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**Effective Date: May 15, 2019**

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**1. Privacy Statement**

Verite Educational Systems, Inc. ("**VES**" or "**we**" or "**us**" or "**our**") values the privacy of its users. This Privacy Policy ("**Privacy Policy**") provides information about (a) the information that VES collects when you use or interact with our website (including without limitation [www.net-ref.com](http://www.net-ref.com)) (the "**Website**"), our applications that access the services (including the NetRef Software) (the "**Application**"), and other services (collectively, the "**Services**"), (b) the ways in which VES uses Personal Information, and (c) your choices regarding use and disclosure of your Personal Information. By using our Website, Services or Application you ("**you**" or "**your**") consent to the policies and practices described in this Privacy Policy, including but not limited to the use of your Personal Information as described herein. As used in this

Privacy Policy, the term “**Personal Information**” means information that identifies you personally, alone or in combination with other information available to us and includes but is not limited to “Personally Identifiable Information” as defined under the Family Educational Rights and Privacy Act of 1974.

**By accessing and/or using any Services or downloading, installing or using any Application, you agree to be bound by this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use our Services. Each time you use our Services, the current version of the Privacy Policy will apply. Accordingly, whenever you use our Services, you should check the date of this Privacy Policy (which appears at the top) and review any changes since the last version. This Privacy Policy is applicable to all Services visitors, registered users, and all other users of the Services.**

Further, you acknowledge you acknowledge that by accessing or using our Services, you agree to be bound by the Terms of Use [<https://net-ref.com/NetRef-Terms-of-Use-2019-0515.pdf>] (“*Terms of Use*”) and that this Privacy Policy is incorporated into the Terms of Use by reference. If you do not agree to our Terms of Use, do not access or use our Services.

If you have any questions about our privacy practices, please refer to the end of this Privacy Policy for information about how to contact us.

## **2. Selling of Personal Information**

We will not sell or transfer for valuable consideration your Personal Information obtained in the course of providing the Services or Application to third parties for their use without your consent. In association with operating the Website, we may share the information that we collect automatically (described below) with third party analytics and advertising partners that may use the information for their own purposes.

## **3. Information Collected by VES**

VES offers an Application and supporting technology to help teachers and parents set Internet boundaries for students and reduce distractions on student devices. When you access and use our Services, VES may collect (i) information that you knowingly and voluntarily provide when you use our Services (such as through forms or profile screens) including, without limitation, registration/account setup information, (ii) student information that is provided to VES from partner schools, (iii) non-personally identifiable information that we are able to collect from your web browser, device or use of the Services, and (iv) information collected from cookies and other similar technologies.

(i) Information that you Knowingly and Willingly Provide. VES collects the information that you knowingly and voluntarily provide when you use our Services (such as through web forms or profile screens), including, without limitation, registration/account setup information and profile details. We primarily use this information to administer the Services.

VES may also use the information that you provide to us for various business purposes such as providing customer service, fraud prevention, market research, improving our products and services. We may use your Personal Information in order to send you e-mail or other communications. If you would like to opt-out of receiving these communications from VES, please contact us in accordance with Section 14 (Privacy Inquiries) of this Privacy Policy.

The information that we collect, and use may include, without limitation, the following kinds of Personal Information:

- First and Last Name
- Email Address
- Login name, screen name or any other identifier that permits the physical or online contacting of a specific individual
- Student Identifier

(ii) Student Information from Partner Schools. As part of the administration of the Services, we may receive certain student information, including Personal Information which may include:

- Student Identifier
- Classes/Schedules
- Date of Birth
- Photograph

VES uses the student information provided from partner schools solely to administer and run the NetRef Software, provide the Services and to improve the Application and Services.

(iii) Information Collected Automatically. VES collects information that is sent to us automatically by your device and web browser. VES may use this information to administer the Services and generate aggregate statistics about visitors to the Services. This information typically includes, without limitation, details about your:

- IP Address
- MAC Address
- Ports
- Browser Type and Plug-In Details
- Operating System
- Webpages and device Apps visited (including date and time of visit)
- Device Type (e.g. desktop, laptop, tablet, phone, etc.)
- General location information inferred from IP Addresses and similar information.

VES may use such information for various business purposes such as administering our Services, providing customer service, fraud prevention, market research, and improving our Services. The information we receive depends on the settings on your browser. Please check your browser if you want to learn what information your browser sends or how to change your settings.

(iv) Information Collected by Cookies, Web Beacons and Other Technologies. VES may obtain information about you by installing "cookies" on your device. We use cookies to collect statistical information about the way's visitors use our Services including, without limitation, which pages they visit, which links they use, and how long they stay on each page. VES also may use cookies to create a database of your previous choices and preferences, saving you time and effort. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your device. If you limit or disable the use of cookies when you visit VES, you may be unable to use the full of the functionality of our Services. VES does install or otherwise utilize cookies on any student devices in connection with the provision of Services to schools.

#### **4. VES's Do Not Track Policy**

VES does not respond to web browser "do not track" signals. As such, your navigation of our Services may be tracked as part of the gathering of quantitative user information described above. If you arrive at

our Services by way of a link from a third party site that does respond to “do not track” requests, the recognition of any “do not track” request you have initiated will end as soon as you reach our Services.

## 5. How Is Your Personal Information Used?

We may use Personal Information we collect about you on its own or combine it with other information we have about you to:

- Create user accounts and/or profiles through registration;
- Administer the Services;
- Perform internal operations, such as tracking and improving the effectiveness of our Services;
- Provide customer support;
- Conducting research and reporting on use of Services;
- Resolve disputes between users and/or a user and VES as set forth in our Terms of Use;
- Receive feedback;
- Conduct audits;
- Provide information to our business partners, suppliers and/or schools;
- Provide information to our representatives and/or advisors, such as our attorneys, accountants, and others to help us comply with legal, accounting, or security requirements;
- Transfer your information as part of a merger or sale of the business;
- Protect the rights, safety, and information of our members, third parties, as well as our own. This includes, without limitation, fraud prevention, prosecuting and defending a court arbitration or similar proceeding, and more; and
- Comply with legal requirements, such as in response to a subpoena or similar investigative demand.

We may aggregate and/or anonymize all information that we collect from you, including, without limitation, Personal Information, for the purpose of conducting research, improving and troubleshooting the Application and Services, and generating reports that we may provide to partner schools and other parties.

We may also disclose your Personal Information as otherwise set forth in this Privacy Policy, as permitted by law, or with your consent.

## 6. Who Can Access the Information We Collect?

VES may disclose your Personal Information in the following instances:

(i) **Agents.** We employ other companies and individuals to perform functions on our behalf including agents, contractors, vendors, licensors, systems integrators, etc. Examples of such functions include, without limitation, sending postal mail and e-mail, analyzing data, providing technical support, and providing customer service. We share our users’ Personal Information with these agents as we deem necessary for such third parties to perform their functions.

(ii) **Employees.** Only authorized employees have access to your Personal Information.

(iii) **Affiliates and Subsidiaries.** When you are asked for information while using our Services, you are sharing that information with VES and our various affiliates, subsidiaries and sister

companies, unless specifically stated otherwise. As a result of this sharing, you may receive communications from any of our affiliates and subsidiaries.

(iv) **Partner Schools.** VES works in coordination with partner schools under the terms and conditions of a separate licensing agreement. VES and partner schools share Personal Information including student identifier, information related to device configuration and type, browser behavior and use of the NetRef Software to administer our Services.

(v) **Parents or Guardians.** VES may share information collected as part of the administration of the Services (e.g., when the tool was in use, browser behavior, date/time of activity) with parents/guardians.

(vi) **To Comply with Legal Process, Protect VES, or Enforce our Rights.** We may release your Personal Information when it is necessary to (i) conform to legal requirements or comply with legal process; (ii) enforce or apply our conditions of use and other agreements (iii) protect the rights, safety or property of VES, our affiliates, service providers, our users or the public, or (iv) prevent a crime or protect national security (including, without limitation, exchanging information with other companies and organizations for fraud protection and credit risk reduction).

(vii) **As Part of a Merger or Sale of Business.** We may disclose your Personal Information in connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

## 7. **Links to Third Party Services**

Our Services may contain links to third party websites and services not operated by us. VES is not responsible for the privacy policies or privacy practices of any third party including, without limitation, websites directly linked to our Services. We encourage you to be aware of when you leave our Services and to review the privacy policies of any third party site that you link from our Services.

## 8. **Social Media Features & Widgets**

Our Services include, without limitation, social media features, such as the Facebook “Like” button and widgets, such as the “Share This” button or interactive mini-programs that run on our Services. These features may collect your IP address, which page you are visiting on our Services, and may set a cookie to enable the feature to function properly. Social media features and widgets are hosted by a third party. Information collected via these features is processed subject to the privacy policies of the third –party companies providing the features.

## 9. **Security, Storage, & Retention**

### (i) Security

VES takes reasonable technical and organizational precautions to protect the confidentiality, security and integrity of your Personal Information. Although we use security measures to help protect your Personal Information against loss, misuse or unauthorized disclosure, we cannot guarantee the security of information transmitted to us over the Internet. There is no guarantee that information may not be accessed, disclosed, altered or destroyed. You are responsible for maintaining the secrecy of your password and account information, and for controlling access to your email communications.

### (ii) Storage

The Personal Information that you provide to VES is generally stored on servers located in the United States. If you are located in another jurisdiction, you should be aware that once your Personal Information is submitted through our Services, it will be transferred to our servers in the United States and that the United States currently does not have uniform data protection laws in place.

(iii) Retention

We aim to maintain our Services in a manner that protects information from accidental or malicious destruction. Because of this, even after you stop using our Services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems. If you wish to have all information we maintain and cancel your account, contact us at [info@net-ref.com](mailto:info@net-ref.com). The specific terms and conditions of VES' practice and procedures for retaining information in connection with the provision of Services and the Application with respect any school system will be set forth in the agreement between the school district and VES.

**10. International Users**

We are headquartered in the United States and this Privacy Policy is intended to cover collection of information on or via our Services from residents of the United States. If you are visiting our Services from outside the United States, be aware that the data protection and other laws of the United States might not be as comprehensive as those in your country, and you access our Services at your own risk.

**11. Changes to this Privacy Policy**

We reserve the right to update or modify this Privacy Policy from time to time. If we make any material changes to this Privacy Policy or the way we use, share or collect Personally Identifiable Information, we will notify you by revising the "Effective Date" at the top of this Privacy Policy, prominently posting an announcement of the changes on our Service, or sending an email to the email address you most recently provided us (unless we do not have such an email address) prior to the new policy taking effect. Users are bound by any changes to the Privacy Policy when he or she uses our Service after notice of such changes has been communicated. We encourage you to review this Privacy Policy regularly to ensure that you are familiar with VES's current practices.

**12. Information Correction, Removal, and Opting-Out**

(i) Correction & Removal

If any of the information that we have about you is incorrect, or you wish to have information (including Personally Identifiable Information) removed from our records, please contact us at [privacy@net-ref.com](mailto:privacy@net-ref.com). We will respond to such inquiries within fifteen (15) business days. With respect to any Services provided to a school or district, the policies for removal and/or correction of information will be set forth in the agreement between the parties.

(ii) Opting Out

Additionally, if you prefer not to receive marketing messages from us, please let us know by clicking on the unsubscribe link within any marketing message that you receive, or by sending a message to us at [privacy@net-ref.com](mailto:privacy@net-ref.com).

(iii) Your California Rights

FOR RESIDENTS OF CALIFORNIA ONLY. Section 1798.83 of the California Civil Code requires select businesses to disclose policies relating to the sharing of certain categories of your Personally Identifiable Information with third parties. If you reside in California and have provided your Personally Identifiable Information to VES, you may request information about our disclosures of certain categories of Personally Identifiable Information to third parties for direct marketing purposes. Such requests must be submitted to us at one of the following addresses: [privacy@net-ref.com](mailto:privacy@net-ref.com) or

Verite Educational Systems, Inc.  
Attn: California Privacy Rights  
Privacy Department  
45240 Business Court  
Suite 200  
Dulles, VA 20166

Within thirty (30) days of receiving such a request, we will provide a list of the categories of Personally Identifiable Information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of those third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this Section.

### **13. Privacy Inquiries**

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us as follows:

By emailing the Privacy Department at [privacy@net-ref.com](mailto:privacy@net-ref.com).

By mail post to: Privacy Department  
Verite Educational Systems, Inc.  
45240 Business Court  
Suite 200  
Dulles, VA 20166

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