

Tailor-Ed - Privacy Policy

Last modified: July 10th, 2018

Tailor-Ed Ltd. ("Tailor-Ed") values your privacy, and has therefore created this Privacy Policy to let you know what information is retained about you, how it is shared and with whom. This Privacy Policy forms part of Tailor-Ed's Terms of Use (the "Terms"). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms. This policy explains the privacy practices of Tailor-Ed on www.Tailor-Ed.com (the "Website") and with respect to the Service as defined in the Terms (Website and Service are collectively referred to as "Services"). This privacy policy describes the ways Tailor-Ed collects, uses and discloses your personal information and the rights and options available to you.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

By visiting or using our Services, you consent to the information handling practices described in this Privacy Policy. Your use of our Services and any information you provide on our Services are subject to the terms of this Privacy Policy, which is incorporated into and subject to our Terms of Service. If you do not agree with this Policy, do not use our Services or provide Tailor-Ed with your personal information.

Children's Privacy

Our Services are intended for teachers/ tutors, and not intended for children under the age of 16. If you are under the age of 16 you may not use the service as a teacher/ tutor.

However, some features of our Services may permit children under the age of 16 ("Child Non-User) to participate in surveys. By doing this, children may provide their teachers/ tutors and us some personal information.

If you are the Parent of a Child Non-User, please advise your Child Non-User of the risks of posting personal information on our Service or any other online services. TailorED won't share personal information about your child or his/her progress with anyone other than you, your child and the teacher/ tutor. As a Parent, you have the ability to control information about your child user. Please refer to the "Regulatory Compliance" section in this Policy for additional information. To refuse future collection or use of your child's personal information, you can contact us at support@tailor-ed.com.

What Information We Collect & How We Collect it

On our Website

On or when you visit our Website, you might be providing information about your visit in the following ways:

Statistics collected as you browse our website

Organizational and personal information our visitors knowingly provide us, such as the visited pages, location, from which domains you found a link to our page and Information about which browsers & devices people use to visit our Website.

Contact us

You may contact us via our website, using your full name and e-mail address.

Registration to our Website

In order to register to our Website, you may be required to create an Account. During the process of creating the Account, you will be requested to provide us with your email and full name. When you will request us to provide you with customized differentiated lesson, you will provide us your lesson subject, technology in use and issues to focus on in the differentiated lesson.

Payment Details

If you will choose to purchase a full plan of customized differentiated lessons, you will need to provide us with payment details.

Your IP Address and Host Name

Tailor-Ed's Website logs host names (or IP addresses when the host name is not available) for system administration and security purposes. These logs are monitored and analyzed to maintain systems and information security and to allow us to constantly improve the value and the availability of our web content.

You are not required by law to provide us with any of the above information; however, if you do not provide certain information, you may not be able to use all of our website features.

On our Services

Educational Information. As part of the Service, following the use of our student surveys, you may provide us with your students' full name, questionnaires results.

Please note: in case you or your students are located within the EU, you shall be deemed as the data controller for your students' personal information collected through our services, and we shall be considered as the data processor.

Our use and collection of educational information may be subject to some additional **Regulatory Requirements:**

We strive to adhere to U.S. federal and certain state regulations. This includes, but may not be limited to, FERPA, COPPA, and California AB 1584. We highly recommend that you read our policies and terms of service to make sure that we adhere to your local regulatory needs, as we make no guarantee of compliance for your specific needs. If you have any questions about how we handle of data, please email us at info@tailor-ed.com.

Notice to California Residents Under 18 Years of Age

If you are a registered user of online services under the age of 18, and we have actual knowledge of your age, then under California law you may request and obtain removal of certain content or information you have posted on our online services. To do so, please refer to 'your rights' section in this Policy. Please note that removal does not ensure complete or comprehensive removal of the content. For example, removal may not be possible or permitted if another provision of law requires the content to be maintained, if it was posted or reposted by others, or if we paid compensation to you in exchange for the posting.

COPPA (Children Online Privacy Protection Act)

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission (FTC), the US consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online. **Children Consent.** According to the FTC, school officials can act in the capacity of a parent to provide consent to sign students up for online educational programs at school.

You hereby represent and warrant that you are a teacher or school administrator or otherwise authorized by a school or district to sign up on behalf of students for the Services. You further represent and warrant that you are solely responsible for complying with COPPA, meaning that you may either act as the parent's agent and consent to the collection of the children's information on the parent's behalf or obtain advance written consent from all parents or guardians whose children under 13 will be accessing the Service. When obtaining consent, you must provide parents and guardians with the Terms and this Privacy Policy. You must keep all consents on file and provide them to us if we request them. If you are a teacher, you represent and warrant that you have permission and authorization from your school and/or district to use the Services as part of your curriculum, and for purposes of COPPA compliance, you represent and warrant that you are entering into the Terms on behalf of your school and/or district. If you are a parent, guardian, and teacher

and believe that your child or student has provided Tailor-Ed with personal information, you should notify us at support@tailor-ed.com so that we may immediately delete the information from our servers.

Please note: you are not obligated by law to provide us with any Personal Information. You hereby acknowledge and agree that you are providing us with Personal Information at your own free will, for the purposes described below, and that we may retain such Personal Information in accordance with this Privacy Policy and any applicable laws and regulations.

FERPA (the Family Educational Rights and Privacy Act)

FERPA is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level.

You hereby declare, represent and warrant that you have obtained all necessary consents under the FERPA in connection with your collection of students' information through our services.

For any questions with Tailor-Ed's compliance with this legislation, please contact us at: info@tailor-ed.com.

Use of Information:

We use the personal information we collect from you for a range of different business purposes according to different legal bases of processing.

Tailor-Ed may use or process your personal information for the following purposes. One or more purposes may apply simultaneously.

Provide the Service

- To provide you with customized differentiated lessons and lessons plans;
- To provide you with further insights and analytical inquiries based on your preferences and student questionnaires results;
- To provide you insights about your lesson (student proficiency, engagement, motivation and students who require attention);
- To operate and maintain your Account, to provide you with access to and use of the Services;
- To allow you to contact us;
- To provide you with free first-time lesson customized for your needs.

We process this information where it is necessary for the adequate performance of the contract with you (e.g. the Terms, when you're creating an Account), and in light of your consent (e.g. when you're contacting us).

Improve, and Develop Services

- We conduct surveys and research, test features in development, and analyze the information we have to evaluate and improve our Services, develop new features, and conduct audits and troubleshooting activities;
- Your e-mail and your Account will be used to send you service updates and notifications about your account;
- To respond to you about any comment or enquiry you have submitted;
- We may use your age to enable age restrictions.
- To contact you when Tailor-Ed believes it to be necessary.

We process this information in light of our legitimate interest in improving the Services and giving our users the best experience.

Maintain a Safe and Secure Environment

- Detect and prevent fraud, abuse, security and incidents.
- Verify and authenticate your identity and prevent unauthorized or illegal activity.
- Enhance the safety and security of our products and services.
- Conduct security investigations and risk assessments.
- To prevent or take action against activities that are, or may be, in breach of our Terms or applicable law.
- To provide you with customer and technical support.

We process this information in light of our legitimate interest in improving the Services and giving our users the best experience.

Personalize Content

- To improve your experience on the Services by providing personalized content, recommendations, and features;
- To customize the content and measure performance of any email, push notification, or in-app message we may send to you;
- Combine information we collect about you with information from different sources and business partners.

We process this information in light of our legitimate interest to personalize your experience and customize our content.

We may use your information for other purposes, provided we disclose the purposes and use to you at the relevant time, and provided that you consent to the proposed use of your personal information.

Sharing information with others:

We may use certain trusted third party companies and individuals to help us provide, analyze, and improve the Services (in particular Payment Processors and Google Forms), and for the purposes described in this policy. These third parties may be located in countries other than your own, and we may send them information we receive. These third parties may have access to your personal information (if this are third parties provide payment means processing services, then your payment details will be shared with them) only for purposes of performing these tasks on our behalf and under obligations similar to those in this Privacy Policy. In such cases, these third parties must abide by our data privacy and security requirements and are not allowed to use personal information they receive from us for any other purpose. We may also disclose personal information as part of a corporate transaction such as a merger or sale of assets. When we transfer personal information, we use a variety of legal mechanisms, including contracts, to help ensure your rights and protections travel with your data. We will transfer personal information within assuring appropriate and suitable safeguards.

In addition, Tailor-Ed may share your Personal Information with others, without your explicit consent, for the following purposes and to the extent necessary in Tailor-Ed's good-faith discretion:

- When it is necessary to facilitate the functionality of the Services and to provide you with the Services, or to protect our customers;
- If Tailor-Ed reasonably believes that you have breached the Terms of Use, or abused your rights to use the Services, or performed any act or omission that Tailor-Ed reasonably believes to be violating any applicable law, rules, or regulations. Tailor-Ed may share your information in these cases, with law enforcement agencies and other competent authorities and with any third party as may be required to handle any result of your wrongdoing;
- If disclosure is necessary in order to comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies.
- In any case of dispute, or legal proceeding of any kind between you and Tailor-Ed, or between you and other users with respect to, or in relation with the Services;
- In any case where Tailor-Ed reasonably believes that sharing information is necessary to prevent imminent harm, physical damage or damage to property;
- If Tailor-Ed organizes the operation of the Services within a different framework, or through another legal structure or entity, or if Tailor-Ed and/or any of its business is acquired by, or merged into or with another entity, or if Tailor-Ed enters bankruptcy, provided, however, that those entities agree to be bound by the provisions of this policy, with respective changes taken into consideration;
- Tailor-Ed may also share personal information with companies or organizations connected, or affiliated with Tailor-Ed, such as subsidiaries, sister-companies and parent companies, and other partners, with the express provision that their use of such information must comply with this policy.

Links to Third-Party Sites

For your convenience and information, our Website may provide links to sites, apps and services of third parties, operated by companies not affiliated with us. Third-party sites have their own privacy notices or policies, which we strongly suggest you review. Third-party sites may carry advertisements or offer content, functionality, newsletters or applications developed and maintained by those third-party companies. We are not responsible for the privacy practices of any third parties' sites, apps or services.

Your rights and Data retention

You can request the deletion of the personal information Tailor-Ed has collected or withdraw your consent to the processing of such information, and disable its future collection by contacting us via "Contact Us" section on our Website. From that point, we shall not have the right to process your personal information, and you'll not be allowed to use our Services. Note, however, that you may withdraw consent at any time, without affecting the lawfulness of data processing we carried out based on your consent before such withdrawal.

As to students' personal information collected on our Services, please note that Tailor-Ed, as the 'Data Processor' (as defined under the GDPR, as defined below), is not allowed to assist students with exercising the above mentioned rights. In order to do so, please contact the relevant teacher/ tutor (the 'Data Controller', as defined under the GDPR, as defined below) who introduced you with our Services, and he will deliver us your request. Please contact Tailor-Ed in connection with every privacy concern at support@tailor-ed.com.

Tailor-Ed does not retain information longer than required to provide the website's features and for reasonable business needs, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. Because these needs can vary for different data types in the context of different products, actual retention periods can vary significantly. The criteria used to determine the retention periods include:

- How long is the personal information needed to provide the website's features and operate our business? This includes such things as maintaining and improving the performance of our website, keeping our systems secure, and maintaining appropriate business and financial records. This is the general rule that establishes the baseline for most data retention periods.
- Do customers provide, create, or maintain the data with the expectation we will retain it until they affirmatively remove it? In such cases, we maintain the data until you actively delete it.
- Is the personal information of a special category under the General Data Protection Regulation (EU) 2016/679 (the "GDPR")? If so, a shortened retention time would generally be appropriate.
- Has Tailor-Ed adopted and announced a specific retention period for a certain data type?

- Has the user provided consent for a longer retention period? If so, we will retain data in accordance with your consent.
- Is Tailor-Ed subject to a legal, contractual, or similar obligation to retain the data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation.

Tailor-Ed may at all times review, retain and disclose any other information as Tailor-Ed deems necessary to satisfy any applicable law, regulation, legal process or governmental request and Tailor-Ed's needs and necessities. By doing so Tailor-Ed does not either expressly or impliedly endorse, affirm or in any manner assume any responsibility for such communications.

The authority supervising our processing activity is the Israeli Privacy Protection Authority, and you have the right to file a complaint to it or any other relevant supervisory authority.

Cookies

A cookie is a small piece of information that is stored on a computer or device and may contain a device identifier for the purpose of recognizing your browser as you interact with websites. Device identifiers may be randomly generated or assembled from available system elements such as IP address, browser version, OS type and version, device type and settings, mobile device, wireless mobile subscriber ISDN numbers, public switched telephone network information, mobile network information or software data.

You can choose to change your browser settings to disable cookies if you do not want us to establish and maintain for you a unique user id. Be aware that cookies might be required to complete certain functions on our website.

Tailor-Ed may use cookies and similar technologies in combination with other information we maintain for a number of purposes, including to:

- Provide internal analytics and reporting to improve our Services;
- To increase our website's functionality and user-friendliness;
- Maintain information in both identifiable and de-identified forms;
- To support security measures;
- To assist in identifying possible fraudulent or abusive activities.

We may use “persistent cookies” to save your registration ID and login password for future logins to the website. We may use “session ID cookies” to enable certain features of the website, to better understand how you interact with the website and to monitor aggregate usage and web traffic routing on the website.

Some of the cookies may expire when the session ends and you exit your browser. Other cookies are saved on your browser’s memory.

Information Security

Tailor-Ed considers information security to be a top priority, and is committed to protecting the security of your personal information. Tailor-Ed implements systems, applications and procedures to secure personal information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing. When we transmit highly confidential data over the Internet, we protect it through the use of encryption. However, these measures are unable to provide absolute assurance.

Personal information collected by Tailor-Ed may be stored and processed in a various locations (also using cloud services), which are chosen in order to operate efficiently, to improve performance, and to create redundancies in order to protect the data in the event of an outage or other problem. We take steps to ensure that the data we collect under this Privacy Policy is processed according to the provisions of this Policy and the requirements of applicable law wherever the data is located.

Therefore, although Tailor-Ed takes great efforts to protect your personal information, Tailor-Ed cannot guarantee and you cannot reasonably expect that Tailor-Ed’s databases will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

Questions about the security of personal information can be directed to Maayan Yavne at maayan@tailor-ed.com.

Contact Tailor-Ed / Abuse reports

If you have a privacy concern, complaint, or a question or believe that your privacy has been compromised by any person, in the course of using the Services, or any other other requests, responses, questions and complaints, then please contact Tailor-Ed via "Contact Us" section on our Website.

Tailor-Ed Ltd., 142 Ehad Ha'Am Tel Aviv 6425319 +972542155500.

Changes to this Privacy Policy

We may change this Privacy Policy from time to time, when necessary to reflect customer feedback and changes in our Services. When we post changes to this policy, we will revise the "last modified" date at the top of the policy. If we make a change to this Privacy Policy that we believe materially reduces your rights, we will provide a notice prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. We may provide notice of changes in other circumstances as well. By continuing to use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy.