PosturePanda, (we, us, our) collects and uses information in order to operate PosturePanda.

This policy explains how we do this and applies to everyone who uses PosturePanda or creates a PosturePanda account.

## Who do we collect information from?

We collect information from anyone who creates an account with PosturePanda. If you do not create an account with us, we do not collect your personal information.

We may collect anonymous information from users before they create an account in order to analyze website usage for PosturePanda.com.

# What information do we collect from your account?

We collect the following personal information:

- Email address and other Google account profile information, which is collected when you connect your Google account to PosturePanda.
- Information you choose to share with us, for example in an email, website form, support ticket, social media, or survey responses.
- Some technical information about how you use PosturePanda, for example the type of device you are using, your operating system, IP address, and length of session.

 Basic application usage data, including but not limited to a timestamped log of videos created and length of videos recorded.

We only collect the minimum about of data required to operate PosturePanda.

We measure visitors to our website using Google Analytics. This records what pages you view within our site, how you arrived at our site and some basic information about your computer. We do not track the content you record nor any non-PosturePanda web traffic. The information we collect from analytics helps us understand what parts of our sites are doing well, and which need changing. Like most websites, we use this information to improve our customer experience. Please see here how Google uses data. You can also opt out if you wish. Any user who identifies themselves as under 13 years old is automatically opted out of our Google Analytics tracking.

## How do we use your information?

We use your information only for the following purposes:

- providing PosturePanda and making sure you can use it properly;
- managing and administering your account;
- responding to any questions, comments or complaints we receive from you;
- communicating with you about PosturePanda for account-related or promotional purposes;
- investigating potentially illegal activities on PosturePanda;
- analyzing usage of PosturePanda;
- improving PosturePanda.

We will never use your information for targeted advertising. We do not build a personal profile of you other than for supporting authorized educational or school purposes, or as authorized by you (or by a parent or guardian if necessary). We also won't use your information for any purposes except those above without letting you know and getting your permission if necessary.

If you are a teacher or school we will work with you as far as we are legally able to accommodate your directions regarding our treatment of personal data belonging to your students, recognizing that the school may be in control of personal data relating to its students.

This includes adhering to a school's requests after PosturePanda is no longer in use by a teacher or the school or after this policy is terminated or expires in relation to transfers of students' personal data, deleting students' personal data and making sure that any third parties that work in connection with PosturePanda do the same, in each case subject to our legal requirements regarding the use, storage and transfer of such data. You can also request that we provide you with written confirmation of the deletion of your data.

For U.S educational institutions we will work with you to ensure mutual compliance with the Family Education Rights and Privacy Act (FERPA). FERPA is a Federal law that protects personally identifiable information in students' education records from unauthorized disclosure. It affords parents the right to access their child's education records, the right to seek to have the records amended, and the right to have some control over the disclosure of personally identifiable information from the education records. As a parent you may request to access or review your student's records at anytime by contacting your child's school directly.

## Who do we share your information with?

We never rent or sell your information.

We don't share your information except:

- with third party service providers, such as hosting providers or an email service, so that they can provide services to us. In cases where we share student personal data with these third parties, they will be notified and be obligated to comply with the commitments in this policy.
- if we have a legal obligation to disclose the information (for example, if a court orders us to).
- if another company buys or invests in our company, or if we go insolvent, or if we merge with another company, in which case the company that receives your information will protect the information in the same way we do. If we transfer our obligations under our terms of use to another company, this may mean that we need to transfer your personal data to that company. We will contact you to let you know if we plan to do this. If you are unhappy with the transfer you may contact us to end your contract with us within 30 days and if you do so, we will not transfer your data to that company.

All information collected through PosturePanda is stored in Google Cloud and hosted in the USA. We take reasonable steps to protect your personal data when it is transferred to Google Cloud, and Google participates in the EU-U.S. Privacy Shield arrangement. This means it safeguards your personal data appropriately.

## Children Under the Age of 13

The PosturePanda team takes the privacy of students and children extremely seriously. We do not intentionally target our services to students or children of any kind. Educators that have the authority to act on parent's behalf may allow students under 13 to use our services, if such use is for educational purposes, and if this use ensures that students will not provide any personal information and will not share, or otherwise, distribute recordings containing personal information of a student.

PosturePanda has taken and upholds the Student Privacy Pledge per the terms consistent on studentprivacypledge.org

### Security

We have strict security measures in place to try to protect your information and make sure that it is not lost, damaged or accessed by anyone who should not see it. Your data is transmitted securely over SSL and stored in Google Cloud. To learn more about Google Cloud's security measures, please visit <a href="https://cloud.google.com/security">https://cloud.google.com/security</a>.

In the unlikely event of an unauthorized disclosure of your data we will notify you by email and, when possible, by telephone, and act in accordance with our legal requirements to resolve such disclosure and prevent any future unauthorized disclosure. Every user affected by the unauthorized disclosure will be notified, either by us or in conjunction with the school district or educational agency.

### Video streams with PosturePanda

Any video you create with PosturePanda belongs to you.

You control where your recordings are stored. When you choose to store your recordings on a third party service, they will be transferred to the respective remote service. Please consult the privacy policy of the applicable third party service provider to see how it handles your files.

If you use some features (like video editing) with recordings stored on Google Drive, we may transfer and process these recordings on remote systems as required to deliver or to speed up the respective feature. We delete any recordings from remote systems immediately after they have been processed.

### **Your Rights**

You can ask us to correct any information we hold about you that is inaccurate. If you would like us to send you a copy of your information or correct your information, please email us at hello@posturepanda.com

You can also ask us to delete your account and all the associated personal data held by PosturePanda by emailing us at hello@posturepanda.com. We are not able to remotely delete videos created with PosturePanda, as these are fully under the user's control.

If you are a school, you may request to review your students' information, have it deleted, and refuse further data collection by emailing us at <a href="https://hellowspace.new.org/">hellowspace.new.org/</a> at hello@posturepanda.com. If further data collection is stopped, those individuals may no longer be able to use PosturePanda.

### **Deleting Information**

We don't keep your information for longer than we need to for the purposes listed in this policy.

We may delete certain personal and usage data if you haven't used your account for more than 2 years. We will never delete any videos created with PosturePanda.

#### Cookies

PosturePanda uses cookies to recognize you when you log in with Google to our website or application and to track referral purchases for our affiliate program. You can block cookies through your browser settings, but if you do you might not be able to use PosturePanda properly.

#### Communication

Upon installing our application, all non-student users over the age of 13 agree to receive account-related and marketing emails including relevant PosturePanda information like new feature releases, product tutorials, customer success stories, and community-related features. You may opt-out of marketing communication at any time by clicking the unsubscribe link in any email received, or by providing us notice to the contact information listed here.

We are not responsible for users who identify themselves incorrectly (e.g. students who declare that they are corporate users), though as noted above we are able to change any user's incorrect information upon request.

### **Changes to This Policy**

We may make changes to this Privacy Policy from time to time. If we make any material changes, we will send you a link to our new policy along with a summary of our updated data collection practices via email or through our application. We encourage you to read this Privacy Policy periodically to stay up-to-date about our privacy practices. As long as you use PosturePanda, you are agreeing to this Privacy Policy and any updates we make to it.

We will notify schools in advance of material changes to this policy.

#### **Contact Information**

Should you have any question about this policy, please email us at hello@posturepanda.com