



## **Angaza Elimu Service Privacy Policy**

Planet Angaza Elimu Limited. (hereafter called "Angaza Elimu " "us" or "we") knows that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This Privacy Policy describes our collection and use of personal information collected from you through the online and/or mobile services, websites, and software provided on or in connection with [www.angazaElimu.com](http://www.angazaElimu.com) (collectively, the "Service"), which are offered through (i) [www.angazaElimu.com](http://www.angazaElimu.com), (ii) mobile applications associated with [www.angazaElimu.com](http://www.angazaElimu.com), and (iii) any other Angaza Elimu website, app or online service which links to this Privacy Policy. "You" or "your" means a visitor or a user (whether signed in or not) of our Service. Your use of the Service is conditioned on your acceptance of this policy.

**A note about Student Data:** This Service may be purchased by providers of educational services, such as schools, school districts, or teachers (collectively referred to as "Schools") that use our services for educational purposes. When Angaza Elimu contracts with a School to provide the Service, we may collect or have access to Student Data (defined below), which may be provided by the School or by the student. We consider such Student Data to be strictly confidential and in general do not use such data for any purpose other than improving and providing our Services to the School or on the school's behalf. Our collection, use and sharing of Student Data is governed by our contracts with the School and any applicable laws.

### **What information does Angaza Elimu collect about you?**

Angaza Elimu collects information in several ways from different parts of the Service.

**Information you provide to us.** The type of personal information we collect may vary depending on your account type.



- **School Information.** When a teacher, school administrator, or other authorized person associated with a School registers for an account on our Service or corresponds with us, we may collect personal information such as a name, e-mail address, payment information, username and password, and information about the School.
- **Student Information.** Once registered, a School may provide information about its students, such as student names or other identifiers, passwords, e-mail address for the student or the student's parent or legal guardian, and educational level and topic of study. Personally identifiable information collected from or about students, along with other information associated with that personally identifiable information is "**Student Data.**" The School may elect to provide user names or identifiers which are not readily identifiable to anyone outside of the School community in lieu of a full student name, at its discretion.
- **Parent and Child Information.** When a parent or guardian ("Parent") registers for an account on our Service or corresponds with us, we may collect personal information such as a name, e-mail address, payment information, username and password. We may also collect information about the child(ren) authorized by the Parent to use the Service through the Parent's account, including a profile name for the child user and selection of a profile avatar. Each child user profile must be associated with a Parent account, and children cannot access the Service without the Parent first signing in to the Parent account with the Parent's sign in credentials.
- **Learning and Activity Information.** During the course of providing the Service, we collect information about your use of the Service, as well as any information that you submit to the Service, such as answers to questions. In addition, we may ask you for personal information at other times, such as when you contact our technical support team, send us an e-mail, complete a user survey or otherwise communicate with us.

#### **Information we receive from your use of our Service.**

Like most websites and online services, Angaza Elimu and our vendors automatically collect certain types of usage information when you visit [www.angazaElimu.com](http://www.angazaElimu.com), read our emails, use our Service or otherwise engage



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with us. This information is typically collected through a variety of tracking technologies, including cookies, web beacons, Locally Stored Objects (LSOs such as Flash or HTML5), log files, and similar technology (collectively, "tracking technologies"), and we may use third party providers to collect this information on our behalf. These tracking technologies collect information about how you access and use the Service (e.g., referring / exit pages and URLs, how frequently you access the Service, the pages you view, the links you click, and other actions you take on the Service); information about your browser and information about the device(s) you use to access the Service (e.g., Internet Protocol (IP address), browser type, browser language, Internet service provider, device type, model and manufacturer, a unique ID that allows us to uniquely identify your browser, device or account, operating system brand and model, and whether you access the Service from multiple devices). We may also collect information about your geographical location data. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service and to understand more about the demographics and behaviors of our users. We may also work with third party partners to employ technologies, including the application of statistical modeling tools, which permit us to recognize and contact you across multiple devices. Although we do our best to honor the privacy preferences of our users, we are unable to respond to Do Not Track signals set by your browser at this time.

We use or may use the data collected through tracking technologies to secure the Service, improve the Service, to save you time, to provide better technical support, for promotional purposes, and to track website usage. For example, tracking technologies help us to:

1. Keep track of whether you are signed in or have previously signed in so that we can display all the features that are available to you.
2. Remember your settings on the pages you visit, so that we can display your preferred content the next time you visit.
3. Customize the function and appearance of the pages you visit based on information relating to your account; for example, to default you to a particular grade level, or to remember customized settings for a report.



4. Track website usage for various purposes including website optimization, website improvement, sales, marketing, and billing.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some features and services (particularly those that require you to sign in) may not function properly if your cookies are disabled. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it. Deleting cookies does not prevent the collection of information through non-cookie technologies and does not delete Local Storage Objects (LSOs) such as Flash objects and HTML5. You can learn more about Flash objects — including how to manage privacy and storage settings for Flash cookies — on Adobe's website or by clicking [here](#). If you choose to delete Flash objects from our sites, then you may not be able to access and use all or part of the sites or benefit from the information and services offered.

We and our third-party partners may also use cookies and tracking technologies for advertising purposes. For more information about tracking technologies, please see "**Third-party tracking and online advertising**" below.

### **How Angaza Elimu uses the information we collect**

We use the information we collect for the following purposes:

**To provide and maintain the Service.** We use the information we collect to deliver the Service to you. For example, we need to use your information to process payments, personalize learning curriculum, provide Schools, Parents and students with information and reports about student and child performance and use of the Service, respond to inquiries and provide customer support.

**To improve, personalize, and develop the Service.** We use information to tailor the content and information that we may send or display to users, to offer



personalized content and instructions, and to otherwise personalize your experience while using the Service, including on various devices you may use to access the Service. We collect statistics to better understand how users access and use our Service, monitor the effectiveness of our Service, detect usage patterns, and to diagnose or fix technology problems. We also use information to demonstrate the effectiveness of the Service and perform research, and to develop, support, and improve our Service and other educational products and services.

**To communicate with you.** We use your information to provide transactional notifications for certain activities relating to your use of our Service. For example, we may send e-mail notifications when a user completes an activity, to provide receipt for payment or other subscription notices. From time to time, we may send periodic promotional or informational e-mails to School or Parent users. We do not use Student Data to send marketing communications, and we do not send marketing communications to student or child users. You may opt-out of certain communications (e.g., marketing or certain notifications about your use of the Service) by following the opt-out instructions contained in the e-mail.

**To promote safety and security and respond to legal process.** We use information to promote the safety and security of our Service, our uses and other third parties. For example, we may use the information to authenticate users, facilitate secure payments, detect and prevent fraud and other harmful activities, respond to legal requests or claims, and enforce our terms and policies.

### **How does Angaza Elimu share your information?**

Angaza Elimu may share or disclose your personal information as needed to provide our Service or with your consent or permission. We may also share personal information in the circumstances described below.

**Third parties with consent.** We share information with consent and at the direction of Schools and Parents. For example, a School or Parent may direct Angaza Elimu to share specific information with another individual, such as



when a teacher directs Angaza Elimu to send a communication to a parent. Similarly, we may share personal information with third parties, for example, if a School authorizes Google login or similar authentication tools for that School's user accounts.

**Others within the School.** Angaza Elimu may share information collected from users associated with a School with other users or persons designated by the School, such as teachers and school administrators of that School.

**Vendors and Service Providers.** Angaza Elimu may share information with our trusted vendors, third party service providers and individuals to provide services or products for us or on our behalf, which may include analytics, hosting, billing, targeted advertising, and marketing. Some of these service providers or vendors may send you e-mails on our behalf. Vendors and service providers who have access to Student Data, if any, shall be contractually bound to uphold privacy and confidentiality terms no less protective than those provided herein.

**Aggregate or De-Identified Information.** We may share information in aggregated and/or anonymous form that cannot reasonably be used to identify an individual. For example, Angaza Elimu may disclose aggregated user statistics (i.e., the total number or percentage of Angaza Elimu users from a particular geographic region) in order to describe our services to current and prospective partners and other third parties, and for other lawful purposes.

**Merger or Sale.** If Angaza Elimu becomes involved in a merger, acquisition, bankruptcy, change of control, or any form of sale of some or all of its assets, your personal information may be transferred or disclosed in connection with the business transaction. In such an event, we will make efforts to provide notice before personal information is transferred and becomes subject to a different privacy policy. We will not transfer Student Data associated with School accounts in the event of a merger or sale unless the recipient has committed to The Student Privacy Pledge principles or similarly stringent privacy protections, or we will provide Schools with notice and an opportunity



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to opt-out of the transfer of Student Data by terminating their accounts and any associated student users before the transfer occurs.

**Other.** Angaza Elimu may release personal information if it has a good faith belief that access, use, preservation, or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process, or enforceable governmental request; (b) enforce applicable Terms of Service, including investigation of potential violations thereof; (c) detect, prevent or otherwise address fraud, security or technical issues; (d) protect the rights, property, or personal safety of Angaza Elimu, its users, or the public; or (e) as required or permitted by law.

### **Third-party tracking and online advertising**

Angaza Elimu does not display any targeted advertising on the Service.

**Please note that although we may permit third party advertising partners to collect information from visitors to the Service for the purpose of displaying advertisements on other websites or online services on our behalf, we take many steps to prevent these third-party advertising networks from collecting information for targeted advertising purposes once a subscriber to our Service signs into our Service. Please note that we rely on cookies to identify whether you are a subscriber to our Service and if you delete or block cookies, you may also delete the Angaza Elimu cookie which prevents subscribers from receiving targeted Angaza Elimu advertisements on other websites or online services.**

### **How to control e-mail communications**

Angaza Elimu may, from time to time, send you e-mail regarding our products and services, or your use of our products and services. Only Angaza Elimu (or its vendors or service providers operating on its behalf) will send you these e-mails. You can choose not to receive these e-mails by clicking the unsubscribe link in any e-mail or by contacting [info@angazaElimu.com](mailto:info@angazaElimu.com).



Please note that you are not permitted to unsubscribe or opt-out of non-promotional messages regarding your account, such as account verification, changes or updates to features of the Service, or technical or security notices.

### **How to access, update or delete your personal information**

You may edit your account information at any time by signing in to your account, clicking on the account menu in the upper-right corner, and selecting Profile & settings. We recommend that you review your personal information periodically to ensure that it is accurate, complete, and current. If you do not provide and maintain accurate contact information for your account, we may not be able to provide you with the notices set forth in this Privacy Policy. If you are a parent or guardian of a student who uses the Angaza Elimu Service through a School, please refer all questions and requests regarding access, modification, or deletion of your student's user account or Student Data to your child's school. The School may, at its discretion, address such requests with Angaza Elimu and Angaza Elimu shall respond promptly to all access, modification and deletion requests it receives from Schools.

### **How long does Angaza Elimu retain your information?**

We will retain personal information for as long as needed to provide the Service and for our internal business purposes, which may extend beyond the termination or cancellation of your subscription or user account. For example, we may retain certain data as necessary to prevent fraud or future abuse, for recordkeeping or other legitimate business purposes, or if required by law. We may also retain and use information which has been de-identified or aggregated such that it can no longer reasonably identify a particular individual. All retained personal information will remain subject to the terms of this Privacy Policy.



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Student Data. We will not knowingly retain Student Data beyond the time period required to support an educational purpose, unless authorized by a School or parent. We do not delete or de-identify any Student Data from an active student user account associated with a School except at the direction of the School. The School is responsible for maintaining current student rosters and identifying Student Data which the School no longer needs for an educational purpose by removing students from the school's master roster or by submitting a deletion request.

Unless otherwise directed by a School or Parent, we will delete or de-identify personal information of student and child users after a period of inactivity, after the termination or cancellation of the license subscription, or after termination of our agreement with the School, in accordance with the terms of any applicable written agreement with the School, written requests from authorized School administrators, and our standard data retention schedule. Authorized School administrators may contact us to request additional information about our standard data retention schedule and available options for customizing Angaza Elimu 's standard data retention schedule to meet individual School requirements.

We may not be able to immediately or completely delete all data in all instances, such as information retained in technical support records, customer service records, backups, and other similar business records. We will not be required to delete any information which has been de-identified or disassociated with personal identifiers such that the remaining information cannot reasonably be used to identify a particular individual.

### **How does Angaza Elimu protect your information?**

**Information Security.** The security of your personal information is very important to us. We have implemented a variety of physical, administrative and technological safeguards designed to preserve the integrity and security of the personal information we collect and to protect against unauthorized access to data. These include internal reviews of our data collection, storage, and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store



personal data. We restrict access to personal information to Angaza Elimu employees, contractors, and agents who need to know that information in order to operate, develop, or improve our services. Our employees may be subject to disciplinary action, including termination, if they fail to meet privacy and confidentiality obligations. However, no security system is impenetrable—for that reason, we cannot guarantee the security of your personal information. If personal information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and take all steps required by applicable laws and regulations and our agreements with any affected Schools.

Maintaining the security of your personal information also requires your cooperation and involvement. For your protection, remember to sign out of all accounts before closing your browser. There is a sign out link available on most Angaza Elimu pages. After signing out, make sure to close all browser windows. In addition, do not use the "Remember" feature if you are signing in to your account from a computer that other persons may have access to. This is to ensure that others cannot access your personal information if you share a computer with someone else or are using a public computer.

Please keep your password secure. If you have forgotten your password, you may request a new one by contacting us. A new password will be sent to the e-mail address you specified during registration.

### **How does Angaza Elimu protect Student Data and comply with laws?**

When Angaza Elimu provides the Service to Schools, our collection, use and disclosure of Student Data is governed by our Terms of Service and/or any other agreement with the School, by the provisions of the law.

As part of our commitment to student privacy, when we have access to Student Data through the provision of our Services to a School, the following core principles guide our decisions around data, security, and technology:

- Angaza Elimu does not collect, maintain, use or share Student Data beyond that needed for an authorized educational or school purpose, or as authorized by our agreement with a School.
- Angaza Elimu does not use or disclose Student Data for targeted advertising purposes.



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- Angaza Elimu does not build a personal profile of a Student other than in furtherance of School purpose, or as authorized by a parent.
- Angaza Elimu will maintain a comprehensive data security program designed to protect the types of Student Data maintained by Angaza Elimu .
- Angaza Elimu will not knowingly retain Student Data beyond the time period required to support the School's purpose, unless authorized by the parent.
- Angaza Elimu will clearly and transparently disclose our data policies and practices.
- Angaza Elimu will never sell Student Data unless the sale is part of a corporate transaction, such as a merger, acquisition, bankruptcy, or other sale of assets, in which case we will use our best efforts to ensure the successor entity honors the privacy commitments made in this policy and/or we will notify the School of such a sale and provide the School an opportunity to opt-out by terminating its account before the data transfer occurs.
- We will not make any material changes to our Privacy Policy or Terms of Service that relate to the collection or use of Student Data without first giving notice to the School and providing a choice before the Student Data is used in a materially different manner than was disclosed when the information was collected.

### **Links to other websites and services**

The Services may contain links to and from third-party websites of our business partners, advertisers, and social media sites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and their practices are not covered by this Privacy Policy. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. We are not



responsible for the privacy practices or the content on the websites of third-party sites.

### **Angaza Elimu Service Children's Privacy Policy**

Angaza Elimu does not permit children under the age of 18 ("Child") to create an account and does not knowingly collect personally identifying information from children under the age of 18 without the consent and at the direction of a parent.

Angaza Elimu permits Parents to set up child profiles associated with the Parent account so that children may access the Service under the Parent's supervision. We take special precautions to collect only as much information as is reasonably necessary for the child to use the Service and to ensure that Parents have access to and control of their child's use of the Service.

This Children's Privacy Policy applies to all users of child profiles associated with a Parent account, regardless of the age of the child.

By creating a child profile associated with a Parent account and permitting your child to use the Angaza Elimu Service, you expressly agree to the practices described in this Children's Privacy Policy and you consent to the collection, use, and disclosure of your child's personal information as described herein.

### **What information does Angaza Elimu collect from or about a child and how does Angaza Elimu use this information?**

**Information you provide us.** Through the Parent's account set-up, the Parent provides information about the child(ren) authorized by the Parent to use the Service through the Parent's account, including a profile name. We recommend that the Parent selects a profile name that does not include the real name or identifying characteristics of the child. The Parent may also create a "secret word," which functions similar to a password to access the child profile, though it cannot be used to sign in to the Service without the Parent first signing in to the Parent's account using the Parent's login credentials. Angaza



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Elimu does not request a birthdate or any additional personal information from the user of the child profile. Angaza Elimu uses this information to provide the Service to the user of the child profile. Angaza Elimu uses the e-mail address provided by users of Parent accounts to communicate messages about the account, such as subscription notices and password resets, and the child user reports and awards.

**Information collected from the Child's use of the Service.** During the course of providing the Service, we collect information about the user of the child profile's use of the Service and information submitted to the Service, such as answers to questions, for the purpose of providing feedback to the user and for compiling reports and awards.

When your Child accesses the Service we automatically collect and store usage information as well as information about the device used by the Parent and Child to access the Service. For example, we collect an IP address, location, browser type, language preferences, and other information about the device used to access the Service, such as the device type, model and manufacturer and a unique identifier which allows us to uniquely identify your browser, device, or account, as well as account usage information such as the day/time stamp, referring/exit pages and URLs, pages viewed, and similar information. This information is typically collected through a variety of tracking technologies, including cookies, web beacons, log files, and similar technology (collectively, "tracking technologies"), and we may use third party providers to collect this information on our behalf. This data collection is explained in greater detail in Section 1 of our Privacy Policy under the sub-heading "Information we receive when you use the Service."

We use this information to secure and improve the Service, to provide personalized content and information, to remember you when you return to the Service at a later time or using a different device, to improve the Service, to save you time, to provide better technical support, to track website usage and other similar purposes.



### **How we disclose information**

Angaza Elimu may share or disclose a child's personal information as needed to provide our Service or with your consent or permission. For example, we share information with our trusted vendors, third party service providers and individuals to provide services for us on our behalf, which may include analytics providers and hosting services. We may also share personal information if we have a good faith belief that access, use, preservation, or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process, or enforceable governmental request; (b) enforce applicable Terms of Service, including investigation of potential violations thereof; (c) detect, prevent or otherwise address fraud, security or technical issues; (d) protect the rights, property, or personal safety of Angaza Elimu, its users, or the public; or (e) as required or permitted by law. If Angaza Elimu becomes involved in a merger, acquisition, bankruptcy, change of control, or any form of sale of some or all of its assets, personal information may be transferred or disclosed in connection with the business transaction, subject to any applicable laws. We may also share aggregate or de-identified information in a manner that cannot be reasonably used to identify an individual user.

### **Third party tracking and online advertising on the Service**

Angaza Elimu does not display any targeted advertising on the Service. We work with third-party online advertising networks which use tracking technologies (such as cookies, web beacons and similar technologies) to collect information about visitors to direct targeted advertising on other websites or services.

We take certain steps designed to avoid these third-party tracking technologies from collecting information from users of Child profiles for targeted advertising purposes, by taking steps to disable such tracking



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technologies once a subscriber to our Service (e.g., the Parent) logs into our Service, maintaining the preferences for as long as the subscriber is signed in, and by remembering these preferences the next time you return to our Service using the same browser or device. Please note that we rely on cookies to identify whether you are a Subscriber and if you delete or block cookies you may also delete the Angaza Elimu cookie which allows us to recognize returning users and prevent subscribers from receiving targeted Angaza Elimu advertisements on other websites or services. These preferences are unique to the browser or device you used to sign in to the Service. Therefore, third-party tracking technologies may be present if you navigate to certain pages of our website using a new browser or device until you sign in to your account on that browser or device.

### **Our practices involving Schools**

When Angaza Elimu is used by a School in an educational setting, the School may authorize Angaza Elimu to collect information from a child under 18. If you are a Parent whose child accesses the Angaza Elimu Service through a School, please contact the child's School to request to access, review and/or delete your child's information. Angaza Elimu will process such requests promptly as directed by the School.