

PRIVACY POLICY - JAGCOMTECH LLC

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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 have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.
- f. What are your rights? The privacy laws in the United States guarantee you certain rights regarding your personal information.

- g. How do you exercise your rights? The easiest way to exercise your rights is by submitting a data subject access request, or by contacting us. 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 names, 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.
- 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. We may request to send you push notifications regarding your account or certain features of the App. If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.
 - 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 lectures 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.

This information is primarily 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.

- 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) but may include device information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use the App, and other technical information. This information is primarily needed to maintain the security and operation 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 and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and 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 (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
 - Device Data. We collect device data such as information about your mobile phone, tablet, or other device you use to access the App. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

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 may 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 delivery of services to the user. We may process your information to provide you with the requested services.
- c. To respond to user inquiries/offer support to users. We may 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 may 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 may process your information when necessary to request feedback and to contact you about your use of the App.
- f. To protect our Services. We may 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 may 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 may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

In addition to the foregoing, we may 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 various purposes, such as analyzing usage patterns, improving our Services, or conducting market research, or sharing with third parties for lawful purposes.

3. LEGAL BASES FOR PROCESSING YOUR INFORMATION

In compliance with the California Consumer Privacy Act (CCPA) and the Children's Online Privacy Protection Act (COPPA), PodiumAI outlines the legal bases for processing your information. 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 may occur 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 may be processed to comply with legal obligations imposed on PodiumAI.

b. COPPA Compliance: In accordance with COPPA, PodiumAI specifically addresses the processing of information for users under the age of 13:

- Verifiable Consent: Upon initial setup, all new users encounter a birthdate entry screen, where they are required to input their date of birth. This step serves a critical purpose, as the App automatically calculates the user's age to verify that they are at least 13 years old. This age verification process is essential for complying with online privacy laws that specifically safeguard minors, as outlined by COPPA. While COPPA's parental consent requirements are specifically targeted at children under 13, PodiumAI extends its commitment to transparency and data privacy to users of all ages. The age verification step underscores our dedication to creating a secure digital space for everyone, promoting responsible online practices, and prioritizing the protection of user information.
- Necessary for the Operation of the Service: Information processing for users under 13 is limited to what is reasonably necessary for the operation of the App. This includes providing age-appropriate content and ensuring a safe online environment for younger users.
- Security and Integrity of Data: Processing is also based on the need to maintain the security and integrity of user data, ensuring a protected environment for all users, especially children.

- c. We may process your information 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 may 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.

PodiumAI is committed to upholding the rights and protections afforded by the CCPA and COPPA. 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. The integration of this data also serves the dual purpose of ensuring secure interactions within the App. When a student engages in conversations or participates in digital classroom activities, their name and email address are prominently displayed. This visibility not only fosters a sense of accountability but also contributes to the overall security of the platform, assuring users that the information shared within the App is contextually relevant and trustworthy.

5. 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.

6. 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. **Other Users.** When you share personal information (for example, by posting comments, contributions, or other content to the App) or otherwise interact with public areas of the App, such personal information may be viewed by other users and may be publicly made available. Understanding the identity of individuals you interact with, be it a counselor or fellow student, is fundamental for a trusted and reliable experience. To achieve this, PodiumAI employs a secure Google Authentication process. When you engage in interactions on the App, your name and email address, authenticated through Google, are automatically stored in our database. This ensures a seamless and trustworthy communication experience within the App.

7. 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 (such as tax, accounting, or other legal requirements). No purpose in this Policy will require us keeping 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.

8. HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. 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.

However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

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 is 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.

9. 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, the purposes of processing, and disclosure to third parties.
- 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.

10. 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 a revised version of this privacy notice.

11. 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 "residents" 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;
 - whether we sell or share personal information to third parties;
 - the categories of personal information that we sold, shared, or disclosed for a business purpose;
 - the categories of third parties to whom the personal information was 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 its 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 use and disclosure of sensitive personal information, please email jagcomtech@gmail.com or submit a data subject access request.

12. USER-GENERATED CONTENT:

If you choose to submit or post user-generated content on the App, such as reviews, comments, or photos, please be aware that this content shall be accessible by the recipients designated by you. The information within the message will only be accessible to those individuals to whom the message has been sent. Once user-generated content is submitted or posted on the App, it is not possible to withdraw or retract the content. We are not responsible for any personal information you include in your user-generated content, so please use caution when sharing personal information within the App.

13. 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.

14. DO WE MAKE UPDATES TO THIS POLICY?

From time to time, we may update this Policy indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Policy frequently to be informed of how we are protecting your information.

15. 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
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