Privacy Policy

Last updated: November [22], 2022

[United for Literacy] and our affiliates and subsidiaries ("**Organization**", "**We**", "**Our**" or "**Us**") respect your privacy and are committed to protecting it. We set out how we do that in this Privacy Policy. This Privacy Policy describes the Organization's policies and procedures on the collection, use and disclosure of information that individuals ("**You**" or "**Your**") may provide when You download, install, register with, access, or use the United for Literacy Reading Application (the "App"), and the types of information that We may collect from You when You do so. By using the App, you agree to the collection and use of Your personal information in accordance with this Privacy Policy.

This Privacy Policy applies only to information We collect in this App, and other electronic communications sent through or in connection with this App, and DOES NOT apply to any information that You provide to or is collected by any third party.

Please read this Privacy Policy carefully. If you do not agree with the Organization's policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, You indicate that You understand, accept, and consent to the practices described in this Privacy Policy.

This Privacy Policy may change from time to time. Your continued use of this App after We make changes indicates that You accept and consent to those changes, so please check the Privacy Policy periodically for updates. [We will notify you in advance of any material changes to this Privacy Policy and obtain Your consent to any new ways that We collect, use, and disclose Your personal information]

Types of Data We Collect About You and How We Collect It

Personal Information

While registering for, using or accessing the App, We may ask You to provide Us with personal information that We can reasonably use to directly or indirectly identify You, such as Your name, the city and province in which you reside, user name or other similar identifier, and any other identifier we may use to contact You (**"personal information"**).

Technical Data

Technical data is collected automatically when registering, using and accessing the App through a mobile device, including:

- the type of mobile device You use.
- time zone settings.
- Your mobile device unique ID, the IP address of Your mobile device;
- Your mobile operating system.
- the type of mobile Internet browser You use.
- information Your browser sends to us when you access or use the App.
- usage details.
- unique device identifiers (including without limitation any IDs assigned by application stores (for example Google Play or Apple App Store) to support essential use cases such as analytics and fraud prevention) and other diagnostic data.

In some cases, technical data may also be personal information.

We collect information about You through:

- **Direct interactions** with You when You provide it to Us, for example, by filling in forms or corresponding with Us.
- Automated technologies or interactions, when You use the App, for example, usage details, and IP addresses.

Please note that the App's search field is integrated with Google Book's API and any content that You include in this field (including, book name, book total pages, author, book genre, book publisher and international standard book number) may be made publicly available on Google services as described by the Books Privacy Policy at https://books.google.com/googlebooks/privacy.html.

How We Use Your Personal Information

We use information that We collect about You or that You provide to Us, including any personal information:

- To provide and maintain the App and its content, including to monitor the usage of our App.
- To manage Your registration as a user of the App.
- To carry out Our obligations and enforce Our rights in any contracts with You, including for billing and collection.
- To satisfy any legal, dispute resolution, accounting, or reporting requirement.
- To notify You when App updates are available, and of changes to any products or services We offer or provide though it.
- To fulfill the purposes for which You provided it or that were described when it was collected or any other purpose for which You provide it.
- To provide You with news, special offers and general information about other goods, services and events which We offer unless You have opted not to receive such information.

- To attend and manage Your requests to Us.
- To conduct data analysis, identify usage trends, determine the effectiveness of our promotional campaigns and to evaluate and improve our App, products, services, marketing and Your experience.
- For any other purpose with Your consent.

In some cases, we use third parties to help provide our services. This means that we must transfer your personal information to them. We transfer personal information that We collect or that You provide as described in this Privacy Policy:

- With contractors, service providers, and other third parties that We use to support Our business. We require these third parties to keep personal information confidential, use it only for the purposes for which We disclose it to them, and to process personal information following the same standards set out in this Privacy Policy
- For business transfers. According to applicable law, We may share or transfer Your personal information in connection with, or during negotiations of, any merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Organization's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Organization about our customers and users is among the assets transferred.
- With Our affiliates, in which case we will require those affiliates to follow the same standards set out in this Privacy Policy. "Affiliates" include Our parent organization and any other subsidiaries, joint venture partners or other companies or organizations that We control or that are under common control with Us.
- With business partners. We may share Your information with Our business partners to offer You certain products, services or promotions. We contractually require these third parties to keep personal information confidential, use it only for the purposes for which We disclose it to them, and to process personal information following the same standards set out in this Privacy Policy.

Disclosure of Your Personal Information

We may disclose personal information that We collect or that You provide as described in this Privacy Policy:

- To comply with any court order, law, regulation or legal process, including to respond to any government or regulatory request, according to applicable law or regulation.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Organization, our customers, or others.
- To enforce our rights arising from any contracts between You and Us, including the App Terms of Service, and for billing and collection, if applicable.

- In limited circumstances we may also provide personal information to potential acquirers of the Organization or its assets. In that case, we will use contractual means to ensure the potential buyers promise to keep your information secure, and, if the acquisition proceeds, to only use the information for the purposes for which you disclosed it and in a manner consistent with this Privacy Policy. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should a sale or transfer occur, we will use reasonable efforts to try to require that the transferee to only use the information for the purposes for which you disclosed it and in a manner consistent with this Privacy Policy.
- For any other purpose We disclose when You provide the information, including as otherwise required or permitted by law.
- To fulfill the purpose for which You provide it.
- With Your consent.

We may disclose aggregated information about our App users, and information that does not identify any individual, without restriction.

Retention of Your Personal Information

Except as otherwise permitted or required by applicable law or regulation, the Organization will retain Your personal information only for as long as is necessary to fulfill the purposes the Organization collected it for as set out in this Privacy Policy, subject to business and legal requirements.

The Organization will also retain technical data, including without limitation, your login information, device type, time zone setting, and usage details, for internal analysis purposes. Technical data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our App, or We are legally obligated to retain this data for longer time periods.

Under some circumstances, We may anonymize or aggregate your personal information so that it can no longer be associated with You. We reserve the right to use such anonymous and de-identified data without further notice to You or Your consent.

Processing Personal Information Outside Canada

Your information, including personal information, is processed at the Organization's operating offices and in any other places where the parties involved in the processing are located.

We may process, store, and transfer your personal information in and to other countries with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information. Whenever we engage a service provider, we require that its privacy and security standards comply with this Privacy Policy and applicable Canadian laws.

By submitting your personal information or engaging with the App, You consent to this transfer, storage, or processing.

Accessing and Correcting Your Personal Information

It is important that the personal information We hold about You is accurate and current. Please keep Us informed if Your personal information changes. By law You have the right to request access to and to correct the personal information that We hold about You.

We may request specific information from You to help Us confirm Your identity and Your right to access, and to provide You with the personal information that We hold about You or make Your requested changes. Applicable law or regulation may allow or require Us to refuse to provide You with access to some or all of the personal information that We hold about You, or We may have destroyed, erased, or made Your personal information anonymous in accordance with Our record retention obligations and practices. If We cannot provide You with access to Your personal information, We will inform You of the reasons why, subject to any legal or regulatory restrictions.

Security of Your Personal Information

The security of Your personal information is important to Us, but unfortunately no method of transmission over the Internet, or method of electronic storage is completely secure. Although We do our best to protect Your personal information, We cannot guarantee the security of Your personal information transmitted through the App. Any transmission of personal information is at Your own risk. We are not responsible for circumvention of any App privacy settings or security measures. We do, however, use physical, electronic, and administrative measures designed to secure Your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Where we have given You (or You have chosen) a password for access to certain parts of our App, You are responsible for keeping it confidential. We ask You not to share Your password with anyone.

Withdrawing Your Consent

Where You have provided Your consent to the collection, use, and transfer of Your personal information, You may have the legal right to withdraw Your consent under certain circumstances. To withdraw Your consent, if applicable, contact Sathya Amirthavasagam at samirthavasagam@unitedforliteracy.ca. Please note that if You withdraw Your consent We may not be able to provide You with a particular product or service. We will explain the impact to You at the time to help You make Your decision.

Children under the Age of 13

Our App is not intended for use by anyone who is under the age of 13. No one under age 13 may provide any information, personal or otherwise, to or on the App. We do not knowingly collect personal information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with personal information, please contact us at: samirthavasagam@unitedforliteracy.ca. If We become aware that We have collected personal information from anyone under the age of 13 without verification of parental consent, We will delete that information.

If We need to rely on consent as a legal basis for processing any information collected through the App and applicable law or regulation requires consent from a parent, or guardian, We may require a parent's or guardian's consent before We collect and use that information.

Third Party Consents

If You are entering or disclosing information to or on the App on behalf of someone else, You are responsible for procuring all necessary consents and permissions as required by applicable law or regulation.

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Contact Us

If you have any questions about this Privacy Policy, You can contact us at:

Sandi Kiverago United for Literacy 35 Jackes Ave, Ontario, M4T 1E2, Canada

and/or <u>skiverago@unitedforliteracy.ca</u> and/or by visiting this page on our website: <u>https://www.unitedforliteracy.ca/contact</u>

For additional information around or privacy policy please see this page: <u>https://www.unitedforliteracy.ca/privacy-policy</u>