

# WORKS International, Inc. Privacy Policy

(Last Updated: May 3, 2021)

## 1. Our Commitment to Privacy

We, WORKS International, Inc. ("WORKS"), being the owner and operator of the website at [www.publicschoolworks.com](http://www.publicschoolworks.com), respect the privacy of your personal information. This website is referred to in this Privacy Policy as "our website" or "our site". We provide this explanation about our online information practices as a show of our commitment to protect your privacy.

We do not sell or rent personally-identifying information collected during your use of our website.

## 2. The Information We Collect

If you submit information to us through our site, we may collect and store your name, email address, and other personally-identifying information.

We need this information to provide services that you request from our website and to let you know of additional services about which you might be interested.

We may ask you for personally-identifying information at other times, such as if you complete a request for information, or otherwise communicate with us.

In addition, we automatically gather general statistical information about our website and visitors, such as IP addresses, browsers, pages viewed, number of visitors, etc., but in doing so we do not reference you by individual name, email address, home address, or telephone number. We use this data in the aggregate to determine how much our users use parts of our site so we can improve our site.

We may use cookies, beacons, and other tracking technologies to store and sometimes track information about you and your use of our website. A cookie is a small amount of data that is sent to your browser from a Web server and stored on your computer's hard drive. A beacon is a transparent graphic image placed on our website to monitor the behavior of a visitor to our website. When you access our website, your personal information is not using tracking technology.

Generally, we use cookies to remind us who you are and enable us to help customize our website and improve your experience. We may also use cookies, beacons, and other tracking technologies to gather statistical information about usage by users and research visiting patterns.

Preferences and options configurations in your browser determine if and how a cookie, beacon, or tracking pixel will be accepted. Most browsers are set to accept cookies by default. You can change those configurations on your computer if you desire. By changing your preferences, you can accept all cookies, you can be notified when a cookie is sent, or you can reject all cookies. If cookies are disabled, you may be required to re-enter your information more often and certain features of our site may be unavailable. You may not decline web beacons or tracking pixels. However, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies and make web beacons and tracking pixels ineffective on an individual basis. You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookie files may also clear certain opt-out cookies, plug-ins, or settings.

In addition, other third parties appearing at our site or linked to our site may use their own cookies, beacons, tracking pixels, and other tracking technologies and may collect personally-identifying information, including credit card information, in connection with your use of their websites. The privacy policy of such third parties may differ from ours. We encourage you to read the third party's privacy policy before responding to the offer to determine how the personally-identifying information is used by that third party.

Our site does not engage in the collection of personally-identifying information from users across third-party websites or third-party online services or applications, except as specified by you when you elect to register and login to or otherwise access our site via certain third-party sites or applications, such as, for example, Google, Facebook, Twitter, or Instagram. Any interaction with a third-party site or application typically allows the third party to collect some information about you (whether through cookies, registration information or otherwise). These third parties may even track you when you do not interact with the application. If you have engaged any of these third-party service providers, their respective privacy policies will govern their tracking and collection of information. Aside from the foregoing, we do not knowingly enable other parties to collect personally-identifying information about our users' activities over time and across different sites, applications, or services.

If your browser or similar mechanism gives our site a "do not track" signal, our site will make commercially reasonable attempts to honor your settings (although we still may deliver and use cookies and other tracking technologies for non-

marketing purposes). However, we do not make any promises or guarantees about the effects of any “do not track” choice that you may make because: (a) such nuanced treatment is not necessarily available or effective for all browsers, mechanisms, or tracking technologies, and our commercially reasonable attempts to honor your settings might not be effective to preclude tracking or behavioral advertising at all or over any particular period of time; (b) third parties may not honor your settings or our policies and may use cookies or other tracking technologies for behavioral advertising despite our commercially reasonable attempts to prevent them from doing so; and (c) tracking technologies, browsers, and access devices may change from time to time and our commercially reasonable attempts might not be effective for each technology or across all platforms.

### **3. The Way We Use Information**

We use your personally-identifying information to improve our marketing efforts, statistically analyze site usage, improve our content and goods and services offerings, and customize our site's content, layout, and services.

We may use your information to deliver information to you that, in some cases, is targeted to your interests. You may opt out of receiving this information by notifying us in writing. We may ask you to provide us voluntarily with additional information regarding your personal or business interests, experience, or requests, which we may use to customize our services for you.

We may use your email address, mailing address, and phone number to contact you regarding administrative notices and communications relevant to your use of our site.

We may also use or disclose information to: (a) resolve disputes; (b) investigate problems; (c) enforce our Website User Agreement (Terms of Use); (d) protect our operations or those of any of our affiliates; (e) protect our rights, privacy, safety, or property, and that of our affiliates, you, or others; and (f) allow us to pursue available remedies or limit the damages that we may sustain. At times, we may review the status or activity of multiple users to do so. We may disclose or access information whenever we believe in good faith that the law so requires or if we otherwise consider it necessary to do so to maintain service and improve our goods and services. In addition, as our business changes, we may buy or sell various assets. In the event all or a portion of assets owned or controlled by us or our affiliated entity are sold, assigned, transferred or acquired by another company, the information from and about our website users may be among the transferred assets.

We use your IP address to help diagnose problems with our server, to manage our website, and to enhance our site based on the usage pattern data we receive.

### **4. Third-Party Websites**

Our website may contain links to third-party websites and applications of interest that are not affiliated with us. Once you have used these links to leave our website, any information you provide to these third parties is not covered by this Privacy Policy, and we do not control the safety and privacy of your information on these third-party websites. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services, or applications that may be linked to or from our website.

### **5. Security**

We and/or our third-party service providers employ reasonable security methods designed to prevent unauthorized access, maintain data accuracy, and ensure correct use of information.

To use some of our services, you may be required to set up a password-protected account or profile on our website. We recommend that you do not divulge your password to anyone. It is your responsibility to keep your password protected. Our personnel will never ask you for your password in an unsolicited phone call or in an unsolicited email. Remember to sign out of your account, close your browser window, and delete your temporary Internet files when you have finished your session. This helps ensure that others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place where others may have access to it.

Whenever you voluntarily disclose personal information online -- for example, on message boards or blogs, through email, or in chat areas -- that information can be collected and used by others.

No data transmission over the Internet or any wireless network can be guaranteed to be perfectly secure. As a result, while we try to protect your personal information, we cannot ensure or guarantee the security of any information you transmit to us, and you do so at your own risk.

## 6. International Users

We maintain information in the United States of America and in accordance with the laws of the United States, which may not provide the same level of protection as the laws in your jurisdiction. By using our website and providing us with information, you understand and agree that your information may be transferred to and stored on servers located outside your resident jurisdiction and, to the extent you are a resident of a country other than the United States, that you consent to the transfer of such data to the United States for processing by us in accordance with this Privacy Policy.

## 7. European Union GDPR Rights

In this Section 7, we have summarized certain rights that you may have under the European Union General Data Protection Regulation 2016/679 ("GDPR") if you are a data subject covered by the GDPR. Some aspects of GDPR are complex and not all details have been provided below. Therefore, you should read the GDPR and relevant guidance from the applicable regulatory authorities for a full explanation of these rights.

Your principal rights under GDPR are: (a) the right to access; (b) the right to rectification; (c) the right to erasure; (d) the right to restrict processing; (e) the right to object to processing; (f) the right to data portability; (g) the right to complain to a supervisory authority; and (h) the right to withdraw consent.

You have the right to confirm whether we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of GDPR; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise, or defense of legal claims.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: You contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise, or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it with your consent; for the establishment, exercise, or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: The performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise, or defense of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is (a) consent; or (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used, and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, we hope that we can resolve any query or concern you raise with us about our use of your information. However, you have a legal right to

lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work, or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us via any of the contact information described in Section 9 below.

## **8. California Residents – Your California Privacy Rights**

California Civil Code Section 1798.83 permits California residents to request from us certain information regarding the disclosure of certain categories of personal information to third parties for their direct marketing purposes within the immediately preceding calendar year. A company may also comply with the law by disclosing in its privacy notice that it provides consumers choice (opt-out or opt-in) regarding sharing personal information with third parties for those third parties' direct marketing purposes, and information on how to exercise that choice.

If you are a California resident and you have questions about our practices with respect to sharing information with third parties for their direct marketing purposes and your ability to exercise choice, please send your request to us via the email address or the mailing address set forth in Section 9 below. You must put the statement "Your California Privacy Rights" in the subject field of your email or include it in your writing if you choose to write to us at the designated mailing address. You must include your name, street address, city, state, and zip code. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

If you are a California resident under the age of 18, and a registered user of our website, California Business and Professions Code Section 22581 permits you to request and obtain removal of content that you have publicly posted. To make such a request, please send an email with a detailed description of the specific content to us via the email address set forth in Section 9 below. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information that you have posted and there may be circumstances in which the law does not require or allow removal even if requested.

To the extent the California Consumer Privacy Act of 2018 (California Civil Code Section 1798.100) is applicable to our collection of information that identifies or relates to you or your household, you may have important rights free of charge. In summary, those rights include: (a) the right to know the categories of personal information to be collected and the purposes for which the information will be used (see Sections 2 and 3 above); (b) the right to know the categories of personal information that were actually collected in the preceding 12 months and sold or disclosed for business purposes in the preceding 12 months (see Sections 2 and 3 above); (c) the right to require us to respond to verifiable requests with disclosures about our collection, sale, or disclosure of your personal information (such requests may be made by contacting us as described in Section 9 below); (d) the right to access a copy of the specific pieces of personal information that we have collected about you (see Section 9 below); (e) the right to request that we delete, and request any third-party service providers to delete, any personal information collected about you (see Section 9 below); and (f) the right to opt out of the sale of your personal information to third parties (Note: we do not sell or rent personally-identifying information to third parties).

## **9. How You Can Update, Correct, or Delete Your Information**

You may access the information that we collect online and maintain through normal updating methods. To access, update, correct, or request deletion of this information, you may contact us by email at support@publicschoolworks.com, by phone at 866-724-6650, or by mail at PublicSchoolWORKS, 3825 Edwards Road, Cincinnati, OH 45209. Your account can be deleted or deactivated, but doing so will result in your not being able to access certain services. During the normal course of doing business, we will continue to share your information among our business units, our affiliates, and unaffiliated third parties as necessary to service your accounts.

## **10. Children Under 13**

We do not intentionally collect information from individuals under the age of 13. Our website is not directed to individuals under the age of 13 and we request that these individuals not provide personal information through our website. If a minor child has provided us with personally-identifying information without parental or guardian consent, the parent or guardian should contact us to remove the information and opt out of promotional opportunities or other applicable services.

## **11. Changes to Our Policy**

We reserve the right to change, add, modify, or remove portions of our Privacy Policy at any time. Any changes to our Privacy Policy will be communicated through our website and will become effective immediately as of the last updated date set forth above. Please continue to check our Privacy Policy from time to time to learn about any changes to our privacy practices. Information collected before changes are made will be secured according to the previous Privacy Policy.

## **12. Your Consent**

By using our website, you consent to the collection and use of this information in the manner described in this Privacy Policy.