

PRIVACY POLICY

Effective date: 03/22/24

This Privacy Policy (the “Privacy Policy”) covers how we, Kyron Learning, PBC, (“Kyron”, “we”, “us” and/or “our”) treat Personal Data that we gather when you access or use our services governed under the Kyron Learning Terms of Service (the “Terms of Service”). "Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations. This Privacy Policy also describes what information we collect about you, how we collect it, how we use it, with whom we may share it, and what rights and choices you have regarding it. By accessing and using our website and any of our product services, you agree that you have read and understand the Privacy Policy and that you accept and consent to the privacy practices that are described in this Privacy Policy.

What Information We Collect

We collect information from users on our website and from users who use our services. Kyron Learning is an AI tutoring platform that uses conversational, multi-modal lessons to interact with and teach students. AI collects data from student interaction with the platform. This includes student's written and oral responses to questions.

We collect the following information from all users: email, first and last name, google avatar_url, language preference, IP address. We may also collect information about the type of internet browser you are using, operating system, what brought you to our website, as well as which of our web pages you have accessed.

We collect the following additional information from student users: lessons the student has started, all lesson segments that a student traversed, written and oral responses to video prompts, and academic performance measurements.

We collect the following additional information from content creators: lessons, training phrases provided by creators, videos that creators upload, email, first and last name, description, and profile picture.

We may also collect class rosters from teachers who choose to upload their rosters.

How We Use Information

Written and oral responses to prompts are captured to recognize what users say and respond accordingly. We also use this data to measure the accuracy of our voice recognition system.

Information collected from our conversational tutoring platform is used to improve the AI model. All training of the AI model is done with de-identified data.

We also use the information to compile student performance reports.

We will only collect and use personally identifiable information for the purpose it was collected which is to deliver our services. We do not collect sensitive personally identifiable information, such as social security numbers or financial information.

We will not sell or share personally identifiable information with third parties for marketing or advertising purposes. We take appropriate measures to protect personally identifiable information from unauthorized access, use, or disclosure.

We may share data to fulfill legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use aggregated, de-identified or anonymized data and share it with third parties to build and improve our services, provided that we will not share such data in a manner that could identify users. We do not allow third parties access to Personal Data for their own purposes. We do not track or target advertisements on other third-party websites or services. We do not create or use data profiles for advertising.

How We Share Your Personal Data

We may disclose user Personal Data to service providers and education partners. We ensure that all data is encrypted when in transit and is stored in an encrypted format.

Service Providers

Services providers help us improve the services or perform business functions on our behalf. Service providers include hosting, technology and communication providers, security and fraud prevention consultants, and support and customer service. We review our service providers to confirm they are compliant with both California data privacy laws and laws specific to student data privacy including prohibiting them from reidentifying information.

Education Partners

Education partners include educational institutions that you have a relationship with, such as school districts. Kyron contracts with school districts as a school business official.

Lesson Creators

Lesson Creators include those who upload lessons for use on our platform. When users interact

with lessons, including through oral responses to video prompts, the answers are shared with Lesson Creators for the sole purpose of improving the lesson to maximize learning potential and educational outcomes. Information is anonymous, however, we caution against providing personally identifiable information in responses. Such information will never be required to respond to a lesson prompt.

Data Retention and Deletion

We will retain personally identifiable information for as long as it is necessary for the operation of our service or as required by law. We will delete information once it becomes no longer necessary to perform our services, including upon cancellation or termination.

Upon request, we will delete or anonymize your personally identifiable information from our system within a reasonable timeframe. To make such a request, please email privacy@kyronlearning.com.

Links

This website may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

Security

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it.

All Kyron Learning user data is backed by a MySQL, Google Cloud Storage bucket, and Redis database hosted on Google Cloud Platform.

In the event Kyron Learning detects, or becomes aware of, a security breach within its systems, including any unauthorized access to Personal Data, Kyron Learning will notify affected users within a reasonable timeframe.

Cookies

We use "cookies" on this site to collect information. Cookies are small pieces of data, usually text files, placed on your computer, tablet, phone or similar device when you use that device to access our services.

Cookies are used to help us improve user access to our site and identify repeat visitors to our site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our site. Usage of a cookie is in no way linked to any personally identifiable information on our site.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the services and functionalities may not work. To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu.

Children's Privacy

Kyron Learning has processes and procedures in place to protect the personal information of children under 13. We do not use such information for any purpose other than to provide our services and for the specific uses in this Privacy Policy and in accordance with contractual agreements with our customers. We have established privacy policies that are compliant with the Children's Online Privacy Protection Act. Kyron Learning does not share personally identifiable information from children under 13 for advertising or marketing purposes.

Consent to Collect, Use, or Disclose Personally Identifiable Information from Children Under 13

Children under 13 may only use Kyron Learning services with the prior consent of a parent or educational institution acting on behalf of the child's parent. We will not collect, use, or disclose any personally identifiable information from children under 13 without such consent. Educational institutions may consent to the collection, use, or disclosure of personally identifiable information from children under 13 by agreeing to purchase our services. This consent is strictly for educational purposes and does not include commercial purposes. Kyron Learning does not use any Personal Data for marketing purposes and does not sell Personal Data to third parties.

California Resident Rights

If you are a California resident, you have the rights set forth in this section.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the California Consumer Privacy Act (CCPA), this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the services or

complete a transaction or other action you have requested.

Exercising Your Rights

You may submit a request to access your data as indicated above by sending us an email at privacy@kyronlearning.com.

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Changes to this Privacy Policy

We are constantly trying to improve our services, so we may need to change this Privacy Policy from time to time. We always indicate the date the last changes were published and you can contact us at privacy@kyronlearning.com if you would like access to previous versions of this Privacy Policy.

Please note that if you have opted not to receive legal notice emails from us (or you have not provided us with your email address), those legal notices will still govern your use of the services, and you are still responsible for reading and understanding them. If you use the services after any changes to the Privacy Policy have been posted, that means you agree to all the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at: privacy@kyronlearning.com.