

## **Cignition**

### **Privacy Policy**

Last updated: February 16, 2018

Welcome to Cignition (“**Cignition**” “**we**” or “**us**”). Please carefully read this Privacy Policy (“**Privacy Policy**”) before participating in Site activities or using any Cignition application. This Privacy Policy applies to information collected as part of using our mobile application and any other information we collect. We refer to the places we collect information generally as the “**Site**.” The “**Site**” includes by definition, our web site, interactive features, applications, or other online or wireless offerings that post a link to this Privacy Policy, whether accessed via computer, mobile device or other technology, manner, or means.

Your use of this Site constitutes acceptance of this Privacy Policy, our Terms of Service (the “**Terms**”), and any other policies, agreements, terms and conditions contained on the Site.

We reserve all rights to modify, delete, or append portions of this Privacy Policy, the Terms, and any other terms and conditions at our sole discretion. We will provide notice of any change by changing the “Last updated” date above, by sending emails, and/or by other methods intended to notify you of any changes. We recommend you review this Privacy Policy from time to time during visits to this Site.

#### **1. Contact Us**

You may contact us for any reason using the following:

Mailing Address:  
Cignition  
21 Hillbrook Drive  
Portola Valley, CA 94028  
attn: Privacy

Email Address: support@cignition.com

#### **2. Information Collection**

We collect information primarily when voluntarily provided to us by you to participate in and use our applications. If you would like to review any of the information we have in our systems about you or your student, please contact us using the contact information in this Privacy Policy.

When anyone uses our applications, products, or services, we collect information around that use. Adults (including but not limited to parents / legal guardians) may provide us with voluntarily supplied personally identifiable information upon registration. Students may, at the time of registration, create a user name, and our system creates an electronic persistent identifier for each student associated with that user name. While parents / legal guardians and/or teachers may have access to student user names to track student performance and results, and the system can utilize the persistent identifier to modify gameplay to adjust to the student’s ability level, our systems do not maintain student personal information, and we do not have the ability to associate persistent identifiers with any particular student. We may use information in our systems in an anonymous and aggregated manner to measure all students’ performance to improve our applications, products, and services.

**Cookies and Pixel Tags:** We use standard technologies such as a “cookie” and pixel tags to collect information about how the Site is used. A cookie is a small removable data file that is stored by your web browser on your computer. We use cookies to, among other things, identify your computer during a particular session, i.e., when you sign into the Site, and analyze Site visitor behavior. Cookies enable you to store your password for fast logon and other conveniences. We do not store personal or sensitive information in cookies. Pixel tags, also known as beacons or Clear GIF’s, are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of users. In contrast to cookies, which are stored on a user’s computer hard drive, pixel tags are embedded invisibly on web pages.

**IP Addresses:** We collect and analyze traffic by keeping track of the IP addresses of our visitors. An IP address is the unique numeric identifier assigned to each browser accessing the Internet. An IP address, by itself, cannot identify you personally. However, when combined with other information provided by your Internet Service Provider (ISP), your IP address can be used to identify the computer originating a message.

### **3. Opting Out**

Cignition applications are customized for each student. All information we request is required to use Cignition applications. At any time, you may revoke your consent to allowing your student to use Cignition applications. If you do so, we will retain anonymous information, but your student will no longer be able to use Cignition applications.

### **4. Use and Sharing Information**

We use information only to provide and improve Cignition applications, products and services. We do not share any information with anyone or any third party for marketing purposes.

For the purpose of operating our business, we may transfer information to our service providers who may use that information only to conduct our business. For example, service providers may handle data management, e-mail distribution, market research, and information analysis. We provide our service providers with the information they need to perform their services and work with them to protect your information.

We reserve the right to share information with legal authorities if it is necessary to investigate, prevent, or otherwise take action regarding suspected fraud, situations involving threats or potential harm, or if otherwise required by law (such as by a subpoena, court order, or other legal means). In the event that we reasonably believe that you have violated any of the terms or policies governing your use of the Site, we reserve the right to use any information we have collected about you in connection with any efforts we make or made by any of our agents on our behalf.

We may share information with other entities affiliated with us for internal reasons, primarily for business and operational purposes including any corporate reorganization, restructuring or other corporate change. In addition, if we sell the company including the Site and any of our products and services, information may be one of the business assets we transfer. We reserve the right to disclose and transfer user information in connection with any activity and/or transaction described above.

## **5. Security Measures**

Information submitted via the Internet, including through a web page, e-mail, or mobile communications, is subject to interception or incorrect routing, and the Internet is not a fully secure communications channel. Please consider this prior to submitting any information to us.

While we follow generally accepted industry standards to protect the personal information submitted to us, no method of transmission over the Internet, or method of electronic storage, is perfectly secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

If we learn of a breach of our systems and that third parties have gained unauthorized access to any information in our systems, we will work with appropriate entities, law enforcement personnel, and other authorities, to determine if public or other notice is necessary or appropriate under the circumstances.

## **6. International Users**

This Site is operated, in whole or in part, from the United States. By using this Site, regardless of where you live in the world, you consent to have your personal data transferred to and processed in the United States, and allow us to use and collect your personal information in accordance with this Privacy Policy.

## **7. Unsubscribe / Contact Us**

We want to communicate with you only if you want to hear from us. If you prefer not to receive information from us or would like to update or change your personal information or preferences, use the Contact Us information in this Privacy Policy. However, we may send you service-related announcements and transactional e-mail from time to time through the general operation of the Site or by e-mail. If you do not want to receive any e-mail from us in the future, click the “unsubscribe” reference in any e-mail we send you.

## **8. COPPA**

In accordance with the Children’s Online Privacy Protection Act, ([www.COPPA.org](http://www.COPPA.org)) parents and legal guardians of children under 13 years of age must consent to certain collections, uses and disclosures of the personal information of their children. Cognition administers its services pursuant to its privacy policy and in accordance with COPPA. By utilizing Cognition’s services, you consent to Cognition’s collection, use, and/or disclosure of your child’s personal information to provide its services and interact with your child. Cognition will not use your child’s personal information for any other purpose. You may revoke your consent at any time – simply contact us and let us know, and we will immediately delete your child’s personal information from our systems.