

SPRING EDUCATION GROUP, INC.
PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

I. Data Collection Notice

This **Privacy Notice for California Residents** supplements the information contained in our website [Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). The purpose of this notice is to provide you with a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of your rights regarding your personal information. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (the “CCPA”) and any terms defined in the CCPA have the same meaning when used in this notice.

Spring Education Group, Inc. (the “Company”) collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household (“personal information”). We collect the categories of personal information specified below. The Company may use, share, or disclose these categories of personal information for one or more of the indicated business or commercial purposes.

Category	Examples	Collected
Identifiers	A real name, alias, postal address, online identifier, Internet Protocol address, email address, account name, state identification number, or other similar identifiers	Yes
Categories of customer personal information described in California Civil Code 1798.80	A name, signature, address, telephone number, driver’s license number, insurance policy number, education, employment information, financial information, medical or health insurance information.	Yes
Protected Class Characteristics	Age, race, ethnicity, physical or mental disability status, gender, veteran or military status.	Yes
Commercial information	Information about products or services purchased, used or considered.	Yes
Biometric information	Behavioral information, fingerprints, sleep, health or biological characteristics.	Yes
Internet or other similar network activity	Information from interaction with a website, application, or the internet.	Yes
Geolocation data	Physical location or movement	Yes
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	No
Professional or employment-related information	Current or past job history or contact information.	Yes
Nonpublic education information	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, student financial information, or student disciplinary records.	Yes
Inferences drawn from other personal information	Profile information which can include a person’s preferences, characteristics, predispositions, behavior, attitudes, abilities, and aptitudes.	No

Sources for Personal Information We Collect.

We collect the Personal Information described above from the following sources:

- **Directly from you.** The Personal Information we collect directly from you may come from sources such as your communications with us, registering to use our parent portals, enrolling your child, completing forms or submitting an inquiry.
- **Indirectly from you.** We collect certain Personal Information automatically from your use of the Site.
- **Third parties.** As described in more detail below.

Purpose of Personal Information We Collect.

We may use or disclose the Personal Information we collect about you for one or more of the following purposes:

- to provide you with our services, communicating with you, ensuring that your child is receiving safe and appropriate care, and complying with licensing regulations and other legal requirements.
- for our direct marketing efforts, including when we send you marketing communications about our services that may be of interest to you, respond to your inquiries, and send you promotional messages, advertising, surveys, and other information that may be of interest to you.
- to create and maintain a trusted and safe educational environment (e.g., to detect and prevent fraud, abuse, or security incidents, conduct security investigations and risk assessments, enforce our policies, or comply with our legal obligations and licensing requirements).
- to maintain and improve the security and functionality of the Site by processing the Personal Information we collect automatically from your use of the Site. We use this information to personalize your user experience; ensure that our web pages appear and function properly; improve the Site, programs, products, services, advertising, and content; and perform other functions.
- for other purposes as permitted by law, such as notifying you about changes to the Site; protecting our rights and property; complying with a law, regulation, legal process or court order; or fulfilling any other purpose with your consent.

We will not collect additional categories of Personal Information or use the Personal Information we collect for materially different, unrelated, or incompatible purposes without notifying you.

Disclosing Personal Information

We may disclose Personal Information for a bona fide business purpose to the following categories of Third Parties:

- Medical providers.
- Law enforcement, regulatory and other governmental agencies.
- Service providers or third parties.
- Parent entities, affiliates and subsidiaries.
- Cookie information recipients, subject to their respective privacy notices.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for a business purpose:

- Identifiers
- California Customer Records Personal Information categories.
- Protected classification characteristics under California or federal law
- Commercial information
- Biometric information
- Internet or similar network activity
- Professional or employment related information

II. Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that the Company disclose to you: (1) the categories of your personal information collected; (2) the categories of sources from which your personal information was collected; (3) the categories of your personal information that were sold or disclosed for a business purpose, if any; (4) the categories of third parties to whom your personal information was sold, if any; (5) the business or commercial purpose for collecting and/or selling your personal information; and (6) the categories of third parties with whom we share your personal information. You also have the right to request to receive the specific pieces of your personal information collected by the Company to the extent such information is maintained by, and available to, the Company.

To submit a request, please complete our online request form <<<link to request form>>> or call 877-322-2861.

In order to verify you are the person about whom we collected personal information you must log in to your account before making a request, or if you do not have an account, we will verify your identity by matching at least two pieces of personal information provided by you with personal information maintained by the Company that we have determined to be reliable.

However, if your request involves receiving specific pieces of personal information (rather than categories of personal information), we must first verify your identity by matching at least three pieces of personal information provided by you with personal information maintained by the Company that we have determined to be reliable. Then, you must provide a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

We cannot respond to your request to provide any personal information if we cannot verify your identity using the information provided.

III. Right to Request Deletion of Personal Information

You have the right to request that the Company delete personal information that we collected from you and retained, subject to certain exceptions.

To submit a request, please complete our online request form <<<link to form>>> or call 877-322-2861. In order to process your request, you must first verify you are the person about whom we collected personal information. If your request relates to non-sensitive information, we can verify your identity by our online account login information, or if you do not have an account, by matching at least two data points provided by you with two data points already maintained by the Company.

However, if your request involves sensitive personal information, we must first verify your identity by matching at least three pieces of personal information provided by you with personal information maintained by the Company that we have determined to be reliable. Then, you must provide a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

IV. Request Processing and Timing

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

Any disclosures we provide in response to data access and/or data portability requests will only cover the 12-month period preceding the receipt of your request. We will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, which in most cases will involve Adobe PDF and comma delineated data files. We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate

before completing your request.

V. No Sale of Personal Information.

The Company has not sold Personal Information in the preceding twelve (12) months. If we ever choose to sell Personal Information, you would have the right to opt out of the sale of your Personal Information.

VI. Right to Non-Discrimination for the Exercise of Privacy Rights

We will not discriminate against you for exercising any of your CCPA rights. This means that, unless permitted by the CCPA, your exercise of these rights will not result in the Company: (1) denying you goods or services; (2) charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; (3) providing you a different level or quality of goods or services; or (4) suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

VII. Designating an Authorized Agent

You may use an authorized agent to submit a request to opt-out of the sale of personal information on your behalf if you provide the authorized agent written permission to do so.

If you use an authorized agent to submit a request for additional disclosures described in **Section I** or a request for deletion described in **Section II**, he or she must provide their name, email address, phone number, and written permission from you that includes your contact information. We will contact you using the information provided and verify your identity directly with us. We cannot respond to your request to provide additional disclosures or delete any personal information if we cannot verify your identity and the authorized agent's authority to make the request on your behalf. Written permission is not required if the agent provides proof of power of attorney pursuant to Probate Code sections 4000 to 4465, or you are submitting the request on behalf of your minor child.

VIII. Contact for More Information

If you have any questions or concerns about our privacy policies and practices, please do not hesitate to contact us at privacy@springedugroup.com.

IX. Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@springedugroup.com or call 877-322-2861.

X. Changes to Our Privacy Notice

This privacy notice was last updated on **May 1, 2020**. The Company reserves the right to amend this privacy notice at its discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on our website and update the notice's effective date.