# Tech4Learning<sup>-</sup>

# Pics4Learning Privacy Policy

Tech4Learning, Inc. ("Tech4Learning", "we", "us" and "our") is committed to protecting your privacy. We have prepared this Privacy Policy to describe our practices regarding the Personal Information (defined below) we collect from users through the Pics4Learning web site ("Application").

This Privacy Policy applies to people who are accessing the Application on their desktop, mobile, and tablet devices individually referred to as a "User" and collectively as "Users".

This Privacy Policy applies only to the Application domain and sub-domains and does not apply to other web sites owned and operated by Tech4Learning, Inc.

#### PERSONAL INFORMATION

"Personal Information" means information that allows someone to identify or contact you, including, for example, your name, address, telephone number, email address, as well as any other non-public information about you that is associated with or linked to any of the foregoing information.

# IN THE APPLICATION

The Application does not collect or store Personal Information from users. Third parties may collect Personal Information through your use of the web site. See the section on THIRD-PARTY SERVICES for more information.

The Application automatically gathers anonymous usage information, such as the number and duration of visits and the pages visited in order to improve the service and optimize the user experience.

#### THIRD-PARTY SERVICES

The Application uses third-party services such as Google Analytics to collect information about how Users interact with the Application and Google AdWords to provide interest-based advertising to Users. These third-party services may use cookies to gather information such as the pages visited, IP address, and a date/time stamp for visits. For more information about how Google Analytics and Google AdWords use this information, please refer to the privacy policies made available on their web sites.

Advertisers in the Application may collect Personal Information on their own sites. This may include other sites owned by Tech4Learning, Inc. These sites are governed by their privacy policies and not this Privacy Policy.

### SECURITY

The Application has security measures in place to protect the loss, misuse, and alteration of information under our control. Users should be aware, however, that the Application cannot guarantee security.

#### STUDENT PERSONAL INFORMATION

Tech4Learning supports the efforts of COPPA to ensure the online safety of children. As stated above, the Application does not collect Personal Information from students.

The Application agrees to:

NOT give the ability to publicly post or otherwise distribute personally identifiable contact information without prior parental consent

NOT entice by the prospect of a special game, prize or other activity or to divulge more information than is needed to participate in the activity

In connection with the sale, merger, bankruptcy, sale of assets or reorganization of our company, Tech4Learning will bind the new entity to the promises in this Privacy Policy.

# DATA LOCATION

The Application is housed in an 80,000 square foot purpose-built hosting facility. The facility is an SSAE 16compliant, SOC 1, 2, and 3 audited facility with N+1 or better redundancy on all data center systems, and extensive security protocols including identification verification, biometric scanning, RFID-controlled access, and 24/7 security, including CCTV monitoring and archived CCTV footage.

#### DISPOSAL

The Application retains anonymized or aggregated data, including usage data, for a commercially reasonable time in order to meet analytics and development needs or requriements. If you have any questions about data retention or deletion, please contact **info@tech4learning.com**.

RESIDENTS OF COUNTRIES OUTSIDE THE UNITED STATES

The Application resides on servers in the United States, where laws regarding processing of personal information may be less stringent than the laws in your country.

# RESIDENTS OF CALIFORNIA

The Application complies with California's "Shine the Light" law. California residents may request a listing of Personal Information about them that we have disclosed to third parties in the preceding calendar year, as well as the names and addresses of those third parties. This request can be made only once per year, and there is no charge for it. To make your request, send an email to **info@tech4learning.com** or send a written request to Tech4Learning Inc. 6160 Mission Gorge Road, Suite 206, San Diego, CA 92120.

As stated previously, the Application does not collect Personal Information for users.

# CONTACT INFORMATION

We welcome your comments or questions about this Privacy Policy.

Tech4Learning, Inc Attn: Privacy 6160 Mission Gorge Rd, STE 206 San Diego, CA 92120

Email: info@tech4learning.com

CHANGES TO THIS PRIVACY POLICY

We may modify or update this Privacy Policy from time to time so you should review this page periodically.

This policy was last updated: 2/5/2020

# New York State EdLaw 2D

Pics4Learning is compliant with the regulations under the New York state's Education Law § 2-d.