Epraise Product Privacy Policy for California Residents

Effective Date: 12 December 2024

This **Product Privacy Policy for California Residents** supplements the information contained in the Epraise Product Privacy Policy and applies solely to all users of our services to our School customers who reside in the State of California ("consumers" or "you"). This **Product Privacy Policy for California Residents** supplements the information contained in the Epraise Product Privacy Policy and applies solely to all users of our services to our School customers who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended by the California Consumer Privacy Rights Act of 2020 (collectively the "CCPA") and any terms defined in the CCPA have the same meaning when used in this Policy. This Policy provides information about our use of data collected through our services web and mobile application platforms (collectively, our "Services"). To understand more about our processing of your Personal Information in connection with our Services, please see our Epraise Product Privacy Policy.To understand more about our processing of your Personal Information in connection with our Services, please see our Epraise Product Privacy Policy.

In our processing of personal information in connection with our Services, we act as a 'service provider' (as this term is defined in the CCPA), and in that context our customers act as businesses on behalf of which we process data for purposes of the Services. When we act as a service provider our processing of data is governed by our Data Processing Agreement or other data processing terms in place between Epraise and each customer. For more information on our processing as a data processor, please contact the educational or other institution that collected your Personal Information in connection with our Services.

Information We Collect

Our Services web and mobile application platforms collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("**personal information**").

Personal information does not include:

- Identifiers
- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:

- health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data, or other qualifying research data;
- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, our Services platforms have collected the following categories of personal information from users of our Services within the last twelve (12) months:

Category	**Examples**
A. Identifiers.	A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, physical characteristics or description, address, telephone number, education, employment, medical or wellbeing information. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law	Race, color, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, sexual orientation).
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E. Biometric information.	Health, or exercise data.
F. Internet or other similar network activity.	Information on a consumer's interaction with our products and services.
I. Professional or employment-related information	Current or past job history or performance evaluations.

J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, or student disciplinary records.

Our Services platforms obtain the categories of personal information listed above from the following categories of sources:

- Directly from you, as a user of our Services.
- Indirectly from you. For example, from observing your actions on our Services platforms.
- From our customers, educational institutions, who have purchased our Services and in connection with which Services we process your Personal Information as a service provider to the related customer.

Sensitive personal information is a subtype of personal information consisting of specific information categories. While we collect information that falls within the sensitive personal information categories, the CCPA does not treat this information as sensitive because we do not collect or use it to infer characteristics about a person.

For more information about the elements of personal information we collect from or about you in connection with our Services, please see our COPPA Data Table.

Use of Personal Information

We may use or disclose the following categories of personal information we collect for the purposes set forth in the table below:

Activity	**Categories of Personal Information**
To manage our relationship with you which will include notifying you about changes to our Product Terms of Service or our Product Privacy Policy.	A. Identifiers B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial Information F. Internet and other similar network activity
To administer and protect our business and our Services (including troubleshooting, data	A. Identifiers

analysis, testing, system maintenance, support, reporting and hosting of data)	B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) F. Internet and other similar network activity
To deliver relevant Services to you, including the platform, any integrations and any associated administrative tasks such as billing.	A. Identifiers B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). C. Protected classification characteristics under California or federal law D. Commercial Information E. Biometric information. F. Internet and other similar network activity J. Non-public education information.
To use data analytics to improve our Services, marketing, customer relationships and experiences.	A. Identifiers B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial Information F. Internet and other similar network activity

We will also collect the above categories of personal information and sensitive personal information about you to provide our Services to you on behalf of your school.

We will also collect Identifiers and California Customer Records personal information to create, maintain, and customize your account with us. We will also collect Identifiers and California Customer Records personal information as well as Internet or other similar network activity-related personal information to prevent transactional fraud. Generally, we will collect your personal information for purposes allowed or required by the CCPA.

We will not collect additional categories of personal information or sensitive personal information or use the personal information and/or sensitive personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

For more information about the various activities for which we collect the above categories of personal information in connection with our Services, please see our COPPA Data Table.

Sharing Personal Information

We may disclose your personal information to a third-party service provider for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the service provider to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed personal information for a business purpose to the categories of third-party service providers indicated in the chart below.

Category of Service Provider	**Personal Information Categories**
Data hosting providers (e.g., Amazon)	All categories
CRM providers (e.g., Salesforce.com)	A. Identifiers B. California Customer Records personal information C. Internet and other similar network activity D. Commercial Information
Providers of email services (e.g., Microsoft)	All categories
Providers of telecommunication services (e.g., Zoom)	All categories

For more information about the third-party recipients of the above categories of personal information in connection with our Services, please see our COPPA Data Table.

We will also share your personal information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Services users is among the assets transferred, or as otherwise permitted or legally required by the CCPA.

We do not sell or share, nor have we sold or shared your personal information for cross-context behavioral advertising purposes in the past twelve (12) months.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information, as follows:

- The right to know what personal information the business collected, sold, shared, or disclosed about them, including the specific pieces of personal information held.
- The right to make the business delete their personal information unless a statutory exception allowing its retention applies.
- The right to make the business correct inaccurate personal information.
- The right to restrict sales of their personal information to third parties and prevent the business from sharing their personal information with third parties for cross-context behavioral advertising purposes.
- The right to limit a business's use and disclosure of their sensitive personal information to specifically permitted purposes.
- The right not to be discriminated against for exercising any of the above rights.

Since we collect and process your personal information on behalf of our customers for purposes of the Services we provide to you on their behalf, we ask that you please direct any request to exercise your data subject rights to the data owner / controller on behalf of which we process your personal information for purposes of our Services.

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on our Services platforms and update the notice's effective date. **Your continued use of our Services following the posting of changes constitutes your acceptance of such changes**.

Contact Information

If you have any questions or comments about this policy, the ways in which Epraise collects and uses your information described here and in our Product Privacy Policy, please do not hesitate to contact us at privacy@epraise.co.uk.

If you need to access this policy in an alternative format due to having a disability, please also contact us at privacy@epraise.co.uk or write us at:

Epraise Limited
Attn: DPO & CISO
c/o Firefly Learning Limited
167-169 Great Portland Street, 5th Floor
London, UK W1W 5PE