

Website Privacy Policy

Last modified: 04.01.2025

OUR PRIVACY POLICY

We value the trust that you have placed in Mosaic Learning, Inc. (“we”, “our”, or “us”) and protecting your personal information is our priority. This Privacy Policy (“**Policy**”) discloses the practices of Mosaic Learning, Inc. and its affiliates (collectively, the “**Company**”), regarding the collection, use, safeguard, disclosure, transfer, access, disposal and other processing (collectively, “**Processing**”) of personal information of individuals who engage with the Company for our support, services or otherwise, or visit our website(s) (“**Website**”) or contribute to the Company social media platforms. For the purposes of this Policy, personal information shall mean information that can identify an individual directly or indirectly through reasonably available information but does not include business contact information that is used solely for the purpose of communicating or facilitating communication with an individual in relation to their employment, business, or profession (“**Personal Information**”).

This Policy is the Company’s way of making sure you are fully informed and affirms our commitment to maintaining the accuracy, confidentiality, and security of Personal Information. The Company respects your privacy and is committed to protecting your Personal Information in line with all applicable laws and regulations governing the Processing of Personal Information.

ACCEPTANCE OF PRIVACY POLICY

By providing Personal Information to the Company and visiting the Website, engaging with our social media, Combobulate Platform, or otherwise, you are consenting to our Processing of your Personal Information in accordance with the terms of this Policy.

This Policy is effective as of the “Last Updated” in the header and will remain in effect except with respect to any of its provisions that are changed in the future. We reserve the right to change this Policy at any time. Changes, modifications, additions, or deletions will be effective immediately upon their posting to the Website or upon you being otherwise notified for all go-forward interactions. Your continued use of the Website or our other services after we post any such modifications will constitute your acknowledgement of the modified Policy and your agreement to abide and be bound by the modified Policy on a go-forward basis. We will also update the “Last Updated” date when we post substantive changes to the Policy.

RIGHT TO OPT OUT

Subject to certain legal and contractual limitations, you have the right to withdraw your consent from us Processing your Personal Information. This may limit our ability to provide you with our services, act on your behalf or engage with you as you would like. To withdraw your consent to certain Processing by the Company you may declare to the Privacy Officer (contact information provided below) in writing, at any time, of your desire to withdraw consent. The Company will inform you of the implications of such withdrawal within thirty (30) days of your written request.

Any withdrawal of consent will apply thereafter and not to information handling practices that have been previously undertaken based on prior consent.

MINORS

The Company will not knowingly obtain consent from those individuals who are minors, or those who are not otherwise able to legally consent to terms. If the Company has a concern about this, we shall seek consent from a person having legal authority in relation to or a power of attorney of such an individual.

COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION

Types of Personal Information Collected and Processed

The Personal Information which the Company may collect includes, but is not limited to:

1. Contact and identifying information including your name, mailing address, country of residence, email address, telephone number, gender and date of birth.
2. Transaction information including details of commercial or other transactions, such as the purchase of merchandise, goods or services, donations, sponsorship, and purchasing history and tendencies.
3. Payment information including your credit card details, bank account information, and payment or other information required when you make a purchase.
4. User information including messages and images uploaded/shared as part of a public forum, message boards and user chats.
5. Login information including username and password.
6. Marketing and communications information including your preferences in receiving marketing from us and third parties, and your communication preferences.
7. Computer information including device type, device identifiers, IP address, MAC address, location, browser type, operating system and platform, protocol, sequence information, cookies, beacons, pixel tags, browser language and type, and domain name system requests.
8. Internet or other electronic network activity including browsing, session, interaction, search history, duration of use, frequency of use, material and pages viewed, time and date of access, number of bytes transferred, number of clicks per visit and other user behaviour related to our website.
9. Other information which you voluntarily provide to us, our employees, or our contractors.

In addition, if you contact us, we may keep a record of your communication to help solve any issues you might be facing.

Purposes for Collection and Processing of Personal Information

Personal Information may be collected by the Company for purposes that include, but are not limited to:

1. Maintaining and improving our services and operations and otherwise running and managing our business in the ordinary course and keeping our records up to date.
2. Fulfilling our contractual and business obligations, including with suppliers and contractors, and accessing and using services and the Website.
3. Receiving communications from us and our Clients.
4. Assisting you when you contact us, including to direct your questions to appropriate individuals, investigate and address any of your concerns, and to improve and monitor our responses.
5. Administering and protecting our business and Website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data.
6. Administering surveys and other promotional materials to you based on your interests.
7. Using data for business development and market research to understand demographics, interests, usage patterns, data science, artificial intelligence, and other characteristics of individuals, and to track and analyze trends and patterns.
8. Complying generally with all laws and applicable statutory requirements.

Methods of Collection of Personal Information

a. General

Personal Information may be collected by the Company in a number of ways, including in person, our website, by email, from our applications or other software, and from third parties whom you have authorized to disclose Personal Information to us.

If you provide information about a third-party or authorize a third-party to do so, we will assume you have taken proper measures to obtain informed consent.

b. Phone Calls

For the purpose of maintaining quality, telephone calls to the Company lines may be recorded. If your call is subject to a quality assurance program, you will be advised prior to speaking to a representative.

c. Cookies and Web Beacons

The Company may collect Personal Information through cookies on our Website. Cookies are small text files inside your computer that contain a unique identifier, allowing us to recognize you when you visit our Website again. This helps us to understand your preferences based on previous or current Website activity, allowing us to provide you with improved services, tailor our content to meet your needs and for advertising purposes. We also use cookies and navigational data on your computer, mobile phone or other devices you use to access the services for us gather information regarding the date and time of your visit and the information for which you searched and viewed, or on which of the advertisements displayed on our Website you clicked.

The Website may use retargeting ads to advertise online. Retargeting uses cookies from third-party vendors like Google and DoubleClick to track visitors. This tracking enables the third-party vendors to display our ads to people on various sites across the internet based on their visits to our Website.

Notably, we use Google Analytics, which is a web analytics service offered by Google that tracks and reports website traffic. Google uses the collected data to track and monitor the use of our services. This data is shared with other Google services. The cookie will store your e-mail address, which is your unique identifier, so that, on return visits, the Website will be able to match you to your identity in the database. This is an opt-in feature that will only be made operational if you choose to do so. Web beacons (also called “clear GIFs” or “pixel tags”), which are small strings of code that are placed in a web page or in an e-mail message, may be used in conjunction with cookies to track activity on our Website. Since they are used in combination with cookies, if you disable cookies, the web beacons will only detect an anonymous visit.

We may also use web beacons (small pieces of data that are embedded in images on the pages of our Website) and auditing software to track page views and entry and exit points to and from our Website. We may use web beacons, cookies, customized links and/or similar technologies to determine whether electronic newsletters sent by us to those who have requested them from us have been opened and which links are clicked. Any data collected will only be used in an aggregate form and will not contain any Personal Information.

Some cookies are automatically deactivated upon your access and use of the Website. However, unless you activate cookies, you may be unable to fully utilize and access all areas and features of the Website. You may activate cookies by visiting our Website and clicking “Activate Cookies”. Some third-party service providers may also place their own cookies on your browser. Note that this Policy only covers the Company’s use of cookies and does not include use of cookies by such third parties.

d. Clickstream Data

When you visit the Website, we may also collect clickstream data (e.g. server address, domain name, device type, browsing software) which may be stored on the Website’s server. This information can be combined with information you have provided to us which will enable us to analyze and better customize your visits.

e. Mobile and Location Information

The Company's Website features may be accessible from web-enabled mobile devices. The intent is to provide screens that are optimized for the size of the screen and operating systems. On some devices, functionality may be limited. If you use mobile-enabled services provided by our Website, we may receive information about you from your mobile device. This may also include information about your precise location if you have enabled location-based services on your mobile device. Some devices may allow you to opt-out of this collection or access, and in those cases, you may be able to subsequently stop the collection or access. Please review your device settings for more information.

f. Social Media

If you post a review, make a comment, or otherwise submit Personal Information on a public forum such as social media accounts or public forums on our Website or other applications, your communications may be viewable by the public. When voluntarily disclosing Personal Information about yourself with other the Company users, we are unable to control what may be done with that content. You should take all necessary precautions to protect your private information by not posting or publishing any information that you do not want in the public domain. While we strive to provide the highest level of confidentiality, you should review your personal privacy settings to further restrict any or all parts of your profile or other certain content or information.

g. Other

The Company may collect Personal Information when you interact with our Website, including when you access the Website, communicate with the Company staff, purchase products or services, register or create or edit your account, sign up to receive newsletters and information, fill out online applications, surveys or forms, send or respond to our emails, or otherwise communicate with us.

Sharing of Personal Information with Third Parties

Although you are entering into an agreement to disclose your Personal Information to the Company pursuant to this Policy, we may delegate our authority for Processing of your Personal Information to third-party individuals and organizations who assist us with providing our services and administering our business, and for such other purposes as set forth below, including:

1. Contractors, including companies we use for storage, processing, and delivery of services.
2. Administrative and technical support, including cloud storage providers, IT support, data analytics providers, providers of auditing, research or reporting tools, and assistance with fraud prevention.
3. Public media and marketing, third-party web and mobile application services such as Google Analytics and companies we use for advertising, analyze usage information, marketing, public relations, and press releases.

4. Parties in connection with proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of our business or assets or to a person who is looking to acquire all or part of the shares in the Company.

We may also disclose Personal Information in situations where we are legally required or permitted to do so. These situations may include criminal investigations, government tax reporting requirements, court orders, or instances where we believe the rights and safety of others may be at risk.

If you believe that a third-party has inappropriately disclosed your Personal Information to us, please contact that third-party directly. If the third-party does not sufficiently respond to your inquiries, please let us know immediately.

MANAGING YOUR PERSONAL INFORMATION

Limiting the Collection and Processing of Personal Information

The Company takes care to ensure that Personal Information you provide to us is accessed internally only by individuals that require access to perform their tasks and duties, and externally only by service providers with a legitimate purpose for accessing it. We will not use or disclose any collected Personal Information outside of the purposes described in this Policy unless you have otherwise consented, or it is required or permitted by law.

We do not sell, trade, rent or otherwise share for marketing purposes the Personal Information that we collect with third parties, unless you consent or authorize us to do so. We limit the Personal Information provided to the aforementioned affiliate and third-party service providers to the extent necessary for them to provide the services. We do not allow these third-party service providers to use your Personal Information for their own purposes and only permit them to access and process your Personal Information for specified purposes and in accordance with our instructions. Such service providers are required by contract to safeguard any Personal Information disclosed or transferred by us.

Accuracy of Personal Information

The Company takes all reasonable steps to keep your Personal Information as accurate, complete and up to date as necessary to fulfill the purpose for which your Personal Information has been collected. If desired, you may verify the accuracy and completeness of your Personal Information in our records with our Privacy Officer.

Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date Personal Information in your file, we will remedy any such errors on a timely basis. You may request correction of the Personal Information we hold about you, though we may need to verify the accuracy of the new information you provide to us. If inaccurate Personal Information is mistakenly sent to a third-party, we will communicate relevant changes to the third-party where appropriate.

Retention of Personal Information

The Company will store your Personal Information only for as long as is reasonably necessary to fulfill the purpose for which the Personal Information was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements or obligations of the Company. Once your Personal Information is no longer needed, we will securely and effectively dispose of it.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your Personal Information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this anonymized information indefinitely without further notice to you.

Request for Access to Personal Information and Processing

You may request access to your Personal Information, which enables you to receive a copy of the Personal Information we have collected from you and information about how we are Processing it. We may need to request specific information from you to help us confirm your identity and right to access your Personal Information. This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. The Company may not always be able to comply with your request for access to Personal Information for specific reasons which you will be notified of, if applicable, at the time of your request.

Request for Deletion or Removal of Personal Information

In some circumstances you have the right to request that we delete or remove your Personal Information where there is no good reason for us to continue Processing it. You may also ask us to delete or remove your Personal Information where you have successfully exercised your right to object to Processing, where we may have processed your information unlawfully or where we are required by law to erase your Personal Information. We may not always be able to comply with your request for deletion of Personal Information for specific legal reasons which you will be notified of, in writing, within thirty (30) days of the time of your request.

Request for Transfer of Personal Information

You may request the transfer of your Personal Information to a third-party. The Company will provide your Personal Information to the third-party you have chosen in a structured, commonly used, machine-readable format. This request may only apply to automated information which you initially provided consent for us to use or where we used the Personal Information to perform a contract with you.

PROTECTING YOUR PERSONAL INFORMATION

Integrity and Security

The Company uses industry standard measures, including administrative, organizational, technical, and physical safeguards, to help protect Personal Information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. We implement measures and processes to help us to keep your Personal Information secure and to maintain its quality, such as keeping electronic files in a secured environment with restricted access and use. We regularly review our security and related policies to adapt the technology as new threats evolve and monitor our systems to help ensure the highest level of availability. If you have any questions about the security of our Website or your Personal Information, you can reach out to our Privacy Officer.

Access to private, sensitive and confidential information, including Personal Information, is restricted to authorized employees or contractors with legitimate business reasons. The Company employees and contractors understand the importance of keeping your Personal Information private. All employees and contractors are expected to maintain the confidentiality of Personal Information.

Confidentiality Incidents

Despite the foregoing security measures and significant steps the Company has taken to protect your Personal Information; no company can fully eliminate all security risks associated with the Processing of Personal Information. The level of risk corresponds with the nature of the information at issue and how it is used. With that in mind, we cannot guarantee the security of any Personal Information provided to or received by us. We encourage you to provide only the Personal Information you are comfortable with providing to a third-party, keep watch for communications that are suspicious, and report any suspicious activity to us as soon as possible.

In the event there has been a breach of our security safeguards which involve your Personal Information, including the unauthorized access, use or disclosure of your Personal Information, loss of your Personal Information, or other breach, and where there is a risk that significant harm will come to you as a result of that breach, the Company will notify you within thirty (30) days of the breach and report the breach to the Privacy Commissioner.

WEBSITE AND APPLICATIONS GOVERNED BY THIS POLICY

Our Website and our applications available from our Website or third-party platforms (including Google Play), if any, are governed by the provisions and practices stated in this Policy. Our Website and such applications may contain links to third-party sites or applications that are not governed by this Policy. Although we endeavour to only link to sites or applications that share our commitment to your privacy, please be aware that this Policy will no longer apply once you leave our Website or such applications, and that we are not responsible for the privacy practices of third-party sites or applications. We therefore suggest that you closely examine the respective privacy policies of third-party sites and applications to learn how they collect, use and disclose your Personal Information.

GOVERNING LAW

This Policy and all related matters shall be interpreted and construed in accordance with the laws of the State of Maryland and the applicable federal laws of the United States.

YOUR STATE PRIVACY RIGHTS

California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding Iowa and Utah).
- Data portability.
- Opt-out of personal data processing for:
 - targeted advertising (excluding Iowa).
 - sales; or
 - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal data.

The specific rights available to you may vary depending on your state of residence.

To exercise any of these rights, you may submit a request to us by emailing privacy@combobulate.com, calling us at 301.441.4700, or visiting <https://www.combobulate.com>.

If we deny your request, you may appeal our decision by emailing privacy@combobulate.com with the subject line "Privacy Rights Request Appeal." We will respond in accordance with applicable laws.

DATA SECURITY

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of personal information is at

your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to this Policy on this page. If we make material changes to how we treat our users' Personal Information, we will notify you through a notice on the Website home page. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Policy to check for any changes.

ADDRESSING YOUR INQUIRIES AND CONCERNS

Your privacy is very important to us. We are happy to provide you with a copy of this Policy and to discuss any of its contents with you.

The Company's Privacy Officer is responsible for the implementation of this Policy and monitoring our adherence to its terms and all applicable laws. The Privacy Officer also handles questions and concerns about our Policy, as well as Personal Information access requests and complaints. The Privacy Officer may be contacted at:

Privacy Officer, Mosaic Learning, Inc.

7055 Samuel Morse Drive

Suite 210

Columbia, MD 21046

privacy@mosaiclearning.com

61254279.1