

VISUAL CLASSROOMS PRIVACY POLICY

Effective Date: August 1, 2015.

Welcome to Visual Classrooms!

We know that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This Privacy Policy discloses the privacy practices and policies of Visual Classrooms, Inc. (“Visual Classrooms”, “we”, “us” or “our”) for int.erlace.com, erlace.com, il-demo.com and its sub-domains (the “Website”) and all related tools and services, including any downloadable applications, we make available to you from time to time (the “Services”). The Services include our on-line platform for enabling teachers (“Teachers”) and educational content publishers (“Publishers”) to provide students (“Students”) with enhanced educational functionality using content supplied by such teachers and/or publishers.

This Privacy Policy covers information that we collect through the Website and our Services, as well as information that we collect about you when our Services are used. This policy does not apply to the practices of companies that Visual Classrooms does not administer, including Publishers, or to individuals that Visual Classrooms does not employ. Visual Classrooms is not responsible for how Publishers or Teachers collect or use information when Students interact with them. You should always review, and if necessary adjust, your privacy settings on any applicable Publisher’s websites and any other third-party websites and services that you connect to in connection with our Services. We may combine the information you submit under your account with information from other services or third parties in order to provide you with a better experience and to improve the quality of our Services. For certain services, we may give you the opportunity to opt out of combining such information. Your access and use of the Services is subject to this Privacy Policy, <http://int.erlace.com/about/privacy> and to our separate Terms of Service <http://int.erlace.com/about/terms>. Capitalized terms used but not defined in this Privacy Policy have the meaning assigned to them in the Terms of Service.

Visual Classrooms provides an educational collaboration platform (the “Visual Classrooms Platform”) that allows Teachers and Publishers to apply cutting edge technologies to provide their content and instruction to Students.

Notice of Information We Collect And How We Use It.

Our primary purpose in collecting Personal Information (as defined below) is to provide you with a safe, smooth, efficient, and customized experience using our Services. This allows us to provide services and features that most likely meet your needs, and to customize our Services to make your experience easier and more productive. “Personal Information” means information that specifically identifies an individual (such as a name, address, or e-mail address, etc.) or other information about that individual that is directly linked to Personal Information. Personal Information does not include “aggregate” information, which is data we collect about the use of our Services. We collect and store information, including Personal Information, that you provide to us when registering or when using the Services. Some such information is required in order for you to register as a user of our Services. You can choose not to provide us with certain information, but by doing so, you may not be able to take advantage of many of our features and functionality. We use Personal Information to deliver the Services to you, to improve the delivery of our Services, including advertising, and to develop analytics and aggregated data that allow us and our partners to improve our Services and correspond with you.

We also collect and store non-personally identifiable information that is automatically generated when you use the Services. We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve you and our community.

In general, our collection and use of information is as follows:

- Visual Classrooms collects Personal Information you knowingly choose to submit to us during registration, such as your name, and email address, which we use for the following general purposes: identification and authentication of a user, improvement to the Services, contact, research, and reporting of aggregated, anonymous data.
- Visual Classrooms automatically receives and records information on our server logs from your browser, including your IP address, cookies, and the pages you request. IP addresses are automatically reported by your browser each time you view a web page. Your IP address is stored by Visual Classrooms when you register with Visual Classrooms. IP addresses may be used for various research purposes, and/or delivering unique functionality to our service.
- Visual Classrooms may make public discussion and comment areas ("Public Areas") available to you on our Services. We may allow users to post content on the Services. If we make such a feature available, you post content to such Public Areas at your own risk.

Cookies

By using our Services, you indicate your consent for Visual Classrooms and our affiliates to send cookies to your computer in order to uniquely identify your browser and improve the quality of our services; you may turn off cookies in your browser though, in doing so, some or all of our Services may not work. A "cookie" is a piece of alphanumeric data stored on a visitor's hard drive that enables us to improve your access to our Website and identify repeat visitors to our Services. We use the non-personally identifiable information, such as your browser version, IP address, referring domains, pages visited, your mobile carrier, device and application IDs, the nature of your use of the Website and cookie information, to improve our Website delivery, including advertising, and to develop analytics and aggregated data that allow us and our partners to utilize our Service and reach out to you via our Services or otherwise. If you wish to restrict or block the cookies which are set by Visual Classrooms, or by any other website, you can do this through your browser settings. The Help function within your browser should tell you how to do so. For information on how to delete cookies on the browser of your mobile phone as applicable you will need to refer to your handset manual.

Log Files

Like many websites, we may automatically gather certain information about our Website traffic and store it in log files. This information includes Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, which does not identify individual users, to analyze trends, to administer the Website, to track users' movements around the Website and to gather demographic information about our user base.

We may link this automatically collected data to Personal Information. IP addresses may be tied to Personal Information to troubleshoot access issues and ban users by IP address from certain communities upon appropriate request.

We may use a third-party tracking service that uses log files and cookies, see "Notice of Information We Collect and How We Collect It" above, to track non- Personal Information about visitors to the Website in

the aggregate. This service captures usage and volume statistics as well as geographical location data to compile usage reports and maps for optimization and troubleshooting purposes. We will support “do not track” signals or other mechanisms except as expressly provided on our Website from time to time. We do utilize Good Analytics or similar third party tracking services.

Clear Gifs (Web Beacons/Web Bugs)

We may employ, and our third party advertising partners may employ, a software technology called clear gifs, also referred to as web beacons or web bugs, that help manage content on the Site by tracking what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user’s computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We tie the information gathered by clear gifs to our customers’ personally identifiable information.

We use clear gifs in our HTML-based emails to let us know which emails recipients have opened. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If you would like to opt-out of these emails, please see “Choice and Opt-out.”

Information We Collect To Respond To Your Choices and Requests

Registration.

In order to use many of our Services, you must first complete the registration form and provide an email address and password (“Login Credentials”). During registration, you are required to complete the registration form and create a user name and password and are required to give truthful contact information (such as name and email address) in accordance with our Terms of Service. We use this information to contact you about the Services in which you have expressed interest.

We may combine the information you submit under your account with information from other services or third parties in order to provide you with a better experience and to improve the quality of our Services. For certain services, we may give you the opportunity to opt out of combining such information.

Interactions with Other Websites and Services.

We may permit you to log in to our Services using sign-in services such as Facebook Connect, or other similar services. These services will authenticate your identity and provide you the option to share certain personal information with us (such as your name and email address) to pre-populate our sign-up form. Services like Facebook Connect also give you the option to post information about your activities on the Services to your profile page to share with others within your social network.

If you log in with Facebook Connect or another similar third-party service, we may use the information we receive from such third party to populate your Visual Classrooms Platform profile.

Profiles

Upon registering on our Website, a user profile may automatically be created for you.

Billing Account

If you purchase or subscribe to a fee-based Service or other products or services from us, we request certain Personal Information from you on our transaction form. We may require you to provide contact information (such as name, email, and shipping address) and financial information (such as account number, expiration date if paying through a third party payment processing service). We may use an outside bitcoin processing company to bill or process payments for goods or services.

We use this information for billing purposes and to fill your orders. If we have trouble processing an order, we will use this information to contact you.

Surveys or Contests

We may provide you the opportunity to participate in contests or surveys on our Services. If you participate, we will request certain Personal Information from you. The requested information typically includes contact information (such as name and mailing address) and demographic information.

We use this information to notify contest winners and award prizes, to monitor site traffic, or to personalize our Services (in the case of anonymous information collected in surveys).

We may cooperate with third parties to offer you surveys, contests, products and services through our Services. When you participate in such surveys or contests, or purchase related products and services, you authorize us to share information about you, including Personal Information, with such third parties. If you have any questions or concerns regarding how such third parties use your information, please consult the applicable third party's privacy policy. You agree that we will not be responsible or liable for any loss or damage incurred in connection with our cooperation with such third parties, their activities on our Services, and the sharing of your information with such third parties.

Communication from Us or our Services

When you send email or other communications to Visual Classrooms, we may retain those communications in order to process your inquiries, respond to your requests and improve our Services. When you send and receive messages we may collect and maintain information associated with those messages. We may also occasionally send you information on products, services, special deals, and promotions offered by us or one of our partners. You can sign up for these emails from us on our registration page.

Service-Related Announcements

We will send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if our Service is temporarily suspended for maintenance, we might send you an email.

Generally, you may not opt-out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to deactivate your account.

Customer Service

Based upon the Personal Information you provide us, we will send you a welcoming email to verify your username and password. We will communicate with you in response to your inquiries, to provide the services you request, and to manage your account. We will communicate with you by email or telephone, in accordance with your wishes. You may contact customer service at support@visualclassrooms.com.

Use Profile

We store information that we collect through cookies, log files, clear gifs, to create a “profile” of your preferences. We use this profile in order to provide promotions and marketing offers and to improve the content of the Services for you.

We do not share your profile with other third parties other than as set forth in this Privacy Policy.

We may purchase marketing data from third parties and add it to our existing user database, to better target our advertising and to provide pertinent offers in which we think you would be interested. To enrich our profiles of individual customers, we tie this information to the personally identifiable information they have provided to us.

Conditions Under Which We Share Information

We may share certain Students’ personal information with Teachers and Publishers, where such Student chooses to join a student group and participate in an activity provided by or for such Teacher or Publisher. We may also share certain of a Teacher’s personal information (such as name and school name) with Students who join a student group provided by or for such Teacher. Further, we may share aggregated demographic information about our user base with our partners. This information does not identify individual users. We may use and publicize aggregate information in any manner that does not identify you, without your consent.

We do not sell, trade, or otherwise transfer to outside parties your Personal Information without your consent. However we may share your Personal Information in situations described below:

- We may share your User Profile information and certain other Personal Information with Publishers and Research Partners to make your use of their content more seamless, but only if you have participated in activities created by and or for that Publisher or Research Partner.
- We may collect and share Personal Information made available by users in Public Areas.
- We may release your Personal Information to authorized agents who are employed by us to perform tasks on our behalf and need to share information with them to provide products, services and offers to you.
- We believe it is necessary to investigate potential violations of our Terms of Service, to enforce the Terms of Service, to comply with law or to protect ours or others rights, property, or safety.
- If we or our business are acquired, your non-personal information and your Personal Information would be transferred to the buyer as part of that transaction, provided that the conditions of this Privacy Policy would continue to apply.

Third Party Advertisers

The ads appearing on our Services, if any, are delivered to users by our advertising partners. We share Website usage information about users with our advertising partners for the purpose of targeting our Internet banner advertisements on our Website.

Our advertising partners may use cookies and clear GIFs on our Services, which allows them to recognize a user’s cookie when a user visits the Website or Services. The information that our advertising partners collect and share through this technology is not Personal Information.

For more information about our third-party advertisers, or to learn more about the choices available to you regarding this anonymous information, please contact support@visualclassrooms.com.

Legal Disclaimer.

We reserve the right to disclose your Personal Information as required by law and when we believe that disclosure is necessary to protect our rights; to comply with a judicial proceeding, court order, or legal process served on us or the Website; or in connection with an actual or proposed corporate transaction or insolvency proceeding involving all or part of the business or asset to which the information pertains.

Choice and Opt-out

We provide you the opportunity to ‘opt-out’ of having your Personal Information used for certain purposes, when we ask for this information. For example, if you purchase a product/service but do not wish to receive any additional marketing material from us, you can indicate your preference on your profile account page.

If you no longer wish to receive our promotional communications, you may opt-out of receiving them by following the instructions included in each communication or by emailing us at support@visualclassrooms.com.

Access to or Changing Your Information.

If your Personal Information changes, or if you no longer desire our Service, you may correct, update, delete or deactivate it by emailing our customer support at support@visualclassrooms.com, or by contacting us by postal mail at the contact information listed below.

Please keep in mind that whenever you voluntarily make your Personal Information or other private information available for viewing by third parties online – for example on blogs, discussion forums, or other Public Areas or social networking websites – that information can be seen, collected and used by others besides us. We cannot be responsible for any unauthorized third-party use of such information or for Teachers’, or Publishers’, Students’ or other users’ use of your information.

Third party links.

We include links on our Website to certain Publishers and other third party websites. Individual users are permitted to include links in their posts to third party websites in both Public and Private areas. These third party websites have separate and independent privacy policies. We have no responsibility or liability for the content and activities of these linked sites. This Privacy Policy applies only to information collected by the Services. Nonetheless, we seek to protect the integrity of our Services and welcome any feedback about these websites.

Information You Post to Other Sites

Please keep in mind that whenever you voluntarily make your Personal Information or other private information available for viewing by third parties online - for example on blogs, discussion forums, or other community posting or social networking sites - that information can be seen, collected and used by others besides us. We cannot be responsible for any unauthorized third-party use of such information.

Information Security

Visual Classrooms is committed to protecting the security and privacy of your information stored by us. Visual Classrooms uses SSL (Secure Socket Layer) encryption when transmitting certain kinds of information. An icon resembling a padlock is displayed in the title bar of most browsers during SSL transactions. All data gathered on our Website is stored by us in a secure, password protected database. Only we and our hosting provider have access to this database. We will protect Personal Information by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. While all standard security protections are implemented by us and our hosting providers, we cannot guarantee the physical or electronic security of the servers and databases on which this Website is hosted. We require our partners who receive your information to agree to security requirements consistent with this Privacy Policy.

Minors

Our Services are not directed to people under 13 years of age. If you become aware that your child has provided us with Personal Information without your consent, please contact us at support@visualclassrooms.com. We do not knowingly collect Personal Information from children under 13. If we become aware that a child under 13 has provided us with Personal Information, we take steps to remove that information and terminate the applicable account.

Terms of Service

Please also visit our Terms of Service, establishing the use, disclaimers, and limitations of liability governing the use of our Website and Services.

Your Consent

By using the Website or our Services, you consent to our latest Privacy Policy.

Changes to our Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make a material change to our Privacy Policy that will retroactively apply to information that we have collected from you, we will notify you at the e-mail address specified in your account (if any) and by means of a notice posted on our Website. We encourage you to periodically review the Privacy Policy posted on our Website for the latest information about our privacy practices. We will treat your continued use of the Services following such notice as your acceptance of the changes. However, to the extent required by law, we will seek your consent prior to applying material changes to this Privacy Policy. If you have questions or concerns regarding our Privacy Policy, please contact us at: support@visualclassrooms.com.

Contact Us

If you have any questions or suggestions regarding our privacy policy, please contact us at:

Visual Classrooms, Inc.
support@visualclassrooms.com

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