PRIVACY POLICY – JAGCOMTECH LLC

Last Updated: 1 Oct 2024

This Privacy Policy ("Policy") for **JAGCOMTECH LLC** ("we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

- Download and use our mobile application ("PodiumAI" "the App"), or any other application of ours that links to this Policy; or

- Engage with us in other related ways.

Reading this Policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at jagcomtech@gmail.com.

SUMMARY OF KEY POINTS

This summary provides key points from our Policy, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

a. What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.

b. Do we process any sensitive personal information? We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.

c. Do we receive any information from third parties? We do not receive any information from third parties.

d. How do we process your information? We process your information to provide, improve, and administer the App, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

e. How do we keep your information safe? We employ Firebase Firestore for our database needs, utilizing its advanced security features to safeguard your personal information. Firestore is built on Google's secure infrastructure, providing robust data encryption at rest and in transit, ensuring that your data is protected against unauthorized access. Additionally, Firestore implements fine-grained access controls that allow us to precisely manage who can view or modify data. Regular security audits and compliance with industry standards such as ISO/IEC 27001 further enhance our data protection measures. While no system can guarantee absolute security, these rigorous protocols significantly mitigate risks, providing a trusted environment for your information.

f. What are your rights? You have the right to request a copy of the personal information PodiumAI holds about you at any time. This helps you understand the nature of the information we collect and how we use it. You can request the deletion of your data (generated notes, summaries, quizzes, etc.) when it is no longer necessary for the purposes for which it was collected, or when withdrawing your consent on which the processing is based. To exercise any of these rights, please contact us at jagcomtech@gmail.com. We will provide a response to your request within 30 days of receiving it. Please note that some requests may require you to provide additional information to verify your identity.

g. How do you exercise your rights? The easiest way to exercise your rights is by contacting us through email. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the privacy policy in full.

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1. **WHAT INFORMATION DO WE COLLECT?**

    a. Information you disclose to us: We collect personal information that you voluntarily provide to us when you register on the App or otherwise express an interest in obtaining information about us or our services. The personal information that we collect depends on the context of your interactions with us and the App, the choices you make, and the features you use. The personal information we collect may include the following your full name, date of birth, and email addresses. This processing will be carried out in accordance with applicable privacy laws and regulations to ensure the confidentiality and security of your personal data. We are committed to maintaining the privacy and protection of your information, and any processing will be conducted in compliance with our Privacy Policy and relevant legal requirements.

    b. Sensitive Information. When necessary, with your consent or as otherwise permitted by applicable law, we may collect certain student data from you (described below).

        a. In addition to the personal information mentioned earlier, we collect specific student data to enhance the educational experience provided through our App. This includes academic performance data such as quiz scores, and lecture transcript data. This data helps us provide educators with insights to improve their instructional methods.

    c. Application Data. If you use the App, we also may collect the following information if you choose to provide us with access or permission:

        • Push Notifications. By default, PodiumAI does not send push notifications unless you explicitly opt-in during the app setup or through your account settings. If you choose to enable push notifications, you can receive alerts regarding your account and specific features of the App. Should you decide at any time that you no longer wish to receive these notifications, you can easily opt-out by adjusting the settings on your device.

        • Microphone and Speech-to-Text Access. If you are a teacher/educator who is using this application, you will need to perform speech-to-text in real-time so the application will ask you access to this. The lecture transcriptions (string) are stored in our database and can be used to generate real-time study guides, quizzes, and flashcards which can be distributed to students.

            o Language Support: Our speech-to-text supports numerous languages, including Arabic, Cantonese, Chinese (Mainland, Hong Kong, Taiwan), English (across multiple regions), French, German, Hindi, Italian, Japanese, Korean, Portuguese, Russian, Spanish, and more, catering to the needs of a diverse school.

    This information is needed to maintain the security and operation of the App, for troubleshooting, and for our internal analytics and reporting purposes. All personal information that you provide to us must be true, complete, and accurate, and you must

notify us of any changes to such personal information. You should contact us through email (jagcomtech@gmail.com) if you want to inform us of any changes.

d. Information automatically collected: We automatically collect certain information when you visit, use, or navigate the App. This information does not reveal your specific identity (like your name or contact information). This information is needed to maintain the security and operation of the App, and for our internal analytics and reporting purposes. The information we collect includes:

- Log and Usage Data. Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use the App which we record in log files. Settings and information about your activity in the App (such as the date/time stamps associated with your usage, pages, and files viewed, searches, and other actions you take such as which features you use), device event information. Nothing user specific will be collected without explicit permission.

2. HOW DO WE PROCESS YOUR INFORMATION?

We process your personal information for a variety of reasons, depending on how you interact with the App, including:

a. To facilitate account creation and authentication and otherwise manage user accounts. We process your information so you can create and log in to your account, as well as keep your account in working order.

b. To deliver and facilitate the delivery of services to the user. We process your information to provide you with the requested services.

c. To respond to user inquiries/offer support to users. We process your information to respond to your inquiries and solve any potential issues you might have in connection with the App.

d. To send administrative information to you. We process your information to send you details about the App and our related products and services, changes to our terms and policies, and other similar information.

e. To request feedback. We process your information when necessary to request feedback and to contact you about your use of the App.

f. To protect our Services. We process your information as part of our efforts to keep the App safe and secure, including fraud monitoring and prevention.

g. To comply with our legal obligations. We process your information to comply with our legal obligations, respond to legal requests, and exercise, establish, or defend our legal rights.

h. To save or protect an individual's vital interest. We process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

We send the student's scores on the various AI-generated classroom materials to teachers. When students interact with quizzes, flashcards, and other resources that are automatically generated from the lecture transcript, our system tracks which questions each student answers correctly or incorrectly. This raw performance data is then compiled into individual-level reports for each student, showing teachers which specific questions or topics a student might be struggling with.

For example, if a student consistently misses questions about photosynthesis in a biology quiz, the teacher will see this in the report. The teacher can then use their professional judgment and teaching expertise to interpret this data. They might decide that the student needs additional support with this topic, or they might look for patterns across the class to see if many students are having the same difficulty.

Our role is to provide teachers with objective, question-by-question performance data for each student, giving educators a clearer picture of individual learning progress. However, we do not interpret this data or make diagnostic claims about learning patterns or educational needs. The identification of learning patterns, the tailoring of educational content, and decisions about personalized teaching strategies are entirely in the hands of the skilled educators who use our app. They have the professional training and contextual understanding required to transform this raw data into meaningful educational insights.

In addition to the foregoing, we use and process your information to comply with our legal obligations, respond to lawful requests or court orders, and enforce our terms and conditions. This includes protecting our rights, safety, and property, as well as the rights, safety, and property of our users or any other third parties. We may aggregate and anonymize your information to create statistical or aggregated data that does not personally identify you.

This aggregated and anonymized data may be used for specific, legitimate purposes, such as:

• Analyzing app usage patterns to improve user experience

• Identifying common learning challenges to enhance our quiz generation

• Conducting educational research to refine our AI algorithms

• Sharing usage statistics (without any personal data) with school districts to demonstrate the app's effectiveness

We do not share personal or identifiable information with third parties. Any sharing of aggregated, anonymized data is strictly for educational and app improvement purposes. We will not share data for marketing, advertising, or any commercial purposes outside of our direct educational services.

3. **LEGAL BASES FOR PROCESSING YOUR INFORMATION**

The processing of sensitive student data is based on consent obtained explicitly from users or their guardians where applicable. We ensure that this data is used strictly for educational purposes as outlined in our services, helping to enhance user learning outcomes and educational experiences. This consent can be withdrawn at any time, providing users with control over their personal information.

In compliance with key federal and state laws, including the California Consumer Privacy Act (CCPA) and the Family Educational Rights and Privacy Act (FERPA) at the federal level, PodiumAI outlines the legal bases for processing your information. Our data processing protocols align with these laws by ensuring strict adherence to privacy rights and data protection mandates. We conduct regular audits and engage with legal experts to continuously assess and adapt our practices to meet these legal standards.The App adheres to stringent privacy standards, ensuring that the collection and processing of user information are conducted within the framework of applicable data protection laws.

a. CCPA Compliance: Under the CCPA, the processing of personal information is based on several legal grounds, including:

- Consent: Where applicable, PodiumAI seeks explicit consent from users for the collection and processing of their personal information. Users have the right to withdraw their consent at any time.

- Contractual Necessity: Processing occurs to fulfill contractual obligations with users. For example, processing personal information is necessary to provide the requested services within the App.

- Legitimate Interests: Some processing activities are based on PodiumAI's legitimate interests, such as enhancing the functionality of the App, improving user experience, and ensuring the security of user data.

- Legal Obligations: Information will be processed to comply with legal obligations imposed on PodiumAI.

c. We will process your information (lecture transcriptions, generated notes, and quizzes) where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

d. We also process your information where we believe it is necessary to protect your vital interests such as situations involving potential threats to the safety of any person.

e. Family Educational Rights and Privacy Act (FERPA)

a. PodiumAI implements strict access controls ensuring that only authorized users, such as educators and students themselves, can access personal education records. Access is based on roles defined within the app, and all access is logged and auditable. PodiumAI ensures that any data used for analysis or improvement of educational tools is anonymized, meaning that personally

identifiable information is removed. This prevents any risk of disclosure as data cannot be traced back to individual students.

PodiumAI is committed to upholding the rights and protections afforded by the CCPA. Users are encouraged to review the app's Privacy Policy for comprehensive details on the legal bases for processing personal information, including their rights and options in managing their data within the App.

4. **HOW DATA WILL BE COLLECTED**

    a. We collect personal data authenticated through Google, to strategically fulfill key roles within the App's ecosystem. The primary purpose of gathering this information is to facilitate a robust and reliable service, enhancing the overall user experience for students. The collected data is used to ensure a seamless and personalized interaction within the App. Specifically, the personal data authenticated through Google plays a crucial role in enabling students to identify and join classes created by teachers, and for teachers to know who specifically joined their classes.

    b. One key feature contributing to this personalized experience is the option for students to set their counselor in the App's settings. This customization further tailors interactions, providing students with more targeted and relevant engagements. By incorporating this user-specific information, PodiumAI aims to enhance the functionality of the App, acknowledging the diverse needs and preferences of its users.

    c. We collect student data through direct inputs when they interact with quizzes, tests, and other learning tools within the App. This data is crucial for providing teachers with the information they need to help their students by identifying their weak points. Students are aware that their performance on the generated quizzes and metrics is being shared with the teachers because they will be interacting with automatically generated materials within a class in the application.

5. **AI TECHNOLOGIES AND DATA HANDLING**

Google Gemini AI

Purpose: We use Google Gemini to automatically generate educational resources from lecture transcripts. These include titles, summaries, flashcards, notes, and quizzes.

Data Provided: The lecture transcripts (text only) are sent to Google Gemini. No personal information (names, emails, etc.) or other student data is ever shared with this AI tool.

Data Handling: Google Gemini processes the text to understand the content and generate relevant educational materials. This processing happens in real-time, and Google does not store or use your lecture content for any other purposes.

Responsibility: Google is responsible for the operation and output of their Gemini AI. They commit to ethical AI practices, continually monitor for biases or inaccuracies, and provide updates to improve performance. However, PodiumAI takes full responsibility for our decision to use this tool. We carefully review all AI-generated content before it's presented to you, ensuring it meets our educational standards. If you notice any issues with the content, please report it to us immediately at jagcomtech@gmail.com.

On-Device Speech-to-text

Purpose: To convert spoken lectures into text in real-time, enabling the creation of instant study guides, quizzes, and flashcards.

Technology: We use on-device speech-to-text technology. This means the conversion from speech to text happens directly on your device, not on our servers or through a third-party service.

Data Handling: Your spoken words are processed locally on your device. The resulting text is then sent to our secure database. No audio data ever leaves your device or is stored anywhere else.

Languages: Our speech-to-text supports numerous languages, including Arabic, Cantonese, Chinese (Mainland, Hong Kong, Taiwan), English (across multiple regions), French, German, Hindi, Italian, Japanese, Korean, Portuguese, Russian, Spanish, and more.

Responsibility: The accuracy of the speech-to-text conversion is the responsibility of your device's operating system (iOS or Android). However, we've chosen this technology specifically for its high accuracy rates across many languages. If you notice any transcription errors, you can manually edit the text within the app.

We're committed to using AI ethically and transparently. These tools are here to enhance, not replace, the vital role of educators. They generate resources that teachers can review, adapt, and use as they see fit, always applying their professional judgment. Your privacy and the quality of your education are our top priorities.

AI Data Privacy and Security

Data Minimization: We only provide AI tools with the minimum data required for their function. Personal details are never shared.

No Data Storage: Neither Google Gemini nor the speech-to-text tool stores your data. They process it in real-time and then discard it.

Secure Transmission: Any data sent to Google Gemini is encrypted in transit, ensuring its confidentiality.

Quality Control: While we trust Google's AI, we don't rely on it blindly. Our team reviews AI-generated content through daily checks in our database to maintain educational quality.

6. ANALYTICS TOOLS FOR OPERATIONAL PURPOSES

PodiumAI may employ analytics tools for operational purposes. These tools serve essential functions, including monitoring app performance, analyzing user interactions, and improving overall functionality. The use of analytics tools, specifically for app store analytics, allows PodiumAI to gather valuable insights into how users interact with the application. This information is instrumental in identifying areas for improvement, enhancing features, and addressing potential issues to provide a more seamless and efficient experience. It's important to note that while analytics tools are utilized, the data collected is aggregated and anonymized to ensure the privacy of individual users. These tools focus on broad trends and patterns rather than personal identifiers.

7. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may need to share your personal information in the following situations:

a. Business Transfers. We may share or transfer your information in connection with or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

b. Educational Purposes: We may share anonymized, aggregated data with educational institutions (such as Northshore School District) to advance the field of personalized learning. This data never includes personal identifiers and is used solely to improve educational technologies.

c. Legal Compliance: We may share information if required by law, such as in response to a valid court order or subpoena. If legally required to share information: a. We'll notify NSD's privacy officer within 24 hours of receiving the request. b. We redact all non-required data (e.g., names in a transcript query). c. We provide a "Minimum Data Report" showing exactly what was shared. d. Unless legally gagged, we notify affected users within 24 hours. e. We file motions to quash overly broad requests.

d. We commit to never sharing personal data for purposes such as targeted advertising, political campaigns, or any activities not directly related to improving our educational services or complying with legal obligations. If you have questions about our data-sharing practices, please contact us at jagcomtech@gmail.com.

8. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this Policy unless a longer retention period is required or permitted by law. Specifically: a. Account Data: Retained until 12 months after account closure. b. Student Performance Data: Kept for the academic year, then anonymized (user can have it deleted by emailing us, or delete it manually within the app). c. Teacher-Generated Content: Stored for 24 months from last use. d. System Logs: 90 days for security audits. e. Backups: 30-day rolling backups, then

overwritten. We use Google Vault for e-discovery, allowing NSD to audit our retention practices.

No purpose in this Policy will require us to keep your personal information for longer than twelve (12) months past the termination of the user's account. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

9. HOW DO WE KEEP YOUR INFORMATION SAFE?

We employ industry-leading security measures to protect your data: a. Data Encryption: AES-256 for data at rest, SSL/TLS for data in transit. b. Access Control: Role-Based Access Control (RBAC) with multi-factor authentication. c. Network Security: AI-driven intrusion detection, real-time threat monitoring. d. Regular Audits: Monthly penetration tests by our technology team, annual SOC 2 Type II audits. To uphold the safety and privacy of student data within PodiumAI, we implement robust security measures, particularly in the storage and management of data through Firebase. Firebase, a platform developed by Google, is renowned for its strong security features.

The following highlights key aspects of how PodiumAI utilizes Firebase to ensure the security of student data:

a. Data Encryption: All data, encompassing emails, names, generated resources (including quizzes, notes, lecture transcripts, etc.), and other student information, undergoes encryption both in transit and at rest. This means that the data is shielded from unauthorized access during transmission to and from Firebase, as well as while stored in Firebase databases.

b. Authentication: Firebase Authentication provides a secure and user-friendly login method for PodiumAI users. Supporting various authentication methods, including email and password, and seamlessly integrating with Google sign-in, it guarantees that only authorized users can access the app securely.

c. Regular Updates and Maintenance: PodiumAI benefits from the platform's routine security updates, protecting against emerging vulnerabilities and threats. This proactive approach ensures ongoing defense against evolving security challenges.

d. Access Controls and Permissions: Firebase allows for the meticulous configuration of access controls, ensuring that only authorized personnel can access sensitive student data. This feature is pivotal in preventing unauthorized access or potential data breaches.

e. Community and Support: As a Google product, Firebase boasts a sizable community and extensive support resources. This ensures swift resolution of any security concerns that may arise, contributing to the overall reliability of PodiumAI security infrastructure.

Additionally, here are specific details regarding encryption methods and secure storage practices, as well as the preventive measures taken against unauthorized access or data breaches:

a. For data at rest, PodiumAI employs Firebase's built-in encryption, automatically encrypting all stored data, including emails, names, and generated resources. This proactive measure safeguards against unauthorized access and potential breaches.

b. PodiumAI implements several measures to prevent unauthorized access and data breaches, with a primary emphasis on integration with Firebase and Google Sign-in for secure authentication. Google Sign-in, utilizing industry-standard protocols and techniques, ensures the protection of user credentials. Furthermore, Firebase, as the backend, employs SSL (Secure Sockets Layer) encryption for all data in transit, establishing a secure channel between the user's device and the Firebase servers. This setup effectively guards against common cyber threats such as man-in-the-middle attacks.

At PodiumAI, safeguarding your data, especially sensitive student information, is our highest priority. We employ Firebase Firestore for our database needs, utilizing its advanced security features to safeguard your personal information. Firestore is built on Google's secure infrastructure, providing robust data encryption at rest and in transit, ensuring that your data is protected against unauthorized access.

Specific Security Measures

Data Encryption: All data in Firebase is encrypted using AES-256, the same level of encryption used by banks and military organizations. This applies to data at rest (stored in our database) and in transit (moving between your device and our servers).

Access Controls: Firebase implements role-based access control (RBAC) that allows us to precisely manage who can view or modify data. Only authorized PodiumAI staff have access, and this access is tiered based on need.

Network Security: Firebase uses secure TLS connections, protecting data as it travels over networks. This prevents eavesdropping, tampering, and message forgery.

Regular Audits: We conduct quarterly security audits with third-party experts to identify and patch any vulnerabilities. Google also performs continuous security testing on Firebase.

Compliance: Firebase is compliant with GDPR, CCPA, and FERPA, ensuring we meet the highest data protection standards, including those specific to student data.

Data Isolation: Each school's data is logically separated in our database, preventing data leaks between institutions.

Physical Security: Google's data centers, where Firebase data is stored, have 24/7 physical security, biometric access controls, and are some of the most secure facilities in the world.

Incident Response: We have a 24-hour incident response team. In the unlikely event of a breach, we will notify NSD within 2 hours and provide full transparency.

No Data Sales: We will never sell, rent, or trade your data. It's used solely for the educational purposes you've consented to.

Staff Training: All PodiumAI staff undergo annual security training, focusing on protecting sensitive student data.

Secure Development: We use industry-standard secure coding practices and conduct code reviews to prevent vulnerabilities.

Real-World Track Record

- Google's infrastructure, which powers Firebase, successfully defends against millions of attacks daily.

- Over 200,000 developers trust Firebase with sensitive data.

We believe in transparency. If you have security questions, please contact us at jagcomtech@gmail.com. We're committed to setting the gold standard for data protection in educational technology.

It's essential to note that while lecture transcripts and notes are securely stored, they remain accessible to designated school administrators. This access is granted to authorized personnel to support the effective administration and oversight of communication within the App. School admins may need to review generated resources for purposes such as ensuring compliance with school policies, addressing concerns, or providing assistance to users. The security and confidentiality of your information are of utmost importance to us. PodiumAI employs robust security measures, including data encryption and access controls, to safeguard the integrity and privacy of the lecture data stored in our database. These measures are designed to prevent unauthorized access and protect the sensitive nature of communication within the educational community.

10. WHAT ARE YOUR PRIVACY RIGHTS?

   a. You may review, change, or terminate your account at any time.

   - Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us via: jagcomtech@gmail.com.

- However, please note that this will not affect the lawfulness of the processing before its withdrawal nor when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

b. Account Information:

- If you would at any time like to review or change the information in your account or terminate your account, you may: (i) log in to your account settings and update your user account; or (ii) contact us using the contact information provided.

- Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms, and/or comply with applicable legal requirements.

- If you have questions or comments about your privacy rights, you may email us at jagcomtech@gmail.com.

c. You have the right to request information about the personal data PodiumAI holds about you. This includes details about the categories of data collected, and the purposes of processing.

d. You can request the correction of inaccurate or incomplete personal data held by PodiumAI. Ensuring the accuracy of your information is vital for a seamless user experience.

e. You have the right to request the deletion of your personal data under certain circumstances. PodiumAI will comply with such requests, subject to legal obligations and legitimate business interests.

f. You may request restrictions on the processing of your personal data under specific conditions. This means that while your data is still maintained, its processing is limited until the matter is resolved.

g. You have the right to object to certain types of processing activities, such as direct marketing. PodiumAI will respect your choice unless there are compelling legitimate grounds for continuing the processing.

h. Upon request, you can receive a copy of your personal data in a structured, commonly used, and machine-readable format. This right applies to personal data provided by you and processed based on consent or for the performance of a contract.

i. For users covered by the CCPA, you have the right to opt out of the sale of your personal information. PodiumAI does not sell personal information, but if this changes, you will be given the option to opt out.

11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in ima revised version of this privacy notice.

12. CALIFORNIA RESIDENTS - CCPA PRIVACY NOTICE

This section applies only to California residents. Under the California Consumer Privacy Act (CCPA), you have the rights listed below.

The California Code of Regulations defines a "resident" as:

- every individual who is in the State of California for other than a temporary or transitory purpose and

- every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

Your rights with respect to your personal data

a. Right to request deletion of the data - Request to delete: You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

b. Right to be informed - Request to know: Depending on the circumstances, you have a right to know:

  - whether we collect and use your personal information;

  - the categories of personal information that we collect;

  - the purposes for which the collected personal information is used;

  - the categories of personal information that we sold, shared, or disclosed for a business purpose;

- the business or commercial purpose for collecting, selling, or sharing personal information; and

- the specific pieces of personal information we collected about you.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

c. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights: We will not discriminate against you if you exercise your privacy rights.

d. Right to Limit Use and Disclosure of Sensitive Personal Information: If we collect any sensitive data from you, you have the right to direct that we limit the use of your sensitive personal information to that use which is necessary to provide our Services. We will not process your sensitive personal information for any other purpose unless you provide consent for the use or disclosure of sensitive personal information for additional purposes.

To exercise your right to limit the use and disclosure of personal information, please email jagcomtech@gmail.com.

13. USER-GENERATED CONTENT:

The only content in the application is that is user generated are classes created by teachers which they can upload their lecture transcription (text) to. After that, students will have access to this information.

14. CHANGES TO OWNERSHIP OR CONTROL:

In the event of a change in ownership or control of our Company, such as through a merger or acquisition, your personal information may be transferred to the new owners. We will notify you of any such change and provide choices regarding your personal information.

If our company undergoes a merger, acquisition, or sale:

- Agreement Transfer: Yes, all terms we've agreed to with Northshore School District will transfer fully to the new owner.

- Notification: We'll notify you via email and certified mail at least 60 days before any ownership change, detailing the new owner and their privacy commitments.

- Data Control: You have the right to terminate our relationship before the transfer, with no penalty. If you choose this:

    - a) We'll provide a full data export within 7 days.

- b) We'll purge all NSD data within 14 days.

- c) Both CTOs will provide signed deletion confirmations.

15. DO WE MAKE UPDATES TO THIS POLICY?

From time to time, we will update this Policy indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. Prior to material changes to the privacy policy, we will send the Northshore School District (NSD) an email notification to ensure we are compliant with their requirements. Once they approve, we may notify you either by prominently posting a notice of such changes and by directly sending you a notification within the application.

16. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact us by email at jagcomtech@gmail.com, or contact us by post at:

JAGCOMTECH LLC
3806 196TH PL SE BOTHELL WA
United States