

Privacy Notice

Effective Date: July 15, 2022

This Privacy Notice (this “**Notice**”) describes the types of information that Readable English, LLC (“**RELLC**,” “**we**,” “**us**,” or “**our**”) collects through your use of the RELLC website (and the service(s) provided through RELLC’s website), <https://www.readablenglish.com/> (the “**Site**”), the Readable English Learning Portal accessible via the Site (the “**Learning Portal**”), and all other non-downloadable software, web applications, and other online and offline services provided by RELLC (collectively, the “**Service**”). This Notice does not apply to information collected about you through any other means.

This Notice covers:

- What Personal Information is collected by RELLC through the Service.
- How RELLC uses this Personal Information.
- With whom RELLC may share Personal Information.
- What choices are available to you with respect to the collection, use and sharing of your Personal Information.
- What types of security procedures are in place to protect against the loss or misuse of your Personal Information under our control.

By accessing or using the Service, you consent to our use of your Personal Information as described in this Notice. “**Personal Information**” for purposes of this Notice is the information that identifies you as an individual or relates to you as an identifiable person.

A. Information We Collect

We collect information from you in two ways. First, you may provide us with certain information when you submit forms, request information, register as a user, upload information or content, or otherwise contact us through the Service. Second, we collect certain information as you use the Service.

1. Information You Provide to Us

We may collect Personal Information from you when you submit forms, register as a user, upload information or content, or request information through the Service. If you do not want us to collect this information, please do not provide it. We directly collect the following types of information that you provide to us:

- Identifying information. We may collect Personal Information, including your name, email address, phone number, credit card information, and mailing address.
- User generated content. When you provide comments or feedback or make submissions of content or information using the Service, including video or images, we may collect that content and associate it with you.
- Customer service interactions. To ensure the quality of your interactions with our personnel, we

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may monitor, document and retain communications between you and our personnel.

2. Information We Collect from You When You Use the Service

When you use the Service, we collect information about the particular ways in which you use the Service. The following is a summary of the types of information we collect when you use the Service:

Usage Information; Use of Cookies and Other Technologies

We collect information about your activity through the Service. For example, we may collect information about:

- the web pages you visit;
- the date and time of your visit to or use of the Service;
- your usage and activity data related to the Service;
- the Internet Protocol (IP) address used to connect your computer or mobile device to the Internet;
- your computer or mobile device and connection information, such as your browser type and version, operating system, and platform; and
- your device identifier.

We (or service providers on our behalf) may collect the above information through the use of technologies, including “cookies” and “web beacons,” which automatically collect information from you when you use the Service.

Cookies are small amounts of data that are stored within your Internet browser, which save and recognize your browsing habits. We use both session cookies (which track a user’s progression during one site visit) and persistent cookies (which track a user over time). Web beacons are web page elements that can recognize certain types of information on your computer or mobile device, such as the time and date you viewed a page, which emails are opened, which links are clicked, and similar information.

We use cookies to help us provide you with a more personalized experience and to improve the Service and/or our products or services.

The following is a list of cookies that we currently use:

readablenglish.com

- re-access-token (used for authentication/authorization across RE services)
- re_uname (for browser to remember password, if chosen)
- re_upwd (for browser to remember password, if chosen)

my.readablenglish.com (user preferences, notifications and session)

- ASP.NET_SessionId
- ReadjR/ReadpopBjR/ReadpopjR (joyRide component for website guides and tooltips)
- colourschemS_new29223 (e-reader settings for font, line height, color)
- cookieleftMenuval (library menu setting)
- ocrdoc_remove_content (e-reader editing)

Most Internet browsers allow you to block or delete cookies and other similar technologies from your browser. If you do not agree to the use of cookies or similar technologies, please disable or delete them by following the instructions for your browser set out here: <http://www.allaboutcookies.org/>, or use automated disabling tools where available. However, if you reject or disable cookies, you may still use the Service, but your ability to use some features of the Service may be limited.

Location Information

When you use the Service we may collect information about your location. With your permission, we may also collect information about your precise location using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and other sensors.

B. “Do Not Track” Requests

Your Internet browser and mobile device may allow you to adjust your browser settings so that “do not track” requests are sent to the websites you visit. IF YOU DO NOT WANT US TO AUTOMATICALLY COLLECT INFORMATION FROM YOU WHEN YOU USE THE SERVICE, EITHER NOW OR FOR FUTURE BROWSING SESSIONS, REFRAIN FROM USING THE SERVICE. WE DO NOT CURRENTLY RESPOND TO DO NOT TRACK (“DNT”) SIGNALS.

C. How We Use the Information We Collect

We may use information collected from or about you for any of the following purposes:

- developing, providing and improving the Service and/or RELLC’s other products and/or services;
- assisting with the provision of services and fulfillment of any orders or requests for information made through the Service;
- sending you information and promotional materials about our products and services and the Service, as well as our company in general;
- responding to information requests;
- complying with regulatory requirements for the maintenance of records;
- conducting internal reviews of the Service to help us better understand visitors’ and customers’ uses of the Service;
- protecting the security and integrity of the Service;
- complying with court orders and legal process, and to enforce this Notice; and

- any other legal, business or marketing purposes that are not inconsistent with the terms of this Notice.

D. How We Share Your Information with Third Parties

We may share the Personal Information we collect in connection with the Service with third parties, as described below:

1. Third Parties Who Provide Services or Information Through the Service

We may share your Personal Information with third parties who provide third party products or services or information through the Service. Such third parties may use the information to fulfill product or service orders, develop and improve their products or services, and contact you about product or service orders, future products or services, or their company in general.

2. Service Providers

We may share your Personal Information with our third party vendors, suppliers and other service providers who provide services to us or on our behalf, such as operating and supporting the Service, performing marketing or consulting services, assisting us with the preparation and mailing of our business and marketing communications, and with processing and fulfillment functions. Examples of such third parties include website developers, hosting service providers, and auditors. These third party service providers may use your Personal Information for their own marketing purposes.

We use third party payment processors, PayPal and HubSpot, to handle online payment transactions. You can read about PayPal's privacy practices in the PayPal privacy notice accessible at the following link: <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>. You can read about HubSpot's privacy practices in the HubSpot privacy notice accessible at the following link: <https://legal.hubspot.com/privacy-policy>.

3. Third Party Analytics Providers

We may share Personal Information with our advertising and analytics partners, such as Google Analytics. The privacy policies of these third party companies apply to their collection, use and disclosure of your information. These third parties may combine your information with the information of other consumers for purposes of conducting studies and/or analytics. For more information about Google Analytics, including how to opt out, please go to: <https://tools.google.com/dlpage/gaoptout>.

4. Our Affiliates

We may share some or all of your information with our subsidiaries and corporate affiliates, joint venturers, or other companies that are or may become under common control with us. We will require these entities to comply with the terms of this Notice with regard to their use of your Personal Information.

5. Transfer or Assignment in Connection with Business Transfers or Bankruptcy

In the event of a merger, acquisition, reorganization, bankruptcy or other sale of all or a portion of our assets, any user information owned or controlled by us may be one of the assets transferred to third

parties. We reserve the right, as part of this type of transaction, to transfer or assign your Personal Information and other information we have collected from users of the Service to third parties. Other than to the extent ordered by a bankruptcy or other court, or as otherwise agreed to by you, the use and disclosure of all transferred user information will be subject to this Notice. However, any information you submit or that is collected after this type of transfer may be subject to a new privacy policy adopted by the successor entity.

6. Response to Subpoenas or Court Orders, or Protection of Our Rights

We may disclose your information to government authorities or third parties if:

- you have given us permission to share your information;
- we are required to do so by law, or in response to a subpoena or court order;
- we believe in our sole discretion that disclosure is reasonably necessary to protect against fraud, or to protect our property or other rights, or those of third parties, or the public at large; or
- we believe that you have abused the Service by using the Service to attack or gain unauthorized access to a system or to engage in spamming, or in any other manner that violates applicable laws or any applicable terms of use.

7. Aggregate Information

We may share aggregated or de-identified information without restriction.

E. How Long We Retain Your Information

We retain Personal Information for a reasonable time period to provide the Service. Personal Information is then archived for time periods required or necessitated by law or legal considerations. When archival use is no longer required, Personal Information is deleted from our records.

We retain your account information, including Personal Information in your account, while your account is active. If you delete your account, your account information will be deleted. We may also choose to delete your account if it has remained inactive for an extended time period. Please note we may retain your information, including Personal Information, within our internal systems for backup, audit, or other purposes.

F. Your Choices

We provide the opportunity to opt out of receiving communications from us and our partners at the point where we request information about you. In addition, you may unsubscribe or opt out of receiving communications from us by clicking the unsubscribe link on any email marketing communication you receive.

You may also opt out of our automatically collecting information from you, as described above.

Note that even if you opt out from receiving communications from us, we reserve the right to send further communications to you for the sole purpose of processing or fulfilling any orders or support

requests you made to us prior to opting out.

G. How We Protect Your Information

We have implemented commercially reasonable measures designed to secure your Personal Information from unauthorized access, use, alteration and disclosure. However, the transmission of information via the Internet is not completely secure. You acknowledge that: (a) the limitations of the Internet are beyond our control; (b) the security, integrity and privacy of information and data exchanged between you and us cannot be guaranteed; and (c) any such information and data may be viewed or tampered with in transit by a third party. RELLC has no responsibility or liability for the security of information transmitted via the Internet.

H. California's Shine the Light Law

California Civil Code Section 1798.83, known as the "Shine The Light" law, permits any users who are California residents to request and obtain from us a list of what personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge.

I. Accessing, Correcting and Updating Your Information

You may have the right to access the Personal Information we collect about you. You may also have the right to correct any errors contained in that information. For details, please email us at privacy@readablenglish.com

If you have registered for an account, you may also access, change or delete certain information that RELLC has collected in connection with the account by logging into the account using your username and password.

J. Children's Privacy

RELLC appreciates that further privacy protections may be required with respect to Personal Information RELLC collects from children using the Service.

Provision of the Service to Schools

Where RELLC is providing the Service to a School (as defined in RELLC's Terms of Service), RELLC does not knowingly collect any Personal Information from children under the age of 13 (or the applicable age of consent in local jurisdictions) unless and until the School has obtained appropriate parental consent. Where RELLC collects and uses Student Data at the direction of and under the control of a School, RELLC relies on each School to provide appropriate notice to parents of the School's use of third party service providers like RELLC, and for the Schools to obtain consent, if necessary, and authorization for RELLC to collect Student Data, as permitted by the Children's Online Privacy Protection Act ("COPPA") and other applicable data protection laws. Please contact us at privacy@readableenglish.com if you believe we have inadvertently collected personal information of a child without proper consent so that we may delete such data as soon as possible.

Provision of the Service to Individuals

Where RELLC is providing the Service to an individual and not to a School, then:

(a) Consistent with the requirements of COPPA, on any child-targeted feature of the Service or in connection with any instance where we ask for age information and determine that the user is under the age of 13, we will ask for a parent or guardian email address before we collect any personal information from the child. We will not use parent or guardian emails provided as part of this process in order to market to the parent or guardian unless the parent or guardian has separately provided their express consent to receive such marketing communications or has separately participated in activities that allow for us to engage in such marketing activities.

In the consent email, we will explain what information we are collecting, how we plan to use it, how the parent or guardian can provide consent, and how any consent previously granted can be revoked. If we do not receive parental or guardian consent within a reasonable period of time after we send the email, we will delete the parent or guardian's contact information, in addition to any information we have collected from the child in connection with the activity for which we are seeking consent

Where Personal Information is knowingly collected from a child under the age of 13, we will retain that information only so for so long as is reasonably necessary to fulfill the activity or task for which the information was collected, for our internal security purposes and the security of our users, or as required by law. If at any time we discover that we have collected information from a child in a manner that is inconsistent with COPPA, we will either delete the information or immediately seek parent or guardian consent.

(b) If a particular feature of the Service allows children to register with RELLC, we may ask the child to provide certain information for notification and security purposes, including a parent or guardian's email address, the child's first name and gender, the child's member or account username, and password. We may also ask for the child's date of birth to validate their age.

Please note that children can choose whether or not to share this information with us, but certain features or functions of the Service cannot function without it. As such, if this information is not provided, the child may not be able to use these features or functions.

We will never collect or require the provision of more Personal Information from a child under the age of 13 than is reasonably necessary in order to provide the particular Service at issue.

(c) Certain features of the Service allow children to create or use content and save it with RELLC. Some of these features do not require children to provide any Personal Information and as such may not require that we notify a parent or guardian or obtain parent or guardian consent. If any of these features allows a child to include or input Personal Information as part of any created content, we will either delete any such Personal Information as part of a pre-screening process, or we will seek parent or guardian consent.

(d) Parents or guardians can refuse to permit the collection of Personal Information from their children in association with a particular account at any time, and can further request that we delete any such Personal Information that we have previously collected. Such a deletion request may, however, result in the termination of the account.

Where a child has registered for an account, parents or guardians can access, change or delete information that RELLC has collected in connection with the account by: (i) logging into the child's account using the child's username and password; or (ii) contacting RELLC via email to privacy@readableenglish.com to request access to, change or delete the child's personal information. Action will be taken in response to a valid deletion request within a reasonable period of time.

Please note that RELLC will take reasonable steps to verify a parent or guardian's identify before granting access to a child's account or other personal information.

Geolocation Data

If features of the Service that are directed toward children collect geolocation information that is sufficient to identify (or enable RELLC to identify) a particular street address, we will first seek parent or guardian consent via email.

Third Parties

RELLC does not currently permit any third parties to collect Personal Information from users of the Service that are directed to children under 13, or that we know children under 13 are using, except those third parties that may collect persistent identifiers, such as IP addresses, cookie information or other identifiers from devices or browsers, solely for the support of internal operations as described in this Notice.

Disclosures

We may share the Personal Information of children with our service providers if necessary for them to perform a business, professional, technical, or similar support function for us. We may further disclose such Personal Information if permitted or required by law, or in response to a law enforcement or public agency's request. RELLC may further disclose such Personal Information if we believe such disclosure may prevent a crime from occurring or to facilitate an investigation related to public safety or to protect the safety of a child, to protect the security or integrity of the Service or any associated IT systems or functions or related technology, or to prevent or take precautions against potential or actual liability.

K. Student Data

In providing the Service to a school, RELLC may have access to personally identifiable information about students ("**Student Data**") that is provided by the school to RELLC. RELLC has access to Student Data only to the extent such Student Data is provided by the school and only for the purposes of providing the Service to the school or on the school's behalf. The type of Student Data RELLC receives will depend on the Service provided to the School, but may include [insert student data].

RELLC treats Student Data as strictly confidential and does not use such data for any purpose other than to provide the Service to or on behalf of the school in accordance with RELLC's contractual agreements with the school. We will only retain Student Data for so long as is reasonably necessary to fulfill RELLC's contractual obligations to the school, for RELLC's internal security purposes and the security of our users, or as required by law.

RELLC's collection, use and disclosure of Student Data is governed by this Notice, RELLC's contractual agreements with the school, the U.S. federal Family Educational Rights and Privacy Act ("**FERPA**"), and

applicable state laws which relate to the collection of Student Data. If you are a student or parent, please contact your school if you have questions about how the school uses the Service.

We may disclose Student Data to authorized school users such as teachers and school administrators. The level of sharing will depend on the Service being provided by RELLC to the school.

RELLC may further disclose Student Data to its service providers if necessary for them to perform a business, professional, technical, or similar support function for us. These service providers are subject to confidentiality and data security requirements. We may further disclose Student Data if permitted or required by law, or in response to a law enforcement or public agency's request. RELLC may further disclose Student Data if we believe such disclosure may prevent a crime from occurring or to facilitate an investigation related to public safety or to protect the safety of a student, to protect the security or integrity of the Service or any associated IT systems or functions or related technology, or to prevent or take precautions against potential or actual liability. RELLC will never share or sell Student Data with or to third parties for marketing purposes.

L. Use of Information Outside Your Country of Residence

The Service is directed to users located in the United States. If you are located outside of the United States and choose to use the Service or provide your information to us, you should be aware that we may transfer your information to the United States and process it there. The privacy laws in the United States may not be as protective as those in your jurisdiction. **Your consent to this Notice followed by your submission of information to us through or in connection with the Service represents your agreement to the transfer of your information to the United States.**

M. Changes to This Privacy Notice

We may change this Notice from time to time. If we decide to make a material change to this Notice, we will post it on this page. Your continued use of the Service after the posting of changes to this Notice will mean you accept these changes. In some cases, we may attempt to contact you through an email or other address you have provided, so we can give you choices about our using your information in a manner different from that stated at the time of collection. If we make any material changes in our privacy practices that affect your Personal Information that is already in our possession, we will apply those changes to that older information only with your consent or as otherwise allowed by law.

N. Contact Us

If you have any questions about this Notice or our use of the information we collect from you in connection with the Service, email us at privacy@readableenglish.com.