

Grayboard privacy policy

The following privacy policy applies to personal data collected by Grayboard at www.Grayboard.com, Behind the or other Grayboard websites, and data that may be collected through the provision of Grayboard products or services (collectively, the "Services"). Grayboard LLC and any of its affiliates (collectively "Grayboard") are committed to protecting the privacy of its users. Because Grayboard gathers certain types of information about the users of the Services, we believe you should fully understand the terms and conditions surrounding the use of the information we collect. The following discloses our information gathering and dissemination practices for the Services. If you are using any of the Services through an educational or other institution that is a customer of Grayboard, this policy does not supersede the terms of any agreements between Grayboard and any other party, nor does it affect the terms of any agreement between any user of the Services and their employer, their educational institution or any third party. Please make sure that you read the terms of any privacy policies that you enter into with parties other than Grayboard, including your employer or educational institution, as those policies may also explain how your personal information is used by those parties. Please review the following statement to understand how the information you provide to Grayboard through the Services will be treated.

1. Information Grayboard collects

You are free to utilize some of the Services without identifying yourself; however, if you would like to utilize or customize some features of the Services, you must first register with Grayboard. When you register, we will request certain personal information, including, but not limited to, contact information, such as your name, city and state, and e-mail address as well as demographic information such as your age, gender and interests. This information better enables us to provide you with content relevant to your interests and provides us with aggregate data that Grayboard uses to improve the Services. We may also ask you for information about your system or how you use Grayboard products and services, and we will collect information through your use of the Service, including your actions taken on the Service and your communications with others through the Service. Please see Section 5, below, for information on how to access or update this information and see Section 7 for information on how we collect and use Student Data.

Grayboard gathers information about all users collectively, such as what areas users visit most frequently and what services users access most often. Grayboard automatically logs IP addresses, session sources, and other data which tracks users' access to the Services. We may analyze these logs for sales and marketing purposes as well as system performance monitoring. These logs are analyzed for the aggregate trends they reveal about our customers and how the customers use the Services. We may also 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 of our users. These tools collect information sent by your browser or mobile device, including the pages you visit, your use of third party applications, and other information that assists us in analyzing and improving the Services. Although we do our best to honor the privacy preferences of our visitors, we are not able to respond to Do Not Track signals from your browser at this time.

When you access our Services by or through a mobile device, we may receive or collect and store unique identification numbers associated with your device or our mobile application (including, for

example, a UDID, Unique ID for Advertisers (“IDFA”), Google Ad ID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and, depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device.

2. Purposes of data collection

Grayboard requests personal information to operate, maintain and provide to you the features and functionality of the Services and to communicate directly with you, as well as for possible purposes such as the provision of customer service and support, billing, network management, customer surveys, sales management, support, newsletter subscriptions, user group memberships, event registration and sponsorship, offers of related services, and other exchanges of information.

3. What Grayboard does with the information it collects

Grayboard may make chat rooms, forums, message boards, and/or news groups available in certain areas of the Services. Please remember that any information that is disclosed in these areas becomes public information, and you should exercise caution when deciding to disclose your personal information.

The personal information you supply to Grayboard will not be given, sold, rented, loaned, or otherwise disclosed to any third parties outside of Grayboard and its agents, except when we have your permission or under special circumstances, such as when we believe in good faith that disclosure is reasonably necessary to (i) comply with legal process, (ii) enforce the Terms of Use, (iii) respond to claims that any content provided by using the Services violates the rights of third parties, or (iv) protect the rights, property, or personal safety of Grayboard, its users, or the public.

Grayboard may use aggregated personal information to determine the demographic composition of our user base and to distribute statistics and general marketplace information about Grayboard. This aggregate information does not identify specific users.

Certain non-personal information regarding users is recorded by the standard operation of the Internet servers hosting the Services. This information is primarily used to provide users of the Services with an enhanced online experience. Except for purposes of billing or service maintenance, Grayboard will not disclose aggregated user statistics except to describe the Services to prospective partners and other third parties, and for lawful purposes.

Some features of the Services may be offered in conjunction with a partner company. In order to provide these features, it may be necessary for either you or us to share your personal information with this company. If you do not want your information to be shared, you can choose not to allow the transfer by not using that particular feature.

Also, please be aware that advertisers or Web sites that are linked to the Services may collect personally identifiable information about you. The information practices of those Web sites linked to the Services are not covered by this Privacy Policy and Grayboard is not responsible for the privacy practices or the content of such Web sites.

Grayboard may utilize other companies to provide limited services on its behalf, including but not limited to customer support and web analytics. These companies are permitted to access only the information they require to perform those services. Grayboard requires these companies to maintain the confidentiality of any personal information and prohibits them from using the information for any other purpose than the purpose for which it was collected.

Grayboard may share personal information other than Student Data, as defined below, with other parties in connection with any company transaction, such as a merger, sale of all or a portion of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party or in the event of bankruptcy or related or similar proceedings. Grayboard's transfer of Student Data to a third party in the event of a company transaction is governed by our agreements with our educational institutions and applicable law.

4. User options — opt-out

Users may opt out of receiving future promotional electronic mailings from Grayboard by following the unsubscribe procedures indicated in the mailing. Individual end users of Grayboard software should contact their educational institution or other organization hosting the software for questions about access to the personal information collected by that institution. Please contact us at the address below if you have other questions about the information you receive from us or the information that we collect from you.

5. Access to your information

Grayboard offers users the ability to correct or change the information collected during registration. Users may change this information at any time and as often as necessary by choosing the "edit personal information" option or other similar functionality offered in the Services. To access or change your personal information, log in to your account through the Services. For data not available through such an account, please contact us at the address listed below.

6. Security

Grayboard maintains reasonable administrative, technical and physical procedures to protect information stored in our servers, which are located in the United States and in other jurisdictions in which Grayboard, its subsidiaries and affiliates maintain facilities. Security safeguards may include but are not limited to data encryption, firewalls, data use and access limitations, and physical access controls to buildings. If you have questions about such security, please contact us at the address listed below.

7. Student data collected during the course of providing services to educational institutions

Grayboard may provide Services to schools and other educational institutions to improve student learning outcomes. Through the provision of these Services, Grayboard may collect personally identifiable information from or about students (“Student Data”). 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 educational institutions, in the U.S. by the provisions of the Family Educational Rights and Privacy Act (FERPA) and applicable state laws, and by other state, federal, and international laws as applicable, but not by the provisions contained in this Privacy Policy. If you have any questions about reviewing, modifying, or deleting personal information of a student, please contact your educational institution directly.

8. Children’s privacy

Grayboard does not knowingly collect any information from children under the age of 13 unless and until a school or educational institution has provided appropriate consent and authorization for a student under 13 to use the Services and for Grayboard to collect information from such student. Please contact us at support@Grayboard.com if you believe we have inadvertently collected personal information from a child under 13 without proper consents so that we may delete such information as soon as possible.

9. European Union and Switzerland data protection

Grayboard complies with the U.S.-EU Privacy Shield Framework and the U.S.-Swiss Safe Harbor Framework (“Swiss Safe Harbor”) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. For more information regarding Grayboard’s compliance with the U.S.-EU Privacy Shield Principles, please see our [Privacy Shield Privacy Statement](#) available.

Grayboard has certified that it adheres to the Swiss Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Swiss Safe Harbor program, please visit <http://2016.export.gov/safeharbor/swiss/>. If you’re in Switzerland, upon registration you will be indicating your explicit consent that the personal information you have provided may be transferred and stored in countries outside Switzerland,

including the United States. If you fail to provide your consent, you will not be permitted to access the Services for which registration is required.

In order to comply with the Swiss Safe Harbor Principles, Grayboard commits to the resolution of complaints about your privacy and our collection or use of your personal information. We have committed to resolve any complaints by Swiss citizens relating to this policy, which cannot be resolved directly with our company, through the Swiss Safe Harbor Dispute Resolution Procedure administered by JAMS. To learn more, visit the [JAMS Website](#).

If you have any questions regarding this policy, please contact:

General Counsel
Grayboard LLC.
67 Cold Hill Road
Granby, MA 01033
support@Grayboard.com

10. Grayboard privacy policy statement changes

If Grayboard changes this privacy statement, we will post those changes at <http://grayboard.com/License/PP.pdf>, so that you will always know what information we gather, how we might use that information, and whether we will disclose it to anyone. By using the Services, you signify your assent to the Grayboard Privacy Policy. If you do not agree to this policy, please do not use the Services. Your continued use of the Services following the posting of changes to these terms will mean you accept those changes.

Notwithstanding the foregoing, however, with respect to Student Data, as discussed in Section 7, above, our data privacy practices are governed by our agreements with educational institutions and applicable law. Accordingly, any changes in our data handling practices involving Student Data would have to be in accordance with our agreements with educational institutions and applicable law.

11. Contact Grayboard

If you have any questions about this privacy policy, the information that we collect from you, or the Services, please contact us at support@Grayboard.com or write to:

Legal Department
Grayboard LLC.
67 Cold Hill Road

Granby, MA 01033

In the event that you are concerned about how data you have provided Grayboard through the Services has been used, please contact us at one of the addresses listed above. Grayboard takes all concerns about privacy and use of data very seriously, and shall endeavor to reply to you within two business days to commence its investigation of your concerns.

Effective: January 18, 2017