



Digital Influx

PRIVACY POLICIES

1. Who We Are And What Do We Do?

Digital Influx is a London-based EdTech platform launching the world's first 'UX for Kids' and 'UX for Teens' course – to introduce young people to User Experience Design – the design process behind their favorite digital and physical products. Our goal is for UX to be taught in school curriculums everywhere, to equip a future generation of innovators with the skills they need to make the digital world a better place. You can read more about our mission and vision statement on www.digitalinflux.com

Privacy Statement

Within this policy, we've attempted to provide useful information, from many different angles, to help you find whatever answers you might need about our approach to privacy. At the core, our approach to privacy is this:

Digital Influx understands that your data is important, personal and that it is yours. You shared your data with us so that we can provide you with the Digital Influx service, but we don't own the data: you do. We will not use your data for third-party marketing or other unrelated purposes. We will not sell it to or share it with any company not directly involved in providing the Digital Influx service. We will always protect your data, using security measures and practices implemented by vetted, fully trained personnel. Digital Influx will be transparent about what data we have from you or about you, how we got that data, how we use it, and how we can remove it if requested. If you request us to delete your data, we will remove you from the Digital Influx service, destroy your data completely, and inform you when we're done.

Effective Date

This policy is in effect as of 02.04.22

Upload Date

This policy was made available on 04.07.22

2. Why We Have Your Information

Digital Influx has your information for one of these reasons:

- You signed up for the Digital Influx service
- An authorized educational institution (a school or school district) shared information about you with Digital Influx
- You provided information when inquiring about Digital Influx's service



3. Definitions of Terms

Individual customers or customers that are individuals: individuals or families who directly purchased the Digital Influx service for personal or family use.

School Customer: an educational institution that has purchased the Digital Influx service and provisions accounts for individual student users.

Student User: any individual using the Digital Influx service, whether signed up by a parent or a school. Students may be of any age, but Digital Influx treats all students as though they are covered by legal protections for children aged 13 or younger.

Individual Parent: a parent or guardian of a student who directly signed their student up to use the Digital Influx service. (In other words, their student was not signed up by a school or district.)

School Parent: a parent or guardian of a student using the Digital Influx service, who has been signed up by a school or district.

Parent: a parent or guardian of a student using the Digital Influx service, regardless of how the student was signed up for Digital Influx services.

4. Information We Collect

Student's First and Last Name: Your student's name will be used to customize your student's participation in the Programs, and to personalize reports and updates about your student's progress. Also, for Individual Customers, we may mail related material to you or your student using your name or his/her name, care of you, at the mailing address you provide.

Email Address: For customers who are parents and school administration officials, your email address will serve as your login username (For customers that are individuals or students, an option to enter a username over email is provided.) Your email address may be used to send a confirmation email at registration, as well as information and updates to the Digital Influx Service. In some cases, we will also email your student's reports to you, with further information about the progress your student is making. We may use the email address as an additional means of communicating with you about the Programs and Digital Influx Learning, including notifying you of updates to websites or policies.

Student's Geographical Location: Although an address is not required, you will be asked to enter the country from which you live, this is to provide the Digital influx team a clear indication of the geographical areas their services are being used in.



Credit Card Information: For our customers that are individuals, we may ask for your credit card information to bill you for each student that you register for the Programs. Credit card processing may require:

- Credit Card Number
- Credit Card Expiration Date
- First and Last Name
- Billing Address including Zip Code/Postal Code
- Phone Number

This information is never handled directly by Digital Influx or stored on any of our systems. All credit card information is processed and stored by our processing partner, Stripe.com. Their privacy policy can be found here: <https://stripe.com/privacy>.

The Information We Collect from Students

Participation History: Participation History (how much a customer uses the service & features) will be collected for product development, customer support, marketing, and other operational and business purposes, including improvements to the Programs. All acquired information will not be disclosed to third parties or used for advertising to students. We will not use your student's participation information to market or sell other products to parents.

Any password created will not be displayed to Digital Influx, however, Digital Influx does have the ability to override passwords and create a new one if requested. All passwords created must be at least 6 characters long and contain at least one uppercase character, and one number to ensure security. To find out more about this please contact info@digitalinflux.com

We will use Performance Data to:

- Measure your student's performance in our User Experience (UX) Programs and adapt the Programs to his or her individual learning needs
- Analyze your student's Performance Data, and provide progress reports about your student's performance in the Programs

How does Digital Influx use Aggregated and Anonymous Information:

Anonymized and aggregated information may be used for demographic profiling and advertising. In these cases, the information will always be aggregated and anonymous. Information used this way will never have a connection/link to any individual, or personal identifier attached to it. It will not be possible to reverse the process and connect this aggregated information to individual/individuals.



5. How we Handle Your Information

How we protect information

Digital Influx takes great care to ensure we will never misuse your data or abuse the trust you placed in us when you shared that data. A significant part of our commitment to your privacy is the way we keep your data out of the wrong hands. Digital Influx has security measures in place to protect the information under our control against loss, misuse, or alteration. All data collected is stored on our platform created on AWS and is only accessible to major stakeholders in the company who are trusted. To find out more about how AWS encrypts data please take a look at: <https://aws.amazon.com/compliance/data-privacy-faq/>

Laws and guidelines that apply

Digital Influx complies with and enforces U.S. data protection laws across all aspects of our system. By signing up for or using the Digital Influx platform, you agree:

- That your personal data can be used for the purposes identified in the Privacy Policy.
- That your data will be handled in accordance with U.S. privacy law. You waive any right or expectation enumerated under the data protection laws of other jurisdictions, and consent to the application of U.S. data protection law.
- Some regions, such as the EU, do not permit you (the Customer) to grant this consent.

Who can access your information

- Only authorized employees, with a business need to handle your data, can access these protected network zones.
- Those employees sign a binding agreement acknowledging that they will safeguard privacy and protect your data. This agreement remains in force even if the employee leaves Digital Influx.
- We do not provide access to your data to 3rd parties, with these specific exceptions:
- Limited data is shared with processing partners during registration or updates to registration information
- Credit card processing is handled entirely external to Digital Influx, by our partner Stripe.com Stripe's privacy policy is found here: <https://stripe.com/privacy>

6. Consent and Opt-in

Digital Influx retains information provided by the Customer ("Customer Data") only so long as we have a business-related need/use for it. We will destroy Customer-supplied data, as well as any other customer-identifying data, at any time upon request. Our service is dependent upon the use of Customer-supplied Data, so destroying your data will mean you will no longer be able to use the Digital Influx service. Derivative, anonymous data such as aggregate performance data will be retained.



Our Rules on Sharing Information

Except as provided in this Privacy Policy, Digital Influx WILL NOT disclose the information that it obtains from you to third parties without your written permission, or where we believe, in good faith, that the law requires us to disclose this information. If you request that Digital Influx share information provided by or collected from you (or in the case of School Customers, student users) directly with a third party designated by you, you agree that you (and not Digital Influx) will be solely responsible for the use, storage, and maintenance of such information by such third party.

Digital Influx WILL NOT sell, trade, or assign any unaggregated personal information that we collect to third parties. We, however, may aggregate the information that we collect from users of our website to create demographic profiles and performance profiles regarding the progress of students who use the Programs. Digital Influx may share aggregated information with researchers, other clients, marketing professionals or potential investors. This aggregated information will be compiled and reported in the form of ANONYMOUS group statistics only in such a manner that makes individual student users unidentifiable.

Digital Influx may also share information about the students, parents, legal guardians, and school officials that register to participate in the Programs, along with such registrants' Participation History, with contractual business partners of Digital Influx that are directly involved in the sale, distribution, operation, maintenance, and support of the Programs on behalf of Digital Influx. These partners function as an element of the Digital Influx Programs, and do not have access to or use your information for any purpose other than providing the Digital Influx Programs.

If you request that Digital Influx share any information provided by you (or in the case of School Customers, your student users) directly with a third party designated by you, then you agree that you (and not Digital Influx) will be solely responsible for the use, storage, and maintenance of such information by such third party.

As Digital Influx continues to develop its business, it might sell some or all of its assets. In such transactions, customer information is generally one of the transferred business assets. An acquiring company would be required to protect all information that Digital Influx Academy collects from users of our website and Programs in accordance with the terms of this Privacy Policy.

Consenting to our collection and use of your information

To use the Digital Influx Programs, you will be asked to submit certain personal information about you and your student, and to authorize Digital Influx to use that information in a limited number of ways

DIGITAL INFLUX DOES NOT SHARE CHILDREN'S PERSONALLY IDENTIFIABLE INFORMATION WITH THIRD PARTIES.



For administrative officials of our School Customers, to the extent that Digital Influx collects, uses, or discloses personal information from children under the age of 13, it is done in strict accordance with this Privacy Policy and for the specific purpose of providing services to the School Customer and Individual Customer.

For more information about COPPA, visit the FTC site at <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>

To report a COPPA violation, you can visit <https://www.ftccomplaintassistant.gov/#crnt&panel1-1> or call (877) FTC-HELP.

FERPA (The Family Educational Rights and Privacy Act)

For our School Customers: The Family Educational Rights and Privacy Act (FERPA) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Digital Influx helps our School Customers be compliant with FERPA. Specifically:

- Any sensitive online information is transmitted over secure channels
- All student data are stored in ways that are not publicly accessible
- Digital Influx does not share information with third parties that could be used to identify students without consent from the student's parent, guardian, or school.

If a School Customer requests that student data be sent to a third-party Digital Influx will:

- (i) send the data to the School Customer directly to transfer to the third party or
- (ii) send the data directly to the third party designated by School Customer if requested by that customer, provided the School agrees that School Customer is solely responsible for use, storage, and maintenance of such information by such third party.

For more information about FERPA, please go to the US Department of Education site at <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>.

To report a FERPA violation, please visit <https://studentprivacy.ed.gov/file-a-complaint>.



PPRA (Protection of Pupil Rights Amendments)

The Protection of Pupil Rights Amendments, originally established in 1978 and updated by the No Child Left Behind Act in 2001, says parents must first consent before a school (or their agent) may collect personal information from minor students as part of a survey, study, or evaluation. Personal information is defined to include things that are considered PII, as well as attitudes and opinions about sex, embarrassing personal history, and critical appraisals of family members.

In all cases, Digital Influx complies with this law. Digital Influx does not collect personal information directly from students. If a student submits or provides personal information of their initiative – such as through an email or phone message – Digital Influx quarantines that information from online systems, notifies the school or parent (as dictated by state law), and then removes the information. For more information about PPRA, visit the US Department of Education site at <https://www2.ed.gov/policy/gen/guid/fpco/ppra/parents.html>.

