

Welcome to CrisisGo, Inc. (“Company”, “we”, “us” and/or “our”). We’re committed to protecting your privacy, and we have prepared this Privacy Policy to explain how we collect, use, protect and disclose information and data when you, visitors or other users use any websites with authorized links to this privacy policy (“Site”), mobile applications with authorized links to this privacy policy (“Application”), and the services available through the Site and Application (collectively, “Services”). “You” or “your” refers to you as a creator of an account through the Site or Application (“Account”). A “user” refers to anyone who uses the Services, including you and/or your child and/or school faculty, as applicable. A “visitor” refers to anyone that accesses or uses the Site. “Personal Data” means data that, by itself, allows someone to identify or contact you as an individual, including, for example, your name, address, telephone number, and e-mail address, as well as any other nonpublic information about you that is associated with or linked to any of the foregoing data. “Anonymous Information” means data that does not, by itself, permit the identification of individual persons and that is not associated with or linked to Personal Data.

BY USING THE SITE OR SERVICES YOU CONSENT TO THIS PRIVACY POLICY.

IMPORTANT NOTICE REGARDING COLLECTION, USE, AND DISCLOSURE OF CHILDREN’S PERSONAL DATA BY SCHOOLS AND SCHOOL DISTRICTS: This Privacy Policy does not govern a school or school district’s collection, use, or disclosure of a child’s Personal Data through the Site, Application, or Service, and we are not responsible for any such collection, use, or disclosure. Parents, please contact your child’s school and school district to understand the school’s and school district’s privacy practices.

Introduction

The Company provides a service that allows you, your child and school staff to report bullying incidents, including situations that may threaten the safety of your child or others, to your child’s school and for school faculty to send messages relating to you and your child regarding school-related incidents.

Contact Us

CrisisGo is the controller for the Personal Data we process, unless otherwise stated.

We have appointed Jacob Lewis as our data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please use the following information to contact the DPO:

CrisisGo, Inc.
Jacob Lewis
640 W. California Ave.
Suite 210
Sunnyvale, CA 94086
Email: support@crisisgo.com
Phone: 314-669-9022

Your Data Protection Rights

Under data protection laws, you have the rights in relation to your Personal Data in some circumstances:

- Right to access. You have the right to obtain from CrisisGo confirmation as to whether or not we process your Personal Data, and, where that is the case, access to the Personal Data and the additional information. That additional information includes details of the purposes of the processing, the categories of Personal Data concerned and the recipients of the Personal Data.
- Right to rectification. You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Right to erasure. You have the right to ask us to delete or remove Personal Data without undue delay where one or more of these grounds applies: (i) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) you withdraw consent to consent-based processing; (iii) you object to the processing under certain rules of applicable data protection law; (iv) the processing is for direct marketing purposes; (v) and the Personal Data have been unlawfully processed. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons. We will notify you when we are legally unable to comply with your request.
- Right to restrict processing. You have to ask us to restrict the processing the of your Personal Data in the following scenarios: (i) if you want us to establish the data's accuracy; (ii) where our use of the data is unlawful but you do not want us to erase it; (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Right to data portability. You have the right to ask that we transfer the information you gave us to a third party you have chosen, or give it to you in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Right to object to processing. You have the right to object to our processing of your Personal Data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your Personal Data for this purpose.
- Right to withdraw consent. You have the right to withdraw your consent at any time where we are relying on your consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

Note that we may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person

who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Information We Collect

Personal Data

In order for a school teacher, administrator, or other employee or independent contractor of a school or school district (each a “Faculty User”) to create an Account, we collect the Faculty User’s first and last name, e-mail address, school name, and password.

In order for a parent or legal guardian to create an Account, we collect the parent’s or legal guardian’s first and last name, child’s first and last name, e-mail address, child’s school name, and password. The parent or legal guardian may also elect to provide a mailing address and phone number in order to receive messages outside of the Site and Application from Faculty Users.

In order for a student to create an Account, we collect from the student’s school or school district, the student’s first and last name, school, grade, e-mail, and student ID number. If the school or school district uses a third-party student information system provider, such information may instead be collected from the third-party provider. Upon first login, we ask the student to set a password for the Account. The student may also elect to provide a mailing address and phone number in order to receive messages outside of the Site and Application from Faculty Users.

When a parent, student or Faculty User submits a report, such information will be submitted to Faculty Users along with such individual’s Personal Data, unless the individual has opted to remain anonymous when submitting the report.

We also collect Personal Data at other points within our Services where we expressly state that Personal Data is being collected.

Usage Data

We automatically collect information regarding visitors to our Site and users of our Application and Services (“Usage Data”) to enable us to provide and improve the Services. Specifically, our servers (which may be hosted by a third-party service provider) may automatically collect information from any computer or device used to access our Services, including but not limited to:

- The date and time of your visit to the Site, the date and time you login or logout of the Application, the content you view on the Site and Application, and the links you click on while navigating within our Services;
- The site you visited before and after visiting our Site;
- The type of Internet browser used;
- Your Internet Protocol (IP) address (a numerical address assigned to your computer by your Internet service provider so that other computers connected to the Internet can communicate with your browser online) that can sometimes be used to derive your general geographic area;

- Unique identifiers, including non-global mobile device identification numbers;
- Information about your computer or device such as your device type, screen size, browser type, language and other settings, memory capacity, plug-ins, Internet domain, TCP configuration parameters, operating system, carrier code, and time zone; and Information collected through cookies, web beacons, and analytics services (see below for further descriptions of these terms).

Cookies and Web Beacons

We use cookies (small text files placed on the computers of visitors to our Site and users of our Application). We may also use Web beacons (files placed on a website or application that monitors usage). We (and/or third-party service providers acting on our behalf) use cookies and Web beacons to improve the experience of the Site, Application, and Services.

Do Not Track

At this time, Company does not recognize automated browser signals regarding tracking, including “do-not-track” signals.

Analytics Services

We use third-party analytics services (“Analytics Services”), including Google Analytics, to help analyze how users use our Services. The information generated by Cookies or other technologies about your use of our Services (the “Analytics Information”) is transmitted to the Analytics Services. The Analytics Services use Analytics Information to compile reports on user activity. The Analytics Services may also transfer the Analytics Information to third parties where required to do so by law, or where such third parties process Analytics Information on their behalf. Each Analytics Service’s ability to use and share Analytics Information is restricted by such Analytics Service’s terms of use and privacy policy. By using our Site, you consent to the processing of data about you by Analytics Services in the manner and for the purposes set out above. For a full list of Analytics Services, please contact us at support@crisisgo.com. To learn more about how Google uses data, visit www.google.com/policies/privacy/partners/.

How We Use Information

We may use Personal Data to respond to inquiries and requests that you make and improve our Site, Application, and Services. Unless direct parental consent is provided for another purpose, Personal Data collected from students will only be used for the use and benefit of the school. We and our authorized Service Providers may also use your Personal Data in various ways, including to:

- facilitate the creation of and secure Accounts on our network;
- identify users in our system;
- provide our Services;
- provide improved administration of our Site, Application, and Services;
- measure and analyze audience traffic and improve the quality of your experience when you interact with our Site, Application, and Services;

- send welcome e-mails to verify ownership of the e-mail address provided when you create an Account;
- send you administrative e-mail notifications, such as security, or support and maintenance advisories;
- prevent potentially prohibited or illegal activities, comply with applicable law and enforce our Terms and Conditions Agreement; and
- for any other purposes pursuant to your consent.

Anonymous Data

We may aggregate Personal Data in order to create Anonymous Information. We reserve the right to use Anonymous Information for any purpose and disclose such information to third parties in our sole discretion.

Message Groups

As part of the Services, students can post messages on school message groups. Such message groups are viewable only by Faculty Users. We cannot control what other users may do with the information posted so it is very important that Personal Data is not included in the posts.

Note that anything you post to a message group may be public. If you choose to voluntarily disclose Personal Data in a message group, that information will be considered public information and the protections of this Privacy Policy will not apply.

Use of Personal Data by Faculty Users

The Company will make reports of incidents submitted to the Services available to Faculty Users so that Faculty Users can address such incidents. Faculty Users may use any Personal Data submitted to the Services in order to contact parents and students regarding school-related incidents.

Service Providers

From time to time, we may establish a business relationship with other businesses that we believe to be trustworthy and have privacy practices consistent with ours (“**Service Providers**”). For example, we may contract with Service Providers to provide certain services, such as hosting and maintenance and data storage and management. We only provide our Service Providers with the information necessary for them to perform these services on our behalf and such Service Providers are prohibited from using any such information for any other purposes without our prior consent. Each Service Provider must agree to use reasonable security procedures and practices, appropriate to the nature of the information involved, in order to protect your Personal Data from unauthorized access, use or disclosure.

Corporate Restructuring

As permitted by applicable law, we may share some or all of the Personal Data and other information we have collected in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving the sale, transfer, or divestiture of all or a portion of our business or assets. In the event of an insolvency,

bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding Personal Data as described in this Privacy Policy. You will be notified via email and/or a prominent notice on the Services of any completed change of ownership as well as any choices you may have regarding your Personal Data.

Compliance with Laws and Law Enforcement

Regardless of any choices you make regarding Personal Data (as described below), the Company may, as permitted by applicable law, disclose Personal Data if it believes in good faith that such disclosure is appropriate (a) in connection with any legal investigation or proceeding; (b) to comply with relevant laws or to respond to subpoenas or other forms of compulsory process served on Company; (c) to protect or defend the health, safety, rights or property of the Company, its affiliates, its users, or any other person; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms and Conditions Agreement.

Data Security and Retention

We maintain commercially reasonable physical, electronic, and procedural safeguards to protect the confidentiality, security and integrity of Personal Data and other information transmitted to us and/or maintained by us. Such measures vary depending on the sensitivity of the information at issue. However, no method of transmission over the Internet or method of electronic storage can be guaranteed to be 100% secure. As a result, while we strive to protect information transmitted or stored on or through the Site, Application, and Services, we cannot and do not guarantee the security of any information you or any other visitors or users transmit on or through the Site, Application, or Services, and you and such visitors or users do so at your own risk. In the event that we become aware of a data breach impacting your Personal Data, we will provide any notification required by applicable law.

We will retain your Personal Data for the length of time needed to fulfill the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law.

Links

Our Site and Application may contain links to other websites and online services. The Company is not responsible or liable for any damage or loss related to your use of any third-party website or online service. You should always read the terms and conditions and privacy policy of a third-party website or online service before using it.

Special Note Regarding Children's Online Privacy

- **Reliance on School Consent.** We are required under the Children's Online Privacy Protection Act ("COPPA"), with limited exceptions, to obtain verifiable parental consent in order to collect, use or disclose Personal Data from children under 13. If a child wants to use our Service, the child's school or school district must first register the child with our Service. We require that the school or school district (on behalf of the child's parent or legal guardian)

consent to the collection, use and disclosure of the child's Personal Data in accordance with this Privacy Policy. COPPA allows us to presume that the school or school district's authorization for the collection of a child's Personal Data is based upon the school or school district having obtained the parent's or legal guardian's consent.

- **Requests through School.** As required under COPPA, we allow parents and legal guardians to make certain choices regarding the Personal Data submitted by their children as described in the section below entitled "Managing Your Information Preferences." Parents and legal guardians should make any requests with the applicable Faculty User and have the school or school district, as the parent's or legal guardian's agent, pass on those requests to us. We may rely on the instructions that we receive from the school or school district that we reasonably believe are given by a child's parent or legal guardian to the school or school district. For example, if a representative of the child's school contacts us, we may assume that the person calling is acting on behalf of the child's parent or legal guardian.
- **Children's Information We Collect, Use and Share.** We collect, use, and disclose children's Personal Data as described in this Privacy Policy. We do not require a child to disclose more information than is reasonably necessary for the purposes of providing the Services. We also may collect, use, and disclose the child's Personal Data in other manners subject to the verifiable consent of the child's parent or legal guardian. We are not responsible for any errors in information the child's school or school district provides to us.

Processing in the United States

Personal Data collected through our Services may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding the processing of Personal Data may be less protective than the laws in your country. By using our Services, our users and visitors consent to such processing and transfer.

Managing Your Information Preferences

We offer our users and visitors several choices regarding their Personal Data:

- **Changing or Deleting Personal Data.** You can always review, correct, delete or update Personal Data by contacting the applicable Faculty User, school, or school district. Parent users and Faculty Users can edit their Personal Data from their Account settings. Students can also edit their phone number, and e-mail address from their Account settings. When a student leaves a school and the school or school district notifies us of the departure, we will remove the student's Personal Data from the Services. However, message group posts, including any Personal Data included in such posts, may still remain. Please contact us at support@crisisgo.com to request the removal of any specific posts. When we delete Personal Data and message group posts, they will be deleted from our active databases but may remain in our archives.
- **Stop Receiving Messages from Schools.** If you would like to stop receiving messages from a Faculty User, please contact a Faculty User or the child's school or school district, as applicable.
- **Prohibition of Sharing a Child's Personal Data.** A parent or legal guardian may prohibit us from sharing a child's Personal Data with a third party by requesting such prohibition

through a Faculty User or the child's school or school district, as applicable. Notwithstanding any such requests, we may continue to share a child's Personal Data for internal purposes to the extent the disclosure is integral to the Site, Application, or Service and enforcement purposes as set forth in the section entitled "Compliance with Law and Law Enforcement." If a parent or legal guardian chooses to prohibit any future collection, use or disclosure of the child's Personal Data, the parent or legal guardian may do so by following the instructions set forth in the section entitled "Changing or Deleting Personal Data" above.

- **Cookies.** Users who no longer wish to accept cookies for any of the purposes described above can instruct their browser, by changing its settings, to stop accepting cookies or to prompt them before accepting a cookie from the websites they visit. Consult your browser's technical information. Users who do not accept cookies, however, may not be able to use all features of the Site, Application, or Services. For further information about how to disable or modify cookies, please let us know at the contact information provided above.
- **Analytics Services.**
 - You may prevent your data from being collected and used by Google Analytics by opting out through the use of the Google Analytics Opt-out Browser Add-on available at <https://tools.google.com/dlpage/gaoptout/>.
 - If you get a new computer or device, install a new browser, erase, or otherwise alter your browser's cookie file (including upgrading certain browsers), you may clear opt-out cookies.

Privacy Policy Changes

From time to time, we may change this Privacy Policy. If we change this Privacy Policy, we will post the updated Privacy Policy on the Site. Those changes will go into effect on the effective date shown in the updated Privacy Policy. You are responsible for regularly reviewing this Privacy Policy for such changes. Continuing to use the Site or Services shall constitute consent to the updated Privacy Policy.

PLEASE PRINT A COPY OF THIS PRIVACY POLICY FOR YOUR RECORDS AND PLEASE CHECK BACK FROM TIME TO TIME FOR ANY CHANGES TO THIS PRIVACY POLICY.

Privacy Policy

Last Updated: June 2018