

AllSides Children's Online Privacy Protection Act (COPPA) Notice

Effective Date: August 30, 2023

This COPPA Notice explains how AllSides Technologies, Inc. ("we," "our") handles the personal information of children under thirteen years-old who use our School Membership log-ins through an arrangement with schools we serve. This Notice also applies to and describes our Mismatch service. This Notice applies to our website (www.allsides.com) (each website a "Site" and collectively, the "Sites"), or other related online or mobile applications available as part of our services to schools, including the Mismatch service (each application an "App," collectively, the "Apps"; collectively with the Sites, "the Platform"). Our Platform provides news coverage and helps student readers to identify ideological trends in news coverage. Schools choose to use our Platform in the school context to support student learning and critical thinking skills. Via our Mismatch service, schools and teachers can choose to profile their own classrooms and students and use those profiles to find and interact with diverse classrooms at other schools.

This notice solely describes our practices regarding the personal information of children and compliance with the Children's Online Privacy Protection Act (COPPA). It does not apply to our practices more broadly. Our general privacy notice can be found at: <u>https://www.allsides.com/privacy-policy</u>. Our general notice may permit broader uses of information than is reflected in this COPPA notice. In case of a conflict between this notice and our general notice with respect to the treatment of children's data, this notice controls.

Information We Collect

In all cases, as required by law, we do not collect more personal information from your child than is reasonably necessary for them to access and use the Platform.

Information we collect directly from children. We may collect the following information from children:

- Any content a child uploads to the site, in forums and other areas designed for user interaction.
- A child's video image and video conversations with other students, potentially including via our Mismatch service, where a child is using a product with that functionality, and related records of interaction with our Platform.
- The contents of surveys provided by students after a Mismatch discussion with another classroom. These surveys may ask students to evaluate and summarize their interactions with others through Mismatch.

Information we collect about a child through automatic data collection technologies. We may collect data regarding a child's use of the Platform through cookies, web beacons, and other automatic data collection technologies. This data may include a child's IP address, the date(s) and time(s) he or she accessed the Platform, the page(s) and content a child accessed during his or her visit, websites that a child was last on when he or she accesses the Platform, and a child's precise geolocation when entering the platform. Cookies are small identifiers which are stored on a child's device for the purpose of



identifying his or her browser or storing information or saving settings within that browser for use in a child's next session. Cookies and similar technologies may also be used to personalize a child's visit by storing his or her preferences or displaying content based upon what a child has viewed on the Platform, or other websites. We may use these and similar technologies on the Platform and other websites and mobile applications.

You can read our full cookie policy here: <u>https://www.allsides.com/cookie-policy</u>.

How We Use Personal Information

We use all the information we gather to provide the Platform and otherwise manage our business. Across the Platform and our business, we may use the personal information we collect for a variety of purposes, including the following:

- To operate our business and provide the Platform. This includes providing the Platform to children and to facilitate teacher-directed discussions of current events with teachers and other students.
- To report on the use of the Platform to schools, school officials, and children, including with respect to their students' use of the Platform. Schools may use the information we provide for administrative, planning, and grading purposes; if you are a parent and wish to understand your school's practices in particular, you should contact the school directly.
- To maintain, analyze, customize, measure, and improve the Platform.
- To provide customer support.
- To measure interest in the Platform.
- To develop new products, develop the Platform, and ensure internal quality control.
- To verify a child's identity.
- To monitor and enforce our Terms of Service or similar terms.
- To comply with law and satisfy our regulatory compliance obligations.
- To detect and prevent fraud and other prohibited, illicit, or illegal activity.
- To protect the safety of children on our Platform.
- For other purposes permitted by law or to which you consent.

How We Share Personal Information

We may share a child's personal information gathered on the Platform with third parties in order to support and provide it and other services. For example, we may share a child's personal information:

- With third party service providers that we have engaged to assist us in supporting our business or delivering the Platform.
- With other users of the Platform, where permitted by the functionality of the Platform. Other users may include other students, teachers, and school administrators at the student's and other schools.
- With corporate affiliates including any of our present or future parent companies, subsidiaries, joint ventures, or other companies under common control with us.
- With regulators, law enforcement, governmental authorities, or as requested or required by legal order



- With financial auditors, legal counsel and other third parties where necessary to comply with our obligations or protect our interests, property or legal rights, or those of our customers or other third parties.
- With companies or other entities in the course of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event.
- To the extent permitted by law, when required by law, in connection with a court order, or other government or law enforcement authority or regulatory agency, or whenever we believe that disclosing such information is necessary or advisable, for example, to protect the rights, property, interests, or safety of children, yourself, ourselves or others.
- Where reasonably required in our discretion to protect the safety of children using our Platform.
- We may enable children to make their information publicly available when they post content in public places on our site, or when they use our Platform to interact with other users.
- At your direction or by your consent.

We may share the results of student surveys relating to our Mismatch service with teachers, administrators, and researchers. We may choose to anonymize or deidentify the results of a particular child's survey, either fully or partially. Aggregate research results may be published or publicized.

What Rights and Control do You Have Over Your Child's Personal Information and Use of the Platform?

If you are a school official acting on behalf of parents with respect to children in your care, you have certain rights. In particular, you have the right to:

- Request and receive a description of specific types or categories of personal information of children we collect or maintain.
- Review all personal information collected from a child or children in your care in the course of their use of the Platform.
- Review the contents of the surveys before distributing them to students for their responses.
- Require us to delete the personal information of a child or children in your care.
- Withdraw your consent to our further collection and use of a child or children in your care's personal information.

You may exercise these rights by notifying us at admin@allsides.com. We may limit our response to the exercise of your rights as permitted by law. If you are a parent interested in exercising your rights over your children's data, you should contact the school which granted your child access to our Platform to coordinate the exercise of these rights on your behalf.

Links to Third Party Sites

We or other users may provide links on our Platform to websites that are owned or operated by other companies. When your child uses a link to visit a third-party website, he or she will be subject to that website's privacy and security practices, which may differ from ours. You should review the Privacy



Notice, terms of use and security practices of the linked third-party website to understand how that site may use your data and/or information. We are not responsible for the privacy or security of these third-party sites, or the accuracy, completeness, or reliability of the information they provide.

Updates to this COPPA Notice

We may update this Privacy Notice from time to time in order to provide clarification or notice of changes to our practices. If we make changes, we will revise the Effective Date at the top of this Privacy Notice. Changes to this Privacy Notice will be effective once they are posted unless otherwise indicated. Additionally, we may provide an updated version of this notice to Schools who use our platform.

Contact Us

If you have any questions or concern about privacy at AllSides please contact us by emailing admin@allsides.com. You may also contact us by phone at 415-295-2067 or by mail at 8275 E. 11th Ave #200241, Denver, CO 80220-9998.



Consent Form

Your permission is required for the collection, use, or disclosure of children's personal information, including children under thirteen years of age. By signing below, you represent and warrant that:

- 1. You have full legal authority to consent to our collection, use and sharing of personal information from the students at the school indicated below ("your children"), including all students under the age of 13.
- You do consent and authorize such collection, use and sharing of your children's information as described in our Children's Online Privacy Protection Act notice, available at www.allsides.com/privacy-policy.

You may revoke this consent at any time to refuse further collection and use of your children's information. If you desire to revoke this consent, please notify AllSides in writing at admin@allsides.com. Upon receiving such revocation, AllSides will delete personal information collected from children at your school. You acknowledge and agree that AllSides will be unable thereafter to continue providing services to your school, even if the revocation relates only to some (but not all) of your students. You acknowledge and agree that AllSides will have no liability for any failure to perform contracted services at your school after receipt of such revocation. AllSides reserves all its rights and remedies under any commercial agreement between the parties.

School Name:	
Your Full Name:	
Title / Role:	
Your Signature:	Date: