Privacy Policy

Last Updated May, 2020

Eyeread Inc. ("**Squiggle Park | Dreamscape**", "**we**", "**us**" or "**our**", as the context dictates) and its Affiliates (as defined below) are committed to preserving the privacy of our users, including you ("**you**" or "**your**" as the context dictates), who uses our Website (https://squigglepark.com/) and/or use any of our education software (such software, together with the Website and any other website, application, platform or other software of Eyeread Inc., collectively the "**Software**"). For the purposes of this Privacy Policy, the term "**Affiliates**" means any entity, directly or indirectly, controlling or controlled by, or under control with, Eyeread Inc.

This Privacy Policy is designed to help you understand how your personally identifiable information ("**Personal Information**") is collected, used, stored and disclosed when you engage with us. Personal Information includes, without limitation, any information you provide to us that personally identifies you, like your name or email address, or other information which could be reasonably linked to such identifying information. We will only collect, use, and share your Personal Information in accordance with this Privacy Policy.

Before registering, submitting any content or Personal Information, or otherwise engaging with us, please make sure that you read and understand this Privacy Policy as well as our Terms of Service (our "**Terms**")

(https://docs.google.com/document/d/1WOTDYdNlgxxqfQUTJoDxV6JPS28a_DojGSwgZrV_0ac/edit?usp=sharing).

This Privacy Policy applies to the Personal Information you provide us when using our Software or submitting information over a form or email. In the course of engaging with us, you may use a third party's intellectual property, tool or resources (e.g., for payment processing), and such third party's privacy policy may also apply to you. We encourage you to read and review each privacy policy that applies to you as our Privacy Policy terms may differ from the terms contained in third parties' privacy policies.

We will identify the purposes for which Personal Information is collected at or before the time it is collected. If Squiggle Park | Dreamscape seeks to use Personal Information that has been collected for a purpose not previously identified, we will seek your consent prior to use, unless it is otherwise permitted by law.

In our commitment to protect the privacy of children, the Software of Squiggle Park | Dreamscape has been reviewed and approved for having policies and practices surrounding the

collection, use, maintenance and disclosure of Personal Information of children consistent with each of the following applicable statutes:

- The Children's Online Privacy Protection Act (COPPA);
- The Family Education Rights and Protection Act (FERPA);
- The Protection of Pupil Rights Amendment (PPRA);
- The Student Online Personal Information Protection Act (SOPIPA); and
- The Health Insurance Portability and Accountability Act (HIPAA) of 1996.

If you have any objections to the terms in this Privacy Policy, you should not use our Software or provide us with any of your Personal Information, as by providing your Personal Information to us, you will be deemed to have consented to the processing of such data. If you have any hesitations or are unsure about any of the terms we invite you to contact us with questions at the contact details provided below.

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1. What is Squiggle Park | Dreamscape and Who Uses It?

Squiggle Park | Dreamscape is an online reading skills game and education platform that is used by children, parents and teachers across the world.

Children log in to Squiggle Park | Dreamscape's online game to play and learn the skills required to become strong readers. Within Squiggle Park | Dreamscape, children design their own online world. Their mission is to collect shards by exploring their friend's worlds where they can challenge their friend's base with their troops. In order to challenge a friend's base, train troops or build resources and defences to protect their own world, the child must read passages and answer corresponding comprehension questions which help build their reading skills. As children play, Squiggle Park | Dreamscape is constantly adapting the educational content that they encounter, so that each child advances through the reading curriculum and succeeds at their own pace.

Educators such as teachers and school/district administrators use Squiggle Park | Dreamscape to engage and assess their students. While Squiggle Park | Dreamscape is not intended to be used as a sole assessment tool, there are built-in features that simplify the assessment process through analyzing performance data that is aligned with the curriculum. As students play, teachers are able to access real-time reports on various deliverables, including, without limitation, the number of questions their students are answering correctly; the expectations their students have met; the reading level of their students; their students' progress over time; and the students' areas of difficulty.

Parents use Squiggle Park | Dreamscape to engage and assess their children. As children play, parents are similarly able to access real-time reports on the aforementioned deliverables.

2. What Information Does Squiggle Park | Dreamscape Collect and Why?

Squiggle Park | Dreamscape collects information in a number of different ways in order to provide a completely personalized education experience for each child, and to provide real-time reporting and assessment features to teachers and parents.

We do not ask for or require children to provide Personal Information beyond that which is reasonably necessary to use Squiggle Park | Dreamscape. Personal Information collected from children is never used or disclosed for third-party advertising or any kind of behaviorally-targeted advertising, and it is never sold or rented to anyone, including, without limitation, marketers or advertisers.

If a Child is Registering to Play Squiggle Park | Dreamscape

Squiggle Park | Dreamscape collects the minimum amount of Personal Information from children to allow for a personalized educational experience and to facilitate progress monitoring for parents and teachers.

There are two (2) ways a child can register for Squiggle Park | Dreamscape: (1) through their parent/teacher's account, or (2) independently through the game.

When children are signed up for the game through a parent or teacher's account, the parent/teacher is prompted to provide to us the child's name (first name, last name initial and grade), and Squiggle Park | Dreamscape prompts the child for the following information:

- Fictional avatar appearance and corresponding tagline.

When children sign up directly through the game with a teacher's class code (an alphanumeric code that is unique to a teacher's account) or parent's email address, Squiggle Park | Dreamscape prompts the child for the following information:

- First name;
- Last name initial;
- Password;
- Location including State/Province and/or Country (e.g. Ontario, Other Canadian Province, Texas, Florida, Other US State, or Other Country);
- Grade;
- Parent's email address; and
- Fictional avatar appearance and corresponding tagline.

Squiggle Park | Dreamscape automatically generates a unique username based on the child's first name, last initial, and a number (e.g. MichaelS2). Since children are asked to only enter their initial for their last name (without a linked parent/teacher account), Squiggle Park | Dreamscape does not obtain the Personal Information of these children. We are committed to protecting the privacy of children and we do not knowingly solicit Personal Information from children under the age of 13 years old. If a child has already provided us with Personal information, his or her parent may contact us for purposes of deleting such information.

The child's name is used to identify that child to their parent or teacher so that they are able to effectively differentiate instruction. The child's grade and location are used to place them in the most appropriate curriculum (e.g. Common Core Reading Standards) and grade level. The child's username and password are used to allow them to securely log in to Squiggle Park | Dreamscape's game via the Website. The child's fictional avatar saying is used to personalize their avatar online to other players. The parent's email address is used to inform parents that their child has registered for an account on Squiggle Park | Dreamscape, in addition to, sending progress updates if they so choose to receive them.

As children play, Squiggle Park | Dreamscape collects information on the game features that they interact with, the reading skills that they encounter, and the questions that they answer (hereinafter referred to as "**Performance Data**"). Squiggle Park | Dreamscape uses the children's Performance Data to customize their educational experience, including the delivery of optimal passages from Squiggle Park | Dreamscape's reading curriculum.

Performance Data from one or more children may also be aggregated and used by Squiggle Park | Dreamscape to improve Squiggle Park | Dreamscape's educational algorithms.

Select components of a child's Performance Data are reported back to a child's parent and/or teacher, in order to allow the parent or teacher, as the case may be, to monitor the child's progress and customize the child's educational experience.

In addition to the information entered into by the child, Squiggle Park | Dreamscape automatically collects some information from any use of our Software as set forth in the "Automatically Collected Information" section.

If a child is signed up through a teacher account, the school remains in control of the child's Personal Information.

If a Parent is Registering to Play Squiggle Park | Dreamscape

When parents sign up for a free account on Squiggle Park | Dreamscape, Squiggle Park | Dreamscape prompts the parent for the following information:

- Full name;
- Email address; and
- Password.

A parent's name, email address and password are used for identification purposes and to allow the parent to securely log in to Squiggle Park | Dreamscape's parent dashboard. Email addresses are also used to communicate important information about the parent's account via email correspondence.

Parents who sign up for a paid membership to Squiggle Park | Dreamscape are asked for their child's username, child's password, credit card number, postal/zip code, card expiration date, and Card Verification Code (CVC), in addition to all of the information required for a free parent account (listed in the paragraph above). This information is used by Squiggle Park | Dreamscape to apply the appropriate charges to the parent's credit card, and to ensure that the membership is applied to the correct child account. Squiggle Park | Dreamscape does NOT directly store any credit card information - all credit card information and transactions are stored by our payment provider, Stripe. Please click here for more information about how Stripe secures customer information.

In addition, Squiggle Park | Dreamscape automatically collects some information from any use of our Software as set forth in the "Automatically Collected Information" section.

If a Teacher is Registering to Play Squiggle Park | Dreamscape

When teachers sign up for a free account on Squiggle Park | Dreamscape, Squiggle Park | Dreamscape prompts the teacher for the following information:

- Full name;
- Email address;
- Password;

- District/board;
- School.

A teacher's name, email address and password are used for identification purposes and to allow the teacher to securely log in to Squiggle Park | Dreamscape's teacher dashboard. Email addresses are also used to communicate important information about the teacher's account via email correspondence.

In addition, Squiggle Park | Dreamscape automatically collects some information from any use of our Software as set forth in the "Automatically Collected Information" section.

School/District Administrators

Squiggle Park | Dreamscape collects all of the information required for a free teacher account from school/district administrators, in addition to a list of the specific schools within the district that the administrator works with. For security purposes, Squiggle Park | Dreamscape also reserves the right to verify a school administrator's identity via email, telephone or another method that we deem appropriate in our sole discretion.

Third Party Authentication

We use third party authentication as an option for sign up and rostering.

Google Single-Sign-On (SSO): We access data via Google API and use that data to securely authenticate users to our applications. We store first name and last name to generate the username for players and to identify teachers. We also store account creator emails to authenticate users again as a part of the single sign on process. No other user information is collected or saved.

3. How Does Squiggle Park | Dreamscape Protect and Secure My Information?

Protecting your information is extremely important to us. In addition to annual staff training to ensure the security and confidentiality of children records, we take several precautions to ensure that user information is secure, including, without limitation, the following:

Password Protection – Secure passwords are the first line of defense for your child or student, parent, teacher or school/district administrator account. In order to prevent unauthorized access to your account, we recommend choosing a password that is memorable but hard to guess, and keeping your password confidential at all times. Additional information on password safety is available on the Government of Canada's website, the US Department of Homeland Security's website, and at ConnectSafely.org.

SSL Encryption – Squiggle Park | Dreamscape protects any information transferred through our website by encrypting it with the Secure Socket Layer (SSL) protocol by default. This makes it more difficult for malicious third parties to intercept your Personal Information.

Salted Hashing – Passwords and other sensitive information are never stored in plain text, and are instead protected via salted hashes.

Independent Service-Level APIs – Children's Personal Information are only available through a select few application programming interface (APIs). This minimizes the impact of a potential breach of any individual API.

Database Protection – Squiggle Park | Dreamscape's databases are inaccessible to all IP addresses except for a pre-specified list of whitelisted IP addresses. All databases are also password protected.

Periodic Data Review – Our team periodically reviews our data collection, storage and processing policies and practices against leading industry standards to ensure our ongoing compliance thereof. Your Personal Information may be stored, processed or otherwise used by us, our Affiliates or our service providers, both inside and outside of Canada.

Jurisdiction – Your Personal Information may be collected, used, processed, transferred, and retained in multiple countries including Canada, the United States and the European Economic Area, which may be outside the region in which you are situated and may have different privacy or data protection legislation, and may therefore be subject to the laws of these countries. If you are a resident of the European Economic Area or a country which restricts data transfers outside of that jurisdiction or region without your consent, by using our Software, you consent to your Personal Information being transferred outside of the European Economic Area or your country for processing or storage by or on behalf of us. We thereby retain the right to transfer your information to an affiliate or third party to protect the information or for internal business reasons as we see fit. By agreeing to this Privacy Policy, you agree and consent to us doing so without your further consent.

While we do our best to keep your data secure, Squiggle Park | Dreamscape cannot guarantee the security of your data. Several factors including, but not limited to, hardware/software failure, outages, human error, attacks, or unauthorized use may compromise the security of our users' information. In the case of a data security breach, we will do our best to alert any affected users electronically via our Website, the email account you have provided to us, and/or another medium that we deem appropriate, depending on the magnitude and severity of the breach.

Squiggle Park | Dreamscape maintains computerized data that includes Personal Information that Squiggle Park | Dreamscape does not own. Should a breach occur, Squiggle Park | Dreamscape will notify the account owner of the breach of the security of the data immediately following discovery, if the Personal Information was, or is reasonably believed to have been, acquired by an unauthorized person.

The security breach notification will be written in plain language and will be titled "Notice of Data Breach." The breach notification will include the following information:

- What happened;
- What information was involved;
- What we are doing about the breach;

- What you can do; and
- Contact information.

4. What Child Information is Visible to Others Within Squiggle Park | Dreamscape's Virtual World?

Since Squiggle Park | Dreamscape is an online multiplayer game, children are able to interact with other players within our virtual world. However, we do take several precautions to ensure that any Personal Information is only visible to an authorized parent and/or teacher within their password-protected Squiggle Park | Dreamscape account, and is not available to the public or other players within Squiggle Park | Dreamscape's virtual world.

Information that is visible to other players within Squiggle Park | Dreamscape's virtual world includes the following:

Avatar Profiles – A child's avatar's appearance, clothing, items and tagline are available for other players to view in the game. This does not include any of the child's Personal Information.

Student or Child Usernames – To discourage children from using their full name or other Personal Information, student or child usernames are generated based on a combination of their first name, last initial, and a number (e.g. MichaelS2).

Safe Chat Messages – Children have the ability to send safe chat messages to others within Squiggle Park | Dreamscape's virtual world. These messages can only be selected from a pre-specified list of phrases (e.g. "In your dreams"), and hence, children are not able to disclose Personal Information such as their telephone number or address. This also prevents children from sending offensive or inappropriate messages.

Squiggle Park | Dreamscape also has built a "bad word filter" to identify and restrict and player accounts to be registered with inappropriate content.

5. Does Squiggle Park | Dreamscape Share Data with Third Parties?

As a website trusted by educators, parents and children worldwide, Squiggle Park | Dreamscape is committed to never selling or leasing your, your student's or your child's, as the case may be, Personal Information with third parties other than for research purposes. All research partnerships are to measure the efficacy of the Software. Such research partnerships are required to provide to us an ethics certificate prior to their engagement. Such research partnerships do not have access to user names or emails to ensure that such data cannot be tracked back to a specific player, school or district.

Prior to engaging into a relationship with a third-party service provider, Squiggle Park | Dreamscape will first review their privacy policies and ensure that these are compliant with those regulations that Squiggle Park | Dreamscape is adhering to and that they are aware that Squiggle Park | Dreamscape is directed to children users.

We value your privacy, and hence restrict sharing your data with third parties, with the exception of the following circumstances:

Other Users That Have Invited You to Squiggle Park | Dreamscape – As a teacher or parent, if you are invited to create an account on Squiggle Park | Dreamscape by another teacher or parent on Squiggle Park | Dreamscape, we will let them know if you have created an account, and the number of Active Students (as defined below) linked to your account. For the purposes of this Privacy Policy, "**Active Students**" are students that have answered at least twenty (20) questions within Squiggle Park | Dreamscape.

School/District Administrators – Verified school/district administrators (e.g. your student's Principal or Superintendent) who have created accounts on Squiggle Park | Dreamscape may be able to see your and your students' usernames, activity and Performance Data on Squiggle Park | Dreamscape.

Third-Party Integrations on Squiggle Park | Dreamscape – When you use third-party apps, websites, or services to log into (e.g. using your Google Classroom to log in to your teacher account) or share information from Squiggle Park | Dreamscape (e.g. sending out a tweet on the number of questions you answered in your class), they may receive information on your activity on Squiggle Park | Dreamscape based on what information you share. Information collected by third-party integrations is subject to the third party's own terms of use and privacy policy.

Service Providers – Squiggle Park | Dreamscape uses various vendors, partners and service providers to help us deliver our Software to our users. For example, we use a support service called Zendesk to deliver support to our users, as it would take a lot of resources for us to develop our own customer service triage platform. As a result, some of your information, including Personal Information, may be shared with our service providers in order for them to perform their tasks. Wherever possible, we ensure that we only share the minimal amount of Personal Information for the respective service provider to perform their services. We carefully vet all of our service providers and ensure that they protect and secure your Personal Information in a manner that is at least as protective as this Privacy Policy.

Analytics Services – Squiggle Park | Dreamscape uses third-party analytics services to better understand how our users are interacting with our Software, and to improve our Software over time. In this process, some of your Personal Information, Performance Data, and interactions with our product may be collected by or shared with these analytics services in order for them to perform their services. We carefully vet all of our analytics services and ensure that they protect and secure your information in a way that is at least as protective as this Privacy Policy.

Non-Personal Information – Squiggle Park | Dreamscape may share aggregated, non-Personal Information with the public for marketing or other purposes. For example, we may share data on the percentage of children on Squiggle Park | Dreamscape who use the game both at home and in school in our marketing materials to parents. None of such information will contain any Personal Information about individual users.

Legal Requirements – Squiggle Park | Dreamscape may share our users' Personal Information if we are legally obligated to do so to comply with the law. In these cases, we will disclose only

the Personal Information that is deemed a legal necessity by the applicable law, so as to protect the rights and safety of our users.

Change of Control – In the case that Squiggle Park | Dreamscape is acquired or merges with a third party, your data will still be protected as per the terms outlined in this Privacy Policy. In the case that Squiggle Park | Dreamscape goes out of business or files for bankruptcy, we will protect your Personal Information, and will not sell it to any third party.

Consent – Squiggle Park | Dreamscape reserves the right to share your or your students' or children's information with your explicit consent, given verbally, on paper, or electronically. For example, we may publish a case study with a teacher's name, school, district, and the number of questions her students have answered on Squiggle Park | Dreamscape with her explicit consent.

6. Parental Choices

We understand that as a parent or legal guardian of a child, controlling your child's Personal Information and access to online resources can be difficult. In accordance with COPPA, if a child signs up for a Squiggle Park | Dreamscape account independently, we require the child to enter a parent's email address so that an email can be sent to their parent seeking the parent's consent for the child to engage with our Software.

While we do our best to protect your child's Personal Information and provide them with an awesome educational experience, legal parents or guardians do have the right to request that their child's account be deleted by contacting us. In order to do so, we may require verification of the parent or guardian's identity, and verification that they are the legal parent and/or guardian of that child. Please keep in mind that this will also prohibit your child from using their Squiggle Park | Dreamscape account in class, and that they may miss out on class work or homework if their teacher uses Squiggle Park | Dreamscape as part of their reading instruction.

7. Automatically Collected Information

When you utilize our Software, Squiggle Park | Dreamscape (and our Service Providers or Analytics Services) may also collect certain information by automated means (the "**Automatic Information**"), such as such as through server log files, cookies (text files sent to and stored on your device when you access the Website), web beacons (also known as clear GIFs and pixel tags, which may be used to transmit information back to the Website), and embedded scripts (programming code that is designed to collect information about your interactions with the Website, such as the links you click on, and which is active only when you are accessing the Website). Automatic Information will not be published or made public through our Software. For further clarification, cookies are alphanumeric identifiers that are stored on your device with which you access the Software. These cookies allow us to adjust our Software to meet your personal browsing preferences. If your browser is not set to allow cookies, you may not have access to all areas or features of the Website.

The information we collect in this manner may include details about the computer, mobile phone, or other device used to access the Website (such as browser type, operating system,

and IP address), location information, session information, referring URLs and information on actions taken or interaction with our digital assets.

We may use third-party web analytics services to help us analyze how users use the Website. We may permit these third parties to operate directly on the Website, use their own technology (such as cookies or web beacons), and collect information about you on our behalf.

The information we collect in this manner is collected to enhance your user experience. For example, this information allows us to track trends, helps us to improve our Software, and provides a more customized experience to our users.

8. How Can I View, Modify, or Delete my Information?

As a parent, teacher, or school/district administrator, you can view and/or modify your information through your password-protected Squiggle Park | Dreamscape account. Your Squiggle Park | Dreamscape account also allows you to view and/or modify information for your child(ren) and student(s).

As a parent, teacher or school district, you have the ability to contact us at any time to review Personal Information and categories of data being held in education records.

Your Squiggle Park | Dreamscape account may limit you from modifying certain information (e.g. the username that you use to log in to your teacher or parent account), and in these cases, we suggest contacting us, as we may be able to modify such information on your behalf.

While we would be sad to see you go, you are able to request to delete your account at any time by writing to us. You are also able to request to delete your child's or student's account as long as you have a parent or teacher account that is linked to that child. In this event, we will delete your and/or your child's or your student's, as the case may be, Personal Information from our systems, and will remove access to the account within ten (10) business days of your request.

Please send your written request to: support@squigglepark.com.

9. How Will Squiggle Park | Dreamscape Notify Me of Changes to this Privacy Policy?

We are committed to keeping your data private and secure, and as technology, privacy laws, and best practices evolve over time, we will do our best to keep this Privacy Policy consistent with leading industry standards.

We reserve the right to change this Privacy Policy, and any other policies and procedures concerning our practices for managing Personal Information, at any time without prior notice to you.

For minor changes which, in our sole discretion, do not reduce your rights under this Privacy Policy, we will notify our users via our Website and/or directly by email (using the email address you provided to us). For more major changes, we will notify our users directly by email (using the email address you provided to us). At the top of the modified Privacy Policy we will include

the date upon which it was last updated. Any changes that are made to this Privacy Policy will apply to both Personal Information that we hold prior to the effective date of the amended Privacy Policy and to any Personal Information collected on or after such effective date.

Schools signed up for a membership will be notified of any material changes to privacy policies, including practices around new or additional data collection, or practices that may lessen the previously noted protections around student-data privacy.

We encourage all users to review this Privacy Policy from time to time and write to us with any questions or concerns. If you do not agree with any updates, you have the option of terminating your account and discontinuing your use of our Software. However, by continuing to use our Software after a change to this Privacy Policy, you are agreeing to accept the changes and the terms of the updated Privacy Policy in their entirety.

10. How Can I Contact Squiggle Park | Dreamscape with Privacy Questions?

If you have any questions or concerns about our Privacy Policy, please contact our support team at: support@squigglepark.com or mail us at: 7 Mellor Avenue, Unit 13, Dartmouth, NS, B3B 0E8, or call us at: 866-599-7540.

To report a privacy breach or if you have cause to believe that either your own or somebody else's data may have been compromised, please contact us immediately at support@squigglepark.com.

11. How Does Squiggle Park | Dreamscape Maintain FERPA Compliance?

FERPA protects the privacy of students' "Educational Records" by specifying how and with whom schools can share information from these records.

12. How Does Squiggle Park | Dreamscape Maintain COPPA Compliance?

The Children's Online Privacy Protection Act (COPPA) is a Federal Trade Commission (FTC) statute designed to ensure that parents remain in control of Personal Information collected from their young children online.