

Privacy Policy

We value your trust. In order to honor that trust, **IEPpilot** adheres to ethical standards in gathering, using, and safeguarding any information you provide. Expatiate Community Foundation (operating under the brand name **IEPpilot**), provides educational technology services, incorporated in the USA, provides educational technology services in the United States. This privacy policy governs your use of the application 'IEPpilot's – www.ieppilot.excomweb.com ('Website') and the other associated applications, products, websites, and services managed by the Company.

Please read this privacy policy ('Policy') carefully before using the Application, Website, our services, and products, along with the Terms of Use ('ToU') provided on the Application and the Website. Your use of the Website, Application, or services in connection with the Application, Website, or products ('Services'), or registrations with us through any modes or usage of any products including through SD cards, tablets, or other storage/transmitting devices, shall signify your acceptance of this Policy and your agreement to be legally bound by the same. If you do not agree with the terms of this Policy, do not use the Website, Application, our products, or avail of any of our Services.

User Provided Information

The Application/Website/Services/products obtain the information you provide when you download and register for the Application or Services or products. When you register with us, you generally provide:

1. Personal Information:

- Your name, age, email address, location, phone number, password, and your ward's educational interests.
- Transaction-related information, such as when you make purchases, respond to offers, or download or use applications from us.
- Information you provide when you contact us for help.
- Information entered into our system when using the Application/Services/products, such as while asking doubts, participating in discussions, and taking tests.

The said information collected from the users could be categorized as "Personal Information," "Sensitive Personal Information," and "Associated Information." These categories (as individually defined under the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 (the "Data Protection Rules")) shall collectively be referred to as 'Information' in this Policy.

We may use the Information to contact you from time to time to provide you with the Services, important information, required notices, and marketing promotions. We will ask you when we need more information that personally identifies you (personal information) or allows us to contact you.

We will not differentiate between who is using the device to access the Application, Website, or Services/products, so long as the login/access credentials match with yours. In order to make the best use of the Application/Website/Services/products and enable your Information to be captured accurately, it is essential that you log in using your own credentials.

We will, at all times, provide the option to you to not provide the Personal Information or Sensitive Personal Information we seek from you. Further, you shall, at any time while using the Application/Services/products, also have an option to withdraw your consent given earlier to us to use such Personal Information or Sensitive Personal Information. Such withdrawal of consent must be sent in writing to us at the contact details provided in this Policy below. In such an event, however, the Company fully reserves the right not to allow further usage of the Application or provide any Services/products thereunder to you.

Automatically Collected Information

In addition, the Application/products/Services may collect certain information automatically, including but not limited to:

- The type of mobile device you use.
- Your mobile device's unique device ID.
- The IP address of your mobile device.
- Your mobile operating system.
- The type of mobile Internet browsers you use.
- Information about the way you use the Application/Services/products.

As is true of most mobile applications, we also collect other relevant information as per the permissions that you provide. We use an outside credit card processing company to bill you for goods and services. These companies do not retain, share, store, or use personally identifiable information for any other purpose.

At the time you (on behalf of yourself and/or your ward) register with us for our Services or during the term of Services relating to our products/services/subscriptions, we may require camera and microphone access while you avail of such products/services/subscriptions to improve the in-classroom experience. All video, audio, and telecalls between you/your ward and our

tutors/representatives/agents are recorded for quality and training purposes. These recordings are used solely for quality assurance, training, and service improvement purposes and are not disclosed to third parties except as required by law.

By agreeing to this Privacy Policy, you (on behalf of yourself and/or your ward) consent to our collection, recording, and use of your and/or your ward's audio/video/telecall recordings and personal information for the above-mentioned purposes.

Use of Your Personal Information

We use the collected Information to:

- Analyze trends.
- Conduct research.
- Administer the Application/Services and products.
- Learn about each user's learning patterns and movements around the Application/Services and products.
- Gather demographic information and usage behavior about our user base as a whole.

Aggregated and individual, anonymized and non-anonymized data may periodically be transmitted to external service providers to help us improve the Application, products, and our Services.

We will share your information with third parties only in the ways described in this Policy. We may use the individual data and behavior patterns combined with personal information to provide you with personalized content and better your learning objectives. Third parties provide certain services which we may use to analyze the data and information to personalize, drive insights, and help us better your experience or reach out to you with more value-added applications, products, information, and services. However, these third-party companies do not have any independent right to share this information.

FERPA Compliance (Family Educational Rights and Privacy Act)

To the extent that IEPpilot collects, stores, or processes information that constitutes **education records** under FERPA, we handle such information in accordance with FERPA requirements.

Education records may include information directly related to a student and maintained by an educational institution or a party acting on behalf of the institution. When IEPpilot processes education records on behalf of schools or educational organizations:

- We act as a **school official with legitimate educational interests** where applicable.
- Access to student information is restricted to authorized personnel who require access to provide the services.
- Student records are used solely for educational purposes related to the services provided by IEPpilot.
- We do not disclose education records to third parties except as permitted by FERPA or with appropriate consent from the educational institution, parent, or eligible student.

Parents and eligible students retain the rights granted under FERPA, including the right to review and request corrections to education records maintained by the school.

HIPAA Compliance (Health Insurance Portability and Accountability Act)

IEPpilot may collect or process certain information that could relate to health, therapy services, or disability-related educational support. When such information qualifies as **Protected Health Information (PHI)** under HIPAA and is handled in connection with healthcare providers or covered entities, we take reasonable administrative, technical, and physical safeguards to protect that information.

When applicable, IEPpilot will:

- Protect health-related information using industry-standard security measures.
- Limit access to health information to authorized individuals who require it to perform their duties.
- Use and disclose such information only for purposes permitted by applicable law or with proper authorization.

In many educational contexts, student health information maintained by schools is governed by **FERPA rather than HIPAA**. In such cases, the protections described under the FERPA section above will apply.

Children's Privacy (COPPA)

IEPpilot is committed to protecting the privacy of children who use our services. In accordance with the **Children's Online Privacy Protection Act (COPPA)**, we take special precautions when collecting or handling personal information from children under the age of 13.

Our services are primarily intended to be used in educational settings under the supervision of schools, educators, or parents. When the services are used by children under 13, personal information may be collected only as reasonably necessary to provide the educational services offered through the platform.

When information from children under 13 is collected, IEPpilot will:

- Collect only the information necessary to support educational activities and the functionality of the service.
- Use the information solely for educational, operational, and service improvement purposes.
- Limit access to such information to authorized personnel who require access to operate or support the service.
- Not require children to disclose more personal information than is reasonably necessary to participate in an activity.

In many cases, educational institutions may provide consent on behalf of parents for the collection of student information when the service is used for educational purposes and for the benefit of the school. When services are provided directly to families, parental consent may be required before certain information is collected.

Parents or legal guardians may request to review, update, or delete their child's personal information by contacting us using the contact information listed in this Privacy Policy.

If we become aware that personal information has been collected from a child under 13 without appropriate consent where required, we will take steps to delete that information as soon as reasonably possible.

Access to your Personal Information

We will provide you with the means to ensure that your Personal Information is correct and current. If you have filled out a user profile, we will provide an obvious way for you to access and change your profile from our Application/Services/Website/products. We adopt reasonable security measures to protect your password from being exposed or disclosed to anyone.

Cookies

We send cookies (small files containing a string of characters) to your computer, thereby uniquely identifying your browser. Cookies are used to track your preferences, help you login faster, and aggregated to determine user trends. This data is used to improve our offerings, such as providing more content in areas of greater interest to a majority of users. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Some of our features and services may not function properly if your cookies are disabled.

Links

We may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve our customized content. Clicking on links may take you to sites outside our domain. We are not responsible for the privacy practices of other websites. We encourage our users to be aware when they leave our site to read the privacy statements of each and every web site that collects personally identifiable information. This Privacy Policy applies solely to information collected by our Website.

Alerts

We may alert you by email or phone (through sms/call/whatsapp) to inform you about new service offerings of the Company and its subsidiaries/affiliates or other information which we feel might be useful for you, through the Company or its subsidiaries/affiliates.

Public Forums

When you use certain features on our website like the discussion forums and you post or share your personal information such as comments, messages, files, photos, will be available to all users, and will be in the public domain. All such sharing of information is done at your own risk. Please keep in mind that if you disclose personal information in your profile or when posting on our forums this information may become publicly available.

Security

We are concerned about safeguarding the confidentiality of your Information. We provide physical, electronic, and procedural safeguards to protect Information we process and maintain. For example, we limit access to this Information to authorized employees only who need to know that information in order to operate, develop or improve our Application/Services/products/Website. Please be aware that, although we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

How Long Do We Retain User Data?

Currently, we plan to retain user data while an account is active and for at least three years afterward. We may alter this practice according to legal and business requirements. For example, we may lengthen the retention period for some data if needed to comply with law or voluntary codes of conduct. Unless otherwise prohibited, we may shorten the retention period for some types of data if needed to free up storage space.

Log Information

When you access our Website, our servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your web request, internet protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.

User Communications

When you send an email or other communication to us, we may retain those communications in order to process your inquiries, respond to your requests and

improve our Services.

Changes to this Statement

As the Company evolves, our privacy policy will need to evolve as well to cover new situations. You are advised to review this Policy regularly for any changes, as continued use is deemed approval of all changes.

Your Consent

We believe that every user of our Application/Services/products/Website must be in a position to provide an informed consent prior to providing any Information required for the use of the Application/Services/products/Website. By registering with us, you are expressly consenting to our collection, processing, storing, disclosing and handling of your information as set forth in this Policy now and as amended by us. Processing your information in any way, including, but not limited to, collecting, storing, deleting, using, combining, sharing, transferring and disclosing information, all of which will take place in the USA. If you reside outside the USA your information will be transferred, processed and stored in accordance with the applicable data protection laws of California, USA.

Contact Information

For any queries or grievances, please contact:

IEPilot

150 E Colorado Blvd #201, Pasadena, CA 91105.

Email: simplesped@excomweb.com