# Privacy Policy for Project Read AI

**Last Updated: June 1, 2025**

Welcome to Project Read AI Inc. ("**Project Read,**" "**we**" or "**us**"). We operate a website and offer a digital learning platform service called the Project Read App (**"Project Read App"**). The Project Read App provides personalized stories and live feedback for students with the help of an AI "co-teacher".

This Privacy Policy ("**Policy**") describes how we collect, use and share personal information, including when you use our Project Read App, visit our website (**"Site"**), use our learning services **("Services")** or otherwise interact with us.

## 1. Changes to this Policy

We may change this Policy from time to time. If we make material changes, we will notify you by prominently displaying that changes have been made at the top of this Policy, by adding a statement to the landing page of our Project Read App or the homepage of our Site. Additionally, we will contact all users by email in the case of a material change to this policy. We encourage you to review this Policy regularly to look for updates.

## 2. Protection of Personal Information of Students and Children

Our Services are designed for use by:

(i)     Students in grades K-4-12 who are enrolled in school districts or schools which make the Project Read App or other Services available to those students. (each a "Child" and collectively "Students"). This includes Students that are under the age of 13.

(ii)    The Services are also designed for use by teachers, school or district administrators or to other educators who purchase our Services or work in a school district or school that purchased our Services. (each an "Educator " and collectively "Educators")

We recognize the importance of protecting the personal information of Student and of complying with legal obligations related to the protection of student records, including personal information of students under the age 13.

Students may only use the learning portion of the Services. Only Educators can create accounts and subscribe to the Services. Students are only permitted to use the Project Read App after the school or district has received required parental consent.

Companies that process the personal information of Students and companies that process the personal information of children under the age of 13 are required to comply with certain federal and state data privacy laws, in particular COPPA and FERPA.

"COPPA" means the Children's Online Privacy Protection Act, 15 U.S.C. §§ 6501–6506, including the rules and regulations promulgated thereunder, in each case as amended.

"FERPA" means the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g, including the Protection of Pupil Rights Amendment, including the rules and regulations promulgated thereunder, in each case as amended.

We have designed our privacy practices to comply with the requirements of both COPPA and FERPA as applicable.

## 3. Collection of Children's Information

Except as explicitly described in this Privacy Policy, we do not knowingly collect personal information from children under the age of 13 without consent from the school, parent or guardian.  We only collect, maintain, use or share personal information from a Child as needed for authorized educational or school purposes with the consent from the Child's school and/or parent or guardian. If we learn that we have collected personal information from a Child under 13 without consent from the Child's school, parent or guardian, we will delete that information.  If you believe we have collected personal information about your Child under 13 without consent, please contact us and we will use good faith efforts to remove such personal information.

We do not share the personal information of any child with third parties for any marketing or promotional purposes. We do not sell student information. We do not share student information with third parties to serve targeted advertising to students.

| Categories | Examples |
|------------|----------|
| Records | Name (or initials), Grade Level, Classroom |

The Project Read App collects the minimal amount of personal information about Students (shown above) necessary for them to use the app. We do not collect address, contact information, race, income or disability status or other personal information from or about Students when they use the Project Read App.

# 4. Collection of Educator Information

We collect the following categories of personal information from Educators when you visit our Site, use our Project Read App, use our Services or otherwise communicate with us:

| Categories | Examples |
|---|---|
| Identifiers | Name, email address, IP address,  school affiliation |
| Educator Records | Name, school name/affiliation, app login credentials (email address and password), classroom name(s), grade level(s) taught |
| Commercial Activities | Records related to the Services we provide and our communications with you. |
| Internet Activity | Internet or other electronic network activity information, including your IP Address, the websites you visit before or after you visit the Site, the date and time you visit our Site; search history, information regarding your interactions with the Site, online identifiers like a cookie ID, browser type, your internet service provider, operating system, application, or advertisement. |
| Employment Information | Grade level and names of classes taught |

# 5. Sources We Use to Collect Personal Information

We collect personal information from or about you in three ways:

1. Information you provide directly to us – We may collect personal information directly from you, including when you use the Services or the Site;

2. Information we collect automatically:

   - When you access or use the Services, the Project Read App or the Site, we automatically collect certain information, including device and log information and information collected from use of cookies and other tracking technologies. We also use this information to allow us to better understand the functionality of the Site, the Project Read App and our Services.

- We collect information about a Child's interactions with the Services, including the Project Read App, such as the stories a Child reads, where they tap, and their progress and choices within the Project Read App. Our collection of this information through cookies and other tracking technologies (as defined above) is used only to support the internal operations of the Services.

3. Information we receive from third parties. We may receive information from Educators, parents or guardians in connection with the operation of the Services.

# 6. We Use Personal Information for the following Purposes:

| Purpose | Examples |
|---|---|
| To Communicate with You, the School, Educators, Administrators, Parents, Guardians and Students | To respond to your questions, requests, comments, or concerns and to provide support for the Services, and the Project Read App<br><br>To notify you of changes to our Terms or this Policy<br><br>To communicate with you regarding our Services and the Project Read App<br><br>To keep your information current<br><br>To send technical notices, updates, security alerts and support and administrative messages;<br><br>To send Schools, Educators and Administrators necessary metrics and information about a Child's reading progress through the in-school application;<br><br>As you request or consent |

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| To Provide and Improve the Project Read App and the Services | To allow you to register for the Services and for use of the Project Read App |
| | To communicate with you about updates to the Project Read App, the Site or the Services |
| | For billing and collection purposes |
| | To personalize and improve a Child's experience using the Services, including the Project Read App and to provide content or features that match a Child's reading level and interests. |
| | To monitor trends, usage and activities, so that we can make the Services, the Project Read App and the Site more helpful to all users. |
| | To track a Child's reading progress and usage of the Services and the Project Read App. |
| | To analyze, operate and improve our Services and the Project Read App. |
| Business Purposes | To operate our business<br>To provide Services<br>To facilitate transactions<br>To inform our business strategies<br>To operate our information technology systems |

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| To Perform Analytics | To improve the content of our Site and the Project Read App<br><br>To enhance user experience when visiting our Site, using the Project Read App or the Services<br><br>To generate statistical information about our Site or the Project Read App usage and traffic patterns.<br><br>To prevent fraud<br><br>To measure the effectiveness of our advertising to Educators. |
| Site, Apps and Services Management | To operate the Services, the Site and the Project Read App and to troubleshoot problems with the Services, the Site or the Project Read App<br><br>To improve the content and functionality of the Site, the Project Read App and the Services and your user experience.<br><br>To improve the security of the Site, the Project Read App and the Services<br><br>To detect, protect against, and prevent security incidents and illegal or unauthorized activities.<br><br>To conduct statistical and other analyses of the Site and the Project Read App |
| Legal Purposes and Protection of Rights | To protect the legal rights or interests, of the company, the users of our Services, the Project Read App and our Site, and those of third parties.<br><br>To bring a legal action against anyone who may be causing harm to us, our Services, our Site, our Project Read App or other users.<br><br>To seek business, financial, or legal advice |

| | To respond to subpoenas, court orders, and other legal processes. |
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| | To investigate complaints and claims. |
| | To enforce our policies, terms and conditions, or other agreements. |

# 7. Disclosure and Sharing of Personal Information

In the chart below, we describe the third parties with whom we may disclose or share personal information and for what purposes.

| Entity | Purpose |
| --- | --- |
| **Affiliates** | Between and among Project Read and current and future parents, affiliates, subsidiaries and other companies under common control and ownership for our Business Purposes as described above. |
| **Service Providers** | We share personal information with service providers for our organization to receive services in accordance with contractual provisions which require those service providers to protect your personal information. |
| | To help us collect and analyze personal information for a Business Purpose |
| | To help us host, operate, support and secure our Site, the Project Read App and the Service |
| | To improve the content and functionality of the Site, the Project Read App and the Service |
| | To provide public relations and marketing services |
| | To provide IT services |
| | To provide data processing services. |

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| **Schools, Administrators and Teachers, Parents and Guardians** | To provide Schools, Administrators and Educators necessary metrics and information about a Child's reading progress through the Service. Where directed by Schools, we may share personal information with parents and guardians. |
| **Third Party Analytics Providers** | To perform data analysis and statistical analysis of our Site and our Project Read App |
| **Professional Advisors** | To receive advice from our professional advisors, such as our attorneys, accountants, financial advisors, and business advisors, in their capacity as advisors to us.<br><br>If we believe a user's actions are inconsistent with our Terms or policies, or to protect the rights, property and safety of Project Read, its employees, users or others. |
| **Government Officials and Law Enforcement** | To comply with court orders or other valid legal process<br><br>To comply with applicable laws<br><br>To enforce our Terms or our legal rights<br><br>To protect our Site, our Services, our Project Read App, our customers, our users, our employees, or others.<br><br>To identify, contact, or bring a legal action against someone who may cause or be causing harm to our customers, users, employees, or another person, including persons who are interfering with our information technology systems and equipment, or an individual's privacy or property.<br><br>If we believe a user's actions are inconsistent with our Terms or policies.<br><br>To protect the rights, property and safety of Project Read or others. |

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| **Parties to Business Transactions** | If we are involved in a potential business transaction, including a due diligence process, merger, asset sale, financing, corporate divestiture, reorganization, or acquisition of all or some portion of our business to another company or if we undergo liquidation or bankruptcy proceedings, we may share your personal information in connection with such transaction or proceeding before and or after the transaction closes or the proceedings are completed.  We may also transfer that personal information and all of our rights in the personal information to the new owner or successor. |

# 8.  Use and Disclosure of De-Identified or Aggregated Information

We may use personal information on a de-identified and aggregated basis. We will maintain this data in a de-identified form and will not attempt to re-identify such information.  Deidentified and aggregated data is not personal information and is the sole and exclusive property of Project Read.

# 9. Cookies and other Tracking Technologies

We use various technologies to collect information regarding the operation of our Site and our Services, including cookies and web beacons. Cookies are small data files stored on hard drives or in device memory that help us improve our Services and users' experience, see which areas and features of our Services and Site are popular and count visits. Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. For more information about cookies, and how to disable them, please see "Your Choices" below.

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# 10. Your Privacy Choices

**User Information**

Project Read acknowledges that all personally identifiable information (PII) about users is the property of the customers that Project Read AI serves.

If at any time you would like to request deletion of Personal Information associated with your account, you may send us a written request to support@projectread.ai and we will delete the requested information within forty-five (45) days.

All deletion requests related to school-based usage of Project Read must be directed to Educators who are designated administrators of school accounts. To make such requests, parents and guardians should follow their school's procedures for managing their Child's personal information under applicable law.

Educators are able to access and update their own personal information and the personal information of the Students for whom they are responsible at any time, either through their Project Read user account or by contacting us at support@projectread.ai in connection with the use of the Project Read App and the Services.

Please note that we may retain certain information as permitted by law. We may also retain cached or archived copies of the information we collect for a certain period of time.

**Communications Preferences**

You may opt out of receiving promotional emails from us by following the instructions in those communications. If you opt out, we may still send you non-promotional emails, such as those about a Child's reading progress, or about the Services.

# 11. How we Secure your Personal Information

We use commercially reasonable physical, technical, and organizational measures to help secure personal information against unauthorized access to, acquisition of, loss, misuse, or alteration.  Specific measures we use include the use of firewalls, encryption, access keys, and rule/role-based access procedures. If we learn of an unauthorized access to or acquisition of your personal information, we will notify you of the incident as required under applicable law. Our Data Security Plan is available upon written request to support@projectread.ai

# 12. California Online Privacy Protection Act

Shine the Light:  Pursuant to California Civil Code Section 1798.83, if you are a California resident you have the right to obtain: (a) a list of all third parties to whom we may have

disclosed your Personal Information within the past year for direct marketing purposes, and (b) a description of the categories of personal information disclosed, by contacting us per the "Contact Us" Section below. We do not share your personal information with any unaffiliated third parties for their own marketing purposes. Nonetheless, you may make one request per year if you are a California resident.

Do Not Track Signals.  We do not currently honor "do not track signals" on our Site.

# 13. Contact Us

If you have any questions about this Privacy Policy, please contact us at: info@projectread.ai or by mail at:

Project Read AI Inc.
555 Bryant St., STE 197
Palo Alto, CA 94301