

# OnWord Stories – School Products

## Privacy Policy

Last Updated: **October 22**, 2024

Welcome! This Privacy Policy (“Privacy Policy”) explains how Sparkstone Investments LLC (“Sparkstone,” “we,” “our” or “us”) collects, uses and discloses information about users of OnWord Stories interactive reading website, application and other online products and services that we provide to schools to support classroom instruction and learning (collectively, the “Products”). By accessing or using our Products, you agree to the terms of this Privacy Policy.

### Types of Users

Our information practices vary depending upon the type of user and the portion of the Products used by that user. Users of the Products primarily include:

- any child under the age of 13 including those who are in enrolled in school districts or schools that make our Products available (“Students”) and
- teachers, school administrators, district administrators, and other educators who use the Products pursuant to an agreement or with the permission of a school districts and schools (“Educators”).

We also provide limited opportunities for parents or guardians (“Parents”) to sign up for an account with us so Students can use our Products at home.

Students, Educators, and Parents are collectively referred to as Users. Students may only use the learning portion of the Products. Only Educators and Parents can create accounts and login to allow Students to use the Products.

### Approach to Student Privacy

Except as explicitly described in this Privacy Policy, we do not collect knowingly collect personal information from Students. Any Student personal information collected is used only for educational purposes at the direction of an Educator or Parent. We do not sell personal information of Students. We do not use or disclose information about Students (whether personal information or otherwise) for behavioral targeting of advertisements to Students. We do not build personal profiles of Students other than for supporting authorized educational/school purposes.

As mentioned above, we collect Student’s personal information through the Products when an Educator or Parent creates an account directly with us and enables the

Student to use the App. Students cannot access the learning portion of our Products without an Educator or Parent first signing into the their account with the their login credentials.

If you are an Educator or Parent and you believe that a Student may have provided us with personal information in violation of the paragraphs above, please contact us at [admin@Sparkstone.com](mailto:admin@Sparkstone.com), and we will delete that information.

## 1. Collection of Information

### Information Provided to Us

We collect the following information through registration and/or Product usage:

From Educators and Parents:

- **Educator / Parent Registration Information:** We collect registration information, including the Educator or Parent's name, school affiliation, email address, and username and password.
- **Student Registration Information:** We collect information that an Educator or Parent provides to enable a Student's use of our Products, including the Student's name, reading level, and your choice for the Student's avatar.

From Students:

- **Student's Interests:** We ask students to provide information about the topics and subjects that they are interested in (e.g., sports, music, art) so that we can generate educational content, such as age-appropriate stories, questions, and images that are tailored to the Student's interests.
- **Student Responses:** When a Student interacts with our Products, we collect the Student's responses to reading comprehension questions, which we evaluate for accuracy and then use to provide customized feedback.

Our Products include features that are reasonably designed to block Students from submitting personal information in open text fields.

### Information we Collect Automatically

When Educators and Parents access or use our Products, we automatically collect certain information, including:

- **Device and Log Information:** We collect information about the device used to access our Products, including the hardware model and device type, unique device identifiers browser type, network information, operating system and version. We also use analytics software to allow us to better understand the

functionality of our Products. This software may record information such as access times and frequency, activity within our Products, and performance data such as crash reports.

- **Information Collected by Cookies and Other Tracking Technologies:** We use various technologies to collect information from our Products, including cookies and web beacons. Cookies are small data files stored on hard drives or in device memory that help us improve our Products and Users' experience, and see which areas and features of our Products are popular and count visits. Web beacons are electronic images that may be used in our Products or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. For more information about cookies, and how to disable them, please see "Your Choices" below.

When Students access or use the learning portion of our Products, we automatically collect certain information, including:

- **Activity Information:** We collect information about a Student's interactions with our Products, such as the stories the Student reads, where they tap, and their progress and choices within our Products. Our collection of this information through cookies and other tracking technologies (as defined above) is used only to support the internal operations of the Products.

## 2. Use of Information

We use information we collect from Educators and Parents to:

- Permit Educators and Parents to register for our Products;
- Send Educators and Parents technical notices, updates, security alerts and support and administrative messages;
- Respond to Educators' and Parents' comments, questions and requests and provide customer support;
- Allow Educators and Parents' to access metrics and information about a Student's reading progress through our Products;
- Provide marketing communications that we believe may be of interest to Educator and Parents; and
- To measure the effectiveness of our advertising to Educators and Parents.

We use the information we collect from Students to:

- Personalize and improve a Student's experience on our Products and provide content that matches the Student's reading level and interests;
- Track a Student's reading progress and usage of our Products, as well as to monitor trends, usage and activities, so that we can make our Products more helpful to all Students.

We use information collected from all Users to:

- Analyze, operate and improve our Products;
- Detect, protect against, and prevent security incidents and illegal or unauthorized activities, as well as investigate complaints and claims;
- Comply with applicable laws, legal processes or enforceable governmental requests, and defend against or pursue claims, disputes or litigation – in court or elsewhere; and
- Enforce our policies, terms and conditions, or other agreements.

### 3. Sharing of Information

We share the information we collect from Educators and Parents as follows:

- With Educator/Parent consent or at the Educator/Parent's direction.
- As otherwise required or permitted, or as disclosed at the time of collection.
- We may also share aggregated or de-identified information, which cannot reasonably be used to identify any individual.

We share the information we collect from Students as follows:

- With Educator/Parent consent or at the Educator/Parent's direction.
- As otherwise required or permitted, or as disclosed at the time of collection.
- We may also share aggregated or de-identified information, which cannot reasonably be used to identify any individual.

We may share the information we collect from all Users as follows:

- With vendors, consultants and other service providers who need access to such information to carry out work on our behalf, provided such third parties are obligated to treat the data we provide in accordance with the commitments set forth in this Privacy Policy;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- If we believe Users' actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of Sparkstone or others; and
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company, provided the successor entity will protect the data in accordance with the commitments in this Privacy Policy.

We do not disclose the personal information of any Student to third parties for any marketing or promotional purposes.

## 4. Your Rights and Choices

### What Choices Do You Have?

**Opt-out of Marketing Communications.** If you want to stop receiving promotional materials from Sparkstone, you can email us at [admin@Sparkstone.com](mailto:admin@Sparkstone.com) or follow the unsubscribe instructions at the bottom of each email.

**Opt-out of Cookies and Similar Tracking Technologies.** With respect to cookies, you may be able to reject cookies through your browser or device controls. Note that you have to opt-out of cookies on each browser or device that you use. If you replace, change, or upgrade your browser or device, or delete your cookies, you may need to use these opt-out tools again. Please be aware that disabling cookies may negatively impact your experience as some features may not work properly. To learn more about browser cookies, including how to manage or delete them, check the “Help,” “Tools,” or similar section of your browser.

### What Rights Do You Have With Respect to Student Personal Information?

**Educator Accounts.** Educators are able to access and update their own personal information and the personal information of the Students for whom they are responsible at any time, either through their Sparkstone user account or by contacting us at [admin@Sparkstone.com](mailto:admin@Sparkstone.com). Deletion requests must be submitted to us by email at [admin@Sparkstone.com](mailto:admin@Sparkstone.com). Unless otherwise required by law, any Parent request to access, make changes to or delete their Student’s personal information from an Educator’s account must be directed to Educators. To make such requests, Parents should follow their school’s procedures for managing their Student’s personal information under applicable law. We will work with the Parent and Educators together to facilitate those requests.

**Parent Accounts.** Parents who have signed up to enable their Student to use the Products at home may also access and update their own personal information and the information of their Student at any time, either through their Sparkstone user account or by contacting us at [admin@Sparkstone.com](mailto:admin@Sparkstone.com). Deletion requests and requests that we make no further use of their Student’s personal information must be submitted to us by email at [admin@Sparkstone.com](mailto:admin@Sparkstone.com).

In all cases, please note that we may retain certain information as permitted by law. We may also retain cached or archived copies of the information we collect for a certain period of time.

**No third-party website tracking.** Sparkstone does not track students across third-party websites and does not respond to Do Not Track (DNT) signals. Sparkstone does not permit third-party advertising networks to collect information from or about Students using Sparkstone educational Products for the purpose of serving targeted advertising

across websites and over time and Sparkstone does not use Student's personal information for targeted advertising.

## 5. Security

We implement and maintain reasonable security measures appropriate to the nature of the personal information that we collect, use, retain, transfer or otherwise process. Those measures include administrative, physical and technical safeguards to protect the security, confidentiality and integrity of personal information. However, data security incidents and breaches can occur due to a variety of factors that cannot reasonably be prevented; therefore, our safeguards may not always be adequate to prevent all breaches of security.

## 6. International visitors

We store and process your data in the United States, and we direct our services to residents of the United States. If you are a visitor to this Product and prefer not to have your personal information transferred to the United States, or one of its territories, do not use the Product. Otherwise, by using the Product or providing any information, you consent to the transfer of personal information to the United States and other destinations outside your home country.

## 7. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to review the Privacy Policy regularly to stay informed about our information practices and the choices available users of our Products.

## 8. Contact Us

If you have questions about this Privacy Policy, please contact us at:

Email: [admin@Sparkstone.com](mailto:admin@Sparkstone.com)

Mail: PO Box 590719, Newton, MA 02459, United States