



PRIVACY POLICY STUDENTS & TEACHERS

- We do not collect or store personal information for unregistered students and teachers.
- Newline Engage does not require students to register or login. No personal details are required to use the service.
- Students of any age can use the service without registration.
- Teachers with students under the age of 16 if you need students to register with Newline Engage, please read our Regulation (EU) 2016/679 (General Data Protection Regulation) compliance notice below.
- While joining a class, students enter a name to help teachers identify them. Aliases or nicknames can be used.
- No information is disclosed or sold to third parties.
- No cookies are used to track and no tracking-based promotions or advertisements are displayed.
- Online analytics services are used to gauge site performance and user behavior anonymously.
- Newline Engage is hosted within the European Union. A more detailed privacy statement is included below.
- Regulation (EU) 2016/679 (General Data Protection Regulation) Compliance

Last Updated: Jan 01 2023

Newline Engage does not collect any personal information if used without registration. GDPR mandated parental consent is required only if teachers or institutions require their students to register.

This policy is in accordance with the Regulation (E.U.) 2016/679, General Data Protection Regulation ("GDPR") and outlines our practices world-wide regarding the personal information of all students under 14 13. For more information about GDPR and general tips about protecting children's online privacy, please visit OnGuard Online.

Children consent and legal guardians authorization.

With regard to school-based activities, GDPR admits the validity of the consent given by minors provided they are at least 16 , exclusively. For any other purposes, parents or legal guardians consent will be necessary for the collection of personal information from children. Schools should always notify parents about these activities. Newline Engage requires schools, districts, or teachers to obtain parental consent. Newline Engage requests students for an email address, or google user id, or Facebook user id to register. This information is collected for controlling access to Newline Engage services.

If you are accessing Newline Engage on behalf of a Class, School or District, the following provisions also apply:

- You represent and warrant that you are solely responsible for complying with the GDPR requirements to secure parental consent for accessing applications which require personal information from children under 16.
- You may need to obtain verifiable parental consent ("Consent") from all parents whose children will be accessing Newline Engage and provide a copy to us upon our request.
- When obtaining such consent, you undertake to provide parents with a copy of our Privacy Policy.

E.U. member States Compliance

- Member States Policy: GDPR allows member States to set a lower age to accept as valid, the consent given by minors in absence of a further authorization by the minor parents or legal guardians. If your residence is localized in any of the countries detailed below, please be aware that any mentions to the age of 16 made in this document, must be substituted by the following age limits:
 - France and Greece: 15 years
 - Spain: 14 years
 - Denmark, Portugal, Sweden and UK (disregarding its abandonment of the UE): 13 years.

Please be aware that any duties and obligations required from you according to this document, will also be claimable from you with respect to the aforementioned limits.

Ownership of Student Records: Any and all Student Records provided to Newline Engage, or to which Newline Engage has been granted access, are and shall remain the sole property of the School District or local educational agency (collectively, "School District") that provided or granted access to such records.

Student-Generated Content: Pupil content can be downloaded by the LEA and pupils. The system may remove pupil content for service efficiency reasons and to abide by the requirement for removal of data when no longer needed to provide service.

Pupils and LEA will be unable to download removed content. Date for content removal is advertised to the pupil and LEA. Pupils can move pupil generated content by downloading from LEA-provided accounts and uploading to a personal account.

Third Party Access and Use: Newline Engage prevents third parties working directly or contracted with us from accessing or utilizing any student record under Newline Engage's control (internal network). Newline Engage does not use any information in a student record for any purpose other than those required or specifically permitted by the Newline Engage Terms and Conditions and Privacy Policy Statement.

Parent and Student Review Procedures: Newline Engage allows pupils and parents to request review of the information stored by Newline Engage by sending a request to support@newline-interactive.com.

Security and Confidentiality of Student Records: Newline Engage stores student login records in a secure database in the cloud with encryption at rest and for in-flight data. Access to the records is limited only to employees needing access to run the service.

Unauthorized Disclosure: In the unlikely event any Student login records are inadvertently compromised via an outside data breach or for any other reason, Newline Engage shall notify the School District that owns such records immediately upon the discovery of such inadvertent disclosure. The School District may in turn notify affected parents, legal guardians, or eligible students as the School District deems appropriate.

Post-Contract Data Deletion: Any and all Student Records provided to Newline Engage, or to which Newline Engage has been granted access, are and shall remain the sole property of the School District or local educational agency (collectively, "School District") that provided or granted access to such records. Schools have the right to review, have deleted and/or refuse to permit further collection or use of the student's information upon request.

Newline Engage hereby certifies that, upon the termination of a service contract with a School District, it shall isolate and permanently delete any and all Student login records belonging to such School District that may remain on the System, unless the School District or applicable regulations require the retention of such data, in which case the records shall be deleted upon the expiration of the retention period.

GDPR and member States Compliance: Newline Engage offers School Districts interfacing with Newline Engage Systems the means to comply with their obligations under the GDPR and member States regulations, by enabling Authorized Users to inspect and review Pupil Records and to correct any inaccuracies therein as described in Section 4 of this Statement.

Prohibition Against Targeted Advertising: Newline Engage will never use any student identifiable information in direct targeted advertising for any product or service. Furthermore, Newline Engage does not sell, trade, or rent any element of personally identifiable information to any third party.

PRIVACY NOTICE

Last updated January 1, 2023

Thank you for choosing to be part of our community at Epiphani Inc ("Company", "we", "us", or "our"). We are committed to protecting your personal information and your right to privacy.

If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at support@newline-interactive.com.

When you visit our website <https://newline-engage.com> (the "Website"), and more generally, use any of our services (the "Services", which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website), as well as any related services, sales, marketing or events.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to

We collect personal information that you voluntarily provide to us when you register on the Website, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The personal information we collect may include the following:

Personal Information Provided by You. We do not collect or store personal information for unregistered students and teachers. For registered users, we collect their names and email addresses.

Social Media Login Data. We may provide you with the option to register with us using your existing social media account details, Facebook, and Google. If you choose to register in this way, we will collect the information described in the section called "[HOW DO WE HANDLE YOUR SOCIAL LOGINS](#)" below.

When you create a paid account with Newline Engage, or initiate a financial transaction, we will use a third-party payment processor to process the payment. We do not collect your credit card number, expiration date, or pin number. We only retain subscribed plan information. The third-party payment processor retains payment information. Please note that we do not control and are not responsible for personal information collected by third party payment processor. We strongly recommend that you review their privacy policy at the time of check-out. You may review their [privacy policy](#) and [terms of service](#) here as well.

2. HOW DO WE USE YOUR INFORMATION?

We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To facilitate account creation and logon process. If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed "[HOW DO WE HANDLE YOUR SOCIAL LOGINS](#)" for further information.
- To manage user accounts. We may use your information for the purposes of managing our account and keeping it in working order.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

Newline Engage prevents third parties working directly or contracted with us from accessing or utilizing any student record under Newline Engage's control (internal network). Newline Engage does not use any information in a student record for any purpose other than to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.

We may process or share your data that we hold based on the following legal basis:

Consent: We may process your data if you have given us specific consent to use your personal information for a specific purpose.

Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

No cookies are used to track and no tracking-based promotions or advertisements are displayed.

5. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

If you choose to register or log in to our services using a social media account, we may have access to certain information about you.

Our Website offers you the ability to register and login using your third-party social media account details (like your Microsoft or Google logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive include your name, and email address.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Website. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

- Newline Engage stores student login records in a secure database in the cloud with encryption at rest and for in-flight data. Access to the records is limited only to employees needing access to run the service.

8. HOW WILL WE NOTIFY OF A BREACH?

Notification of Breach and Unauthorized Release

- Notify of any breach of security resulting in an unauthorized release of student data or teacher or principal data, in the most expedient way possible and without unreasonable delay but no more than seven (7) calendar days after we have discovered or been informed of the breach or unauthorized release. (Users will be notified at their registered email addresses).

- We will provide as much information as possible about the incident, including but not limited to: a description of the incident, the date of the incident, the date we discovered or was informed of the incident, a description of the types of protected data involved, an estimate of the number of records affected, what we have done or plan to do to investigate the incident, stop the breach and mitigate any further unauthorized access or release of Protected Data, and contact information for our representatives who can assist affected individuals that may have additional questions.

Please refer to our detailed [Data Breach Policy](#).

9. WHAT ARE YOUR PRIVACY RIGHTS?

You may review, change, or terminate your account at any time.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have questions or comments about your privacy rights, you may email us at support@newline-interactive.com.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may:

- Access your account settings and update your preferences.
- Contact us using the contact information provided.

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

11. SPECIFIC PRIVACY RIGHTS

What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

| Category | Examples | Collected |
|---|--|------------------------------|
| A. Identifiers | Contact details, such as name, email address | YES |
| B. Personal information categories | Name, contact information, education, employment, employment history and financial information | YES (Name and Email only) |
| C. Protected classification characteristics | Gender and date of birth | NO |
| D. Commercial information | Transaction information, purchase history, financial details and payment information | NO |
| E. Biometric information | Fingerprints and voiceprints | NO |

| | | |
|--|---|----|
| F. Internet or other similar network activity | Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements | NO |
| G. Geolocation data | Device location | NO |
| H. Audio, electronic, visual, thermal, olfactory, or similar information | Images and audio, video or call recordings created in connection with our business activities | NO |
| I. Professional or employment-related information | Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply for a job with us | NO |
| J. Education Information | Student records and directory information | NO |
| K. Inferences drawn from other personal information | Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics | NO |

We may also collect other personal information outside of these categories in instances where you interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

How do we use and share your personal information?

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at support@newline-interactive.com, or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your right to opt-out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Will your information be shared with anyone else?

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal data.

Epiphani Inc has not disclosed or sold any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. Epiphani Inc will not sell personal information in the future belonging to website visitors, users and other consumers.

Your rights with respect to your personal data

Right to request deletion of the data - Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell your personal information to third parties;
- the categories of personal information that we sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Other privacy rights

- you may object to the processing of your personal data
- you may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data
- you may request to opt-out from future selling of your personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, you can contact us by email at support@newline-interactive.com, or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

12. DO WE MAKE UPDATES TO THIS NOTICE?

Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), by email at support@newline-interactive.com, or by post to:

Newline Interactive Europe
Ronda de Poniente 2, 1B
28760, Tres Cantos, Madrid
Spain

HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please visit: support@newline-interactive.com. We will respond to your request within 30 days.

DATA BREACH POLICY

What Is a Personal Data Breach?

Data breaches may be caused by the following (but not limited to)

- Human error includes unauthorized access or disclosure of sensitive information to wrong recipients.
- Malicious causes include hacking incidents / Illegal access to cloud services where personal data is stored.
- Computer System Error causes include errors or bugs in Newline Engage and/or failure of cloud services, cloud computing or cloud storage security / authentication / authorization systems.

Responding to a Data Breach

Upon being notified of a (suspected or confirmed) data breach, the Data Breach Team should immediately activate the data breach & response plan.

Newline Engage's data breach management and response plan are:

1. Confirm the Breach
2. Contain the Breach
3. Assess Risks and Impact
4. Report the Incident
5. Evaluate the Response & Recovery to Prevent Future Breaches

1. Confirm the Breach

The Data Breach Team (DBT) should act as soon as it is aware of a data breach. Where possible, it should first confirm that the data breach has occurred. It may make sense for the DBT to proceed Contain the Breach on the basis of an unconfirmed reported data breach, depending on the likelihood of the severity of risk.

2. Contain the Breach

The DBT should consider the following measures to Contain the Breach, where applicable:

- Establish whether steps can be taken to limit any damage caused by the breach.
- Prevent further unauthorized access to the system.
- Reset passwords if accounts and / or passwords have been compromised.
- Isolate the causes of the data breach in the system, and where applicable, change the access rights to the compromised system and remove external connections to the system.

3. Assess Risks and Impact

Knowing the risks and impact of data breaches will help determine whether there could be serious consequences to affected individuals, as well as the steps necessary to notify the individuals affected.

4. Reporting Breaches

All members of staff have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary.
- Maintain a register of compliance failures.
- Notify the school districts of any compliance failures that are material either in their own right or as part of a pattern of failures.

support@newline-interactive.com will notify any affected school districts without undue delay after becoming aware of a personal data breach.

We will provide as much information as possible about the incident, including but not limited to

5. Preventing Future Breaches

Once the data breach has been dealt with, Newline Engage will consider its security processes with the aim of preventing further breaches. In order to do this, we will:

- Establish what security measures were in place when the breach occurred Assess whether technical or organisational measures can be implemented to prevent the breach happening again.
- Consider whether there is adequate staff awareness of security issues and look to fill any gaps through training or tailored advice.
- Consider whether its necessary to conduct a privacy or data protection impact assessment.
- Consider whether further audits or data protection steps need to be taken to update the data breach register.

Continuous Monitoring

We will monitor the effectiveness of this and all of our policies and procedures and conduct a full review and update as appropriate. Our monitoring and review will include looking at how our policies and procedures are working in practice to reduce the risks posed to our users.