

PRIVACY POLICY

Last Updated: March 20, 2025

This Privacy Policy describes how we collect, use, and share your personal information and the choices you may have regarding our use of your personal information. We may update and make changes to this policy, so we encourage you to review it periodically.

Through our Site, we collect information from you as described in this Privacy Notice. You can use some parts of our Site without sharing Personal Data, but accessing Content Offerings and related Services requires it. To enjoy certain features and benefits, you might need to provide, or we might collect, "Personal Data"—information that identifies you, like your name, email, IP address, and device details. It's important that the Personal Data you give us is accurate. If it's not, it could affect how you use the Site, the information you see, and how we can reach you. For example, please keep your email address up-to-date, as we often use it to communicate with you.

We are dedicated to providing a safe and secure online environment for you.

We do not sell your personal information to third parties.

1. INFORMATION WE COLLECT. In the 12 months prior to the "last updated" date of this notice, we have collected the following categories of personal information:

- Identifiers such as a real name, alias, postal address, online identifier, Internet Protocol address, email address, account name, or other similar identifiers
- Personal information as defined in California Customer Records law such as name, signature, address, telephone number, education;
- Commercial information such as purchase or transaction history;
- Education information.

2. HOW YOUR INFORMATION IS COLLECTED. We collect your personal information from:

- You—in person, by telephone, text or email, and/or through our website, account creation, contacts with customer service.

3. WHY WE COLLECT YOUR INFORMATION. We collect and use consumer personal information for the following business purposes:

Monitoring User Activity on Our Site. To understand how users navigate our Site and to enhance the overall user experience, we automatically gather information about your visit. This includes tracking the pages you access, the sequence and duration of your engagement with each page, as well as the links you click. We may also note the website from which you originated. This involves the documentation of technical specifications such as your IP address, operating system, and browser.

Personal Data You Share. We collect Personal Data that you provide when you register for an account, manage your account information, purchase services, subscribe to email updates, participate in public forums, contact us via email, and/or engage with Content Offerings or other services on our Site. The collected Personal Data may be utilized for the following purposes: responding to your inquiries; delivering the specified Content Offerings and/or Services that you have selected; sending you updates about our Content Offerings and events; and notifying you regarding Site maintenance or updates via email.

- **Account Registration.** When registering for an account, you may be required to provide certain Personal Data, including but not limited to your name and email address. You may choose to voluntarily provide additional Personal Data at your discretion.
- **Updates.** Brain Builder may provide you with the option to receive updates through email or by posting content on specific areas of the Site that are accessible solely to registered users. To subscribe to these Services, you may be required to provide us with Personal Data, including but not limited to your name and email address.
- **Forums.** Brain Builder may provide public forums (hereinafter referred to as the "Forums") wherein individuals can share their comments and thoughts. To engage in the Forums, you may need to register with us and/or provide us with Personal Data, such as your name and email address. It is

important to remember that information you post or make available within the Forums will be accessible to the public. You are strongly advised against including any Personal Data or other information of a personal or sensitive nature, whether concerning yourself or others, in a Forum post. Additionally, we encourage you to review your User Agreement and the Acceptable Use Policy for further information regarding the appropriate use of our Forums.

- **Participation in Content Offerings.** Brain Builder allows users to participate in Content Offerings on or through the Site. If you desire to participate in a Content Offering, you will be asked to provide us with certain information necessary to conduct such a Content Offering. This information may include, among other things, your name, email address, and credit card number.

If you participate in a Content Offering, we may collect certain user-generated content, such as assignments you submit. We also collect course data, including responses to quizzes, exams, and surveys. You should not include any Personal Data or other information of a personal or sensitive nature, whether related to you or another person, on assignments or exams, except for information required to participate in or submit such assignments or exams.

- **Identity Verification.** Brain Builder may require you to verify your identity for certain services. You may be required to provide us or a third-party identity verification vendor with personal data, including but not limited to your name, address, date of birth, a headshot captured using a webcam, and a photo identification document.

- **Correspondence with Brain Builder.** Personal Data may be collected and documented when individuals send us an email message or otherwise reach out to us.

- **Third Party Payment Processing.** Brain Builder provides you with the ability to pay for Content Offerings and Services using a credit card or other methods through a third party payment processing service provider. Please note that our service provider – not Brain Builder – collects and processes your financial information. Our third party payment processing service provider is Go Daddy Payments.

4. CATEGORIES OF INFORMATION SOLD TO OR SHARED WITH THIRD PARTIES. In the preceding 12 months, we have shared the following categories of personal information with the following categories of third parties for cross-contextual behavioral advertising:

Categories of Third Parties and Purposes of Sharing;

- Advertising Networks
- Marketing Partners
- Merchant Partner

Categories of Personal Information

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier
- Demographics such as age, sex, race, date of birth, education, occupation
- Commercial information such as purchase or transaction history.
- Inferences

"Cross-context behavioral advertising" means advertising that is targeted to you based on personal information obtained from your activity across businesses, distinctly branded internet websites, applications, or services.

You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to opt-out of the sharing of your personal information for purposes of cross-contextual behavioral advertising or targeted advertising.

We do not knowingly sell or share the personal information of consumers under 16 years of age.

5. CATEGORIES OF INFORMATION DISCLOSED FOR A BUSINESS PURPOSE. In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose with the following categories of third parties:

Categories of Third Parties and Business Purpose for Disclosure

- Service providers we use to help deliver our services to you, such as payment service providers;
- Other third parties we use to help us run our business, such as marketing agencies or website hosts;
- Our insurers and brokers;
- Our bank;
- External auditors

Categories of Personal Information

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name;
- Personal information as defined in California Customer Records law such as a name, signature, address, telephone number, education, employment;
- Internet or other electronic network activity information such as browsing history, search history, and information regarding a consumer's interaction with our services;
- Professional or employment-related information;
- Education information;
- Inferences drawn from any of the above information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

6. USE OR DISCLOSURE OF SENSITIVE PERSONAL INFORMATION. We do not use or disclose your sensitive personal information for purposes other than those listed below:

- The use that is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions

- To ensure the physical safety of natural persons
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, provided that the personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business
- To perform services on behalf of the business
- To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by the business
- To collect or process sensitive personal information where the collection or processing is not for the purpose of inferring characteristics about a consumer

You have the right to limit the use and disclosure of your sensitive personal information. If you exercise your right to limit the use of your sensitive personal information, we will limit our use and disclosure of your sensitive personal information for the purposes listed above.

7. YOUR RIGHTS. You have the following rights as a California consumer:

- Right to know what personal information the business has collected about you, including:
 - o The categories of personal information we have collected
 - o The categories of sources from which the personal information is collected
 - o The business or commercial purpose for collecting, selling, or sharing personal information
 - o The categories of third parties to whom we disclose personal information –and–

- o The specific pieces of personal information we have collected about you.
- Right to delete personal information that we have collected from you with certain exceptions, including where the information is necessary to complete our transaction with you. Subject to the exceptions set out below, on receipt of a verifiable request from you, we will:
 - o Delete your personal information from our records;
 - o Direct any service providers or contractors to delete your personal information from their records;
 - o Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort.

Please note that we may not delete your personal information if it is reasonably necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes;
- Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the

information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;

- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
- Right to correct inaccurate personal information that we maintain about you. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.
- Right to opt-out of the sharing of your personal information for cross-contextual behavioral advertising.
- Right to limit the use or disclosure of your sensitive personal information for reasons other than those set forth in

6. USE OR DISCLOSURE OF SENSITIVE PERSONAL INFORMATION.

- Right not to receive discriminatory treatment for exercising any of these rights. This means we cannot, among other things:
 - o Deny goods or services to you;
 - o Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
 - o Provide a different level or quality of goods or services to you; or

o Suggest that you will receive a different price or rate for services or a different level or quality of services.

Please note that we may charge a different price or rate or provide a different level or quality of services to you if that difference is reasonably related to the value your personal information provides to our business.

8. HOW TO EXERCISE YOUR RIGHTS. You can submit a request to exercise your rights to access, correct, or delete your personal information by sending an email to brainbuilder@zohomail.com and providing us with your name, address, phone number, email or using one of the following methods:

- Access Requests: Contact us at (855) 771-0926.
- Correction Requests: Contact us at (855) 771-0926.
- Deletion Requests: Contact us at (855) 771-0926.

Verification of Your Identity

We will need your contact information, including your name, address, phone number, and email, to verify your identity for access, correction, or deletion requests. Our verification process may also include asking you to answer a few questions about yourself to help us verify your identity or using a third-party identification service to assist us. We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf. Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

Authorized Agent Request

If you are an authorized agent, then you will be required to submit your contact information and complete a certification form as well as provide information about the consumer for whom you are making a request.

- To opt-out of the sharing of your personal information, you may:

- o Contact us at (855) 771-0926

 - o Send an email to brainbuilder@zohomail.com and provide us with your name, email, phone number

- To limit the use of your sensitive personal information, you may:
 - o Contact us at (855) 771-0926

 - o Send an email to brainbuilder@zohomail.com and provide us with your name, email, phone number

9. CONTACT US. For questions or concerns about our privacy policies and information practices, please contact us at (855) 771-0926 or by email at brainbuilder@zohomail.com.

EXHIBIT A: PARENTAL CONSENT FORM.

Please sign and return this form as a parent or guardian to give express permission for your child or ward to use our Services.

Brain Builder - Parental Consent and Privacy Notice for Minor Children

Important Notice for Parents and Legal Guardians (referred to as "you," "your," or "yours"):

Welcome to Brain Builder! Brain Builder (referred to as "we," "us," or "our") is dedicated to protecting the privacy of children online. We understand that you and/or your child are interested in using our educational platform. To ensure a safe and enriching experience, and in compliance with applicable privacy laws, including COPPA, we require verifiable parental consent before your child can begin using our services. This document outlines how we collect, use, and protect your child's information and serves as the necessary consent form for you to review and complete.

Please read this entire Parental Consent and Privacy Notice carefully before proceeding.

1. INFORMATION WE COLLECT FROM YOUR CHILD.

a. When your child (referred to as "Child" or "User") uses Brain Builder, we may collect the following types of personal information, which is reasonably necessary for them to participate in our Services:

b. Contact Information: We may collect your child's email address [or name, display name, etc.] during the account registration process to allow them to log in and for us to communicate with you about their account.

c. Usage Information: We collect information about how your child uses Brain Builder, including the specific lessons and activities they access, their progress within those activities, the scores they achieve, and the content they interact with to understand their learning patterns and improve our service.

d. Content Created by Your Child: Users interact in forums to help each other in the learning process. This content is stored to allow them to save their work and continue their learning.

e. Device Information: We may collect information about the type of device (e.g., tablet, computer) and operating system your child uses to access Brain Builder for technical support and to optimize the user experience across different devices. We may also collect a unique device identifier for authentication purposes.

We will not collect any other personal information from your child without your further explicit consent.

2. HOW WE USE YOUR CHILD'S INFORMATION.

We use the information we collect from your child for the following purposes:

a. To create and manage their individual Brain Builder account.

b. To provide access to our educational content, features, and interactive learning experiences.

- c. To track a User's learning progress, personalize a learning path, and provide tailored feedback to support a User's educational development.
- d. To allow Users to save their work and resume activities where they left off.
- e. To analyze usage patterns to improve and personalize Brain Builder, develop new educational content, and enhance the overall learning experience for all users.
- f. To communicate with you, as the parent or legal guardian, regarding your child's account activity, progress reports, important updates, and any relevant information about Brain Builder.

3. DISCLOSURE OF YOUR CHILD'S INFORMATION TO THIRD PARTIES.

a. We are committed to protecting your child's privacy. We will not sell, rent, or trade your child's personal information to third parties. We may disclose your child's personal information only in the following limited circumstances:

(i) **Service Providers:** We may share information with third-party service providers who provide essential services for the operation of Brain Builder, such as website hosting, data storage, analytics, and technical support. These providers are contractually obligated to maintain the confidentiality and security of your child's information and are prohibited from using it for any other purpose.

(ii) **Legal Compliance:** We may disclose personal information if we are required to do so by law, such as to comply with a subpoena, court order, or other legal process. We will make reasonable efforts to notify you of any such legal request, unless prohibited by law.

(iii) **Safety:** We may disclose personal information if we have a good-faith belief that it is necessary to protect the safety and well-being of a child or others, to prevent illegal activity, or to address fraud or security issues.

4. YOUR RIGHTS AS A PARENT OR LEGAL GUARDIAN.

Under COPPA, you have the following rights regarding your child's personal information:

- a. Right to Review: You have the right to review the personal information we have collected from your child. You can request to access this information by contacting us at brainbuilder@zohomail.com. We will take steps to verify your identity before providing access.
- b. Right to Delete: You have the right to request that we delete your child's personal information from our records. You can make this request by contacting us at brainbuilder@zohomail.com. We will comply with your request unless we have a legal obligation to retain the information.
- c. Right to Refuse Further Collection or Use: You have the right to refuse to permit our further collection or use of your child's personal information. You can exercise this right by contacting us at brainbuilder@zohomail.com. If you choose to refuse further collection or use, your child's account may be terminated, and they may no longer be able to access Brain Builder.

5. VERIFIABLE PARENTAL CONSENT.

To give your consent for Brain Builder to collect, use, and disclose your child's personal information as described in this notice, please complete the following steps:

- a. Review this entire Parental Consent and Privacy Notice carefully.
- b. To provide access to our educational content, features, and interactive learning experiences.
- c. Government-Issued ID Verification: You may be asked to submit a copy of your government-issued identification electronically through our secure portal or by following specific instructions provided after you submit this form.
- d. Verification of Parentage / Guardianship: You may be asked to submit proof of parentage or guardianship, such as a Birth Certificate or Guardianship Order.

We will not store or collect any copies of the documents used to verify your identity or to verify you have the authority to give consent on behalf of the child. Documents are to be presented at the time of signing the Services Agreement.

6. OUR CONTACT INFORMATION.

If you have any questions or concerns about our privacy practices or this notice, or if you wish to exercise your parental rights, please contact us at:

Brain Builder

6330 Sunrise Blvd #1006, Citrus Heights, CA 95610

brainbuilder@zohomail.com

(855) 771-0926

Parental Consent:

Please check the boxes below to indicate your agreement and provide the requested information to complete your verifiable parental consent.

I confirm that the User is a person under the age of majority.

I confirm I am the User's biological parent or legal guardian and that I have the authority and ability to consent to the collection of their personal information.

I confirm that I have read and understand the agreement above and consent to the terms for the User.

I wish to have the User's information collected under the terms of this agreement.

I do not wish to have the User's information collected under the terms of this agreement. (Selecting this option will prevent the creation or continued use of the User's account).

Parent/Legal Guardian Full Name: _____

Parent/Legal Guardian Email Address: _____

Parent/Legal Guardian Phone Number: _____

Minor User's Full Name: _____

Minor User's Username: _____

By typing my name below, I attest that the information provided is true and accurate, and I am submitting this as my electronic signature, indicating my verifiable parental consent.

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Parent/Legal Guardian Electronic Signature: _____

Date:

COPPA PRIVACY POLICY

We at Brain Builder LLC ("Brain Builder" "we," "us," or "our") created this Privacy Policy ("Privacy Policy") because we know that you care about how information you provide to us is used and shared. This Privacy Policy relates to the information collection and use practices of Brain Builder in connection with our Online Services (the "Services"), which are made available to you through our website located at Brainbuilder101.com (the "Site").

We strive to educate parents and kids about how to appropriately safeguard their privacy when using our Services. We are committed to complying with the Children's Online Privacy Protection Act of 1998 ("COPPA"), which requires us to inform parents and legal guardians about our information collection and use practices. COPPA also requires that we obtain parental consent before we allow children under the age of 13 to access and/or use our Services. This can be done by having your parent or legal guardian contact us at brainbuilder@zohomail.com for our consent form. We have attached a form at the end of this Privacy Policy as Exhibit A as an example. Parents will need to provide proof of parentage through a verifiable method, such as a birth certificate, or, if a legal guardian, through a court order. We urge kids to check with their parents before entering information through our Site and/or Services, and we recommend that parents discuss with their kids restrictions regarding the online release of Personal Information (as defined below) to anyone they don't know. **We will not store or collect any copies of the documents used to verify your identity or to verify you have the authority to give consent.**

By visiting our Site and/or using our Services, or by permitting your child to use our Services, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. Capitalized terms not defined in this Privacy Policy shall have the meaning stated in our Terms of Use.

1. INFORMATION WE COLLECT FROM MINORS.

- *PERSONAL INFORMATION.*

We collect only the minimum amount of Personal Information necessary to provide our educational services to children under 13.

With verifiable parental consent, we collect the following information from children:

- Child's Username: A unique username chosen by the parent to identify the child's account.
- Child's First Name: The child's first name, provided by the parent, used for personalization within the learning platform.
- Child's Grade Level: The child's current grade level, provided by the parent, to tailor the educational content.

We do not collect any other Personal Information from children under 13

When you sign up to become a User of the Site (a "User"), you will be asked to provide us with certain Personal Information, such as your first name, last name, and email address. In this Privacy Policy, we refer to this information as "Personal Information." Other than the services agreement information required to obtain parental consent, we do not collect any Personal Information from users under the age of 13 unless the User's parent or legal guardian has first provided us with consent for that User to use the Services and disclose Personal Information to us. If you are a User under the age of 13, please do not send any Personal Information to us if we have not obtained prior consent from your parent or guardian. If we learn we have collected Personal Information from a User under the age of 13 without parental consent, or if we learn a User under the age of 13 has provided us Personal Information beyond what we request from them, we will delete that information as quickly as possible. If you believe that a User under the age of 13 may have provided us Personal Information in violation of this Privacy Policy, please contact us at brainbuilder@zohomail.com.

- *USAGE INFORMATION*

Like most websites, we use automatic data collection technology when you visit the Site to record information that identifies your computer, to track your use of our Site, and to collect certain basic information about you and your surfing habits. This information includes information about your operating system, your IP addresses, browser type and language, referring and exit pages and URLs,

keywords, date and time, amount of time spent on particular pages, what sections of a website you visit, and similar information concerning your use of the Site and the Services (the "Usage Information").

We collect this Usage Information by using cookies and pixel tags (also called web beacons or clear gifs). Cookies are small packets of data that a website stores on your computer's hard drive so that your computer will "remember" information about your visit. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of website users. You can reject cookies by following the directions provided in your internet provider's "help" file. If you reject cookies, you may still visit the Site, but may not be able to use some areas of the Site and/or the Services.

We do not collect Personal Information in this way, but if you've provided us with Personal Information, we may associate that information with the information that is collected automatically. Automatic data collection may be performed on our behalf by our Services providers.

2. HOW WE USE YOUR CHILD'S INFORMATION.

We use the information we collect from your child solely for the following purposes:

- To create and manage the child's account.
- To provide access to the educational content and services appropriate for the child's grade level.
- To track the child's progress within the educational content and provide feedback.
- To communicate with the parent about the child's account, progress, and important Site updates.

We do NOT use children's Personal Information for:

- Marketing or advertising to children.

- Profiling children for any purpose other than to personalize the educational experience within our Site.
- Sharing with social media platforms.

3. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES.

We do not disclose your child's Personal Information to third parties for their direct marketing purposes.

4. HOW WE PROTECT YOUR CHILD'S INFORMATION.

We take commercially reasonable steps to protect the Personal Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, email sent to or from us may not be secure, and you should therefore take special care in deciding what information you send to us via email.

5. Data Retention.

We retain children's Personal Information only for as long as necessary to provide the educational services.

We delete a child's account and associated Personal Information when:

The parent requests deletion;

The Services Agreement is terminated; or

We no longer offer the specific services for which the information was collected.

6. ACCESSING AND MODIFYING YOUR CHILD'S ACCOUNT INFORMATION.

You may update the information that is stored in your User account by e-mailing us at brainbuilder@zohomail.com or calling us at (855) 771-0926.

We strive to help parents ensure that their kids have a safe experience using our Services. Parents or legal guardians can review any Personal Information collected about their child under 13 years of age, have this information deleted, request that there be no further collection or use of their child's Personal Information, and/or allow for our collection and use of their child's Personal Information while withholding consent for us to disclose it to third parties. We take steps to verify the identity of anyone requesting information about a child and to ensure that the person is in fact the child's parent or legal guardian.

Right to Review: To review the Personal Information we have collected from your child, please send a written request to:

Brain Builder LLC
COPPA Information Request
6330 Sunrise Blvd #1006
Citrus Heights, CA 95610

In your request, please include:

Your full name

Your relationship to the child

Child's username

A copy of your government-issued photo ID presented at the time of contracting. (for verification purposes only, and it will be securely destroyed after verification)

Right to Delete: To request that we delete your child's Personal Information, please send a written request to the address above. Include the same identifying information as in a "Right to Review" request.

Right to Refuse Further Collection or Use: You may refuse to allow us to collect or use any further Personal Information from your child. Please send a written request to the address above. Be aware that refusing further collection or use may result in the termination of your child's account.

Right to Refuse Disclosure: You may refuse to allow us to disclose your child's Personal Information to third parties (except as permitted by law or to service providers). Please send a written request to the address above.

7. YOUR CHOICES.

If you wish to stop receiving promotional emails, you may do so by visiting by e-mailing brainbuilder@zohomail.com.

8. LINKS.

The Site may contain content, services, advertising, and other materials that link to websites operated by third parties. We have no control over those other sites, and this Privacy Policy does not apply to them. Please refer to the privacy policies of those sites for more information on how the operators of those sites collect and use your Personal Information.

9. IMPORTANT NOTICE TO USERS OUTSIDE THE U.S.

The Site and the Services are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred to the United States. By providing us with any information through the Site or the Services, you consent to this transfer.

10. CHANGES TO THIS PRIVACY POLICY.

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time and will post any changes on the Site as soon as they go into effect. By accessing the Site or using the Services after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

11. HOW TO CONTACT US.

If you have questions about this Privacy Policy, please email us at brainbuilder@zohomail.com, "PRIVACY POLICY" in the subject line, or mail us at the following address: 6330 Sunrise Blvd #1006, Citrus Heights, CA 95610.

DATA RETENTION POLICY

This Data Retention Policy outlines how Brain Builder retains Personal Information and Usage Information collected from users of our Site and Services. We retain this information for as long as necessary to fulfill the purposes outlined in our Privacy Policy, as required by law, or as described below.

1. Account Information:

Active Accounts: We retain Personal Information associated with active user accounts for the duration that the account is active. If a user closes their account, we will initiate the process of deleting their Personal Information within 30 days, unless we have a legal obligation to retain it for a longer period.

Inactive Accounts: We may delete or anonymize Personal Information associated with accounts that have been inactive for an extended period 2 years. We will make reasonable efforts to notify users before deleting their accounts due to inactivity.

2. Educational Records:

Progress Data: User progress data, including lesson completion, scores, and assessment results, may be retained for as long as the user's account is active to provide ongoing educational services and track learning progress.

Assignment Submissions: User-submitted assignments and other user-generated content are generally retained for 1 year after the user's last activity, unless a longer retention period is required for academic integrity purposes, to resolve disputes, or as required by law.

3. Communications:

Customer Support: Records of user communications with our customer support team, including emails and chat logs, are generally retained for 1 year to address inquiries, resolve disputes, and improve our support services.

Marketing Communications: If a user has opted in to receive marketing communications, we will retain their contact information until they opt out.

4. Legal Obligations:

We may retain Personal Information for longer periods if required by law, such as to comply with legal obligations, resolve disputes, enforce our agreements, or defend against legal claims.

5. Security:

Even after information is deleted from our active databases, it may remain in our backup systems for a limited time for disaster recovery purposes.

6. Data Deletion:

When Personal Information is deleted, we will take reasonable steps to ensure that it is no longer accessible or usable. This may involve deleting or anonymizing the data.

7. Changes to This Policy:

We may update this Data Retention Policy from time to time. We will post any changes on our Site and notify users as required by applicable law.