

QWILL MEDIA & EDUCATION, INC.

PRIVACY POLICY

QWILL Media & Education, Inc. (“**QWILL**”/“**we**”/“**us**”/“**our**”) is committed to protecting Your privacy.

We make these websites (“**Websites**”) located at

[HTTP://WWW.QWILLEDUCATION.COM](http://www.qwilleducation.com)

[HTTP://WWW.WHYQWILL.COM](http://www.whyqwill.com)

[HTTP://WWW.QWILLME.COM](http://www.qwillme.com)

[HTTP://WWW.WHYQWILLES.COM](http://www.whyqwilles.com)

[HTTP://WWW.EXPLOREQWILLES.COM](http://www.exploreqwilles.com)

[HTTP://WWW.QWILLENESPANOL.COM](http://www.qwillenespanol.com)

available together with our Service as further described in our Terms of Use (the “**Service**”). This Privacy Policy describes how we collect, store, use and distribute information about our Users through these Websites and Service.

Consent: By using these Websites and/or our Service You consent to the use of Your Personal Information as described in this Privacy Policy. Except as set forth in this Privacy Policy, Your Personal Information will not be used for any other purpose without Your consent. We will not actively collect Personal Information for the purpose of sale or marketing in a way that specifically identifies the individual. In other words, we don’t sell customer lists. You may withdraw Your consent to our processing of Your Personal Information at any time. However, withdrawing consent may result in Your inability to continue using these Websites and/or the Service.

Collection of Information: We aim to collect, use and disclose only such information as is required to enable us to manage Your account, to provide the Service, to maintain our Customer/Visitor lists, to respond to Your inquiries or provide feedback, for identification and authentication purposes and for service improvement. We will maintain the confidentiality of any contact information You provide to us on registering for our Service or contacting us with questions or for further information and we will use it only for the purposes for which we have collected it (subject to the exclusions and disclosures we have listed below), unless You agree that we may disclose it to other third-parties.

Two types of information may be collected through these Websites and our Service: Personal Information and Non-Personal Information. This Privacy Policy does not extend to the collection, use or disclosure of the following information which is currently not limited by applicable privacy laws: (a) information that is publicly available, such as

names, addresses, telephone numbers and electronic address when listed in a directory or made available through directory assistance; or (b) Non-Personal Information (as defined further below).

"Personal Information" is personally identifiable information, such as Your name, address, email address, credit card information, birth date and gender. It is always Your choice whether or not to provide Personal Information but if You choose not to provide certain requested Personal Information, in some instances You may not be able to register to use these Websites or Service or be able to access and use these Websites or Service at all. In other instances, Your choice not to provide certain other Personal Information may mean that You will not be able to use certain features of these Websites or Service. We may collect Personal Information in respect of these Websites or Service through registration processes; communications with You; information downloads; service use; purchases; User support; and surveys.

"Non-Personal Information" is information of an anonymous nature, such as an Internet Protocol Address (IP Address), the domain used to access these Websites or Service, and the type and version of browser or operating system being used by Visitors to access these Websites or Service. Aggregate information, such as demographic statistics of our Users (e.g. average age or geographical location of our Users), number of Visitors, what pages Users access or visit, and average time spent on these Websites or Service is not considered Personal Information. Similarly, business contact information such as the name, title, business address, email address, or telephone number of a business or professional person or an employee of an organization and/or educational institution is not considered Personal Information.

Although the use of certain Non-Personal Information collected, used or disclosed through the Internet as described herein is not restricted (and to the extent that such is the case, the obligations under this Privacy Policy do not apply to such information), we provide information in this Privacy Policy about the collection of such information for the sake of transparency with respect to the operation of these Websites and Service. Such Non-Personal Information is collected or derived by us in the course of operating these Websites and our Service. For example, our servers may automatically collect Non-Personal Information that is provided through Your browser or stored in a cookie.

Use of Information

We collect information for the following purposes:

- **Registration:** In order to register for our Service You must provide certain Personal Information to us such as Your full name, email address, phone number, position, school name, school district/organization name, location and how You heard about us. In the future, You may have the option to register for an account using Your account credentials with a third-party platform such as Facebook, Twitter, Instagram or LinkedIn. If You register using Your account

credentials with a third-party platform provider, we will also collect and use the Personal Information associated with Your third-party account pursuant to this Privacy Policy. The information we will have access to in respect of Your third-party account will depend on the applicable third-party platform provider's privacy policy as well as any applicable privacy preferences You may have selected in respect of Your third-party account.

- **Account Information:** In the future, You may have the option to provide us with additional account information including photos. We will use such information to provide You with the Service and as otherwise permitted by this Privacy Policy.
- **Sharing Features:** If You use any third-party platforms that we support from time to time such as Facebook or Twitter to share content, such content will be publicly available and searchable on the Internet.
- **Posts and/or Comments:** In the future, You may have the option to publish posts and/or comments on these Websites. If You choose to publish a post or a comment on these Websites, Your username, profile photo and the content of Your post or comment will be made publicly available on these Websites.
- **Messages:** In the future, You may have the ability to send messages to other Users through the Service. If You send a message to another User, they will be able to see Your username, profile photo and the content of Your message. If You receive a message from another User, we will send You an email to let You know that You have received a new message.
- **Referrals:** In the future, You may have the option to invite a friend to join our Service by providing us with their name and email address. We will use this information to send Your friend one email inviting them to join our Service. If they do not set up an account to use our Service, we will delete their contact information.
- **Testimonials:** In the future, You may have the option to provide testimonials regarding our Service. If You choose to provide a testimonial, Your testimonial will be displayed on these Websites and in other promotional materials along with the following information: (a) if You are a teacher, we will display Your full name, the grade that You teach and the name of Your school, and (b) if You are the guardian of a student, we will display Your child's first name along with the grade that they are in and the name of their school (i.e. "Parent of Michelle, grade 3 student at Maple Leaf Elementary School").
- **Transactional Notifications:** We provide notifications for certain activities relating to Your use of our Service despite Your indicated email preferences, for example we may send You notices of any updates to our Terms of Use or Privacy Policy.
- **Marketing Communications:** If You opt-in to receive marketing communications from us, we will keep You up-to-date on our Products and Service. You may withdraw Your consent to receiving marketing communications from us at any time by following the opt-out instructions in each communication.
- **Statistics:** We also collect statistics about the use of our Service which we use for analytics including predictive analytics. Aggregate statistics that do not

personally identify an individual will be kept by us and such aggregate statistics may be made available to other members or third-parties.

- **System Logs and Cookies:** Cookies are used by us to track content usage and traffic on these Websites and Service. A cookie is a feature of Your web browser that consists of a text file that is placed on Your hard disk by a web server. These Websites uses cookies to help it compile aggregate statistics about usage of these Websites, such as how many Users visit these Websites, how long Users spend viewing these Websites, and what pages are viewed most often. This information is used to improve the content of these Websites. You can set Your browser to notify You when You are sent a cookie. This gives You the chance to decide whether or not to accept it. If You disable cookies, You may not be able to take advantage of all the features of these Websites or Service.

Your IP address is reported by Your web browser whenever You visit a page on these Websites. This information is recorded together with Your registration information on our service providers' databases (see further, '*Disclosures & Transfers*').

- **Advertisements and/or Sponsorships:** These Websites may feature advertisements and/or sponsorships. Advertisements appearing on these Websites may be delivered by us or one or more third-party web advertisers. These third-party web advertisers may set cookies. These cookies allow the advertisement server operated by that third-party to recognize Your computer each time they send You an online advertisement. Accordingly, advertisement servers may compile information about where or whether You viewed their advertisements and which advertisements You clicked on. This information allows web advertisers to deliver targeted advertisements that they believe will be of most interest to You. This Privacy Policy applies to our information practices and it does not extend to the information practices of any third-party advertisers and/or sponsors. For the privacy practices of such third-party advertisers and/or sponsors, You should consult the applicable privacy policy for the relevant third-party advertisers and/or sponsors.
- **Third-Party Links:** These Websites may contain links to other third-party websites that are not owned or controlled by us. Such third-party websites are governed by the terms and conditions and privacy policies of such third-party providers and we are not involved in any interaction or transaction between you and such third-parties.

If we plan to use Your Personal Information in the future for any other purposes not identified above, we will only do so after informing You by updating this Privacy Policy. See further the section of this Privacy Policy entitled '*Amendment of this Policy*.'

Disclosures & Transfers: We have put in place contractual and other organizational safeguards with our agents (see further below) to ensure a proper level of protection of Your Personal Information (see further *Security* below). In addition to those measures, we will not disclose or transfer Your Personal

Information to third-parties without Your permission, except as specified in this Privacy Policy (see further *Important Exceptions* below).

As at the date of this Privacy Policy, we share Personal Information about You in respect of these Websites or Service only with our service providers and partners which include website hosting, cloud service providers, analytics providers, email marketing providers and (in the future) payment processors. Our service providers are located in Canada and the United States and accordingly Your Personal Information may be available to Canadian and United States governments under a lawful order, irrespective of the safeguards we have put in place for the protection of Your Personal Information.

From time to time we may employ third-parties to help us improve these Websites and/or the Service. These third-parties may have limited access to databases of User information solely for the purpose of helping us to improve these Websites and/or the Service and they will be subject to contractual restrictions prohibiting them from using the information about our members for any other purpose.

Important Exceptions: We may disclose Your Personal Information to third-parties without Your consent if we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other Website members, other Users of the Service, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. We may disclose Personal Information when we believe in good faith that such disclosure is required by and in accordance with the law.

We may also disclose Your Personal Information in connection with a corporate re-organization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to the same, provided that the information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the information.

Security: The security of Your Personal Information is important to us. To the extent that we store Personal Information, we use commercially reasonable efforts to store and maintain Your Personal Information in a secure environment. We take technical, contractual, administrative, and physical security steps designed to protect Personal Information that You provide to us. We have implemented procedures designed to limit the dissemination of Your Personal Information to only such designated staff as are reasonably necessary to carry out the stated purposes we have communicated to You.

You are also responsible for helping to protect the security of Your Personal Information. For instance, never give out Your email account information or Your password for the Service to third-parties.

Retention: We will keep Your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with You. We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained personal information will remain subject to the terms of this Privacy Policy. If You request that Your name be removed from our databases, it may not be possible to completely delete all Your Personal Information due to technological and legal constraints and Your Service may also be interrupted and/or terminated.

Amendment of this Policy: We reserve the right to change this Privacy Policy at any time. If we decide to change this Privacy Policy in the future, we will post an appropriate notice on the home page. Any non-material change (such as clarifications) to this Privacy Policy will become effective on the date the change is posted and any material changes will become effective 30 days from their posting on these Websites. Unless stated otherwise, our current Privacy Policy applies to all Personal Information that we have about You. The date on which the latest update was made is indicated at the bottom of this document. We recommend that You print a copy of this Privacy Policy for Your reference and revisit this policy from time to time to ensure You are aware of any changes. Your continued use of these Websites and Service signifies Your acceptance of any changes.

Access and Accuracy: You have the right to access the Personal Information we hold about You in order to verify the Personal Information we have collected in respect to You and to have a general account of our uses of that information. Upon receipt of Your written request, we will provide You with a copy of Your Personal Information although in certain limited circumstances, we may not be able to make all relevant information available to You such as where that information also pertains to another User. In such circumstances we will provide reasons for the denial to You upon request. We will endeavor to deal with all requests for access and modifications in a timely manner.

We will make every reasonable effort to keep Your Personal Information accurate and up-to-date, and we will provide You with mechanisms to update, correct, delete or add to Your Personal Information as appropriate. As appropriate, this amended Personal Information will be transmitted to those parties to which we are permitted to disclose Your information. Having accurate Personal Information about You enables us to give You the best possible service.

Contact Us: You can help by keeping us informed of any changes such as a change of address or telephone number. If You would like to access Your information, if You have any questions, comments or suggestions or if You find any errors in our information about You, please contact us at: agl_@me.com

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