Practice Makes Perfect Privacy Notice

We at Practice Makes Perfect (“PMP,” “we,” “us,” or “our”) respect your concerns about privacy. This Privacy Notice describes how we collect, use, store, and share the personal information of you and your child to provide our programs.

This Privacy Notice applies to all information collected through the use of our products, our website, practicemakesperfect.org (“Website”), and any related services, sales marketing, or events (collectively, our “Programs”).

Please read this Privacy Notice, as well as our Terms of Use, available at www.practicemakesperfect.org/privacy-policy/ carefully to understand our policies and practices regarding your information. By accessing or using our Programs, you agree to this Privacy Notice.

INFORMATION WE COLLECT

In general, we collect information, including personal information, when you interact with us or use our Programs. If you are a student, parent or guardian, educator, or administrator, we may collect personal information about you when you interact with us or when you or your school use our Programs. When we use the term “personal information” we mean information that can identify you. Through our use of our Programs and interactions with us, we may collect personal information including:

- Identifiers such as your name, email address, phone number, student identification number, and guardian name and email address.
- Education related information such as your school, your school’s address, class schedule and attendance, grades, and demographic information.
- Account related information, such as a username, password, photo, or other information that you upload to your account.
- Certain automatically collected information, such as your Internet protocol (“IP”) address, time of last sign in, browser name and version, and unique device identification number.

Some of this personal Information may be protected as an education record by the Family Educational Rights and Privacy Act (“FERPA”). We encourage you to review information provided by your education institution about your rights to access and review education records under FERPA. If you choose to connect your account to a third-party provider, such as Gmail or Clever, we also may collect any personal information that you allow the third-party service provider to provide us. We encourage you to read any third-party service provider’s privacy policies.
HOW WE COLLECT INFORMATION

We may collect personal information directly from you when you (i) visit our Website; and (ii) use and/or register for one of our Programs. We may also collect some information automatically through your use of our Programs, such as your IP address, unique device information, and other usage data.

We may also collect information from your school or school district, which may include information about your child. For example, your school or school district may provide us with information about you when they contract with us so that we can provide our Programs.

Additionally, we may collect personal information from third parties or other related vendors.

HOW WE USE THE INFORMATION WE COLLECT

We may use the personal information we obtain to provide the education services for which your education institution has contracted with us. In addition, we may use your Personal Information to ensure that our Programs function correctly, and to make any necessary improvements. For example, we may use personal information to:

• Provide our Programs;
• Create student accounts with third-party technology providers to provide our tutoring services remotely;
• Send, only to parents or guardians, newsletters, emails, or other marketing communications;
• Administer participation in surveys or other programs;
• Respond to inquiries;
• Develop new products and services;
• Enhance and improve our services;
• Manage communications;
• Analyze our services and customer base;
• Perform data analytics;
• Perform accounting, auditing and other internal functions;
• Protect against and prevent fraud, unauthorized transactions, claims, and other liabilities; and,
• Comply with and enforce applicable legal requirements, industry standards, and our policies.
HOW WE MAY SHARE YOUR INFORMATION

We do not share, or otherwise disclose, any personal information that we collect from you with third parties except in the following limited circumstances:

- **Performance of a Contract.** Where we have entered into a contract with your school or school district to provide our Programs to you, we may process your personal information to fulfill the terms of our contract.

- **Service Providers.** We may disclose your personal information that we have collected with our third party service providers when they provide us services and act on our behalf. We do not authorize our service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

- **Legal Obligations.** We may disclose your personal information when we are legally required to do so in order to comply with applicable law, government requests, a judicial proceeding, or legal process, such as in response to a court order or a subpoena (including to meet national security or law enforcement requirements).

- **Vital Interests.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

- **Consent.** We may disclose your information if you have given us specific consent to use your personal information for a specific purpose.

- **Business Transfers.** We may securely transfer your personal information in connection with evaluating or as part of a company merger, acquisition, restructuring or similar transaction.

COOKIES AND OTHER TRACKING TECHNOLOGIES

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Cookies are pieces of code that allow for personalization of our Website experience by saving your information such as user ID and other preferences. A cookie is a small data file that we transfer to your device’s hard disk (such as your computer or smartphone) for record-keeping purposes. Cookies can then be used to make site navigation more efficient, help remember your preferences and generally
improve your browsing experience. They can also ensure that advertisements that you see online are more relevant to you and your interests. They may be served by the entity that operates the website you are visiting ("first-party cookies") or by other companies ("third-party cookies"). Some of these cookies are temporary ("Session Cookies") while other may stay on your browser until you delete them manually or until your browser deletes them based on the duration period set within the cookie ("Persistent Cookies").

We may use the following types of cookies:

- **Strictly Necessary Cookies**: These cookies are necessary for the Website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in, remembering the goods you ordered when you get to the checkout page or filling in forms.

- **Functional Cookies**: These cookies enable the Website to provide services or to remember settings to improve your visit. They may be set by us or by third party providers whose services we have added to our pages, including social media sites. For example, these cookies help us remember your choice of language or region, show you have logged into our website.

- **Performance Cookies**: These cookies help us understand how visitors interact with our Website by allowing us to count visits and traffic sources so we can measure and improve the performance of the Website. These cookie are used to provide statistics on how our websites is used, how you move around our Website and the pages you visit, how effective our advertisements are, and measuring any errors that occur.

- **Targeting Cookies**: These cookies may be set through our Website by our advertising partners including social media sites, such as Facebook. They may be used by those companies, including social media, to build a profile of your interests and show you relevant adverts on other sites, also known as “interest based advertising.” These cookies uniquely identify your browser and internet device and observe your behaviors and browsing activities over time across multiple websites or other platforms.

We use Google Analytics to understand how visitors interact with our Website, such as how you use the Website or the pages you visit. Google Analytics uses its own cookies. You can read more information about how Google Analytics uses cookies [here](https://policies.google.com/technologies/partner-sites). You can also prevent the use of
Google Analytics relating to your use of our Website by downloading and installing the browser plug-in available at, https://tools.google.com/dlpage/gaoptout?hl=en-GB.

You may have several options with respect to our use of cookies. You can control our uses of cookies through our cookie management tool, your internet browser, or through other third party tools:

- **Internet Browser.** You can also control cookies through most browsers by changing your cookie settings. These settings will typically be found in the “options” or “preferences” menu of your browser.

- **Other Third Party Tools.** You can also visit http://www.allaboutcookies.org/ where you will find comprehensive information on cookie management and blocking which pertains to a wide variety of browsers.

Please note that if you disable certain cookies, some portions of our Website or our Programs may not work or function properly.

**HOW LONG WE KEEP YOUR INFORMATION**

We store your personal information only for as long as necessary for the purposes for which it was collected. Such purposes include providing you with access to our Programs, facilitating job applications, as required by law, and for the exercise or defense of legal claims. Retention periods can vary based on the type of information and how it is used. We have established retention periods based on several criteria, including the type of data collected, our purposes for collecting it, applicable laws, pending or potential litigation, intellectual or property rights, contract requirements, and historical archiving.

In addition, personal information provided to us by a school or school district is retained within our system until the termination or expiration of our contract with that school or school district. If a student exits a school or school district, his or her personal information will remain in the system until that year’s end of year process. Personal information about a student will generally be deleted upon request of a parent within a reasonable amount of time.

**HOW WE PROTECT PERSONAL INFORMATION**

We maintain administrative, technical and physical safeguards designed to protect personal information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure, or use. We use encryption to protect personal information in our custody while in motion and at rest. We limit internal access to personal
information to only those employees or third parties that need access to provide our services.

YOUR RIGHTS AND CHOICES

We require that schools and school districts get parental consent before using our Programs with students. Parents or guardians can withdraw consent for the further collection of their child’s information at any time. If you are aware that we are collecting information from a student without parental consent, please contact us immediately at tech@practicemakesperfect.org and we will delete the data. If you are a parent or guardian of a child under the age of 13, you have the right to review or have deleted your child’s personal information, as well refuse to permit further collection or use of your child’s personal information. To exercise these rights, please contact us as set forth in the "How to Contact Us" section of this Privacy Notice.

CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time. The updated version will be 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 Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. If we make material changes to this Privacy Notice, we will notify you via a banner on our platform after you have logged in to our system. You will need to review and consent to material changes before continuing to use our platform. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

EDUCATION RECORDS

Data that we collect may include personally identifiable information from education records that are subject to the Family Educational Rights and Privacy Act, “FERPA,” (“FERPA Records”). To the extent that student data includes FERPA Records, PMP is designated as a "School Official," as that term is used in FERPA and its implementing regulations, under the direct control of the District with regard to the use and maintenance of the FERPA Records. PMP agrees to comply with FERPA.

HOW TO CONTACT US

To submit any questions or comments you may have about this Privacy Notice, please contact us by email at communications@practicemakesperfect.org by phone at (646) 767-6936, or by mail at 25 Broadway, Fl 12, New York, NY 10004