#### **SPARK MATH TUTORING**

## **Privacy Policy**

This Privacy Policy is designed to help you understand how Spark Math Tutoring collects, transmits, and stores information about our Users. The term "you" or "You" or "User" or "Users" shall refer to Students, Tutors or any person or entity who views, uses, accesses, browses or submits any content or material to the Service (defined below). This Privacy Policy is not a contract and does not create any legal rights. Providing your information is voluntary and your use of the Service (defined below) after the effective date of this document constitutes your acceptance of this Privacy Policy. If you do not agree to all the terms and conditions of this Privacy Policy, do not use the Service.

#### Information we collect

#### Information you provide to us

This Privacy Policy applies only to information we collect via the website http://www.sparkonlinemathturing.com ("Site"), online and mobile applications ("Apps") (the Site and Apps collectively referred to as, the "Service"), email, telephone, electronic devices and other interactive services. In order to help you get the most out of our service, we collect User submitted personally identifiable information ("PII") when you use the Service. For example, we may collect information you provide when you create an account. Such information may include your name, address, password, zip code, email address, and phone number for communication purposes. Information may be submitted to the Site or Apps or via telephone or email when communicating with a Spark Math Tutoring. For students and parents, we may collect information related to your documentation of and payment for tutoring sessions; tutoring questions related to homework or your studies; teacher feedback of a student (once the parent provides consent for submission); and content you upload for the purposes of transmitting it to another user or for public display on the Site or Apps. As detailed in the "Data Transmission and Storage" section below, we use Secure Socket Layer (SSL) encryption on any page of the Site where we ask you to submit personally identifiable information and encrypt all such information for safe storage in our system.

#### Information we collect automatically

We also gather non-PII when you use the Service, including type of browser you use, access time, pages viewed, your IP address; and we collect information about the computer or mobile device you use to access the Service, including without limitation operating system and unique device identifiers and mobile network information. This data is used to better understand and enhance the user experience on the Site. Spark Math Tutoring may publish these statistics or share them with third parties without including PII. Some browsers allow you to indicate that you would not like your online activities tracked, using "Do Not Track" indicators ("DNT Indicators").

## Data transmission and storage

Spark Math Tutoring uses industry-standard 128-bit SSL encryption when collecting and transmitting your information through the Site and the Spark Math Tutoring network (collectively, the "System.") Once information has been collected, we encrypt sensitive data in our database for added security. The Spark Math Tutoring also uses firewalls and hardware monitoring across our System to protect against unauthorized access. Unfortunately, even with these measures, Spark Math Tutoring cannot guarantee the security of PII. By using the Service, you acknowledge and agree that Spark Math Tutoring makes no such guarantee, and that you use the Service at your own risk.

#### **Financial information**

If you elect to pay for tutoring lessons with a credit card, we will collect your name, credit card number, expiration date, and address information associated with the account. All financial information, other than credit card numbers, is stored and encrypted in our System in full compliance with the Payment Card Industry Data Security Standard. We do not store credit card numbers.

#### Use of cookies

Spark Math Tutoring uses cookies to help create a better user experience. A cookie is a small text file that is sent to your browser from a web server and may be stored on your computer's hard drive. Spark Math Tutoring uses cookies to better customize your experience on the Site based on User attributes like your location and account preferences. No personally identifiable information is stored in our cookies. While you may elect to disable or delete cookies from your browser at any time, please note that this action may limit your use of Spark Math Tutoring services that require cookies. If you are interested in more information about tailored browser advertising and how you control cookies from being put on your computer to deliver tailored advertising, you may visit the Network Advertising Initiative's website and/or the Digital Advertising Alliance's website. You also can control advertising cookies from Google, by using its Ads Preference Manager. Please note that to the extent advertising technology is integrated into the Site, you may still receive advertisements even if you opt-out of tailored advertising.

## **Use of Personally Identifiable Information**

Spark Math Tutoring may use PII or other personal information you specifically give to us: a) to provide services to you through the System, b) to process transactions and billing, c) for identification and authentication purposes, d) to communicate with you concerning the System, transactions, security, privacy and administrative issues relating to your use of the System, e) to improve your response to and interaction with the System, f) to do something you have asked us to do, or tell you of services that we think may be of interest to you; g) in the case of teacher feedback of a student, we will transmit it as you ask us to. Spark Math Tutoring shares a minimum amount of information between tutors and students in order to facilitate the arrangement of tutoring sessions. We reserve the right to release non-personally identifiable information collected in aggregate, however. Third parties, including Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from our Site, apps and elsewhere on the internet and use that information to provide measurement

services and target ads. If you wish to opt-out of the collection and use of information for ad targeting you can do so using the following links: <a href="http://www.aboutads.info/choices">http://www.aboutads.info/choices</a> and <a href="http://www.youronlinechoices.eu/">http://www.aboutads.info/choices</a> and <a href="http://www.youronlinechoices.eu/">http://www.aboutads.info/choices</a> and <a href="http://www.youronlinechoices.eu/">http://www.youronlinechoices.eu/</a>

#### Referrals

If you choose to refer our service, to tell a friend about our Service, we will ask you for your friend's email address and contact your friend. Your friend may contact us at sparkmathtutoring@gmail.com to request that we remove this information from our database.

#### **Minors**

This Service is not intended for use by children under 13 years of age.

Spark Math Tutoring does not knowingly collect personally identifiable information from children under the age of 13. If you are under the age of 13, please do not provide your contact information or any other personally identifiable information to Spark Math Tutoring. If you are the parent or legal guardian of someone under the age of 13 who may have provided us with information without your knowledge or consent, please contact us to have this information removed. All contact, including tutoring sessions, between a tutor and any minor, should, of course, take place only in a supervised setting. Supervision is the responsibility of the parent.

## Legal requests and business transfers

Spark Math Tutoring may disclose personal information when we believe such action is necessary to comply with the law or enforce or apply our Terms of Service. In the event of a change in control of the Spark Math Tutoring business, personal information may be exchanged as part of a merger, sale, or other business transfer. If such a transfer makes a material change to this Privacy Policy, we will notify you of any changes.

#### Your choices

Spark Math Tutoring may send you email communications periodically detailing new features or promotions on the Site. You may unsubscribe from these messages by using the link at the bottom of the email. We may also send you email messages about the status of your account or any notices as required by law. You may not opt-out of receiving these administrative emails so long as you continue to use this voluntary service. If you wish to terminate your account, please contact us.

# **Your California Privacy Rights**

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information, disclosed to those parties. If you are a California resident and would like to request this information, please submit your request in an email to sparkmathtutoring@gmail.com.

## **Privacy policy changes**

Spark Math Tutoring reserves the right to change this Privacy Policy, from time to time, due to modifications to the Site's features and functionality. We will post any changes here and indicate the new effective date of the Privacy Policy at the top of the document. We encourage you to review the Privacy Policy for any updates while you are an active User of the Site.

#### **Users Outside the United States**

The Site is hosted in the United States and is governed by United States law. If you are using the Site from outside the United States, please be aware that your information may be transferred to, stored and processed in the United States where our servers are located and our databases are operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. We do abide by the laws of our country and are compliant with other countries as well so that we can continue to offer tutoring services to students all over the world.

#### **Contact information**

Questions regarding this Privacy Policy should be directed to sparkmathtutoring@gmail.com

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