

# **LIOR LEARNING Inc.**

8 The Green, STE A, City of Dover, County of Kent-19901, State of Delaware

## **PRIVACY POLICY**

- We design and operate our technology and services with our users' protection and privacy in mind, and we make every effort to be transparent in our data collection and use practices.
- We do not use student or children's personal information for advertising purposes, including targeted advertising
- We do not rent or sell student data.
- We use industry standard protocol to ensure student data is encrypted and transmitted securely from end to end and at rest.
- We limit the data collected from students or children to only that necessary to meet the educational purposes of MathKraft.
- We do not collect sensitive data like biometric or health data.
- We provide prominent notice to users and send out email notices to customers before making any material changes to our Privacy Policy.
- MathKraft complies with the Children's Online Privacy Protection Act (COPPA).
- MathKraft agrees to operate as a school official as the term is used in the Family Educational Rights and Privacy Act (FERPA) and operates at the direct control of our school customers concerning our use and handling of their student records.

**Privacy Questions?** If you have questions or complaints regarding our privacy policy or practices, please contact us at [info@mathkraft.org](mailto:info@mathkraft.org).

### **1. Privacy Policy**

Last updated 2/3/2025.

This privacy policy ("Privacy Policy") applies to all **Lior Learning Inc.** (a company organized under the laws of the State of Delaware, with its registered office at 8 The Green, STE A, City of Dover, County of Kent -19901, State of Delaware) and its affiliates ("**MathKraft**") owned and operated websites and professional tutoring services (which we collectively refer to as "Services"). By accessing or using our Services, you agree to the terms of this Privacy Policy.

### **2. Definitions**

For purposes of this policy, we will use the following definitions:

**Personally identifiable information (PII)** is information that can identify a user of the Services, including his or her e-mail, name, video, and address. It also includes PII combined with non-PII.

**De-identified information** is information from which personally identifiable components have been removed and a reasonable determination made that an individual is not identifiable.

**Student Records** are records that are directly related to a student and maintained by MathKraft on behalf of a school subscriber.

### **3. What Type of Information Do We Collect and Why?**

#### **3.1. Education Product Subscribers:**

**Information collected during the subscription process:** During the registration process for any of our subscriptions, we ask the subscriber to provide us with a name, email address, school or district affiliation (when applicable), phone number, and billing information. We may also ask you to provide username and password. We use the information to create and service the account, fulfill the subscription, and send you service-related announcements. For instance, we may send emails about routine maintenance, new feature launches or product recommendations related to your subscription. We may also use this contact information to request feedback on our products and services, to inform future customer service and product improvements. You may opt out of promotional email messaging at any time as described in the Opt Out section below.

#### **3.2. MathKraft at Schools:**

Schools are required to appoint an administrator ("**Administrator**"), who is authorized by the school to be responsible for the Students' Records.

To create the accounts, we require a full name, email address, class name, and a password security question. We also use the email address to send product updates and use recommendations, password recovery information, effectiveness and efficacy data, invitations to participate in surveys and research, and more (messaging may not be available in all jurisdictions). An unsubscribe option is included in promotional messaging.

#### **3.3. Students:**

We collect students' full name, class, graduation year/grade, username, password and may collect student school email addresses and other teacher and student unique identifiers for certain single sign on services login integrations. Students will be able to store their activities, quizzes, answers, movies and other projects they've created and correspondences with their teachers within their individual accounts. We only collect student's video recording (captured during the tutoring sessions) for improving our Services. Students cannot interact with other users outside their school or classroom subscription. Students' PII is not posted publicly. Student emails shall only be used for the purpose of providing login integration.

### 3.4. MathKraft at Home:

For home use, parents or legal guardians are asked to provide their full name, email address and other minimally required personal information.

We also ask parents or guardians for their children's name (first or full name, depending on product), graduation year/grade, username, password and security question(s), an avatar image, when applicable. We use this information to create the individual child accounts. Some of the Services allow children to store their activities, quizzes, movies and other projects they created, and badges or goals they have achieved, and the Homeschool subscription allows for children to correspond with the parent/guardian within the Services. We only collect the children's video recording (captured during the tutoring sessions) for improving our Services. Children cannot interact with other users outside their family or homeschool subscription. Children PII is not posted publicly.

Parents or guardians subscribing to the family products will receive occasional emails with information about usage of the accounts, new features, product use recommendations, effectiveness and efficacy testing, backup schedules, survey and research participation invitation and more. An opt-out will be included at the bottom of promotional messaging.

### 3.5. Children under Age 13:

In compliance with the Children's Online Privacy Protection Act (COPPA), MathKraft does not collect personally identifiable information from children under 13, without a parent or guardian's consent, or that of a school if applicable. **Consent** is obtained either directly from a parent or legal guardian or, in the case of schools, from an authorized school administrator. **The collected data is strictly used for educational purposes in compliance with COPPA;** Parents and guardians of children under 13 who use MathKraft's Services have certain rights under COPPA and MathKraft recognizes those rights. At any time, parents/guardians using a home product may request to review the personal information we collected from their child, request that we make no further use of that information or request that we delete it. To exercise your right to delete information, please use the contact information below. Parents/guardians of children using MathKraft through a school account should contact their school to exercise their rights and we will work with the parent/guardian and school together to facilitate those requests.

A child's participation or access to an activity on MathKraft cannot be conditioned on him or her providing more personal information than is reasonably necessary for that activity.

### 3.6. Connecting with MathKraft:

**Contact information for newsletter and surveys:** On pages like our homepage, our adult users may choose to sign up for newsletters, promotional offerings, or participation in surveys, all of which require contact information. The submitted contact information will be used for promotional purposes, and you may opt-out at any time. An opt-out link or instructions on how to opt-out will be included at the bottom of such messages. Registration for newsletters, promotional offerings, and surveys participation are not intended for minors.

**Information we collect when you contact us:** When you send us messages through our system or by email or through other online platforms, we collect the information you provide, including your message and any contact information you include. We use and retain such information to respond to your request, facilitate support to you in the future and to optimize our support services. We will respond once to messages from children under age 13 and then we delete those messages and any personally identifiable information contained in them.

**Feedback:** Certain features we offer include an option to provide us with feedback. The feedback feature does not identify the user submitting it. If we receive personally identifiable information through a feedback form we take steps to immediately delete that information. We reserve the right to use feedback for any purpose with no obligation to you.

#### **4. Information Collected Automatically**

We automatically receive and record information on our server logs from a user's browser. This may include the IP address, pages of MathKraft visited, the time spent on those pages, and access times and dates. We use this information to better display our Services, maintain a user's session, identify the country the user is located in, monitor, analyze use of and administer MathKraft, and to better tailor it to your needs. We may also use this information to serve advertising to adult users.

#### **5. How We Use Artificial Intelligence (AI)**

While we use AI to improve our Services (including for personalising math tutoring like personalised math questions to student's ability and gap), we never share Personally Identifiable student data or use Student Records to train any third-party AI models.

#### **6. How Long We Retain Personal Information:**

MathKraft retains personal information for only as long as is reasonably necessary to fulfil the purpose for which the information was collected. All student and children PII are automatically deleted within 30 days of the users terminating their account with MathKraft - first from our server and then, two weeks later, from any back-up server. At that point it cannot be restored. Students that are no longer at the school and removed by the admin, are deleted after 7 days.

Teacher accounts will be deleted after one year of inactivity.

If the teachers, parents and legal guardians require the deletion of student data, they may contact us for assistance at [info@mathkraft.org](mailto:info@mathkraft.org).

Teachers, parents or legal guardians may request copies of their student personal information (which includes an CSV template file of names, classes and quiz scores), which shall be provided within four (4) weeks of the written request.

We will retain, use and share anonymous or aggregate and de-identified information for lawfully permissible purposes, including developing and improving educational products and services, educational research purposes, evaluating, informing and demonstrating the effectiveness and efficacy of our products and services.

## **7. How We Share Your Information**

We reserve the right to disclose personally identifiable information if we are required to do so by law, or if we believe that disclosure is necessary to protect our rights, protect your safety or others' safety, investigate fraud, and/or comply with a judicial proceeding, court order, subpoena, or legal process.

We also reserve the right to transfer your Personally Identifiable Information in case of a corporate restructuring (such as a merger, acquisition or other disposition of our business), as long as the receiving entity adopts this Privacy Policy regarding your information.

## **8. Security**

We strive to maintain security policies and procedures that are designed to protect your information.

Our servers are located in a secured, locked, and monitored environment to prevent unauthorized entry or theft, and are protected by a firewall. The servers are located in a data center in the United States and backed up daily to a secure, U.S.-based, off-site data center.

We apply a Secure Sockets Layer (SSL or HTTPS) encrypting technology to encrypt data in transit between the server and the browser remains encrypted. We also encrypt the data at rest.

Governance policies and access controls are in place to ensure that the information of each district, school, or other subscriber is separated, and all subscribers can only access their own data.

Only limited MathKraft personnel have access to the database, and personnel only access it when necessary to provide services. Personnel with access to Student Records pass criminal or other background checks and undergo periodic privacy training.

We follow standardized and documented procedures for coding, configuration management, patch installation, and change management for all applicable servers, and we have a third party audit our practices at least once a year.

While we strive to maintain industry-standard privacy and security practices, it should be noted that no industry system is fail proof, and we are not responsible for security incidents not reasonably foreseeable or reasonably within our control. In the event of unauthorized access to Personally Identifiable Information, we will notify the affected subscriber(s) in accordance with applicable law, and as appropriate, coordinate with the subscriber to support notification of affected individuals, students, and families.

## **9. Opt Out**

If you have subscribed to receive marketing messaging from us, or if you receive an unwanted email from us, you can opt-out of receiving future emails by clicking the opt-out link in the email or alternatively by sending an email to [info@mathkraft.org](mailto:info@mathkraft.org), with "Opt out" in the subject line. We will

process your request within a reasonable time after receipt. Note that you will continue to receive operational emails regarding the products or services you are subscribed to.

## **10. For California Residents**

As a California resident, you have certain rights regarding your personal information. These rights include:

- **Right to Know and Access Information:** You may request access to the personal information we maintain about you in the ordinary course of business. This may include what personal information we collect, use, or disclose about you. We may not fulfill some or all of your request to access as permitted by applicable law.
- **Right to Deletion:** You may request that we delete your personal information. Depending on the scope of your request, we may refrain from granting your request, as permitted by applicable law. For example, we may be legally required to retain your information in our business records.
- **Right to Opt Out of the Sale of Your Personal Information:** California law considers certain uses of personal information, such as sharing your personal information with a third party in order to serve ads to you to be a “sale.” We do not sell personal information of children or students. However, we do engage in some marketing behavior with data from adults that would be considered a “sale” under California law. You may request to opt-out of that use of your information by using the methods provided below.

In order to prevent unauthorized access to your information, we are required by law to verify your identity before we may address your request.

## **11. To Exercise Your Rights**

MathKraft is used in schools at the direction of our customers. In addition, we are obligated under FERPA to remain under the direct control of our customers with respect to our use and maintenance of student personal information that is part of the education record. As such, if you use MathKraft through a school account and wish to exercise your rights in respect to student personal information, please contact your education institution and we will work with them to facilitate your request.

All other MathKraft users and visitors may exercise these rights by:

- Emailing us at [info@mathkraft.org](mailto:info@mathkraft.org)

Your exercise of the above rights is subject to certain exemptions to safeguard the public interest and our interests. Requests to exercise these rights may be granted in whole, in part, or not at all, depending on the scope and nature of the request and applicable law. Where required by applicable law, we will notify you if and why we are unable to fulfill your request.

**Non-discrimination:** We shall not discriminate or otherwise penalize anyone for exercising their rights.

Categories of Personal information we collect	<ul style="list-style-type: none"> <li>• Identifiers such as a real name, unique personal identifier, online identifier, Internet Protocol address, email address, billing address, and phone number.</li> <li>• Internet or other electronic network activity information regarding your interaction with MathKraft</li> <li>• Geolocation information in the form of your country</li> <li>• Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).</li> <li>• Video-recordings of the tutoring sessions with the students</li> </ul> <p>For adult users, we also collect:</p> <ul style="list-style-type: none"> <li>• Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.</li> </ul>
Categories of sources from which the Personal Information is collected	<ul style="list-style-type: none"> <li>• We collect Personal Information directly from the Customer, teacher and from student users.</li> <li>• We collect this information directly from you, from our business partners and affiliates, from your browser or device when you visit our websites, or from third parties that you permit to share information with us.</li> </ul>
Business or commercial purpose for collecting or selling Personal Information	<p>We collect your Personal Information to provide the services and for the following business purposes:</p> <ul style="list-style-type: none"> <li>• Performing services in accordance with our contract with the Customer and the terms of use including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, and processing payments.</li> <li>• Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</li> </ul>

	<ul style="list-style-type: none"> <li>• Debugging to identify and repair errors that impair existing intended functionality.</li> <li>• Sending you product communications.</li> </ul>
Specific pieces of Personal Information we have collected	<p>Education Products Subscribers:</p> <p>Administrators, educators and parents: full name, email address, phone number, username, password, school, school address (or home if parents), classes associated with the account, IP address, and unique identifier for certain single sign on services login integrations</p> <p>Students: full name, username, password, school and classes associated with the account, graduation year/grade, video recording, IP address, and email and unique identifier for certain single sign on services login integrations</p> <p>Connecting with MathKraft: name, email address, other contact information, IP address</p> <p>Website visitors: IP address, pseudonymous end user identifiers</p>

Authorized Agent: California residents may use an authorized agent on their behalf to exercise a privacy right discussed above. If you are an authorized agent acting on behalf of a California resident to communicate with us or to exercise a privacy right discussed above, you must be able to demonstrate that you have the requisite authorization to act on behalf of the resident and have sufficient access to their laptop, desktop, or mobile device to exercise these rights digitally. If you are an authorized agent trying to exercise rights on behalf of a MathKraft user, please contact the user's school or district with supporting verification information, which includes a valid Power of Attorney in the State of California, proof that you have access to the user's device, and proof of your own identity.

## 12. Using MathKraft Outside the US

If you are using the Services outside the United States, you consent to having your information and data transferred to the United States. If you are in any jurisdiction with laws or regulations governing internet use, including collection, use, and disclosure of personal data, different from those of the United States, you may only use the Services in a manner that is lawful in your jurisdiction. If your use of the Services may be unlawful in your jurisdiction, please do not use them. If your use of the individual accounts may be unlawful in your jurisdiction, please do not use it.



Please note that MathKraft complies and requires its users to comply with U.S. sanctions and export control restrictions. You agree not to use our Services in any country or jurisdiction subject to US comprehensive sanctions, including but not limited to, Cuba, Iran, North Korea, Syria, Iran, Venezuela, and the Donetsk, Luhansk, and Crimea regions of Ukraine, without written approval from MathKraft. You further agree that you are not subject to any sanction, restriction or prohibition that has been imposed by the United States or any other applicable jurisdiction.

### **13. Changes to Our Privacy Policy**

Changes to this policy or any of the pages linked in this policy may be required in order to address changing technology and threats, changing laws, or as we release new or amended services. Should we make material changes to this Privacy Policy, we will provide notice and request your consent. In the event of any non-material changes, we will provide prominent notice as required by law. Posting the modified privacy policy on our Services and providing notice as stated above will give effect to the revised Privacy Policy. Your continued use of the Services constitutes your acceptance of any revised Privacy Policy. If you do not agree to the revised Privacy Policy, please refrain from using the Services and/or leave this website(s) or app(s).

### **14. Contact information**

If you have any questions or concerns about this Privacy Policy, please contact us by either:

- Email at [Info@mathkraft.org](mailto:Info@mathkraft.org)

If you wish to report a security breach, please contact us at [raj@mathkraft.org](mailto:raj@mathkraft.org).