

EFFECTIVE: JANUARY 1, 2020

PRIVACY NOTICE-CALIFORNIA CCPA

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Policy of codeSpark, Inc. (“codeSpark” or “We,”) and applies to Consumers who reside in the State of California (“Consumers”) utilizing codeSpark website (the “Site”), mobile applications (“Apps”) and online products and services (collectively, the “Services”). This Notice does not apply to employees of codeSpark. We adopt this notice under the California Consumer Privacy Act of 2018 (“CCPA”). Terms used in this notice shall have the same meaning as defined in the CCPA, unless otherwise noted.

Personal Information We Collect

We collect the following categories of Personal Information under CCPA from California Consumers within the last twelve months:

From	Personal Information
Our App/Use of the Game	Teachers/Parents: email address; account login information; User activities and interaction with the Services associated with the Teacher/parent account using persistent identifiers Students: first name (or player nickname).zip code level location, along with birth month and year of the user, will be collected for use in student progress reports Voice and pictures (which may identify an individual) only if students or teachers choose to utilize our Kid Community feature and upload text, voice or an image of an individual
Our Websites	An email address If you provide it to us; Browsing activities on the Site may be associated with an ip address

Sources of Personal Information:

- when you provide it directly to us as part of using our Site or Services;
- Using a persistent identifier when you use the Services to follow the progress of the account interacting with the Services
- Directly from browsing activities on the Site or using the Services.
- when you provide it directly to us as part of formation or fulfillment of a contract or as part of us delivering our Services; or
- when our service providers provide it to us;

Use of Personal Information

As discussed more fully in our Privacy Policy, Personal Information We collect is used only in connection with providing our Services and the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with an email address to set up an account.
- To provide the products and Services.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our Services and present its contents to you.
- For testing, research, analysis and product development.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different purposes without providing you notice. We do not sell your Personal Information to any third parties.

Sharing Personal Information

We may disclose your Personal Information to a third party service provider working on our behalf for a business purpose. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for a business purpose:

to service providers: Mixpanel and Google for their Analytics services.

In the preceding twelve (12) months, we have not sold any Personal Information.

Your Rights and Choices

The CCPA provides Consumers with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

Access Rights

You have the right to request that we disclose certain information about our collection and use of your Personal Information over the past 12 months to you. Once we receive and confirm your verifiable Consumer request, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.

- If we sold or disclosed your Personal Information for a business purpose.

Access to Specific Information

CCPA provides Consumers with rights to request access of the Personal Information about them when the Consumer can verify that they are the rightful owner of the information requested as discussed above. The access rights include the right to know the specific pieces of Personal Information, if the requestor can be verified. Currently we identify our users by email account, but we don't have sufficient other information to verify adequately that an email request matches the particular student or child. It would require us to actually collect more Personal Information to try to verify that the correct person eligible to receive the specific information about student users. We want to avoid the potential risk of providing any minor child's Personal Information into the wrong hands. Accordingly, in a matter of caution, we are not able to provide the particular Personal Information associated with any student, but you are free to ask us to delete all Personal Information associated with an account. You will not be able to use the Services if your account is deleted. If you are uncomfortable with our having any Personal Information about you, please send us a request to opt out or to delete your information.

Opt out of Sales and Deletion Request Rights

Opt out of Sales: You have the right to request that we opt out your Personal Information from any sales. We do not sell any Personal Information from our Services.

Deletion Request Rights:

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, opt out, and deletion rights described above, please submit a verifiable Consumer request to us by sending the request by email to privacy@codespark.com. You will need to have the email of the account you are requesting information because we will match this information to our account information.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable Consumer request related to your Personal Information. You may also make a verifiable Consumer request on behalf of your minor child. You may only make a verifiable Consumer request for access or data portability twice within a 12-month period.

We do not sell Personal Information, however, if you would like to exercise your right to opt out of any possible, future sales of your Personal Information, or request that we delete your Personal Information, please send this request to privacy@codespark.com.

Response Timing and Format

We endeavor to respond to a verifiable Consumer request within 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. We do not charge a fee to process or respond to your verifiable Consumer request unless it is excessive, repetitive, or unfounded.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights.

Changes to This Notice

We reserve the right to amend this notice at our discretion and at any time. When we make changes to this privacy notice, we will post the update information on our website.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your Personal Information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us.