

# PRIVACY NOTICE

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Thank you for choosing to be part of our community at Reconstruction US, Inc., doing business as Reconstruction (“**Reconstruction**”, “**we**”, “**us**”, or “**our**”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [info@reconstruction.us](mailto:info@reconstruction.us).

When you visit our website <http://www.reconstruction.us> (the “**Website**”), and more generally, use any of our services (the “**Services**”, which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information submitted by users or collected through our Services (which, as described above, includes our Website), as well as any related services, sales, marketing or events, and governs not only our practices with respect to students' personal information, but also with respect to the personal information of teachers, school administrators and the administrators of other organizations who use our learning platform.

**Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.**

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## 1. OUR COMPLIANCE WITH COPPA AND FERPA

Our learning platform is designed for schools and other organizations working with K–12 students. We recognize the sensitive nature of personal information concerning students under age 13, and concerning K–12 students generally, including the information contained in a school's educational records. This personal information is protected under either or both of the following federal statutes: the Children's Online Privacy Protection Act ("COPPA") and the Family Educational Rights and Privacy Act, including the Protection of Pupil Rights Amendment ("FERPA"). Our privacy practices comply with both COPPA and FERPA.

- COPPA requires us to tell you the name, address, telephone number, and email address of all operators collecting or maintaining personal information through the Website or the Services (such as an advertising network or social network plug-in). Currently, we are the only such operator.
- COPPA also requires us to give you a description of what information we collect from children, including whether we enable children to make their personal information publicly available (we don't!), how we use such information, and our disclosure practices for such information, all of which you will find below in this privacy notice.
- As a parent or legal guardian of a minor child who uses the Website or our other Services, you have the following rights:
  - we will not require a child to disclose more information than is reasonably necessary to participate in an activity;
  - you can review your child's personal information, direct us to delete it, and refuse to allow any further collection or use of your child's information; and
  - you can agree to the collection and use of your child's information, but still not allow disclosure to third parties unless that is part of the Services.
- In order to make any such request, please contact us by email at [info@reconstruction.us](mailto:info@reconstruction.us) or by post to: Reconstruction US, Inc., 109 Kingston Street, Fifth Floor, Boston, MA 02111, United States.

## 2. CONSENTS REGARDING STUDENTS' PERSONAL INFORMATION

## **Consents from Schools Regarding Students' Personal Information**

COPPA permits a school, acting in the role of "parent," to provide required consents regarding personal information of students who are under the age of 13. Where a school is the subscriber to our learning platform, we rely on this form of COPPA consent. We provide the school with this privacy notice, to ensure that the school, in providing its COPPA consent, has full information and assurance that our practices comply with COPPA.

FERPA permits a school to provide educational records (including those that contain students' personal information) to certain service providers without requiring the school to obtain specific parental consent. FERPA permits this where the service provider acts as a type of "school official" by performing services, for example, that would otherwise be performed by the school's own employees. We fulfill FERPA requirements for qualifying as a school official by, among other steps, giving the school direct control with respect to the use and maintenance of the education records at issue (including associated personal information), and refraining from re-disclosing or using this personal information except for purposes of providing our learning platform to the school. We comply with FERPA by relying on this form of consent.

## **Consents from Parents Regarding Minors' Personal Information**

To comply with COPPA with respect to users who are (i) organizations, other than schools, which will create accounts for minor children or (ii) minor children themselves, we will require the consent of the parent or legal guardian prior to activating the child's account. We will make reasonable efforts, taking into account available technology, to ensure that a parent or guardian receives direct notice of our privacy practices with regard to the collection, use, or disclosure of personal information from children, including notice of any material changes to our practices to which the parent or guardian previously consented. The direct notice will:

- State that we have collected the parent's or guardian's online contact information from the organization or the child, and, if such is the case, the name of the child or the parent/guardian, in order to obtain the parent's/guardian's consent;
- State that the parent's/guardian's consent is required for the collection, use, or disclosure of their child's personal information, and that we will not collect, use, or disclose any personal information from the child if the parent/guardian does not provide such consent;
- State that we intend to collect from the child the following personal information, should the parent provide consent: full name, address, online contact information (email address), screen name or user name, school name, IP address, age, date of birth, grade level, gender, race, ethnicity, video and audio recordings of the child during the Services provided.
- Include a hyperlink to this privacy notice so the parent/guardian may read it in full;
- Explain the ways by which the parent/guardian can provide their verifiable consent, which will include:
  - Requiring the parent/guardian, in connection with paying their child's fees, to use a credit card, debit card, or other online payment system that provides notification of each discrete transaction to the primary account holder; or
  - Having the parent/guardian call a toll-free telephone number staffed by trained personnel, or have the parent connect to trained personnel via video-conference; or

- Having parent/guardian indicate consent in a reply email message which includes a phone number or mailing address, so we can follow up with a confirming phone call or letter to the parent/guardian. If the reply email does not include a phone number or mailing address which allows us to follow up and confirm the consent, then we will send another email to the parent/guardian to confirm consent, which email will include all the original information contained in the direct notice, inform the parent/guardian that he or she can revoke the consent, and inform the parent/guardian how to do so.
- State that if the parent/guardian does not provide consent within a reasonable time from the date the direct notice was sent, we will delete the parent's/guardian's online contact information from our records.

As described above, Reconstruction collects and maintains video and audio recordings of Student users during our Services provided, namely the online tutoring sessions. These recordings are available to be shared with Parents and Schools upon request. Reconstruction may also use these recordings for customer support, compliance purposes and reviewing/improving our Services. Reconstruction will obtain additional parental consent before we use any recordings for promotional or other purposes. We utilize reasonable means to (i) limit the ability of recipients to create copies of the recordings or to share the recordings with anyone aside from permitted recipients, and also (ii) limit the ability of Permitted Recipients to download or re-share the recordings. While we expect recipients to abide by our standards of conduct, please note that we cannot control or monitor what such third parties ultimately do with the recordings and disclaim all responsibility in that regard.

You and any users of this Site or the services, including students, tutors, parents, and third parties, are strictly prohibited from copying or making any recording (audio, video, print or digital), or from any transmittal, redistribution, use or publication of any tutoring session or other materials used or published on this Site. You may not either directly or through the use of any device or other means copy, download, stream, reproduce, duplicate, archive, distribute, upload, publish, modify, translate, broadcast, perform, display, sell, transmit or retransmit any materials or content from this Site, unless expressly permitted in writing by Reconstruction, US Inc.

### **Consents from Non-Student Users**

We also obtain consents regarding personal information of users who are not minors (such as school administrators, teachers, and youth group administrators). To obtain these consents we (a) notify the users of our privacy practices by including links to this privacy notice within our learning platform, and (b) rely on their continued use of our learning platform to indicate their consent to this privacy notice.

## **3. WHAT INFORMATION DO WE COLLECT?**

### **Personal information you disclose to us**

*In Short: We collect information that you provide to us.*

We collect personal information that you voluntarily provide to us when you register on the Website, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The personal information we collect may include the following:

**Personal Information Provided by You.** We collect names; phone numbers; email addresses; mailing addresses; usernames; passwords; contact preferences; contact or authentication data; billing addresses; debit/credit card numbers; date of birth; phone number; and other similar information, and this may vary depending on your role. For example, we collect registration information from a school administrator when the school administrator activates the school's subscription account, which may include the school administrator's own first and last name, business address and phone number, email address, and username. We collect registration information from a teacher or school administrator when the teacher or school administrator activates the account of an individual student, which may include the student's full name, address, online contact information (email address), screen name or user name, school name, IP address, age, grade level, gender, race, ethnicity and audio/video recordings of the child during sessions. We collect registration information from the administrator of a non-school organization when the administrator activates the organization's subscription account, which may include the administrator's own first and last name, business address and phone number, email address, and username. With regard to minor children who wish to use the Website or Services and are not registering through a school account, we will initially collect only the parent's or guardian's name and/or online contact information from the organization or the child, and the name of the child, in order to obtain the parent's/guardian's consent; after such consent is received, we may collect the child's full name, address, online contact information (email address), screen name or user name, school name, IP address, age, grade level, gender, race, ethnicity and audio/video recordings of the child during sessions.

**Payment Data.** We may collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by Stripe, Inc.. You may find their privacy notice link(s) here: <https://stripe.com/privacy>.

**Social Media Login Data.** We may provide you with the option to register with us using your existing social media account details, like your Facebook, Twitter or other social media account. If you choose to register in this way, we will collect the information described in the section called "HOW DO WE HANDLE YOUR SOCIAL LOGINS" below.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

By voluntarily providing us with Personal information, you are consenting to our use of it in accordance with this Privacy Notice.

### **Information automatically collected**

***In Short:*** *Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Website.*

We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about who and when you use our Website and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- ***Log and Usage Data.*** Log and usage data is service-related, diagnostic usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).
- ***Device Data.*** We collect device data such as information about your computer, phone, tablet or other device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system configuration information.
- ***Location Data.*** We collect information data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type of settings of the device you use to access the Website. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Locations settings on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

#### **4. HOW DO WE USE YOUR INFORMATION?**

***In Short:*** *We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon process.** If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed "HOW DO WE HANDLE YOUR SOCIAL LOGINS" for further information.
- **To post testimonials.** We post testimonials on our Website that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update, or delete your testimonial, please contact us at [info@reconstruction.us](mailto:info@reconstruction.us) and be sure to include your name, testimonial location, and contact information.
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our Website.
- **To enable user-to-user communications.** We may use your information in order to enable user-to-user communications with each user's consent.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

- **Fulfill and manage your orders.** We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Website.
- **Administer prize draws and competitions.** We may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- **To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see the "[WHAT ARE YOUR PRIVACY RIGHTS](#)" below).
- **For other business purposes.** We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Website, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We do this in accordance with COPPA and FERPA where applicable. We will not use identifiable personal information without your consent.

## 5. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.

- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

## 6. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

*In Short:* We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

## 7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

*In Short:* If you choose to register or log in to our services using a social media account, we may have access to certain information about you.

Our Website offers you the ability to register and login using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will

often include your name, email address, friends list, profile picture as well as other information you choose to make public on such social media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Website. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

## **8. HOW LONG DO WE KEEP YOUR INFORMATION?**

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **9. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

## **10. WHAT ARE YOUR PRIVACY RIGHTS?**

***In Short:*** You may review, change, or terminate your account at any time.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If you are resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have questions or comments about your privacy rights, you may email us at [info@reconstruction.us](mailto:info@reconstruction.us).

## **Account Information**

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.
- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website. To opt-out of interest-based advertising by advertisers on our Website visit <http://www.aboutads.info/choices/>.

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may:

- Access your account settings and update your preferences.
- Contact us using the contact information provided.

**School Administrators:** School administrators and (where applicable) teachers hold access to personal information of the students for whom they are responsible, and they are able to update this information in the manner permitted by our Website. School administrators and teachers are similarly able to access and update their own personal information. The parents of

a student can obtain access — through their child's school — to information concerning their child that is available on our Website. To do so, the parent should follow the school's procedures for access under FERPA. We cooperate with and facilitate the school's response to these access requests. Where the school's procedures do not apply to the parent's access request (and the request is otherwise proper), we will ourselves fulfill the request if and as required by law. After fulfilling an access request, we will update and (where necessary) correct the personal information at issue, as requested by the school or individual entitled to such access. We limit access to personal information to only those employees (i) who have a need to know such information, and (ii) who use the information only for the purposes of operating our Website and other Services.

## **11. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## **12. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

***In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Website, you have the right to request removal of unwanted data that you publicly post on the Website. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Website, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

### **CCPA Privacy Notice**

The California Code of Regulations defines a "resident" as:

(1) every individual who is in the State of California for other than a temporary or transitory purpose and

(2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, certain rights and obligations apply regarding your personal information.

### **What categories of personal information do we collect?**

We have collected the following categories of personal information in the past twelve (12) months:

<b>Category</b>	<b>Examples</b>	<b>Collected</b>
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name	YES
B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment, employment history and financial information	YES
C. Protected classification characteristics under California or federal law	Gender and date of birth	YES
D. Commercial information	Transaction information, purchase history, financial details and payment information	NO
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements	NO
G. Geolocation data	Device location	NO

H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	YES
I. Professional or employment-related information	Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply for a job with us	YES
J. Education Information	Student records and directory information	YES
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	YES

We may also collect other personal information outside of these categories in instances where you interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries

### **How do we use and share your personal information?**

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at [info@reconstruction.us](mailto:info@reconstruction.us), by visiting <http://www.reconstruction.us>, or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your right to opt-out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

### **Will your information be shared with anyone else?**

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal data.

Reconstruction US, Inc. has not disclosed or sold any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. Reconstruction US, Inc. will not sell personal information in the future belonging to website visitors, users and other consumers.

## **Your rights with respect to your personal data**

### Right to request deletion of the data - Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

### Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell your personal information to third parties;
- the categories of personal information that we sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

### Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

### Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

#### Other privacy rights

- you may object to the processing of your personal data
- you may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data
- you can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- you may request to opt-out from future selling of your personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, you can contact us by email at [info@reconstruction.us](mailto:info@reconstruction.us), by visiting <http://www.reconstruction.us>, or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

### **13. NY PARENTS' BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY**

The New York Parents' Bill of Rights for Data Privacy and Security (the "Privacy Bill of Rights") addresses the relationship between schools and their third party contractors in addition to the schools' relationships with parents. The only elements of the Privacy Bill of Rights that are incorporated herein are those provisions directed to third party contractors ("Contractor Privacy Provisions"). We agree to comply with the Contractor Privacy Provisions for schools in the State of New York. In the event of a direct conflict between this privacy notice and the Privacy Bill of Rights, the Privacy Bill of Rights will control. The full text of the Privacy Bill of Rights is available at <http://www.nysed.gov/data-privacy-security/bill-rights-data-privacy-and-security-parents-bill-rights#:~:text=The%20purpose%20of%20the%20Parents,legal%20requirements%20that%20protect%20personally>.

### **14. DO WE MAKE UPDATES TO THIS NOTICE?**

*In Short:* Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently

posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## **15. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, or if you wish to request to review, update, or delete your personal information or the personal information of your student or your minor child, you may contact us by email at [info@reconstruction.us](mailto:info@reconstruction.us) or by post to:

Reconstruction US, Inc.  
109 Kingston Street, Fifth floor  
Boston, MA 02111  
United States