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Newsela Privacy Policy

We know how important it is to you to understand how your personal information is collected and shared. We take your privacy very seriously. This Privacy Policy ("Policy") describes how your and your student's personal information is collected, used, and disclosed by Newsela, Inc. and its related companies ("Newsela" or "We" or "Us"). For users with "Learner" accounts on the services, references to "your" and "your student" shall both mean the Learner user. This Policy applies to all users of the Services who are 13 years of age or older. For information about Newsela's collection, use or disclosure of personal information about individuals under 13 years of age, please see our Children's Privacy Policy below.

This Policy applies to the Newsela websites available at www.newsela.com and the Newsela mobile application, and any of our other websites or applications that post this Policy (respectively the "Site" or "App") as well as all of our services made available through the Site or App (together with the Site and the App, the "Services"). By submitting personal information through our Services, you expressly consent to the processing of your and your student's personal information in the U.S. in accordance with this Privacy Policy.

IMPORTANT NOTICE FOR SCHOOL USERS

If you are a user (or a parent of a student user) who was given access to the Services by the school you are affiliated with, this Privacy Policy does not govern how your school might collect, use, or disclose your student's information. Please consult with your school for more information about their privacy practices. In addition, your and your student's information may be shared with your school or school district. Your school may choose to share, and we may share at their request, your student's information with new administrators or teachers. We are not responsible for your school's collection, use, or disclosure of your personal information or information shared at your school's request. Please contact your school to better understand your school's privacy practices.

PROTECTION OF STUDENT DATA

When Newsela provides our Services to students, teachers and schools, our collection, use and disclosure of student data, including any personally identifiable information, is governed by and in compliance with our Terms of Use, any agreement with the school or district, and the provisions of the Family Educational Rights and Privacy Act ('FERPA'), the Children's Online Privacy Protection Act ('COPPA') and other applicable laws that may relate to the collection and use of personal information of students. If you have any questions about our collection and use of student data, please contact us at info@newsela.com. If you have any questions about reviewing, modifying, or deleting the personal information of a student who accesses our Services through a school, please contact your school directly.

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unique identifiers and other tracking tools, and information collected through the use of third party analytics technologies. We may combine information we collect from you, your student's teacher or school, or third parties, as applicable, with information we collect from you or your student directly.

Information a Teacher or Parent Gives Us

We collect personal information you provide to us, which may include personal information of your students if you provide us with such information. By providing us with personal information about your students, you are representing to us that you have all necessary authority or consent to provide us with such information. For example, in connection with your use of the Services, you may provide us your name, country, postal code, email address, username, password, and other information, including demographic information and information about your classroom, your school, and your students. We also collect writing by teachers, including but not limited to annotations, feedback and assignment prompts that teachers provide to students using the Services. If you order our premium services or products, we will collect all information necessary to complete the transaction, including your name, credit card information, billing information, and shipping information (as applicable). This transaction-related information may be shared with third parties who help process and fulfill your transaction. We require these third parties to use your transaction-related information only for the purposes of processing and fulfilling your transactions and for no other purposes. For more information about how your personal information is shared, please see the section of this Policy titled "Sharing of Personal Information" below.

Information a Student Gives Us

We collect any personal information a student directly provides to us through use of the Services, including a student's name, classroom affiliation, username, and password. We also collect information about how a student interacts with the Services, including the articles that a student reads, the types of articles a student has expressed interest in, quiz-related information, responses a student writes to teacher assignment prompts, how much time a student spends reading the articles, and other performance related information. We also collect writing by students in many forms, including but not limited to their annotations and written responses to writing prompts. We may also collect information about a student provided by a school.

Information about You and Your Student that Your School Gives Us

We collect personal information about you and/or your student that your school, school district and/or their administrators choose to provide to and share with us, directly and through third party service providers.

Information Automatically Collected from You and Your Student

We and our third party service providers may automatically collect information about you and your student's computer or mobile device when you or your student visit our Site or access our

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using a feature, access times for a webpage or feature, and demographic information, such as gender and age range. These Tracking Tools help Newsela learn more about our users, such as their demographics and internet behaviors, so that we can improve our Services.

By accessing or using the Services, whether as a registered user or otherwise, you acknowledge, understand, and hereby agree that you are giving us your consent to set and access Tracking Tools, including cookies, on your device and in the emails we send you, and to track your activities and your use of the Services through these Tracking Tools in accordance with this Privacy Policy. For clarity, our third party business partners do not have access to Tracking Tools set by Newsela or on our Services except to the extent necessary to provide services to the Services.

The following are Tracking Tools used by Newsela or its third party service providers in connection with the Services:

COOKIES

We may automatically collect information using "cookies." Cookies are small data files stored on your hard drive by a website. Among other things, cookies help us make our Services and your experience better. For example, we use cookies to see which parts and features of our Services are popular, count visits to our Services and improve or tailor the Services and our advertisements to make them more relevant to our users. For more information on cookies, visit <http://www.allaboutcookies.org>.

UNIQUE IDENTIFIERS

We may use unique identifiers to track individual usage behavior on our Services, such as length of time spent on a particular page and pages viewed during a particular log-in period. The unique identifiers collect information about a user's use of the Services on an individual basis. We use the information that we gather through unique identifiers to evaluate and improve the Services and its content, including, but not limited to, improving and evaluating the effectiveness of certain materials on our Services and the student and teacher experience while using the Services.

WEB BEACONS

Web beacons, or clear GIFs or pixel tags, are small graphic image files that can be embedded in web pages or emails to collect information about a user's use of our Services or the correspondences that we send to them. The information collected by web beacons allows us to analyze how and how many people are using the Services or when users open our emails. Web beacons also allow us to enhance our Behavioral Advertising, which is further discussed below in the section titled ["Interest-based and Behavioral Advertising"]("#INTEREST-BASED OR ONLINE BEHAVIORAL ADVERTISING").

ANALYTICS AND OTHER TECHNOLOGIES

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analytics services to improve our Site, App and Services. Please see the following links for more information about Google Analytics and to opt-out if you choose to:

<http://www.google.com/policies/privacy/partners/> and <https://tools.google.com/dlpage/gaoptout>.

MOBILE DEVICE IDENTIFIERS

Mobile device identifiers are identifiers stored on your mobile device that may track your mobile device and data and activities occurring on or through it, as well as the applications installed on it. Mobile device identifiers enable collection of personal information (such as media access controls) as well as non-personally identifiable information (such as usage and traffic data). As with other Tracking Tools, mobile device identifiers help Newsela learn more about our users' demographics and internet behaviors and operate and improve the Services.

THIRD PARTY ACCOUNT CONNECTIONS

If you or your student chooses to log on or otherwise associate the Services with another third party account (for example, a Google Account), we may receive information from that third party site to make it easier for you or your student to create an account on the Services and display relevant content. Any information that we collect from these third party accounts may depend on the privacy settings you or your student has with that third party, so please consult their privacy and data practices.

USE OF PERSONAL INFORMATION

We use information collected through our Services, or disclosed by you on our Site or App or in connection with our Services, for the purposes described in this Policy. For example, we may use your and your student's information to:

- understand your student's performance in relation to others, and to provide you and your student with insight into their performance;
- understand your and your student's preferences and to enhance your and your student's experience and enjoyment using our Site, App, and Services;
- operate, maintain, and improve our Site, App, and Services;
- respond to comments and questions and provide customer service;
- send you related information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
- create advertisements shown to teachers and administrators that reflect the interests and capabilities of their students and communicate with teachers and administrators about promotions and other news about Services offered by us (Note: Newsela never directs targeted advertising at Children. See: "Interest-Based or Online Behavioral Advertising," below.);
- customize advertisements and communicate about promotions and other news about Services offered by us;

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We will not use your personal information in any way other than in connection with providing the Services, as described in this Policy, as directed by a teacher or school, or upon obtaining your consent.

SHARING OF PERSONAL INFORMATION

We do not share your or your student's personal information except as follows:

- with your school or school district at their request;
- with third party service providers, consultants, and other service providers who perform services for us and need access to your or your student's information to do that work in a manner consistent with this Policy (for example, our web hosting provider, third party analytics service providers, advertising services providers, and purchase processors. Note: Newsela never directs targeted advertising at Children. See: "Interest-Based or Online Behavioral Advertising," below.);
- to comply with laws or to respond to lawful requests and legal process;
- to protect the rights and property of Newsela, our agents, users, and others including to enforce our agreements, policies, and terms of use;
- in an emergency to protect the personal safety of our users or any person;
- in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets to another company, in which case the company receiving the personal information would be obligated to follow this Policy.

Additionally, we may share your or your student's personal information with new teachers who use the Services in their classrooms when you or your student, as applicable, enroll in such teachers' classes, and we may share teacher personal information with other teachers within a school using the Services.

We may create and use anonymized and/or aggregated data for our own purposes by excluding information (such as your or your student's name) that makes the data personally identifiable to you or your student. The purposes for which we may create and use anonymized and/or aggregated data include but are not limited to, conducting analysis and generating statistics regarding the use of our Site, App, and/or Services.

We will not share your or your student's personal information in any way other than in connection with providing the Services, as described in this Policy, as directed by a teacher, parent/legal guardian or school, or upon obtaining your consent.

We require our third party service providers not to use your or your student's personal information other than to provide the services that we have requested.

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the Services to students based on their demographic information or activities on our Services. For example, we may suggest a text set to a student based on the student having read a similar text set in the past, or based on the student's age or grade level.

INTEREST-BASED OR ONLINE BEHAVIORAL ADVERTISING

We may advertise to teachers and administrators using a type of advertising known as interest-based or online behavioral advertising ("Behavioral Advertising"). Behavioral Advertising is the use of Tracking Tools by us or our Advertising Service Providers (defined below) to display Newsela ads on other websites or services based on information about a user's use of the Services or on the user's interests (as inferred from the user's online activity).

For clarity, Newsela's Behavioral Advertising is intended for teachers and administrators; we do not behaviorally target advertising to student users on sites that are directed to student users.

Newsela adheres to the Digital Advertising Alliance Self-Regulatory Principles for Online Behavioral Advertising ("OBA Principles"). More information about the OBA Principles can be found at <http://digitaladvertisingalliance.org/blog-terms/daa-principles>.

Advertising Service Providers

We may work with third parties that use Tracking Tools to collect and use information about your access and use of the Services and non-affiliated websites and applications in order to provide Behavioral Advertising and related services to you and us ("Advertising Service Providers"), for example by facilitating targeting of advertisements and measuring and analyzing advertising effectiveness and traffic on the Services, (collectively, all such services, "Targeting Services"). Advertising Service Providers include advertising networks, data exchanges, traffic measurement service providers, marketing analytics service providers, and other third-party service providers. Targeting Services enable us to display advertisements based on your use of the Services and other websites or applications you have visited, including for Newsela content, products or services that may interest you. Targeting Services can also help prevent you from seeing repeated advertisements and enable us to research the usefulness of certain advertisements. Our Advertising Service Providers do not have access to Tracking Tools set by us or on our Services except to the extent necessary to provide services to Newsela.

Opting Out of Behavioral Advertising

You can opt-out of certain Behavioral Advertising activities by doing one or more of the following. Please note that you will need to opt-out of each browser and device for which you desire to apply these opt-out features.

- **Service Provider Opt Out:**

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- DoubleClick: <https://google.com/settings/ads>
- Facebook: <https://www.facebook.com/settings?tab=ads>

- **Industry Opt Out Tools:**

Some Advertising Service Providers may participate in the Network Advertising Initiative's (NAI) Opt-Out Tool (<http://www.networkadvertising.org/choices/>) and/or the Digital Advertising Alliance (DAA) Consumer Choice Page (<http://www.aboutads.info/choices/>), and therefore you can opt-out of certain services by those Advertising Service Providers (and other NAI or DAA member companies) by visiting the links included here. Please click on the links to these tools to learn more about your choices.

- **Web Browser Controls:**

You can prevent the use of certain Tracking Tools on a device-by-device basis by using the controls in your web browser. These controls can be found in the Tools > Internet Options menu for your browser, or as otherwise directed by your browser's support feature. Through your web browser, you may be able to:

- Delete existing Tracking Tools
- Disable future Tracking Tools
- Set your browser to provide you with a warning each time a cookie or certain other Tracking Tools are being set

- **Mobile Opt Out:**

Your mobile devices may offer settings that enable you to make choices about the collection, use, or transfer of mobile app information for Behavioral Advertising. You may also opt-out of certain Tracking Tools on mobile devices by installing the DAA's AppChoice app on your mobile device (for iTunes, visit <https://itunes.apple.com/us/app/appchoices/id894822870?mt=8>, for Android, visit <https://play.google.com/store/apps/details?id=com.DAA.appchoices&hl=en>). For more information, please visit <http://support.apple.com/kb/HT4228>, or <https://support.google.com/ads/answer/2662922?hl=en> and <http://www.applicationprivacy.org/expressing-your-behavioral-advertising-choices-on-a-mobile-device>, as applicable.

Please note the following with respect to opting out of Behavioral Advertising:

- Some opt-out features are cookie-based, meaning that when you use these opt-out features, an "opt-out" cookie will be placed on your computer, tablet or mobile device indicating that you do not want to receive Behavioral Advertising from certain companies. If you delete your cookies, use a different browser, use a different device or buy a new computer or mobile device, you will need to renew your opt-out choice.
- Opting-out of, deleting, rejecting, disabling or turning off Tracking Tools does not mean that you will no longer receive online ads. Opting-out of Behavioral Advertising only means that such ads

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consumers to opt-out of tracking on our Services.

INFORMATION CHOICES AND CHANGES

Below are some ways you can control the collection and use of your and/or your student's information in connection with the Services. While we and others give you choices described in this Policy, there are many ways web browser signals and other similar mechanisms can indicate your choice to disable tracking, and we may not be aware of or honor every mechanism.

Promotional Emails

You may "opt-out" of receiving our promotional emails by following the instructions in those emails. If you opt-out, we may still send you non-marketing emails. Non-marketing emails include emails about your accounts and our transactions with you.

Information in the Services

You may change some of your or your student's personal information stored in the Services by following the directions on the Site or App. You may send requests about your or your student's personal information, including requests to change your or your student's contact preferences and update or correct your or your student's personal information, to our contact information below. In some cases, changes about a student's personal information may have to be executed by the student's school or teacher, and in such situations, we will attempt to assist you and the school or teacher with such efforts.

Behavioral Advertising and Tracking Tools

You can opt-out of certain mechanisms for tracking, including tracking of your online activities over time and across different websites, by using one or more of the options described above in the "Interest-Based and Behavioral Advertising" section of this Policy.

Disclosure

You may prohibit us from disclosing your or your student's personal information with a third party by contacting us at the information provided below to opt-out of such disclosures in advance; provided that if you prohibit us from sharing your or your student's personal information with your or your student's school or our third party service providers, we may not be able to provide the Services to you or your student. Additionally, you cannot prohibit us from sharing your or your student's personal information when reasonably necessary to defend the rights or property of us, including our Services, or anyone else or as reasonably necessary to comply with relevant laws or respond to a legal request.

Review

You may review your or your student's personal information by logging into your or your student's account or by sending us an email or postal mail at the address below.

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personal information 4 years after the user's last login to the Services.

Deletion

You may request deletion of your or your student's personal information by sending us an email or postal mail at the address below. IN SUCH CASE, WE WILL NO LONGER ALLOW THE APPLICABLE USER TO USE THE SERVICES. We will delete your or your student's information using reasonable measures to protect against unauthorized access to, or use of, the information in connection with its deletion. When we delete a user's personal information, it will be deleted from our active databases but we may retain an archived copy of such user's records as required by law or for legitimate business purposes.

Refusing Further Collection or Use

You may at any time refuse to permit our further use or future online collection of your or your student's personal information, by terminating your or your student's account and directing us to delete your or your student's personal information (as described above). IN EITHER CASE, WE WILL NO LONGER ALLOW THE APPLICABLE USER TO USE THE SERVICES. We will not have any liability whatsoever for any termination of the account or related deletion of your or your student's personal information. After termination, a terminated user will not be able to use his or her account anymore. Access to schoolwork associated with the account will no longer be available to such user.

Reliance on Teacher or Parental Instructions

We may, and you authorize us to, rely on the instructions that we reasonably believe are given by a teacher, parent or legal guardian in connection with a student. For example, if a person calls our customer support number and provides the account information we request, we may assume that the person calling is the teacher, parent or legal guardian of such student. We will not be held liable for any disclosure made in good faith and following reasonable procedures in responding to a request for disclosure of a student's information from such individual.

Third Parties

Different rules might apply to the collection, use or disclosure of your information by third parties in connection with their advertisements, promotions and other websites you encounter on the Internet. The use of such technology by these third parties, and their policies and practices regarding your information and their sites and services, is within their control and not Newsela's. Those parties may use the information they collect from you consistent with their own privacy policies, which we encourage you to carefully review.

SECURITY OF YOUR PERSONAL INFORMATION

We encrypt the transmission of your and your student's personal information using security measures designed to protect the security, privacy, confidentiality, and integrity of personal

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and intercept data transmissions. Therefore, although we take security very seriously and work very hard on behalf of your and your student's privacy, we cannot guarantee the security of your or your student's information.

STATE-SPECIFIC POLICIES

Connecticut For Connecticut local or regional boards of education purchasing Services directly or indirectly from, or pursuant to a group purchasing contract with, Newsela:

Pursuant to Connecticut Public Act 16-189:

“Student information,” “student records” and “student-generated content” have the same definitions as appear in CT Public Act 16-189. Student information, student records and student-generated content as defined in CT Public Act 16-189 are the property of and under the control of the school or district and not Newsela.

The local or regional board of education may request the deletion of student information, student records or student-generated content in the possession of Newsela by sending a written request to Newsela. Newsela will delete the data as requested.

Newsela shall not use the student information, student records or student-generated content for any purposes other than those authorized pursuant to the Terms of Use and, if applicable, the Newsela Customer Agreement.

A student, parent or legal guardian of a student may review personally identifiable information contained in the student records and correct erroneous information, if any, in such student record by contacting the school or district, which may access and amend all such records via the classroom portal provided by Newsela.

Newsela maintains commercially reasonable security standards to help safeguard your student information. These include encryption of the data in transit and at rest, use of two-factor authentication to access the system, regular software security updates and additional network and physical security measures. In addition, Newsela staff members undergo annual privacy and security training.

In accordance with the provisions of Section 4 of CT Public Act 16-189, in the event of an unauthorized release, disclosure or acquisition of student information, student records or student-generated content, Newsela shall notify the local or regional board of education as soon as practicable, but no later than the period of time required in clauses (a) (1) or (2) of Section 4 of CT Public Act 16-189 (as applicable) after Newsela becomes aware of it.

Upon completion of the contracted services, and with the written request from the school or district that student information be deleted, Newsela shall delete the data. If no such request is

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The laws of the state of Connecticut shall govern the rights and duties of the parties with respect to this section of the Terms.

Should any provision of these Terms be held invalid by a court of competent jurisdiction, the invalidity does not affect other provisions or applications of the Terms which can be given effect without the invalid provisions or application.

CONTACT INFORMATION

We welcome your comments or questions about this Policy. Feel free to email us at privacy@newsela.com. You may also contact us at our address: Newsela Inc., PO Box 25588 Brooklyn, NY 11202

CHANGES TO THIS PRIVACY POLICY

We may change this Policy from time to time. If we make any changes to this Policy, we will change the Last Revised date above.

If we make material changes to this Policy, we will send a notice to the email address we have on file for the account holder. For material changes regarding use or collection of data, we will provide choices and additional information regarding the collection of such data before it is used in any manner inconsistent with the terms initially provided to users.

You are responsible at all times for providing to us your most current email address.

Except as otherwise provided in this Policy, any changes to this Policy will be effective immediately for new users of the Site, App and Services.

Newsela Child Privacy Policy

We know how important it is to you to understand how your Child's personal information is collected and shared. We take your Child's privacy very seriously. This Children's Privacy Policy ("Children's Policy") describes how Newsela, Inc. and its related companies ("Newsela" or "We" or "Us") collect, use, and disclose personal information from students under the age of 13 who have been given access to the Services by their school or their parents (each, a "Child") and explains how each parent or guardian ("Parent" or "you") may request the deletion of, or place certain restrictions on the collection, use, and disclosure of, your Child's personal information. This Children's Policy applies to the Newsela websites available at www.newsela.com, the Newsela mobile application, and any of our other websites or applications that post this Children's Policy (respectively the "Site" or "App"), and our services made available through the Site or App (together with the Site and the App, the "Services"). By submitting personal information through our Services, you expressly consent to the processing of your and your Child's personal information in the U.S. in accordance with this Children's Policy.

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IMPORTANT NOTICE FOR SCHOOL USERS

If your Child has been given access to the Services by the school your Child is affiliated with, this Children's Policy does not govern how your school might collect, use, or disclose your Child's information. Please consult with your school for more information about their privacy practices. In addition, your Child's information may be shared with your school or school district. Your school may choose to share, and we may share at their request, your Child's information with new administrators or teachers. We are not responsible for your school's collection, use, or disclosure of your Child's personal information or information shared at your school's request. Please contact your school to better understand your school's privacy practices.

PROTECTION OF STUDENT DATA

When Newsela provides our Services to students, teachers and schools, our collection, use and disclosure of student data, including any personally identifiable information, is governed by and in compliance with our Terms of Use, any agreement with the school or district, and the provisions of the Family Educational Rights and Privacy Act ('FERPA'), the Children's Online Privacy Protection Act ('COPPA') and other applicable laws that may relate to the collection and use of personal information of students. If you have any questions about our collection and use of student data, please contact us at info@newsela.com. If you have any questions about reviewing, modifying, or deleting the personal information of a student who accesses our Services through a school, please contact your school directly.

WHAT WE COLLECT

We collect information about your Child in a variety of ways, such as information that your Child provides to us, information that your Child's school provides to us, information collected automatically through technology, information collected through the use of cookies and unique identifiers, and information collected through the use of third party analytics technologies. We may combine information we collect from you or your Child's teacher or school (see our general Privacy Policy) with information we collect from your Child.

Information Your Child Gives Us

We collect any personal information your Child provides to us, including your Child's name, classroom affiliation, username, and password. We also collect information about how your Child interacts with the Services, including the articles that your Child reads, the types of articles your Child has expressed interest in, quiz-related information, responses your Child writes to teacher assignment prompts, how much time your Child spends reading the articles, and other performance related information. We also collect writing by your Child in many forms, including but not limited to their annotations and written responses to writing prompts. We may also collect information about your Child provided by your school.

Information about Your Child that Your Child's School Gives Us

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We automatically collect information about your Child's computer or mobile device when your Child visits our Site or uses our App by using the technologies described below (collectively, "Tracking Tools"). Some of the information that may be collected when a user uses the Services, include, for example, computer or device operating system type, IP address, browser type, browser language, mobile device ID, device hardware type, the website or application visited or used before or after accessing our Services, the parts of the Services accessed, length of time spent on a page or using a feature, access times for a webpage or feature, and demographic information, such as gender and age range. These Tracking Tools help Newsela learn more about our users, such as their demographics and internet behaviors, so that we can improve our Services. For clarity, our third party business partners do not have access to Tracking Tools set by Newsela or on our Services except to the extent necessary to provide services to the Services.

We do not behaviorally target advertising to Children on sites that are directed to Children or where Newsela has actual knowledge that a user is under 13. For more information about Newsela's Behavioral Advertising activities, please see [the section in our general Privacy Policy titled "Interest-based or Online Behavioral Advertising"](#).

The following are Tracking Tools used by Newsela or its third party service providers in connection with the Services:

COOKIES

We may automatically collect information using "cookies." Cookies are small data files stored on your Child's hard drive by a website. Among other things, cookies help us make our Services and your Child's experience better. We use cookies to see which parts and features of our Services are popular, to count visits to our Services and improve or tailor the Services to make them more relevant to your Child.

UNIQUE IDENTIFIERS

We may use unique identifiers to track individual usage behavior on our Services, such as length of time spent on a particular page and pages viewed during a particular log-in period. The unique identifiers collect information about a Child's use of the Services on an individual basis. We use the information that we gather through unique identifiers to evaluate and improve the Services and its content, including, but not limited to, the effectiveness of certain materials on our Services and a Child's experience while using the Services.

ANALYTICS AND OTHER TECHNOLOGIES

We use other technologies and analytics services (including Google Analytics) to help analyze how users use the Services. These analytics use cookies, digital images called web beacons, and other technological methods to collect and store information such as how often users visit the Services, what features they use, what pages they visit, what emails they open, and what other sites they used prior to and after visiting the Site. We use the information we get from analytics services to

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Web beacons, or clear GIFs or pixel tags, are small graphic image files that can be embedded in web pages to collect information about a Child's use of our Services. The information collected by web beacons allows us to analyze use of the Services, such as how and how many people are using the Services.

MOBILE DEVICE IDENTIFIERS

Mobile device identifiers are identifiers stored on a mobile device that may track a Child's mobile device, and data and activities occurring on and through it, as well as the applications installed on it. Mobile device identifiers enable collection of personal information (such as media access controls) as well as non-personally identifiable information (such as usage and traffic data). As with other Tracking Tools, mobile device identifiers help Newsela learn more about our users' demographics and internet behaviors and operate and improve the Services.

How We Respond to Do Not Track Signals

We do not currently respond to "do not track" signals or other mechanisms that might enable consumers to opt-out of tracking on our Services.

THIRD PARTY ACCOUNT CONNECTIONS

If your Child chooses to log on or otherwise associate the Services with another third party account (for example, a Google Account), we may receive information from that third party site to make it easier for your Child to create an account on the Services and display relevant content. Any information that we collect from these third party accounts may depend on the privacy settings your Child has with that third party, so please consult their privacy and data practices.

USE OF PERSONAL INFORMATION

We use information collected through our Services, or disclosed by your Child on our Site or App or in connection with our Services, for the purposes described in this Children's Policy. For example, we may use your and your Child's information to:

- understand your Child's performance in relation to others and to provide you and your Child with insight into their performance;
- understand your Child's preferences and to enhance your Child's experience and enjoyment using our Site, App and Services;
- operate, maintain, and improve our Site, App and Services;
- respond to comments and questions and provide customer service;
- send your Child related information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
- communicate about promotions and other news about Services offered by us;

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We will not use your Child's personal information in any way other than in connection with providing the Services, as described in this Children's Policy, or as directed by a teacher, parent/legal guardian or school.

SHARING OF PERSONAL INFORMATION

We do not share your or your Child's personal information other than as follows:

- with your school or school district at their request;
- with new teachers within a school that already uses Newsela or schools within a district that already uses Newsela;
- with third party service providers, consultants, and other service providers who perform services for us and need access to your or your Child's information to do that work in a manner consistent with this Children's Policy (for example, our web hosting provider, third party analytics service providers and purchase processors);
- to comply with laws or to respond to lawful requests and legal process;
- to protect the rights and property of Newsela, our agents, users, and others including to enforce our agreements, policies, and terms of use;
- in an emergency to protect the personal safety of its users or any person;
- in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of our business or assets to another company, in which case the company receiving the personal information would be obligated to follow this Children's Policy.

We may create, use, and disclose anonymized and aggregated data for our own purposes by excluding information (such as your Child's name) that makes the data personally identifiable to your Child. The purposes for which we may create, use, and disclose anonymized and aggregated data include, but are not limited to, conducting analysis and generating statistics regarding the use of our Site, App, and/or Services.

Additionally, we may share your Child's personal information with new teachers who use the Services in their classrooms when your Child enrolls in such teachers' classes.

We may create and use anonymized and/or aggregated data for our own purposes by excluding information (such as your Child's name) that makes the data personally identifiable to you or your student. The purposes for which we may create and use anonymized and/or aggregated data include but are not limited to, conducting analysis and generating statistics regarding the use of our Site, App and/or Services.

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information to any third party for that third party's own marketing purposes. Additionally, we will not knowingly use or disclose your Child's information (whether personal information or otherwise) for behavioral targeting of advertisements to your Child. We do not sell Children's personal information. For clarity, we may make recommendations within or through the Services of features, tools, and content on the Services to students, including Children, based on their demographic information or activities on our Services. For example, we may suggest a text set to a student based on a previous one the student has read or based on the student's age or grade level.

INFORMATION CHOICES AND CHANGES

Below are some ways you can control the collection and use of your Child's information in connection with the Services. While we and others give you choices described in this policy, there are many ways web browser signals and other similar mechanisms can indicate your choice to disable tracking, and we may not be aware of or honor every mechanism.

Information in the Services

You may change some of your or your student's personal information stored in the Services by following the directions on the Site or App. You may send requests about your or your student's personal information, including requests to change your or your student's contact preferences and update or correct your or your student's personal information, to our contact information below. In some cases, changes about a student's personal information may have to be executed by the student's school or teacher, and in such situations, we will attempt to assist you and the school or teacher with such efforts.

Behavioral Advertising

Newsela does not behaviorally target advertising to Children on sites that are directed to Children or where Newsela has actual knowledge that a user is under 13. For more information about Newsela's Behavioral Advertising activities, please see [the section in our general Privacy Policy titled "Interest-based or Online Behavioral Advertising"](#). However, if you would like to opt-out of certain mechanisms for tracking on a device or web browser used by your Child, including tracking of online activities over time and across different websites, you can use one or more of the options described above in the "Interest-Based and Behavioral Advertising" section of the general Privacy Policy.

If you delete your Child's cookies, use a different browser or device, or buy a new computer, you or your Child will need to renew your opt-out choice.

Disclosure

You may prohibit us from disclosing your Child's personal information with a third party by contacting us at the information provided below to opt-out of such disclosures in advance; provided that if you prohibit us from sharing your Child's personal information with your Child's

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You may review your Child's personal information by logging into your Child's account or by sending us an email or postal mail at the address below.

Retention

We will retain your Child's personal information, including after the school term in which your Child uses the Services, for only as long as is reasonably necessary to fulfill the purpose for which the information was collected. Generally, Newsela will delete a Child's personal information 4 years after the Child's last login to the Services.

Deletion

You may request deletion of your Child's personal information by sending us an email or postal mail at the address below. **IN SUCH CASE, WE WILL NO LONGER ALLOW YOUR CHILD TO USE THE SERVICES.** We will delete your Child's information using reasonable measures to protect against unauthorized access to, or use of, the information in connection with its deletion. When we delete a Child's personal information, it will be deleted from our active databases but we may retain an archived copy of your records as required by law or for legitimate business purposes.

Refusing Further Collection or Use

You may at any time refuse to permit our further use or future online collection of your Child's personal information, by terminating your Child's account and directing us to delete your Child's personal information (as described above). **IN EITHER CASE, WE WILL NO LONGER ALLOW YOUR CHILD TO USE THE SERVICES.** We will not have any liability whatsoever for any termination of the account or related deletion of the Child's personal information. After termination, your Child will not be able to use his or her account anymore. Access to schoolwork associated with the account will no longer be available to your Child.

Reliance on Parental Instructions

We may, and you authorize us to, rely on the instructions that we reasonably believe are given by you as a parent of your Child. For example, if a person calls our customer support number and provides the account information we request, we may assume that the person calling is the Child's parent. We will not be held liable for any disclosure made in good faith and following reasonable procedures in responding to a request for disclosure of a Child's personal information from such individual.

Emails

You may "opt-out" of receiving our promotional emails by following the instructions in those emails. If you opt-out, we may still send you non-marketing emails. Non-marketing emails include emails about your Child's accounts and our business dealings with you and/or your Child. You may change some of your Child's personal information stored in the Services by following the directions

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Third Parties

Please be aware that different rules might apply to the collection, use or disclosure of your Child's information by third parties in connection with their advertisements, promotions and other websites you encounter on the Internet. The use of such technology by these third parties, and their policies and practices regarding your information and their sites and services, is within their control and not Newsela's. Those parties may use the information they collect from your Child consistent with their own privacy policies, which we encourage you to carefully review.

SECURITY OF YOUR CHILD'S PERSONAL INFORMATION

We encrypt the transmission of your Child's personal information using security measures designed to protect the security, privacy, confidentiality, and integrity of personal information against risks through the use of administrative, technological, and physical safeguards. We also take reasonable steps to release Children's personal information only to third parties who are capable of maintaining the confidentiality, security and integrity of such information, and who provide assurances that they will maintain the information in such a manner. Despite our efforts, however, third parties may still find ways to hack into the service and intercept data transmissions. Therefore, although we take security very seriously and work very hard on behalf of your Child's privacy, we cannot guarantee the security of your Child's information.

CONTACT INFORMATION

We welcome your comments or questions about this Children's Policy. Feel free to email us at privacy@newsela.com. You may also contact us at our address: Newsela Inc., PO Box 25588, Brooklyn, NY 11202

CHANGES TO THIS CHILDREN'S POLICY

We may change this Children's Policy from time to time. If we make any changes to this Children's Policy, we will change the Last Revised date above.

If we make material changes to this Children's Policy, we send a notice to the email address we have on file for the account holder, which may include your Child's teacher. For material changes regarding use or collection of data, we will provide choices and additional information regarding the collection of such data before it is used in any manner inconsistent with the terms initially provided to users.

Except as otherwise provided in this Children's Policy, any changes to this Children's Policy will be effective immediately for new users of the Services. You are responsible at all times for providing to us your most current email address.

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