Inspirit Learning, Inc. (“Inspirit”, “we”, or “us”) provides the Inspirit App to allow our users to engage in virtual reality educational learning experiences. Our Privacy Policy (“Privacy Policy”) is designed to help you understand how we collect, use and share your personal information and to assist you in exercising the privacy rights available to you.

SCOPE
This Privacy Policy applies to personal information processed by us in our business, including on our websites, mobile applications, and other online or offline offerings (collectively, the “Services”).

PERSONAL INFORMATION WE COLLECT
The categories of personal information we collect depend on whether you are a customer, user, or visitor, and the requirements of applicable law.

Information You Provide to Us.

User Account Creation: When you create a user account, we collect your profile information such as name, email address, date of birth, and location.

Use of App: When you use our app, we will collect information about your interaction with our app, including for example, user test scores, head orientation data, and clicks.

Device Information: We collect information from the devices and apps you connect to our Services and information from these devices and apps will be passed along to us. For example, you may connect your Oculus, Vive, Android/iOS devices or other mobile hardware.
**Your Communications with Us:** We collect personal information from you such as email address, phone number, or mailing address when you request information about our Services, request customer or technical support, or otherwise communicate with us.

**Surveys:** We may contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information which may include personal information.

**Social Media Content:** We may offer forums, blogs, or social media pages. Any content you provide on these channels will be considered “public” and is not subject to privacy protections.

**Registration for Sweepstakes or Contests:** We may run sweepstakes and contests. Contact information you provide may be used to reach you about the sweepstakes or contest and for other promotional, marketing and business purposes, if permitted by law. In some jurisdictions, we are required to publicly share information of winners.

**Automatic Data Collection:** We may collect certain information automatically when you use the Services. This information may include your Internet protocol (IP) address, user settings, IMEI, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, details about your browser, operating system or device, location information, Internet service provider, pages that you visit before, during and after using the Services, information about the links you click, and other information about how you use the Services. Information we collect may be associated with accounts and other devices as described in this Privacy Policy.

In addition, we may automatically collect data regarding your use of our Services, such as the types of content you interact with and the frequency and duration of your activities. We may combine your information with information that other people provide when they use our Services, including information about you.
Cookies, Pixel Tags/Web Beacons, Analytics Information, and Interest-Based Advertising technologies: We, as well as third parties that provide content, advertising, or other functionality on the Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through the Services. Technologies are essentially small data files placed on your computer, tablet, mobile phone, or other devices that allow us and our partners to record certain pieces of information whenever you visit or interact with our Services.

- **Cookies:** Cookies are small text files placed in visitors’ computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Services may not work properly.

- **Pixel Tags/Web Beacons:** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects information about users’ engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.

**Analytics:** We may also use Google Analytics, Squarespace, and other service providers to collect information regarding visitor behavior and visitor demographics on our Services. For more information about Google Analytics, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can opt out of Google’s collection and processing of data generated by your use of the Services by going to [http://tools.google.com/dlpage/gaoptout](http://tools.google.com/dlpage/gaoptout).

**Biometric information:** We will not collect biometric data that uniquely identifies you without your explicit prior consent.

**Information from Other Sources:** We may obtain information about you from other sources, including through third party services and organizations to supplement information provided by you. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made public via your privacy settings. Information we collect through these services may include your name, your user identification number, your user name, location, gender, birth date, email, profile picture, and your contacts stored in that service. This supplemental information allows us to verify information that you have provided to us and to enhance our ability to provide you with information about our business, products, and Services.
HOW WE USE YOUR INFORMATION

We use your information for a variety of business purposes, including to:

Fulfil our contract with you and provide you with our Services, such as:
• Managing your information and accounts;
• Responding to your questions, comments, and other requests;
• Providing access to certain areas, functionalities, and features of our Services;
• Communicating with you about your account, activities on our Services and policy changes;
• Processing your financial information and other payment methods for products or Services purchased (if applicable);
• Processing applications and transactions;
• Answering your requests for customer or technical support; and
• Allowing you to register for events.

Analyze and improve our Services pursuant to our legitimate interest, such as:
• Measuring interest and engagement in our Services;
• Conducting research and development;
• Developing new products and Services;
• Ensuring internal quality control;
• Verifying your identity and preventing fraud;
• Detecting bugs or other software issues;
• Preventing potentially prohibited or illegal activities;
• Enforcing our Terms; and
• To comply with our legal obligations, protect your vital interest, or as may be required for the public good.

Provide you additional content and Services, such as:
• Providing you with customized materials about offers, products, and Services that may be of interest, including new content or Services;
• Providing Services to you and our customers;
• Auditing relating to transactions; and
• Other purposes you consent to, are notified of, or are disclosed when you provide personal information.

You may contact us at any time to opt out of the use of your personal information for marketing purposes, as described below.
Use De-identified and Aggregated Information
We may use personal information and other data about you to create de-identified and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our Services, or other analyses we create.

Share Content with Friends or Colleagues
Our Services may offer various tools and functionalities. For example, we may allow you to provide information about our Services to your friends through our referral services.

Automatic Collection Technologies
We, as well as third parties that provide content, advertising, or other functionality on the Services, may use cookies, pixel tags, local storage, and other technologies to automatically collect information through the Services. Our uses of these Technologies fall into the following general categories:

• Operationally Necessary: This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular site behavior, prevent fraudulent activity and improve security or that allow you to make use of our functions such as shopping-carts, saved search, or similar functions;

• Performance Related: We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how our visitors use the Services;

• Functionality Related: We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;

• Advertising or Targeting Related: We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on Third Party sites.
Notice regarding Third Party Websites and Social Media Platforms
The Services may contain links to other websites, and other websites may reference or link to our website or other Services. These other websites are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

Our Services may include publicly accessible blogs, forums, social media pages such as Instagram, and private messaging features. By using such Services, you assume the risk that the personal information provided by you may be viewed and used by Third Parties for any number of purposes.

DISCLOSING YOUR INFORMATION TO THIRD PARTIES
We may share your personal information with the following categories of third parties:

Service Providers
We may share any personal information we collect about you with our third-party service providers. The categories of service providers (processors) to whom we entrust personal information include: IT and related services; payment processors; shipping companies; customer service providers; and vendors to support the provision of the Services.

Business Partners
We may provide personal information to business partners with whom we jointly offer products or services. In such cases, our business partner’s name will appear along with ours.

Disclosure in the Event of Merger, Sale, or Other Asset Transfers
If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.
Disclosures to Protect Us or Others
We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

Affiliates
We may share personal information with our affiliated companies.

Advertising Partners
Through our Services, we may allow third party advertising partners to set Technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day). We may also combine and share such information and other information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising. We may allow access to other data collected by the Services to share information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer not to share your personal information with third party advertising partners, you may follow the instructions below.

International Data Transfers
You agree that all information processed by us may be transferred, processed, and stored anywhere in the world, including but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We have taken appropriate safeguards to require that your personal information will remain protected and require our third-party service providers and partners to have appropriate safeguards as well. Further details can be provided upon request.
YOUR CHOICES

General
You have certain choices about your personal information. Where you have consented to the processing of your personal information, you may withdraw that consent at any time and prevent further processing by contacting us as described below. Even if you opt out, we may still collect and use non-personal information regarding your activities on our Services and for other legal purposes as described above.

Email Communications
If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding the Services or updates to our Terms or this Privacy Policy). We process requests to be placed on do-not-contact lists as required by applicable law.

“Do Not Track”
Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

Cookies and Interest-Based Advertising
You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy, at www.networkadvertising.org/managing/opt_out.asp, http://www.youronlinechoices.eu/, https://youradchoices.ca/choices/, and www.aboutads.info/choices/. To separately make choices for mobile apps on a mobile device, you can download DAA’s AppChoices application from your device’s app store. Alternatively, for some devices you may use your device’s platform controls in your settings to exercise choice.
Please note you must separately opt out in each browser and on each device. Advertisements on third party websites that contain the AdChoices link may have been directed to you based on information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt out of the advertising partners’ use of this information for interest-based advertising purposes.

**Your Privacy Rights:**
In accordance with applicable law, you may have the right to:

- Request confirmation of whether we are processing your personal information;
- Obtain access to or a copy of your personal information;
- Receive an electronic copy of your personal information or ask us to send that information to another company;
- Restrict our uses of your personal information, including the right to opt in or opt out of the sale of your personal information to third parties, depending on applicable law;
- Seek correction or amendment of inaccurate, untrue, incomplete, or improperly processed personal information; and
- Request erasure of personal information held about you, subject to certain exceptions prescribed by law.

If you would like to exercise any of these rights, please log into your account or contact us as set forth below. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

**DATA RETENTION**
We store the personal information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.
SECURITY OF YOUR INFORMATION
We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unintentional disclosure.

By using the Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on the Services, by mail or by sending an e-mail to you.

CHILDREN’S INFORMATION
The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children. If you learn that your child has provided us with personal information without your consent, you may contact us as set forth below. If we learn that we have collected any personal information in violation of applicable law, we will promptly take steps to delete such information and terminate the child’s account.

SUPERVISORY AUTHORITY
If you are located in the European Economic Area, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

CHANGES TO OUR PRIVACY POLICY
We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use the Services after the new Privacy Policy takes effect.
CONTACT US
If you have any questions about our privacy practices or this Privacy Policy, or if you wish to submit a request to exercise your rights as detailed in this policy, please contact us at:

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