PARLAY IDEAS INC. PRIVACY POLICY Ver. 1.4 Last Updated: 2020.OCT.8

Parlay ("Parlay," "we," or "us") understands that privacy is tremendously important to schools and faculty who register for our Service ("Schools"), and to students whose information we may access on behalf of a School ("Students"). Parlay provides a platform that enables teachers and schools to facilitate and measure secure and engaging discussions online and inside the classroom. This privacy policy applies to our website https://www.parlayideas.com/policies and to the Parlay platform (our "Service") and describes the steps we take to protect your data.

Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms of Service.

The main topics covered in this policy are as follows:

1. How We Collect and Use Information 2. Sharing of Your Information 3. How We Store and Protect Your Information 4. Your Choices About Your Information 5. Children's Privacy 6. Links to Other Websites and Services 7. How to Contact Us 8. Changes to Our Privacy Policy

1. HOW WE COLLECT AND USE INFORMATION

We collect the following types of information:

Information about Schools: We ask for certain information when a School administrator registers a School with Parlay, or if the administrator corresponds with us online, including a name, school name, school email address and/or account name and password, phone number, and message content. We may also retain information provided by a School if the School sends us a message, posts content to our website or through our Service, or responds to emails or surveys. Once a School begins using the Parlay Service, we will keep records of activities related to the Service. We use this information to operate, maintain, and provide the features and functionality of the Service, to analyze our Service offerings and functionality, and to communicate with our Schools and website visitors.

Student Data: Parlay may have access to personally identifiable information about students ("Student Data") in the course of providing its services to a School. We consider Student Data to be confidential and do not use such data for any purpose other than to provide the services on the School's behalf. The Personal Identifiable Information we collect per student is limited to their First and Last Name, Profile Photo (optional), and School Email Address. This information is collected at the time of students creating an account which is required for teachers and students to use the service. In some instances, when accessing the system through Single Sign On (Google or Microsoft API Authentication), Parlay may be passed personal data from these services. The School, as the provider of student's email addresses, provides each student with login credentials and confirms that it has obtained appropriate parental consents, as needed, before the student is permitted to access the Service. If you are a Student or parent, please contact your School if you have questions about the School's use of technology service providers like Parlay. If a Student contacts Parlay with a question about our Service, we will collect personal information from that Student only as necessary to respond to the Student's request and, if necessary, direct the Student to contact the Student's School. The product operator responsible for collecting and maintaining student PII is Bobby McDonald (CEO) 647 289 3384. Bobby [at] parlayideas.com. 387 Shuter Street, Toronto ON M5A 1X3.

See "How We Share Your Information" below for more information on the limited ways in which we share School and Student Data. See "Children's Privacy" below for more information on how we collect and use the personal information of children under 13.

Information collected through technology: We automatically collect certain types of usage information when visitors use our service. We may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets Parlay help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Service (e.g., the pages you view, the links you click and other actions you take on the

Service), and allow us to track your usage of the Service over time. For teacher accounts <u>only</u>, we may collect log file information from their browser or mobile device each time they access the Service. Log file information may include anonymous information such as web request, Internet Protocol ("IP") address, browser type, information about mobile device, number of clicks and how you interact with links on the Service, pages viewed, and other such information - this information is collected strictly for the purposes of providing effective and efficient technical support to teachers who use the platform. In addition, we may also use clear gifs in HTML-based emails sent to our Schools to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service.

We use or may use the data collected through cookies, log files, device identifiers, and clear gifs information to: (a) remember information so that a user will not have to re-enter it during subsequent visits; (b) provide custom, personalized content and information that is strictly for relevant educational purposes relating to their usage of Parlay; (c) to provide and monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and usage on our Service; (e) diagnose or fix technology problems; and (f) help users efficiently access information after signing in.

User-generated Content: Students can only create or upload content and engage with one another in a moderated environment that is created and managed by their teacher. No student-generated content or student-to-student interaction exists on the platform without the invitation to an activity by a teacher's account.

Student privacy is very important to us. Student Data is used only for educational purposes at the discretion of the School.

2. HOW WE SHARE YOUR INFORMATION

Parlay only shares personal information in a few limited circumstances, described below. We do not rent or sell student data or information for marketing or any other purposes. We do not allow third party advertising networks to collect information about the users of our Site or Service. We do not have in-app or contextual advertising of any kind. We do not display behavioural or targeted advertising. We do not use data to track and target advertisements on other third-party websites or services.

Who we may share information with:

● We may share information with those that provide us with technology services (e.g. web hosting and analytics services), but strictly for the purpose of carrying out their work for us. We only contract with third party vendors that have equal or stronger privacy, security, and data retention requirements as our own.
● We may be required to share information with law enforcement or other third parties when compelled to do so by court order or other legal process, to comply with statutes or regulations, to enforce our Terms of Use, or if we believe in good faith that the disclosure is necessary to protect the rights, property or personal safety of our users.

In the event of a change of control: If we sell, divest or transfer our business, we will not transfer personal information of our customers unless the new owner intends to maintain and provide the Service as a going concern, and provided that the new owner has agreed to data privacy standards no less stringent than our own. In such case we will provide you with notice and an opportunity to opt-out of the transfer of personally identifiable Student Data.

How Student Data is shared: In addition to the actions described above, Parlay may facilitate the sharing of Student Data with third parties, though only when instructed and authorized to do so on behalf of the School. Some elements of our Service enable Schools to interact with students, teachers and third party applications, for the benefit of the student's education. Parlay does not facilitate the sharing of any Student Data with third parties on the Service except on behalf of the School after the School has authorized a third party or application to access Student Data through the Service. Please remember that this Privacy Policy applies to the Parlay Services, and not other services or third party applications, which may have their own privacy policies. Schools should carefully read the privacy practices of each third party application before agreeing to engage with the application through the Service.

Parlay does not share student personally identifiable information publicly. Any content that is made publicly available (such as a class word cloud or engagement diagram) is filtered to remove all PII prior to being made public.

3. HOW WE STORE AND PROTECT YOUR INFORMATION

Storage and processing: Any information collected through the Service is stored and processed in the USA. If you use our Service outside of the USA, you consent to have your data transferred to USA. Customer Data is hosted with Amazon Web Services.

Parlay and the district are jointly responsible for ensuring compliance with the federal Family Educational Rights and Privacy Act. This will be ensured through a joint review of and signing off on this Privacy Policy and the Terms of Service as a part of the contract execution between both organizations.

Keeping information safe: Parlay maintains strict administrative, technical and physical procedures to protect information stored in our servers, which are located in the USA. Access to information is limited (through user/password credentials and two factor authentication) to those employees who require it to perform their job functions. We use industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process and sign-up information. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls to building and files. Any Parlay team member that is directly or peripherally involved in collection, use, storage disclosure or handling of PII and student records must complete CSP Program certification on an annual basis. This certification will be re-submitted to the iKeepSafe FERPA Program as part of the annual review.

Security audits are conducted annually in a joint review between iKeepSafe and the Parlay Ideas. Included in this security audit is a review of the policies, procedures, personnel, and technical requirements outlined in this document and in compliance with iKeepSafe FERPA and COPPA compliance evaluation criteria. The audit is initiated by iKeepSafe. Documentation is submitted by Parlay. The audit and any deficiencies are completed by iKeepSafe and shared with Parlay. Necessary updates to controls, product and procedures are made, and a final version is submitted for sign-off and approval. This takes place over a 6-month period.

In the event of a breach of service, the Parlay team operates under the following process:

Definition: A breach is any unauthorized acquisition of computerized data that compromises the security, confidentiality, or integrity of personal information that we maintain.

Personal information: Unencrypted information containing: individuals' names or initials, social security numbers, driver's license number or other identification numbers, financial information (i.e., bank account number, credit or debit card number), medical information, health insurance information, and other personal identifiers. In the event of a data breach, Parlay goal is to provide notice within 48 hours of our knowledge of the event.

Recipients of the Notice: We will notify any known schools to which affected users (teachers and students) belong via contact information on record. Through the school, Parlay will coordinate individual written notices to eligible students, parents, and guardians.

Information in the Notice

- Company contact information.
- A general description of the breach incident
- An explanation, to the best of our knowledge, of what happened.
- A listing of the types of personal information that is believed to be compromised.
- If known, the date and time of the breach, or a best estimate.
- Whether the notification was delayed as a result of law enforcement.
- What steps the Company has taken to mitigate the situation, prevent it from happening again, and advice to the impacted individuals on how they can best protect themselves.

Method of notification: Notifications will be sent via email. Written notice may be sent to the impacted schools in addition to email. Depending on where the impacted user lives, the may have a legal right to receive notice of a security breach in writing.'

Questions about data? Here are your options.

4. YOUR CHOICES ABOUT YOUR INFORMATION

Student records continue to be the property of and under the control of the school district. Account information and settings: Schools may update account information and modify Services by signing into the administrator account. Schools and teachers can opt-out of receiving promotional emails by clicking on the "unsubscribe" feature at the bottom of each email. Teachers and students cannot unsubscribe from Service-related messaging.

In the event that a parent, legal guardian or eligible student would like to review personally identifiable information in the students record and/or correct erroneous information, the Parlay team will require a written request from the school or district on behalf of the parent, guardian or student. All inquiries of this nature are to be directed to joao@parlayideas.com.

Deleting or disabling cookies: You may be able to disallow cookies to be set on your browser. Please look for instructions on how to delete or disable cookies and other tracking/recording tools on your browser's technical settings. You may not be able to delete or disable cookies on certain mobile devices and/or certain browsers. For more information on cookies, visit www.allaboutcookies.org. Remember, disabling cookies may disable many of the features available on the Service, so we recommend you leave cookies enabled.

Following termination or deactivation of a School account, Parlay will delete/archive all Student Data associated with the School. Inactive data (accounts dormant for more than 1 year) will be identified and deleted on an annual basis. Following deletion of student and teacher records, we may maintain anonymized/aggregated data, including usage data, for analytics purposes.

We do not collect any information from students without consent.

5. CHILDREN'S PRIVACY

Parlay is designed to be used for students in Grades 3 - 12, and is therefore used by students who are under the age of 13. Parlay does not knowingly collect any information from children under the age of 13 unless the School has obtained appropriate parental consent for the student to use the Service. Please contact us at bobby@parlayideas.com if you believe we have inadvertently collected personal information of a child under 13 without proper parental consents so that we may delete such data as soon as possible. Unless otherwise agreed to in writing by teachers, parents or school administrators, Parlay de-identifies all personal data from student records when accessing the information for internal operations purposes - such as improving the functionality of its product, conducting research to validate and improve the produce, integrating there party tools, and other related activities.

6. LINKS TO OTHER WEB SITES AND SERVICES

Parlay's content library (called the Universe) is a collection of discussion topics created by teachers in the community. These topics often link students to websites with relevant educational materials such as YouTube or news websites. Teachers can choose topics and resources they feel are appropriate, and edit these resources as they see fit, giving them full control over the links and services that are sent to their students for the educational purposes of the activity. We are not responsible for the practices employed by websites, applications or services linked to or from our Service. We recommend that the School review the privacy policies of other applications before authorizing a third party to access data through the Service.

7. HOW TO CONTACT US

If you have any questions about this Privacy Policy please call or email Bobby McDonald (CEO). 647 289 3384. bobby@parlayideas.com. Consumer questions about COPPA can be directed to COPPAPrivacy@ikeepsafe.org.

8. CHANGES TO OUR PRIVACY POLICY

Parlay may modify or update this Privacy Policy from time to time so you should review this page periodically. If we seek to use personal information in a materially different way than we had previously, we will provide at least 30 days notice to the Schools so that you have sufficient time to evaluate the change in practice. Of course, you can always opt-out by deleting your account before the changes take effect. In addition, we notify all users via a banner on our website and an in-app message/notification for teachers to review and consent to changes when they log in to Parlay following any material changes that are made to the policy.

This privacy policy was last modified on October 8, 2020. Effective Date: October 8, 2020.