Child User cannot post to public discussion forums.

Some other features of our Services may, however, permit a Child User to enter free-form text through which the Child User could enter Personal Information that would be visible to other Users. This may occur, for instance, if a Child User enters Personal Information in answering an exercise problem or creating other projects on our Services. If you are the Parent of a Child User, please advise your Child User of the risks of posting Personal information on our Services or any other online services, as information posted may be used by others without restriction.

As a Parent, you can choose to share information about your child as you deem appropriate. Sandbox Scholar won't share Personal Information about your child or his/her progress with anyone other than you, your child and any permitted Coaches, unless we receive your permission (or as otherwise noted in this Privacy Notice).

As a Parent, you have the ability to control information about your Child User. To review, update, or delete information collected from your Child User, you can do so in the "Your Children" section within your account. To refuse future collection or use of your child's Personal Information, you can delete your Child User's account or contact us at scout@sandboxscholar.com.

California Children's Privacy Rights

If you are under the age of 18, or the parent of a User under the age of 18, residing in California, you are entitled to request removal of content or information you have posted on our Services. If you would like to request removal of your or your child's content or information, please email us at scout@sandboxscholar.com, put DELETE PERSONAL INFO in the subject line, and request that we delete that child's personal information from our systems, or you can delete specific information (or delete your or your child's account) directly. Please note that removal of your content or information does not ensure complete or comprehensive removal, as there may be de-identified or recoverable

elements of your content or information on our servers in some form. Additionally, we will not remove content or information that we may be required to retain under applicable federal and state laws.

Our approach to Data Security

Data security is important to you and to us.

To protect your privacy and security, we take reasonable steps to verify your identity before granting you account access or making corrections to your information. For example, we may ask you to provide certain Personal Information to confirm your identity, and we may require that you create and use a password to access certain parts of our Services. You should create and maintain a strong password to help ensure the security of your account.

We try to ensure that our Services and information sent to us are safe, but no security measures are perfect.

Sandbox Scholar uses certain physical, managerial, and technical safeguards designed to preserve the integrity and security of your Personal Information and other information we maintain in connection with our Services. We cannot, however, ensure or warrant the security of any or all of the information you transmit to Sandbox Scholar, and you do so at your own risk. Once we receive your transmission of information, Sandbox Scholar makes commercially reasonable efforts to ensure the security of our systems. When you enter sensitive information, we encrypt the transmission of that information using secure socket layer technology (SSL) or similar technologies. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. Moreover, we are not responsible for the security of information you transmit to the Services over networks that we do not control, including the Internet and wireless networks.

We will notify you electronically or via the Services if Sandbox Scholar experiences a data security incident that could affect you.

If we learn of a data security incident that compromises or appears to compromise your Personal Information, then we will attempt to notify you electronically so that you can take appropriate protective steps. We may also post a notice on our Services if a data security incident occurs.

How we maintain data integrity

At Sandbox Scholar, we only use Personal Information as needed for the purposes for which it was collected or where you have consented to our use of Personal Information relating to you. We take reasonable steps to ensure that the Personal Information we store and use is accurate, complete, and up-to-date. If you discover that Personal Information or other data pertaining to you is inaccurate, incomplete, or out-of-date, please update your account information or contact us as outlined below.

Links to other sites

The Services may link to and may be linked by websites operated by other entities or individuals. Some of these websites, such as the Sandbox Scholar Facebook page, may be co-branded with our name or logo. This Privacy Notice does not apply to, and we cannot always control the activities of, such other third-party websites. You should consult the respective privacy policies of those third-party websites.

Location of information processing

Our Services are operated and managed on servers located within the United States. Your information may be stored and processed in any country where we have facilities or in which we engage service providers, including the United States, which may have data protection laws that are different from those of your country. If you choose to use our Services from the European Union or other regions of the

world with laws governing data collection and use that differ from U.S. law, then you acknowledge and agree that you are transferring your Personal Information outside of those regions to the United States and that, by providing your Personal Information on the Services, you consent to that transfer. In addition, your information may be subject to access requests from governments, courts, or law enforcement officials in countries where it may be processed, under the laws of those countries.

Changes and updates to this Privacy Notice

Sandbox Scholar may modify or revise this Privacy Notice from time to time. Sandbox Scholar will notify Users of any changes to our Privacy Notice by posting the revised Privacy Notice with an updated date of revision on our Services, along with a short notice of the revision posted on our homepage. We will not change how we use any Personal Information in any material way without also providing notice of the change via email to you (or in the case of a Child User, to your Parent) or through the Services, and obtaining consent to any new uses.

Contacting Sandbox Scholar

Please contact Sandbox Scholar with any questions or comments about this Privacy Notice, your personal information, our third-party disclosure practices, or your consent choices by email at scout@sandboxscholar.com or by mail at: Sandbox Scholar, LLC. 27 N. Wacker Drive, Suite 271, Chicago, Illinois 60606.