

## PRIVACY AND COOKIE NOTICE

Effective Date: 5/1/2020

Spring Education Group and its subsidiaries (“Spring Education Group,” “we,” or “us”) respect and value your privacy. As part of our commitment to use the information you share with us responsibly, we want you to be familiar with how we collect, use, and disclose information relating to you, your computer, or your device and that enables your identification (“Personal Information”).

This Privacy and Cookie Notice (this “Notice”) describes how we process Personal Information about you that we collect through each website or application operated and controlled by us from which you are accessing this Notice (the “Site”). This Notice does not apply to information that we collect offline, such as over the telephone or in person. By using the Site, you agree to the terms and conditions of this Notice.

### 1. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

#### a. What You Give Us

Some parts of the Site may ask you to submit Personal Information so that you may benefit from the specified features or to participate in an activity. For example, you may voluntarily provide Personal Information to us in the following ways:

- **Application Forms:** We collect the Personal Information you voluntarily provide when you complete an application form on the Site. This information may include your name, street address, email address, telephone number, employer, the name, birth date, and gender of the child that is applying, and academic information regarding that child.
- **Contact Us Forms:** If you contact us, we collect the information that you provide on the “contact us” form available on the Site.
- **Registration for An Account:** If you register for an account with us, we will collect the information that you voluntarily provide when registering, which will include your username and password.
- **Employment Applications:** Some areas of the Site may allow you to submit information related to job opportunities with Spring Education Group.
- **Forums:** If you participate in message boards, blogs, or chat features, we receive any Personal Information you reveal in those forums.

We may combine Personal Information you submit through the Site with other information we have collected from you, whether on-line or off-line. We treat the combined information in accordance with this Notice.

## **b. Information from Use of the Site**

Through your use of the Site, we may also gather information about your use of the Site that does not identify you directly but may identify your computer or device. Generally, this information is collected through what we refer to herein as "Traffic Data." We may collect and store such Traffic Data automatically whenever you interact with the Site. For example, we may collect your IP address, the hostname of your computer, browser information and reference site domain name every time you use the Site. We may collect information regarding user traffic patterns and Site usage. This Traffic Data does not, however, contain anything that can personally identify you, though it may identify your computer or device; it is used to analyze and improve the Site, to provide you with a better experience on the Site, and to show you advertisements tailored to you. Please see the section below in this Notice regarding Passive Information Collection for more information about our use of cookies and other technologies.

## **c. Data about Children**

We do not knowingly collect Personal Information through the Site from children under the age of 13. We reserve the right to delete any information identified as having been provided through the Site from children under the age of 13.

## **d. Sensitive Information**

Unless we specifically request or invite it, we ask that you not send or otherwise disclose to us your racial or ethnic origin, political affiliations or opinions, health information, or criminal background. In those cases where we may request or invite you to provide the foregoing information, we will only do so in accordance with the requirements of applicable law. Where you provide us with such information without being requested to do so by Spring Education Group, we reserve the right (but do not have any obligation) to erase such information at our discretion.

## **2. HOW DO WE USE THE INFORMATION WE COLLECT FROM YOU?**

We use Personal Information submitted by you or otherwise collected through the Site for the purposes described in this Notice and as otherwise described to you at the point of collection. Generally, we use the information you provide for the reason for which it was provided. For example, if you contact us by e-mail, we will use the Personal Information you provide to answer your question or resolve your problem and will respond to the email address from which the contact came. We may also use Personal Information about you as specifically described below:

- **Requests, Inquiries, and Applications:** We may use your Personal Information to process, evaluate, and respond to your requests, inquiries, and applications. So, if you provide us with information to schedule a tour, we will use the information you provide for that purpose. If you request certain information from us, we will use your Personal Information to process and respond to your request. If you fill out an application form on the Site, we may combine the Personal Information you provide on the Site with information we receive offline about you or your child to process the application.

- **Use of Parent and Student Portals:** If you are a parent or student and have a registered account, we may use your Personal Information to allow you access to our parent and student portals.
- **Manage Our Relationship with You:** We may use your Personal Information to send you important information regarding our relationship with you or regarding the Site, such as information about changes to our terms, conditions, policies, and other administrative information. If your child is enrolled in the school, we also use Personal Information to manage your family’s relationship with the school. Further, we may use Personal Information to contact you about special events, school news, or your child’s academic progress.
- **Access to Interactive Features:** We use your Personal Information to allow you to participate in interactive features of the Site, when you choose to do so, such as online message boards, blogs, and chat features.
- **Internal Business Purposes:** We may use your Personal Information for internal business purposes, including without limitation, to help us operate, evaluate, and improve the quality of the Site; to better understand those individuals that utilize the Site; to verify your identity; to prevent, protect against, identify, or address fraud, unauthorized activity, claims, liabilities, and other wrongdoing; to provide you with customer service; and to generally manage our business.
- **Employment:** If you provide Personal Information to apply for a job with Spring Education Group, we may use the Personal Information you provide to evaluate your job application, consider you for that job or for similar jobs in the future, and contact you regarding possible employment.
- **Online Advertising:** We may use Traffic Data for marketing and advertising purposes, including determining appropriate advertising channels and venues to place ads, placing advertising on such channels and venues, measuring and managing the effectiveness of our advertising and marketing, and performing market research and data analytics. To learn more about how we use Traffic Data for Interest Based Advertising, please see Sections 5 and 6 of this Notice.
- **Legal Requirements, Industry Standards, and Contractual Obligations:** We may use your Personal Information for complying with and enforcing applicable legal requirements, industry standards, and our contractual obligations.

We may use non-personal information or aggregate information that does not identify an individual without restriction, and we may share such information with third parties.

### 3. WITH WHOM DO WE SHARE YOUR INFORMATION?

We may share your Personal Information only as described in this Notice or as otherwise described to you at the point of collection.

- **Affiliates:** We may share your Personal Information with our affiliates for purposes consistent with this Notice. Our affiliates will be bound to maintain that Personal Information in accordance with this Notice.

- **Agents, Consultants, and Service Providers:** We may share your Personal Information with individuals or companies that we hire to provide services to us, such as website hosting services.
- **Forums:** Students who participate in live classes or message boards through our student portal are sharing Personal Information with other students who also participate in those classes or boards. Parents may participate in message boards, blogs, and chat features. Please be aware that if you use these forums you are disclosing Personal Information to the other users of the forums and we cannot control whether those other users will further use or disclose any Personal Information that is shared with them.
- **Business Transfers:** We may transfer your Personal Information in the event of a business sale, merger, consolidation, change in control, transfer of substantial assets, bankruptcy, liquidation, or reorganization. We may also disclose your Personal Information in the course of due diligence of such a transaction. You acknowledge and agree that any successor to or acquirer of Spring Education Group (or its assets) will continue to have the right to use your Personal Information and other information. Whether the recipient of your Personal Information in these cases will handle your Personal Information pursuant to this Notice will depend on the applicable law and other factors.
- **Legal Requirements:** We use and disclose Personal Information as we believe to be necessary or appropriate: (i) under applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iv) to enforce our terms and conditions; (v) to protect our operations or those of any of our affiliates; (vi) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.
- **Passively Collected Information:** We may share Traffic Data that does not identify you directly, but may identify your computer or device, as described in Sections 5 and 6 of this Notice.

#### 4. COOKIES AND OTHER PASSIVE COLLECTION TECHNOLOGIES

As you navigate the Site, certain Traffic Data may be passively collected, meaning it is gathered without your actively providing it. This is done using the following technologies in the following ways:

**Through your browser:** Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type and operating system type and version screen resolution, and Internet browser type and version.

**Through your device:** If you access the Site through a mobile device or other network-connected product, certain information may be collected about that device, including your device type, network service provider, and other identifiers. We may collect unique device identifiers (such as IDFA and AID tags and UUID and UDID identifiers) associated with the devices you use to access the Site.

**Using cookies:** Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to collect information such as browser type, time spent on the Site, pages visited, and language

preferences. We and our service providers use this information for security purposes, to facilitate navigation, display information more effectively, and to personalize your experience while using the Site. More specifically, we use cookies to:

- recognize your computer or device to make your use of the Site easier, such as to remember your locations of interest and other preferences with the Site;
- gather statistical information about use of the Site in order to continually improve its design and functionality, understand how individuals use it, and to assist us with resolving questions regarding it;
- select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Site and on other websites, applications, and online services that you use; and
- track consumer responses to online advertisements. To learn more about cookies, please visit <http://www.allaboutcookies.org>.

Should you view any embedded YouTube video on the Site, please be aware that YouTube applies its own cookies. For further information regarding their policies, please refer to the [Google privacy policy](#).

**Using Monitoring Tools:** Cookies are not the only way to recognize or track visitors to a website. We may use other, similar technologies from time to time, like web beacons (sometimes called “tracking pixels” or “clear gifs”) to better tailor the Site in order to provide a better service. These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Site. These technologies usually work in conjunction with cookies. To disable cookies used on our Site, and therefore any other tracking technologies that work in conjunction with these cookies, please follow the instructions below.

**IP Address:** Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many online service providers, including website operators. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering the Site.

**Social Media Plug-Ins:** We use social media plug-ins from social media networks like Facebook, Pinterest, Instagram, YouTube and Twitter, which are labeled on our Site with the well-known symbols of the respective social network. If you interact with these plug-ins, your activity on the Site will also be made available to those social networks. To understand how those social networks use and disclose your Personal Information, please review the privacy policies available on the websites of those social networks.

**Analytic Tools:** We also use tools and third-party services to collect information about usage of the Site, including Google Analytics. To learn more please consult the [Google privacy policy](#). Google Analytics collects information on how often users visit the Site, what aspects of the Site they visit when they do so, and what other websites users visited prior to accessing the Site. You may prevent your data from being collected and used by Google Analytics by opting out through the use of the [Google Analytics Opt-out Browser Add-on](#).

Our Site currently does not respond to “Do Not Track” (DNT) signals and operate as described in this Notice whether a DNT signal is received, as there is no consistent industry standard for compliance.

Although our use of passive collection technologies may change over time as technology evolves, the above descriptions are designed to provide you with additional detail about our current approach to information collected from passive technologies.

## **5. INTEREST BASED ADVERTISING**

We may collect information about your online activities on the Site to provide you with advertising tailored to your individual interests. We also may obtain information for this purpose from third-party websites on which our ads are served. This section of our Notice provides details and explains how to exercise your choices.

You may see certain ads on other websites because we work with advertising partners (including advertising networks) to engage in remarketing and retargeting activities. Our advertising partners allow us to target our messaging to users through demographic, interest-based and contextual means. These partners track your online activities over time and across websites by collecting information through automated means, including use of third-party cookies, web server logs, and web beacons. They use this information to show you advertisements that may be tailored to your individual interests. The information our advertising partners may collect includes data about your visits to websites that participate in the relevant advertising networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our Site and on third-party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts. For example, we utilize certain of our ad partners’ targeted advertising services to show you our ads on other websites based on your prior visits to the Site and other online activity.

Provided that an advertising partner participates in industry-developed programs designed to provide consumers choices about whether to receive targeted advertising, you also may opt out of ad network interest-based advertising generally through the [Network Advertising Initiative](#) or the [Digital Advertising Alliance](#).

## **6. SECURITY**

We take what we believe to be reasonable steps to protect the Personal Information collected by us from loss, misuse, unauthorized use, access, inadvertent disclosure, alteration, and destruction. However, no network, server, database, or Internet or e-mail transmission is ever fully secure, error-free, or “hacker proof.” Therefore, you should take special care in deciding what information you provide to us. Please keep this in mind when disclosing any Personal Information.

## **7. DATA RETENTION**

We generally retain Personal Information for so long as it may be relevant to the purposes above, or for longer when required by law. To dispose of Personal Information, we may anonymize it, delete it, or take other appropriate steps. Even if we delete your Personal Information, it may persist on backup or archival media for an additional time period for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

## **8. INTERNATIONAL TRANSFERS OF PERSONAL DATA**

Spring Education Group is based in the United States. The recipients of the Personal Information disclosures described in the “How We Share Your Personal Information” section above may be located in the United States or elsewhere in the world. Privacy laws in these countries may not provide protections equivalent to those of your country of residence, and your government may or may not deem such protections adequate. Whenever we transfer personal data outside of the European Economic Area (“EEA”) or the UK, we take legally required steps to make sure that the appropriate safeguards are in place to protect your Personal Information.

## **9. YOUR RIGHTS AND CHOICES**

### **Opt Out from Direct Electronic Communications**

Where it is in accordance with your preferences, Spring Education Group may send you direct electronic communications, such as through email or text message. You may “opt out” of receiving these electronic communications by following the instructions in the message that you receive, or by sending an e-mail to [privacy@springedugroup.com](mailto:privacy@springedugroup.com) indicating which communications you no longer wish to receive. Note that if you are a parent of a student enrolled at the school, we may still send certain administrative messages to you by email that relate to the student’s relationship with the school.

### **Opt Out from Cookie-Related Processing and Interest Based Advertising**

You can opt out from certain cookie-related processing and interest-based advertising as described in Sections 4 and 5 of this Notice.

### **How You Can Access, Update, Correct, or Delete Your Personal Information**

If you would like to submit a data access, correction, restriction, or deletion request, you can do so by contacting us at [privacy@springedugroup.com](mailto:privacy@springedugroup.com) and we will process such request with respect to any Personal Information that we are able to link to you individually based on the information that you can provide to us. If you choose to delete or restrict the use of your Personal Information, you may not be able to use certain functionality on the Site or to be enrolled at the school. These rights and options that you have with respect to Personal Information are subject to limitations and exceptions under our policies and applicable law. In addition to those rights, if you live in certain jurisdictions, you have the right to submit a complaint to your relevant supervisory authority. However, we encourage you to contact us first at [privacy@springedugroup.com](mailto:privacy@springedugroup.com) and we will try to resolve your concerns.

### **Notice to California Residents**

Subject to certain limits under California Civil Code § 1798.83, if you are a California resident, you may ask us to provide you with: (1) a list of certain categories of Personal Information that we have disclosed to certain types of third parties for their direct marketing purposes during the immediately preceding calendar year; and (2) the identity of the third parties that received certain Personal Information from us for their direct marketing purposes during that calendar year. To do so, please contact us at [privacy@springedugroup.com](mailto:privacy@springedugroup.com).

## **10. LINKS TO THIRD PARTY SITES**

The Site may contain links to other web sites for the convenience of users in locating information or services that may be of interest. If you access a third-party website from a link on the Site, any information you disclose on that website is not subject to this Notice. It is possible that these links may be used by third parties or others to collect personal or other information about you. Spring Education Group is not responsible for the privacy practices of such websites, advertisers, or third parties or the content of such websites. Spring Education Group does not control these third parties' use of cookies, collection of information, or how they manage such information. It is solely your obligation to review and understand the privacy practices and policies of these other websites, advertisers and any third parties.

## **11. UPDATES AND CHANGES TO OUR PRIVACY POLICY**

The business and operations of Spring Education Group may change from time to time. As a result, at times it may be necessary for us to make changes to this Notice to reflect changes in the law, our data handling practices, or the features of our services, websites, and apps. We reserve the right, in our sole discretion, to update or modify this Notice at any time. Modifications to this Notice will be posted at <https://www.springeducationgroup.com/privacy/> and the new Effective Date will be displayed at the top of this Notice. In certain circumstances, Spring Education Group may, but need not, provide you with additional notice of such modifications, such as via e-mail. Modifications will be effective 30 days following the Effective Date, or such other date as communicated in any other notice to you. Where required by applicable law, we will apply changes only with your consent.

Please review this Notice periodically, and especially before you provide any Personal Information. This Notice was updated on the date indicated above. Your continued participation in our programs, services, and events following the effectiveness of any modifications to this Notice constitutes your acceptance of those modifications. If any modification to this Notice is not acceptable to you, you should cease accessing, browsing, and otherwise utilizing Spring Education Group's website, as well as its programs, services, and events.

## **12. HOW TO CONTACT US**

If you have any questions regarding this Notice or the use of your Personal Information under this Notice, you can contact us at:

Spring Education Group Home Office East1615 West Chester Pike, Suite 200  
West Chester, PA 19382  
[privacy@springedugroup.com](mailto:privacy@springedugroup.com)