Privacy Policy

Effective day 2 February 2020

If you are a visitor to a Tutorbook Website, a recipient of Tutorbook communications, a customer of a Tutorbook Service or a teammate of a customer's Tutorbook Service then except as expressly set forth below, this Privacy Policy applies to your use of such Website or Service. This Privacy Policy also applies to information we collect in certain offline settings where this Privacy Policy is posted.

At Tutorbook, we respect the privacy rights and data protection rights of our users and recognize the importance of protecting the personal information we collect about you. Our Privacy Policy is designed to help you understand what information we collect and how we use and share that information.

As used in this Privacy Policy, "Tutorbook," "us" and "we" refers to Tutorbook, LLC. The "Websites" means Tutorbook's websites (including without limitation tutorbook.app, tutorbook.me, and any successor URLS, mobile or localized versions and related domains and subdomains), and the "Services" means Tutorbook's communications and tutoring platforms, applications and services, in each case in whatever format they may be offered now or in the future. The Websites and Services are collectively referred to herein as the "Offerings."

Information We Collect

Profile Information

We collect the following profile information from our users:

- name (first and last; typically sourced from Google)
- email (to sign-in and for email notifications)
- bio (user-populated "about me" description)
- subjects (they can tutor or mentor or need help with)
- availability (for tutoring and mentoring lessons)
- language fluency (to only match users who speak the same language)
- parents (optional; to send parental notifications)
- phone (optional; for SMS notifications)
- profile image (optional; typically sourced from Google)
- social media accounts (optional; used during matching to learn about a tutor or mentor)

Applicable student profile information is deleted—at the latest—45 days following their high school graduation.

Content Created on Our Platform

The following information is created and stored on our platform:

- mentoring and tutoring matches (i.e. recurring meetings)
- mentoring and tutoring requests (i.e. job posts)

Applicable pupil generated content is deleted—at the latest—45 days following their high school graduation. Some pupil generated content can be exported (to an external account) prior to deletion.

Technical Usage and Location Information

We automatically collect interaction statistics such as:

- the IP address from which you access our site
- date and time
- information about your browser, operating system, and computer or device
- pages viewed
- items clicked
- location information

We use cookies and similar technologies to collect some of this information.

Third Party Information

We use third party services that may collect additional information:

- Intercom, Inc. (Messenger, Product Tours, Educate) for customer support
- Medium, Inc. for our blog
- Alphabet, Inc. (Firebase, Google Analytics, Google Maps API, YouTube) for everything else

See https://firebase.google.com/support/privacy/ for additional details on how Alphabet, Inc. collects and uses your data.

Sources of Information We Collect

- Students (who populate their own pupil or tutor profiles)
- Supervisors (who create pupil and tutor accounts)
- Third party data providers (e.g. Intercom, Alphabet)
- Automatic collection (e.g. cookies)

Other Disclosure of Your Information

The Offerings may also contain links to third party websites. This Privacy Policy applies solely to information collected by us. Even if the third party is affiliated with us through a business partnership or otherwise, we are not responsible for the privacy practices of such third party. We encourage you to familiarize yourself with the privacy policies of such third parties to determine how they handle any information they separately collect from you. Please be aware that we do not warn you when you choose to click through to another website when using the Offerings.

The Websites contain features that enable you to post reviews, comments or other content that is publicly viewable. You should be aware that any personal information you submit as part of those posts can be read, collected, or used by other visitors to the Websites, and could be used to send you unsolicited messages. We are not responsible for the personal information you choose to publicly post on the Websites.

How We Use the Information We Collect

We collect information to:

- connect pupils with tutors
- track tutor service hours

Where We Store the Information We Collect

All of our datastores are spread across 3 regional Google Cloud Platform ("GCP") resource locations (one multi-region location). Data is stored across GCP's nam5 <u>multi-region location</u> that consists of the us-central1 and us-central2 regional resource locations with additional metadata stored in the Oklahoma private region. See https://cloud.google.com/security/ for details on GCP security infrastructure.

For additional details on our data storage infrastructure, see our **Security Policy**.

Information We Share

We share the following profile information with other users at your school:

- name (first and last, sourced from Google)
- profile image (sourced from Google and configurable)
- grade level (to better match students)
- gender (to better match students)
- type (tutor, pupil, parent, or supervisor)

- subjects (they can tutor or need help in)
- availability (for tutoring lessons)

We do not share or transfer information to third parties except:

- to maintain and improve our platform (e.g. we share profile information with Intercom to better communicate with customers)
- to detect, prevent, or otherwise address fraud or security or technical issues
- to satisfy applicable law, regulation, legal process, or enforceable governmental request
- if we become involved in a merger, acquisition, bankruptcy, or any form of sale of some or all of our assets
- when given consent to do so

We may also share de-identified/anonymized information for development and other purposes.

Your Rights and Choices

You are able to edit and delete all profile information and any applicable content created on our platform. We do not save deleted data except:

- to prevent misuse of our platform (e.g. cyber-bullying via in-app messaging)
- in data backups (that are refreshed weekly; after a week, deleted data disappears forever)
- in de-identified/anonymized form for development or other purposes

Blocking Cookies

You can remove or block certain cookies using the settings in your browser but some facets of our platform may cease to function properly if you do so (e.g. Intercom Messenger, Google Firebase Authentication, Google Analytics).

How We Respond to Do Not Track Signals

Your web browser may have a "do not track" setting which, when enabled, causes your browser to send a do not track HTTP header file or "signal" to each site you visit. At present, we do not respond to this type of signal.

Data Subject Rights

You can access, rectify, erase, restrict or export your personal information at any time by emailing us at team@tutorbook.app. You can object to our processing of your personal

information at any time. If you are unsatisfied with the response you have the right to lodge a complaint with your supervisory authority.

Access to Your Information

When you use the Offerings, we make good faith efforts to provide you with access to your personal information upon your request and either provide you the means to correct this information if it is inaccurate or to delete such information at your request if it is not otherwise required to be retained by law or for legitimate business purposes. You may access, review, correct, update, change or delete your information at any time. To do so, please contact us at team@tutorbook.app with your name and the information requested to be accessed, corrected or removed, or if you are using the Service, sign in to your account, go to your profile, and make the desired changes. We may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort (for instance, requests concerning information residing on backup tapes), jeopardize the privacy of others, would be extremely impractical, or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

Please note that if you cease using the Service or we terminate your access to the Service in accordance with your Customer Agreement, you may no longer have the ability to access or update your information.

We may retain your information as necessary to support the Offerings, comply with our legal obligations or resolve disputes. Note that content you post may remain on the Offerings even if you cease using the Offerings or we terminate your access to the Offerings.

Security

The security of your personal information is important to us. We maintain a variety of appropriate technical and organizational safeguards to protect your personal information. We limit access to personal information about you to employees who we believe reasonably need to come into contact with that information to provide products or services to you or in order to do their jobs. Further, we have implemented reasonable physical, electronic, and procedural safeguards designed to protect personal information about you. When you enter sensitive information (such as your password), we encrypt that information in transit using industry-standard Transport Layer Security (TLS) encryption technology. No method of transmission over the Internet, method of electronic storage or other security methods are one hundred percent secure. Therefore, while we strive to use reasonable efforts to protect your personal information, we cannot guarantee its absolute security.

For more information, see our Security Policy.

Changes to the Privacy Policy

We reserve the right to change our Privacy Policy at any time. If we make changes, we will post them and will indicate on this page the policy's new effective date. If we make material changes to this policy, we will notify you by email or through notice on the Offerings.

Contact Us

If you have questions or need to contact us about this Privacy Policy, please email us at team@tutorbook.app.