



PARLAY IDEAS INC. PRIVACY POLICY

Ver.1.1.1

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Parlay ("Parlay," "we," or "us") understands that privacy is tremendously important to schools and faculty who register for our Service ("Schools"), and to students whose information we may access on behalf of a School ("Students"). Parlay provides a platform that enables teachers and schools to facilitate and measure secure and engaging discussions online and inside the classroom. This privacy policy applies to our website <https://www.parlayideas.com/legal> and to the Parlay platform (our "Service") and describes the steps we take to protect your data.

Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms of Service.

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We strive to be transparent in our data collection and use practices. This is the type of personal information we may collect.

1. HOW WE COLLECT AND USE INFORMATION

We collect the following types of information:

Information about Schools: We ask for certain information when a School administrator registers a School with Parlay, or if the administrator corresponds with us online, including a name, school name, school email address and/or account name and password, phone number, and message content. We may also retain information provided by a School if the School sends us a message, posts content to our website or through our Service, or responds to emails or surveys. Once a School begins using the Parlay Service, we will keep records of activities related to the Service. We use this information to operate, maintain, and provide to the features and functionality of the Service, to analyze our Service offerings and functionality, and to communicate with our Schools and website visitors.

Student Data: Parlay may have access to personally identifiable information about students ("Student Data") in the course of providing its services to a School. We consider Student Data to be confidential and do not use such data for any purpose other than to provide the services on the School's behalf. The Personal Identifiable Information we collect per student is limited to their First and Last Name and School Email Address. In some instances, when accessing the system through Single Sign On (Google or Microsoft API Authentication), Parlay may be passed personal data from these services. The School, as the provider of student email addresses, provides each student with login credentials and confirms that it has obtained appropriate parental consents, as needed, before the student is permitted to access the Service. If you are a Student or parent, please contact your School if you have questions about the School's use of technology service providers like Parlay. If a Student contacts Parlay with a question about our Service, we will collect personal information from that Student only as necessary to respond to the Student's request and, if necessary, direct the Student to contact the Student's School.

See "How We Share Your Information" below for more information on the limited ways in which we share School and Student Data. See "Children's Privacy" below for more information on how we collect and use the personal information of children under 13.

Information collected through technology: We automatically collect certain types of usage information when visitors use our service. We may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets Parlay help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Service (e.g., the pages you view, the links you click and other actions you take on the Service), and allow us to track your usage of the Service over time. We may collect log file information from your browser or mobile device each time you access the Service. Log file information may include anonymous information such as your web request, Internet Protocol ("IP") address, browser type, information about your mobile device, number of clicks and how you interact with links on the Service, pages viewed, and other such information. We may employ clear gifs (also known as web beacons) which are used to anonymously track the online usage patterns of our Users. In addition, we may also use clear gifs in HTML-based emails sent to our Schools to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service. We do not allow third party advertising networks to collect information about the users of our Site or Service.

We use or may use the data collected through cookies, log files, device identifiers, and clear gifs information to: (a) remember information so that a user will not have to re-enter it during subsequent visits; (b) provide custom, personalized content and information; (c) to provide and monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and usage on our Service; (e) diagnose or fix technology problems; and (f) help users efficiently access information after signing in.

Student privacy is very important to us. Student Data is used only for educational purposes at the discretion of the School.

2. HOW WE SHARE YOUR INFORMATION

Parlay only shares personal information in a few limited circumstances, described below. We do not rent or sell information for marketing purposes.

Who we may share information with:

- We may share information with those that provide us with technology services (e.g. web hosting and analytics services), but strictly for the purpose of carrying out their work for us.
- We may be required to share information with law enforcement or other third parties when compelled to do so by court order or other legal process, to comply with statutes or regulations, to enforce our [Terms of Use](#), or if we believe in good faith that the disclosure is necessary to protect the rights, property or personal safety of our users.

In the event of a change of control: If we sell, divest or transfer our business, we will not transfer personal information of our customers unless the new owner intends to maintain and provide the Service as a going concern, and provided that the new owner has agreed to data privacy standards no less stringent than our own. In such case we will provide you with notice and an opportunity to opt-out of the transfer of personally identifiable Student Data.

How Student Data is shared: In addition to the actions described above, Parlay may facilitate the sharing of Student Data with third parties, though only when instructed and authorized to do so on behalf of the School. Some elements of our Service enable Schools to interact with students, teachers and third party applications, for the benefit of the student's education. Parlay does not facilitate the sharing of any Student Data with third parties on the Service except on behalf of the School after the School has authorized a third party or application to access Student Data through the Service. Please remember that this Privacy Policy applies to the Parlay Services, and not other services or third party applications, which may have their own privacy policies. Schools should carefully read the privacy practices of each third party application before agreeing to engage with the application through the Service.

We store our data in the Canada and we take strong measures to keep data safe and secure.

3. HOW WE STORE AND PROTECT YOUR INFORMATION

Storage and processing: Any information collected through the Service is stored and processed in Canada. If you use our Service outside of the Canada, you consent to have your data transferred to Canada. Customer Data is hosted with Amazon Web Services.

Keeping information safe: Parlay maintains strict administrative, technical and physical procedures to protect information stored in our servers, which are located in Canada. Access to information is limited (through user/password credentials and two factor authentication) to those employees who require it to perform their job functions. We use industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process and sign-up information. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls to building and files.

Questions about data? Here are your options.

4. YOUR CHOICES ABOUT YOUR INFORMATION

Account information and settings: Schools may update account information and modify Services by signing into the administrator account. Schools and teachers can opt-out of receiving promotional email from us by clicking on the "unsubscribe" feature at the bottom of each email. Sorry, you cannot unsubscribe from Service-related messaging.

Deleting or disabling cookies: You may be able to disallow cookies to be set on your browser. Please look for instructions on how to delete or disable cookies and other tracking/recording tools on your browser's technical settings. You may not be able to delete or disable cookies on certain mobile devices and/or certain browsers. For more information on cookies, visit www.allaboutcookies.org. Remember, disabling cookies may disable many of the features available on the Service, so we recommend you leave cookies enabled.

How long we keep User Content: Following termination or deactivation of a School account, Parlay may retain profile information and content for a commercially reasonable time for backup, archival, or audit purposes, but any and all Student Data associated with the School will be deleted promptly. We may maintain anonymized or aggregated data, including usage data, for analytics purposes.

We do not collect any information from students without consent.

5. CHILDREN'S PRIVACY

Parlay does not knowingly collect any information from children under the age of 13 unless the School has obtained appropriate parental consent for the student to use the Service. Please contact us at bobby@parlayideas.com if you believe we have inadvertently collected personal information of a child under 13 without proper parental consents so that we may delete such data as soon as possible.

6. LINKS TO OTHER WEB SITES AND SERVICES

We are not responsible for the practices employed by websites, applications or services linked to or from our Service. We recommend that the School review the privacy policies of other applications before authorizing a third party to access data through the Service.

7. HOW TO CONTACT US

If you have any questions about this Privacy Policy or the Service, please contact us by visiting our Help Center.

8. CHANGES TO OUR PRIVACY POLICY

Parlay may modify or update this Privacy Policy from time to time so you should review this page periodically. If we seek to use personal information in a materially different way than we had previously, we will provide at least 30 days notice to the Schools so that you have sufficient time to evaluate the change in practice. Of course, you can always opt-out by deleting your account before the changes take effect.

This privacy policy was last modified on March 1, 2017. Effective Date: March 1, 2017.