



INTELITEK CHILDREN'S ONLINE PRIVACY PROTECTION ACT (COPPA) POLICY

Intelitek Inc. and its affiliate CoderZ, Inc. (the “**Company**”, “**we**”, “**us**” “**CoderZ**” or “**Intelitek**”) is committed to protecting the privacy of children who use our Intelitek site, Learnmate™ sites, CoderZ sites (the Site) and CoderZ application (the “**Application**”). This Children’s Online Privacy Policy explains our information collection, disclosure, and parental consent practices with respect to information provided by children under the age of 13 (“**child**” or “**children**”) and uses terms that are defined in our general Privacy Policy. This policy is in accordance with the U.S. Children’s Online Privacy Protection Act (“**COPPA**”) and outlines our practices in the United States regarding children’s personal information.

What Information is Collected and How it is Used

The Application is a website application whose primary audience is traditional-school students and home-school students, their teachers, and their parents and/or legal guardians. Below we summarize potential instances of collection and outline how and when we will provide parental notice and/or seek parental consent. In any instance that we collect personal information from a child, we will retain that information only so long as reasonably necessary to fulfill the activity request or allow the child to continue to participate in the activity and ensure the security of our users and our services, or as required by law. In the event we discover we have collected information from a child in a manner inconsistent with COPPA’s requirements, we will either delete the information or immediately seek the parent’s consent for that collection.

Registration

Children can register as a member of our site to use the content and access our curriculum and applications, or download software for any of the products we commercialize. During the registration process, we ask users to provide certain information for notification and security purposes, including a parent or legal guardian’s email address, a username (valid or using an alias), and password. We strongly advise children never to provide any personal information (e.g. actual full name) in their usernames though such may be required to be identified by School teachers. Please note that children can choose whether to share their information with us, but access and certain features cannot function without it. As a result, children may not be able to access certain features if required information has not been provided.

Consistent with the requirements of COPPA, on any child-targeted site or application, or in any instance where we ask for age and determine the user is age 13 or under, we ask for a parent or legal guardian email address before we collect any personal information from the child. If you believe your child is participating in an activity on the Application that collects personal information and you or another parent/legal guardian have NOT received an email providing notice or seeking your consent, please feel free to contact us at privacy@intelitek.com. We will not use parent emails provided for parental consent purposes to market to the parent, unless the parent has expressly opted in to email marketing or has separately participated in an activity that allows for such email contact.



Birthdates

Wherever children are supposed to signup, we will ask for birth dates from users at signup before the account is created, to validate their ages before entering a purchasing area on the website.

Content Generated by a Child

Activities for children on our sites may allow children to develop software code and save it in the on-line Application. Some of these activities do not require children to provide any personal information and therefore may not result in notice to the parent or require parental consent. Intelitek will review any published content. If there is information that does not meet COPPA laws, the content will immediately be made private and an email will be sent to the parent/legal guardian.

About Verifiable Parental Consent

Email Consent. In the event Intelitek wishes to collect personal information from a child, COPPA requires that we first seek a parent or legal guardian's consent by email. In the email we will explain what information we are collecting, how we plan to use it, how the parent can provide consent, and how the parent can revoke consent. If we do not receive parental consent within a reasonable time, we will delete the parent contact information and any other information collected from the child in connection with that activity.

- **High-Level Consent.** In the event Intelitek collects personal information from a child that will be posted publicly, we will seek a higher level of consent than email consent. Such "high-level" methods of consent include but are not limited to: Providing a consent form to be signed by the parent and returned via U.S. mail, fax, or electronic scan;
- Requiring the parent, in connection with a monetary transaction, to use a credit card, debit card, or other online payment system that provides notification of each discrete transaction to the primary account holder;
- Having the parent call a toll-free telephone number staffed by trained personnel, or have the parent connect to trained personnel via video-conference; or
- Verifying a parent's identity by checking a form of government-issued identification against databases of such information, provided that we promptly delete the parent's identification after completing the verification.

Teacher consent in lieu of a parent. With regard to school-based activities, in certain cases COPPA allows teachers and school administrators to act in the stead of parents to provide consent for the collection of personal information from children. Schools should always notify parents about these activities and should ensure that they have received all required parent or legal guardian consents.

Specifically, if You are using the CoderZ platform as part of Your school's curriculum, then Your school may act as the agent of Your parent or legal guardian and can consent under COPPA to Your use of the Website and Services. In such cases, Intelitek will only collect personal information for the use and benefit of the school and for no other commercial purpose in accordance with the Federal Trade Commission, *Complying with COPPA: Frequently Asked Questions*, N.1; N.2; and N.5 (July 2020) (<https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked->



[questions-0](#)). In such cases where Your school provides such consent, we shall presume that such consent is based upon the school's receipt of consent from your parent or legal guardian.

Contests

For contests, if and when we decide to hold them, we may require only the information necessary for a child to participate, such as first name (to distinguish among family members) and parent email address (to notify the parent where required by law). We only contact the parent for more personalized information for prize-fulfillment purposes when the child wins the contest or sweepstakes.

Of course, some contests ask the child to submit their own created content along with the child's entry. In those instances, we may require parental consent prior to submission.

Email Contact with a Child

On occasion, in order to respond to a question or request from a child, we may need to use the child's online contact information, such as an email address provided when access was permitted. We will delete this information immediately after registration with us is terminated.

In connection with certain activities or services, we may collect a child's online contact information, such as an email address, in order to communicate with the child more than once. In such instances we will retain the child's online contact information to honor the request and for no other purpose such as marketing. One example would be a newsletter that provides occasional updates about a site, activity, new feature or character.

Whenever we collect a child's online contact information for ongoing communications, we will simultaneously require a parent email address in order to notify the parent about the collection and use of the child's information, as well as to provide the parent an opportunity to prevent further contact with the child. On some occasions a child may be engaged in more than one ongoing communication, and a parent may be required to "opt-out" of each communication individually.

Persistent Identifiers

When children interact with us, certain information may automatically be collected, both to make the Application more interesting and useful to children and for various purposes related to our business. Examples include the type of computer operating system, the child's IP address or mobile device identifier, the web browser, the frequency with which the child visits various parts of our sites or applications, and information regarding the online or mobile service provider. This information is collected using technologies such as cookies, flash cookies, web beacons, and other unique identifiers. This information may be collected by Intelitek or by a third party. This data is principally used for internal purposes only, in order to:

- provide children with access to features and activities on our sites and applications
- customize content and improve our sites and applications
- conduct research and analysis to address the performance of our sites and applications
- generate anonymous reporting for use by Intelitek.



In the event that we collect (or allow others to collect) such information from children on our sites (other than usage statistics for product analytics) and applications for other purposes, we will notify parents and obtain consent prior to such collection.

The list of third-party operators who collect persistent identifiers on our sites and applications may be found here:

- Jaco Analytics – More information on their privacy terms can be found at <https://www.getjaco.com/privacy.html>

Please contact us at the mailing address, email, or phone number below with questions about the operators' privacy policies and collection and use practices:

Intelitek
Attention: Management
18 Tsienneto Road
Derry, NH 03038
USA
Toll Free: 800-221-2763
Phone: 603-413-2600
Fax: 603-437-2137
privacy@intelitek.com

When Information Collected from Children Is Available To Others

In addition to those rare instances where a child's personal information is posted publicly (after receiving high-level parental consent), we also may share or disclose personal information collected from children in a limited number of instances, including the following:

- We may share information with our service providers if necessary for them to perform a business, professional, or technology support function for us.
- We may share work- and data-related to children's work performed using the Application, such as developed code, competition scores, usage, class average comparisons, and similar data with school teachers, administrators, and others further to grading or assessment of such activities.
- We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information collected from children (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or applications; (iii) to protect the security or integrity of our sites, applications, and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.



Parental Choices and Controls

At any time, parents can refuse to permit us to collect further personal information from their children in association with a particular account, and can request that we delete from our records the personal information we have collected in connection with that account. Please keep in mind that a request to delete records may lead to a termination of an account, membership, or other service.

Where a child has registered for a Intelitek.com or CoderZ account, we use two methods to allow parents to access, change, or delete the personally identifiable information that we have collected from their children:

1. Parents can request access to and delete their child's personal information by logging on to the child's account and accessing the profile settings. Our knowledge base offers information on how to delete an account. Parents will need their child's username and password, you can recover a password if the child cannot recall it using "forgot password" on our login page.
2. Parents can contact Customer Services to request access to, change, or delete their child's personal information by sending an email to us parents@gocoderz.com
3. Parents of Intelitek users can also contact Intelitek at:

Intelitek
Attention: Management
18 Tsienneto Road
Derry, NH 03038
USA
Toll Free: 800-221-2763
Phone: 603-413-2600
Fax: 603-437-2137
privacy@intelitek.com

In any correspondence such as e-mail or mail, please include the child's e-mail and full username, the parent's email address and telephone number. To protect children's privacy and security, we will take reasonable steps to help verify a parent's identity before granting access to any personal information.

Last updated: December 8, 2021



INTELITEK FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA) POLICY

Intelitek, Inc. (the “Company”, “we”, “us” or “Intelitek”) does not maintain, and will not agree to accept, student educational records in any form on behalf of schools, educational institutions, or other clients of the Company.

Nonetheless, there may be instances in which students’ personal identifiable information (“PII”) is provided by Intelitek’s clients to the Company as part of signing up for or using our Intelitek™ site, LearnMate™ sites, Coderz™ sites (the Site) and Coderz application (the “Application”). This Family Educational Rights and Privacy Act Policy explains our collection, transparency, and data security policies with respect to such PII, and uses terms that are defined in our general Privacy Policy. This policy is in accordance with the Family Educational Rights and Privacy Act Policy (“FERPA”) and outlines our practices in the United States regarding students’ PII.

What Information is Collected and How it is Used

In registering students for the Application, schools may provide the Company with students’ basic identifying information, such as student name, contact information, and birth dates (for purposes of age validation). In addition, the App may generate metadata or user content, which in some instances may be considered PII if it can be used to identify students indirectly (see “Persistent Identifiers”, below).

In any instance that we collect PII, we will use such PII only for the purposes for which it was provided by our FERPA-regulated clients. PII will not be used for marketing new products or services to the student, targeting individual students with directed advertisements, selling the information to a third party, or any other purpose prohibited by state or federal law.

Intelitek may, in a manner consistent with FERPA, use de-identified PII provided by a school for product development, research, or other purposes. In the event of such use, de-identified data will have all direct and indirect personal identifiers removed. This includes, but is not limited to, name, ID numbers, date of birth, demographic information, location information, and school ID. We will not attempt to re-identify de-identified data and not to transfer de-identified data to any party unless that party agrees not to attempt re-identification.

Persistent Identifiers

When students interact with us, certain information may automatically be collected, both to make the Application more interesting and useful to students and for various purposes related to our business. Examples include the type of computer operating system, the student’s IP address or mobile device identifier, the web browser, the frequency with which the student visits various parts of our sites or applications, and information regarding the online or mobile service provider. This information is collected using technologies such as cookies, flash cookies, web beacons, and other unique identifiers.

This information may be collected by Intelitek or by a third party. This data is principally used for internal purposes only, in order to:



- provide students with access to features and activities on our sites and applications
- customize content and improve our sites and applications
- conduct research and analysis to address the performance of our sites and applications
- generate anonymous reporting for use by Intelitek.

The list of third-party operators who collect persistent identifiers on our sites and applications may be found here. Unless such data has been de-identified, it will not be used for any other purpose:

- Jaco Analytics – More information on their privacy terms can be found at <https://www.getjaco.com/privacy.html>

Please contact us at the mailing address, email, or phone number below with questions about the operators' privacy policies and collection and use practices:

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Attention: Management
18 Tsienneto Road
Derry, NH 03038
United States of America
Toll Free: 800-221-2763 / Phone: 603-413-2600 / Fax: 603-437-2137
Email: privacy@intelitek.com

When Information Collected From Students Is Available To Others

Intelitek's policy is not to use or re-disclose non-anonymized PII without the permission of our FERPA-regulated clients. Consistent with applicable law and our agreements with Company clients, we also may share or disclose personal information collected from children in a limited number of instances, including the following:

- We may, subject to FERPA's requirements, share information with our service providers if necessary for them to perform a business, professional, or technology support function for us
- We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information collected from children (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or applications; (iii) to protect the security or integrity of our sites, applications, and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.

Data Mining and Scanning

If the Company engages in data mining and scanning of PII stored in the Application, such activities will be limited to necessary and permitted purposes such as malware/spam detection or personalization



tools. Under no circumstances will PII be used for targeted advertising directed to students or their parents or for any other purpose prohibited by law or by our user agreement.

Data Security and Destruction

Intelitek has in place robust checks and controls to ensure data security for itself, its customers, and any other third party whose data may be accessed through Intelitek's servers and systems. In the event of a breach, Intelitek will promptly notify any affected party of such data breach and work with all relevant parties, including its FERPA-regulated clients, its own and/or outside cybersecurity teams, and law enforcement, to limit the impact of such breach and prevent future data breached. Intelitek will cooperate with its FERPA-regulated customers to confirm that policies and procedures to ensure the security and confidentiality of the data are being followed.

Upon the completion of Intelitek's contractual relationship with its FERPA-regulated clients, we will retain PII only so long as reasonably necessary to fulfill the activity request or allow the student to continue to participate in the activity, and ensure the security of our users and our services, or as required by law. Any other PII will be promptly destroyed in accordance with industry-standard practices subject to verification by our clients.

Transparency

Intelitek does not maintain education records on behalf of FERPA-regulated clients. If any parent believes that Intelitek possesses PII relating to his or her child, the parent should notify Intelitek and Intelitek shall, as relevant, comply with FERPA and all applicable laws and regulations in providing the parent with access to such records through the FERPA-regulated client from which such records were received.

All communications from parents should be directed to:

Intelitek
Attention: Management
18 Tsienneto Road
Derry, NH 03038
United States of America
Toll Free: 800-221-2763 / Phone: 603-413-2600 / Fax: 603-437-2137
Email: privacy@intelitek.com

The End