

CALIFORNIA SB 1177 COMPLIANCE STATEMENT

Updated: November 15, 2015

This Statement describes the policies and procedures employed by Learning Genie to ensure compliance with the requirements set forth in Section 22584 of the California Business and Professions Code (the “Code”). For the purposes of this Statement, “System” shall mean the bundle of services provided Learning Genie via its website and/or mobile application.

SECTION 1: CODE PROHIBITIONS

The Code prohibits online or mobile service providers whose services are used primarily for K-12 school purposes to engage in certain activities as listed in the Code. Learning Genie has enacted the following policies intended to ensure compliance with these provisions of the Code:

- 1. No Targeted Advertising (§22584(b)1):** Learning Genie strictly prohibits the use of any element of personally identifiable information (PII) of any student, parent, or other user of the System for the purpose of directing targeted advertising on its website or application. In furtherance of this prohibition, Learning Genie does not sell, trade, or rent any element of PII to any third party.
- 2. Student Profiles (§22584(b)2):** Learning Genie does not utilize any information (including persistent unique identifiers), created on or gathered by the System, to amass a profile about a K-12 student except in furtherance of K-12 school purposes.
- 3. Sale of Student Information (§22584(b)3):** Learning Genie does not sell, trade, or rent any information relating to K-12 students to any third party for any purpose whatsoever.
- 4. Disclosure of Information (§22584(b)4):** Learning Genie does not disclose any information created or gathered by the System unless such disclosure is authorized by the Code. Any such authorized disclosure is strictly limited to the extent necessary to provide the Learning Genie service.

SECTION 2: CODE REQUIREMENTS

The Code requires online or mobile service providers whose services are used primarily for K-12 school purposes to protect, delete, and disclose information in certain circumstances. Learning Genie has enacted the following policies to ensure compliance with these provisions of the Code:

- 1. Security Procedures and Practices (§22584(d)1):** Learning Genie is committed to maintaining the security and confidentiality of information, and to protect it against unauthorized access, destruction, use, modification, or disclosure. Learning Genie has designated a Security Compliance Officer (SCO), who is responsible for: (a) ensuring that Learning Genie servers are protected against unauthorized access to the greatest degree

possible; (b) limiting employee access to Pupil Records to whatever extent is required for them to perform their job functions; and (c) training employees in data security procedures to further ensure compliance with company data security policies.

- 2. Authorized Deletion (§22584(d)1):** Learning Genie will permanently delete any student information upon the request of an authorized school district or educator representative.

Additional privacy information is included in the Learning Genie online Privacy Policy.