

Simple Solutions Learning Inc. COPPA Privacy Policy The Children’s Online Privacy Protection Act (COPPA) regulates online collection of information from persons under the age of 13 (collectively, “Children”; individually, a “Child”). The information in this COPPA Privacy Policy outlines our commitment as an operator of the Service (as hereinafter defined) to protect the privacy and safety online of Children. The most important things we want you to know about our privacy practices is that we do not sell any Child’s personal information for marketing purposes – and we will not change this Privacy Policy in a way that allows us to sell any Child’s personal information for marketing purposes.

As used herein: the term “Service” means (collectively) the Simple Solutions Learning Inc. website at <https://digital.simplesolutions.org> and any subdomains (the “Site”), as well as the services, features, and information available on the Site, on associated and successor sites, and on any mobile applications we provide; and the terms “you” and “your” mean a user of the Service the policies outlined in this COPPA Privacy Policy are intended to supplement the information appearing in the General Privacy Policy. Where the COPPA Privacy Policy conflicts with the Privacy Policy concerning information about a Child, the terms of this COPPA Privacy Policy will prevail over the Privacy Policy.

The operator collecting or maintaining personal information from Children, or on whose behalf such personal information is collected or maintained, through the Service is Simple Solutions Learning Inc. Any inquiries regarding the Service’s privacy policies should be directed to: Simple Solutions Learning Inc.

24755 Highpoint Road  
Beachwood, OH 44122  
Telephone Number: 216-832-5673 or 877-382-7537  
<https://simplesolutoins.org/contact-us/>

The personal information that may be collected from Children by or on behalf of Simple Solutions Learning Inc. includes the following: first and last name, email, user name; password; a web page the user is currently viewing; date and time the user logged on to or access the Service: user’s IP address; device properties, including, but not limited to unique device identifier or other device identifier; third-party system information; device software platform and firmware; mobile phone carrier; information logged from a user’s hardware or device; software; hardware; applications; browser information; information related to online usage of the Simple Solutions Learning Inc. Service; in-app information; geo-location information; and activity on and progress in connection with the Service, including without limitation assignments assigned and performance on and grades received for such assignments. ***The Service may, on a limited basis, enable Children to make personal information publicly available to other students in their own class, such as if a Child decides to include personal information in an in-Service classroom submission.***

In general, we use the information collected to provide the Service, to help us understand who uses the Service, and for internal operations such as operating and improving the Service.

We may also use the information gathered to perform statistical analysis of user behavior (such as to understand how most users performed on a particular assessment item) or to evaluate and improve the Service. We may link some of this information to personal information for internal purposes or to improve experience with the Service.

We do not disclose personal information collected from Children to third-parties other than to persons who provide support for the operations of the Service and who do not use the information for any other purpose, except as follows:

**Schools, Districts, and Teachers.**

The respective School, District or Child's Teacher (as agent for such School or District) that provides a Child with access to the Service may have access to information collected from the Child through the Service.

**Laws and Legal Rights.**

We may disclose personal information collected from Children if we believe in good faith that we are required to do so in order to comply with an applicable statute, regulation, rule or law, a subpoena, a search warrant, a court or regulatory order, or other valid legal process. We may disclose personal information collected from Children in special circumstances when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating the Simple Solutions Learning Inc. Terms of Service, to detect fraud, for assistance with a delinquent account, or to protect the safety and/or security of our users, the Service or the general public.

**Outside Contractors.**

We may employ independent contractors, vendors, and suppliers (collectively, "Outside Contractors") to provide specific services and products related to the Service, such as hosting and maintaining the Service, and developing applications for the Service. When possible, we try not to share personal information collected from Children with Outside Contractors. However, there are times when, in the course of providing products or services to us, these Outside Contractors may have access to information collected through the Service, including personal information collected from Children. With respect to personal information collected from Children through the Service to which Outside Contractors may have access, we require that these contractors contractually agree to (1) protect the privacy of such personal information consistent with our Privacy Policy and this COPPA Privacy Policy, (2) not use or disclose such personal information for any purpose other than providing us with the products or services for which we contracted or as required by law, (3) not disclose such personal information to third parties, and (4) implement and maintain reasonable security procedures and practices to protect such personal information unauthorized access, destruction, use, modification, or disclosure.

**Sale of Business.**

We reserve the right to transfer personal information collected from Children to a third party in the event of a sale, merger, or other transfer of all or substantially all of the assets of Simple Solutions Learning Inc. or any of its Corporate Affiliates (as defined herein), or that portion of Simple Solutions Learning Inc. or any of its Corporate Affiliates to which the Service relates, or in the event that we discontinue our business or file a petition or have filed against us a petition in bankruptcy, reorganization or similar proceeding, provided that the third party agrees to adhere to the terms of this COPPA Privacy Policy.

**Affiliates.**

We may disclose personal information collected from Children to our Corporate Affiliates. For purposes of this COPPA Privacy Policy, "Corporate Affiliate" means any person or entity which directly or indirectly controls, is controlled by or is under common control with Simple Solutions Learning Inc., whether by ownership or otherwise. Any personal information collected from Children through the Service that we provide to our Corporate Affiliates will be treated by those Corporate Affiliates in accordance with the terms of this COPPA Privacy Policy.

Because the collected information is necessary to provide certain functionality, certain aspects of the Service, products, offerings, features, or resources may not work properly, or at all, if consent is revoked, if an entity that provides the Child with access to the Service refuses to allow us to further use or collect a Child's information, or an entity if that provides the Child with access to the Service directs us to delete the information in accordance with the rights described above. However, in these circumstances, it may be possible for us to provide a Child with a generic account from which the Child can continue to use the Service.

If you are a parent of a Child who is using the Service, and you would like to review, have deleted, or refuse to permit further use of collection of your Child's personal information, please contact the entity responsible for providing your Child with access to the Service.

### **Changes to this COPPA Privacy Policy**

We reserve the right to amend this COPPA Privacy Policy at any time, provided we will never change this Policy to allow us to sell any Child's personal information for marketing purposes. Please check this page periodically for changes. If we intend to make a material change in the collection, use, or disclosure practices with respect to a Child's previously-collected personal information to which a School or District or Teacher (as agent for such School or District) that has provided the Child with access to the Service previously has consented, we will obtain the consent of the Child's respective School or District or Teacher that has provided the Child with access to the Service to such changes.