

Starfall Privacy Policy

Last Updated: 12 December 2022

Starfall Education Foundation (“we”) strives to create a safe and playful environment for all children. We adhere to a strict policy of respecting and protecting the privacy of our users. This privacy policy applies to Starfall branded websites, mobile applications, and software (collectively the “services”) whether accessed via computer, mobile device, or otherwise.

Starfall does not ask children for personal information or track children's progress. The Starfall websites and apps directed toward children operate in accordance with COPPA and FERPA. Starfall does not display any advertising to children.



Personal Information Collection and Use

GUESTS

Guest visitors to Starfall are not asked to provide personal information. Network information is anonymized.

MEMBERS, SUBSCRIBERS, AND OTHER CUSTOMERS

We ask adult users (“you”) to provide information about themselves when: signing in to the member or subscriber portion of Starfall; purchasing in our store; or engaging with customer service. We do not ask for personal information from children.

- **Basic Account Information:** When you become a Starfall member or subscriber, you must provide an email address and a password. We may again ask for this information when you sign in or when you make changes to your account. IP addresses and transactional use may be retained to respond to customer service requests. Aggregated usage data associated with membership or GroupIDs may be provided to teacher, class, and school members upon request.
- **Payment Information:** When you make a purchase of a Starfall product or service, whether it is for an online membership or a physical product, we require billing and shipping information. This information is handled with the utmost care. We engage a secure and nationally recognized payment processor using strong industry standard encryption for credit card transactions. Starfall does not store credit card numbers, nor do we have access to credit card numbers through our payment processor. In order to provide customer service, we retain the details of a purchase, such as the payment date, the billing address, and the shipping address. Information regarding subscription payments to an app store are between you and the app store.
- **Use of Information:** We use the information we collect to operate, maintain, and enhance the services we provide, as well as to communicate with you about your account or send you emails about services or activities that may be of interest to you.
- **Third Parties:** We do not rent or sell your personal information to third parties. We do share or disclose your personal information with our trusted vendors, but only as needed to provide our services. These vendor services may include hosting, email delivery, and payment services.

Technical Information Collection and Use

When you use Starfall on a computer or mobile device, we collect some basic technical information in order to customize your experience as well as to improve our services.

- **Cookies:** Like many websites, we rely on cookies (a small text file sent to your browser). Starfall uses only necessary and functional cookies, for example to retain your preferences and remember the state of an activity (such as an online shopping cart) or a service (such as a membership sign in). Statistical cookies are sparingly used for content intended for parents and educators. Starfall does not use marketing (targeting) cookies, including third party cookies.

- Other Non-Personal Information: We automatically receive and record non-personal information on our server logs from a user's browser. We may collect technical information about the browser, operating system, or mobile device being used, as well as information about patterns of usage and technical performance.
- Use of Technical Information: We use the technical information collected to deliver content and support a user's experience of our services. For example, when a user returns to the services after signing in, cookies help us recognize that user.

Updating Information and Disclosure of Information

Please contact us at helpdesk@starfall.com to update or delete your personal information. We may not be able to delete information in all instances, such as information retained in technical support logs and other business records.

Starfall may disclose information we have retained if we believe it necessary to comply with a legal process, law enforcement investigation, or government request. We may also divulge collected information in response to fraud or technical security issues or in matters of public safety. Any such disclosure or response will be tailored to comply with applicable law.

International Visitors and Use Outside the U.S.

Our services are operated and managed on servers located within the United States. If you are using our services outside the United States, you consent to having your information and data transferred to the United States for the purpose of performing the services according to our Terms of Service. If you are in any jurisdiction with laws or regulations governing internet use, including collection, use, and disclosure of personal data, different from those of the United States, you may only use our services in a manner that is lawful in your jurisdiction. Please do not use our services if use of our services is unlawful in your jurisdiction.

This paragraph outlines our compliance with the General Data and Protection Regulation (GDPR) of the European Union and other applicable data protection laws. Starfall is the company that controls your data and is sometimes called the 'data controller' within the terms of the GDPR. We maintain records of all requests and our responses with respect to issues addressed in this Privacy Policy. Under the GDPR, we must maintain a data inventory and data flow mapping for compliance

purposes. You have various rights under data protection laws and you have the right, without charge, upon verification of identity, to:

1. Request a copy of the personal information about you that we have;
2. Correct any inaccuracies in personal data about you that we have;
3. Withdraw your consent where we have requested your consent to process information;
4. Delete personal information within legally prescribed limitations; and
5. Lodge a complaint with the appropriate public authority if you have any concerns about how we process or retain your data.

If you have any questions or requests concerning these rights, please contact us at helpdesk@starfall.com and your inquiry will be responded to as soon as possible but within 30 days of our receipt of your request.

We have appointed an internal Data Protection Officer for you to contact if you have any questions regarding our privacy policy or if you wish to exercise your data protection rights. Your first point of contact should be with our customer service team that can be contacted at helpdesk@starfall.com. The Data Protection Officer for residents of the European Union may be contacted at euprivacy@starfall.com.

COPPA and FERPA

We do not ask children for personal information or track children's progress. Children do not provide personal information to use and access our services. The Starfall websites and apps directed toward children operate in accordance and are consistent with the Children's Online Privacy Protection Act (COPPA) and the Family Educational Rights and Privacy Act (FERPA).

Security

Our servers are located in a secured, locked, and monitored environment. Data access is controlled by several firewall layers. Since no system is absolutely fail proof, we cannot guarantee the absolute security of your information. However, we employ physical, technical and administrative security measures designed to safeguard user information that follow or exceed industry standards.

Advertising and Social Media

Starfall does not display any advertising to children on our websites or apps. We strongly believe that children should not be the targets of marketing efforts during

their educational experience. Resources for grown-ups, specifically those found on the Starfall Parent-Teacher Center™ and the Starfall Store™, may contain links to social media services, but are kept separate from children's activities and safeguarded behind a parent gate.

Updates

We may make changes to this privacy policy from time to time and will notify you of changes by posting the revised privacy policy with an updated date of revision on our websites. Your continued use of our services following the effective date of such update constitutes your acceptance of the revised policy.

Contact Information

Please contact Starfall with any questions or comments.

By email: helpdesk@starfall.com

By mail: Starfall Education Foundation, PO Box 359, Boulder, CO 80306

The Starfall Parent-Teacher Center™ is a program service of Starfall Education Foundation, a publicly supported nonprofit organization, 501(c)(3).

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