

Privacy Policy for Scholaric.com

SCOPE

Positive Slope LLC (Positive Slope), the publisher of Scholaric.com respects your privacy. This Privacy Statement applies to personal data collected by Positive Slope through the scholaric.com website, and any other websites which we operate and on which we post a direct link to this Privacy Statement.

As used in this Privacy Statement, “personal data” means any information relating to an identified or identifiable natural person (‘data subject’). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

PERSONAL INFORMATION WE COLLECT

Positive Slope Collects the minimal amount of personal information possible. This is only done when you interact with scholaric.com, or and any other websites we operate, when you:

- Sign up
- Request support
- Enter data one of our applications
- Participate in surveys
- Register for an online event
- Submit comments
- Respond to emails

HOW YOUR PERSONAL INFORMATION IS USED

Positive Slope uses your personal information in the normal course of business in several ways.

- *Identify and Authenticate You.* We use your personal data to verify your identity when you access and use our Services and to ensure the security of your personal data. This includes your creation of an account that is associated with your personal data. The personal data that may be collected and processed for this purpose includes: name, email address, username, and password. We process this information in order to comply with our obligations to you.
- *Process Your Data.* Due to the nature of the Scholaric.com application, other personal data may be entered into our system, including, but not limited to the names of children, address, and phone number. We process this information at your request, as part of the normal course of business.
- *Provide Support and Customer Service.* We use your personal data to provide support for products or services you have obtained from us and answer other questions. In the course of providing technical support to you, we may sometimes have incidental access to data that you have provided to us or data that is located on your systems. If you request support from us, we use the personal data you provide to respond to your request: name, username, and sometimes telephone number. We never ask for your password to provide support.
- *Subscribe for Payment and Charge You for our Service.* We ask for credit card information be submitted to a third party payment service. As a result, we collect an identifying token, the minimal amount of card identifier possible - last 4 digits of the card number and the expiration date. These are used to identify customers to the third party service and to display to you.

We will not use your personal data in a manner that is inconsistent with the purpose of its original collection, unless you have consented.

HOW WE DISCLOSE YOUR PERSONAL INFORMATION

Positive Slope will not sell, rent or lease your personal information to others without your consent.

Positive Slope discloses personal information in the following ways:

- Mailing List Services are provided your email address in order to contact you during the normal course of business. They may be provided with other information to personalize a specific email.
- Payment Services are provided your email address and an identity token.
- Positive Slope may disclose personal data as required by law or legal process, such as responding to a duly authorized and lawful request of a police or public authority (including to meet national security or law enforcement requirements), to enforce or protect the rights of Positive Slope, when such disclosure is necessary or appropriate to prevent physical harm or financial loss as permitted by applicable law, or in connection with an investigation of suspected or actual illegal activity.
- Positive Slope may also disclose personal data in the context of a business transaction involving part or all of Positive Slope, such as a merger, acquisition, consolidation, or divestiture. Such a transaction may involve the disclosure of personal data to prospective or actual purchasers, or the receipt of it from sellers. It is Positive Slope's practice to seek appropriate protection for information in these types of transactions. Following such a business transaction, you may contact the entity to which we transferred your personal data with any inquiries concerning the use of that information.

COOKIES AND OTHER TECHNOLOGIES

A cookie is a small amount of data that is sent to your browser from a web server and stored on your device, so that it will be sent back to the server on the next visit. Cookies are used by Positive Slope to primarily to track a user's

session so that the server can enforce security. Additionally, cookies may be used to track a site referring a user for marketing purposes, or to enhance your experience, such as remembering your username.

Third party services we use may also place cookies in your browser in their normal course of business.

THIRD PARTY SUBPROCESSORS

Positive Slope uses third party subprocessors, such as cloud computing providers and customer support software, to provide our services:

- Amazon Web Services - file storage
- Heroku - web hosting
- Stripe - payment processing
- Google Analytics - web analytics
- Optimizely - A/B testing
- Redis Cloud - high-speed caching
- Logentries - logging services
- Sendgrid - email services
- Mailchimp - mailing list services

YOUR RIGHTS AND CHOICES

In accordance with the laws of certain countries, you may have certain rights and choices regarding the personal data we collect and maintain about you, and how we communicate with you.

Where the EU General Data Protection Regulation 2016/679 (“GDPR”) applies to the processing of your personal data, especially when you access the website from a country in the European Economic Area (“EEA”), you have the following rights, subject to some limitations, with respect to Positive Slope LLC, for the website you are using:

- The right to access your personal data;
- The right to rectify the personal data we hold about you;
- The right to erase your personal data;
- The right to restrict our use of your personal data;
- The right to object to our use of your personal data;
- The right to receive your personal data in a usable electronic format and transmit it to a third party (also known as the right of data portability);
and
- The right to lodge a complaint with your local data protection authority;

SECURITY

Positive Slope intends to protect your personal data. We have implemented appropriate physical, administrative and technical safeguards to help us protect your personal data from unauthorized access, use and disclosure. For example, we encrypt certain personal data such as payment information when we transmit such information over the Internet. We also require that our business partners and service providers protect such information from unauthorized access, use and disclosure.

CHILDREN'S ONLINE PRIVACY

Positive Slope allows children login at the discretion of a parent, for the parent's convenience. Child accounts are not required. Child accounts do not require an email address, but an email address is allowed.

CHANGES TO THIS PRIVACY STATEMENT

Positive Slope reserves the right to make corrections, changes or amendments to this Privacy Statement at any time. The revised Privacy Statement will be posted on this website. A notice will be posted on our homepage for 30 days whenever this Privacy Statement is changed in a material way, and the date of last update will be indicated at the top of the Privacy Statement. If you do not refuse the changes in writing within that notice period, this shall mean that you have consented to the Privacy

Statement as changed, including with respect to personal data provided to us prior to the changes in the Privacy Statement. We encourage you to periodically review this Privacy Statement for any changes or updates.

EEA DATA PROTECTION AUTHORITY

If you are a resident of the European Economic Area and wish to raise a concern about our use of your personal data, you may direct questions or complaints to the Irish Data Protection Commissioner, at:

Irish Data Protection Commissioner

Office of the Data Protection Commissioner

Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Ireland

Phone: +353 57 8684800

+353 (0)761 104 800

Fax: +353 57 868 4757

Email: info@dataprotection.ie

Alternatively, you may contact your local supervisory authority.