

STARSPARK PRIVACY POLICY

Effective Date: July 10, 2024

This Privacy Policy describes how StarSpark AI Corp. (“**StarSpark**”, “**we**”, or “**us**”) handles personal information that we collect through our website, application, and any other sites or services that link to this Privacy Policy (collectively, the “**Services**”).

APPLICABILITY OF THIS PRIVACY POLICY

The Services are only intended to be used by individuals located in the United States and this Privacy Policy applies to personal information that we collect from:

- (1) “**Adult Users**”, who are individuals (such as parents, guardians, teachers or school administrators) that are of legal age and who can enter into a contract in the state in which the individual resides, and
- (2) “**Child Users**” who are individuals below the age of majority in their respective state that are granted access to the Service by an Adult User.

PERSONAL INFORMATION WE COLLECT

Information collected from Child Users: Personal information that Child Users may provide to us through the Services include:

- **Account Information**, which is limited to the Child User’s interests, avatar, and other related information the Child User voluntarily provides to us. We limit a Child User’s ability to modify most portions of their Account Information.
- **Usage information**, such as information about how the Child User uses the Services and interacts with us, including information associated with any content Child Users upload to the Services or otherwise submit, and information Child Users provide when you use any interactive features of the Services.

Information collected from Adult Users. Personal information that Adult Users may provide to us through the Services include:

- **Child User account information**, such as the Child User’s name, gender, email address, grade, academic learning goals, and other related information that you voluntarily provide to us.
- **Adult User’s account information**, such as your name, email address, payment information, and other related information that you voluntarily provide to us.
- **Feedback or correspondence**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us online.
- **Usage information**, such as information about how you use the Services and interact with us, including information associated with any content you upload to the Services or otherwise submit, and information you provide when you use any interactive features of the Services.
- **Marketing information**, such as your preferences for receiving communications about our Services, and details about how you engage with our communications.

- **Other information** that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

Automatic data collection. We and our service providers may automatically log information about Adult Users and Child Users, including their computer or mobile device and interactions over time with our Services, our communications and other online services, such as:

- **Device data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 5G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, browsing history, navigation paths between pages or screens, information about your activity on a page or screen, access times, duration of access, and whether you have opened our marketing emails or clicked links within them.

We use the following tools for automatic data collection:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

HOW WE USE YOUR PERSONAL INFORMATION

To operate our Services:

- Provide, operate, maintain, secure and improve our Services.
- Provide our users with customer service.
- Communicate with you about our Services, including by sending you announcements, updates, security alerts, and support and administrative messages.
- Understand your needs and interests, and personalize your experience with our Services and our communications. Our Services are dynamic and intended to adapt to Child Users' learning goals. For example, we may make inferences about a Child User's reading preferences to provide a better curriculum experience.
- Respond to your requests, questions and feedback.

For research and development. We may use your personal information for research and development purposes, including to analyze and improve our Services and our business. As part of these activities, we may create aggregated, de-identified, or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We

may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve our Services and promote our business.

Direct marketing. We may from time-to-time send Adult Users direct marketing communications as permitted by law, including, but not limited to, notifying you of special promotions, offers and events via email and in-app notifications. You may opt out of our marketing communications as described in the “Opt out of marketing communications” section below.

Compliance and protection. We may use personal information to:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.
- Protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims).
- Audit our internal processes for compliance with legal and contractual requirements and internal policies.
- Enforce the terms and conditions that govern our Services.
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

HOW WE SHARE YOUR PERSONAL INFORMATION

Service providers. We may share your personal information with third party companies and individuals that provide services on our behalf or help us operate our Services (such as lawyers, bankers, auditors, insurers, customer support, hosting, analytics, email delivery, marketing, and database management). To power our generative AI features, we may rely on third party AI service providers to process user content to return replies. We do not permit third parties to use user data to train or improve their own services.

Linked Accounts. For Child Users, we may share account activity data with the linked Adult User. For example, this may include reports on the linked Child User’s progress towards their learning outcomes.

Authorities and others. We may disclose your personal information to law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

Business transfers. We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution. In such a case, we will make reasonable efforts to require the recipient to honor this Privacy Policy.

YOUR CHOICES

Access or update your information. Users may themselves update their personal information in their accounts by logging in and editing their information.

Opt out of marketing communications. You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing emails.

Online tracking opt-out. There are a number of ways to limit online tracking, which we have summarized below:

- **Blocking cookies in your browser.** Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org.
- **Using privacy plug-ins or browsers.** You can block our Services from setting cookies by using a browser with privacy features, like [Brave](#), or installing browser plugins like [Privacy Badger](#), [DuckDuckGo](#), [Ghostery](#) or [uBlock Origin](#), and configuring them to block third party cookies/trackers.

Note that because these opt-out mechanisms are specific to the device or browser on which they are exercised, you will need to opt out on every browser and device that you use.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

THIRD PARTY SERVICES

Our Services may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third party websites, mobile applications or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

CHILDREN

Our Service is available to and used by Child Users who are under the age of 13. After obtaining verifiable parental consent, we collect and use personal information relating to such children as described in the “[Personal Information We Collect](#)” and “[How We Use Your Information](#)” sections of this Privacy Policy. StarSpark will not require a Child User to disclose more information than is reasonably necessary to use the Service.

We do not disclose Child Users’ personal information except with the Child User’s linked Adult User and as needed to support the internal operations of the Service.

YOUR PRIVACY RIGHTS AND CHOICES

Access or update your information. If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account.

Opt out of marketing communications. You may opt out of marketing-related communications – both emails and texts – by following the opt-out or unsubscribe instructions in the communications you receive from us or by contacting us as provided in the “[How to Contact Us](#)” section below. You may continue to receive Services-related and other non-marketing communications.

Personal information requests. We offer you choices that affect how we handle your personal information. Depending on your location and the nature of your interactions with our Services, you may be able to request the following in relation to personal information:

- **Information** about how we have collected and used personal information of you or the Child User(s) linked to your account. We have made this information available to you without having to request it by including it in this Privacy Policy.
- **Access** to a copy of the personal information that we have collected about you or the Child User(s) linked to your account. Where applicable, we will provide the information in a portable, machine-readable, readily usable format.
- **Correction** of your personal information or the Child User(s) linked to your account that is inaccurate or out of date.
- **Deletion** of your personal information or the Child User(s) linked to your account that we no longer need to provide the Services or for other lawful purposes.
- **Appeal** our denial of your personal information request by contacting us as set out in the “How to Contact Us” section below.

To make a request, please email us or write to us as provided in the “How to Contact Us” section below. We may ask for specific information from you to help us confirm your identity. You are entitled to exercise the rights described above free from discrimination.

Limits on your privacy rights and choices. In some instances, your choices may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights. If you are not satisfied with how we address your request, you may submit a complaint by contacting us as provided in the “How to Contact Us” section below.

SECURITY

We employ a number of technical, organizational, and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe and we cannot guarantee the security of your personal information.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the website.

HOW TO CONTACT US

Please direct any questions or comments about this Privacy Policy or our privacy practices to privacy@starspark.ai.