

Skyrocket, Inc Privacy Policy

This Privacy Policy applies to your use of the Services and describes how Skyrocket may collect, use, and disclose personal information from users of the Services. By downloading, accessing and using the Services, you accept the Privacy Policy.

Laws That Generally Apply to Student Records. Skyrocket complies with laws that protect education records. This includes FERPA and state laws about student records. Other entities can access those records only if allowed by those laws and they agree to keep them confidential as required by those same laws. Skyrocket does not use a student's PII to target the student for advertising. Skyrocket does not sell a student's PII. Skyrocket does not illegally create profiles about a student. Skyrocket does not use (unless Skyrocket asks for and received permission) a student's PII for purposes unrelated to providing or improving their education where Skyrocket is prohibited from doing so. If any part of this Privacy Policy conflicts with FERPA or other applicable laws, Skyrocket will comply with the standard that provides more protection for the education records.

What Non-Personally Identifiable Information Does Skyrocket Collect? Skyrocket automatically receives Non-PII from your web browser or device connected to the Internet. That includes your IP address (the string of numbers that identifies the device), the name of the webpage you visited immediately before visiting Skyrocket's, the page or pages you visit when using our Services, and how much time you spend using our Services.

How Does Skyrocket Use Non-Personally Identifiable Information? Skyrocket uses Non-PII to monitor and improve the Services it provides. Skyrocket also uses Non-PII to study Internet traffic trends, administer the Services and gather information. When you use any AI-Enabled Services we may use and retain this information, including inputs or communications you provide when using the AI-Enabled Services to provide the Services or to improve the Services. If you do not consent to the use or retention of this information, do not use, or discontinue use of Skyrocket's AI-Enabled Services.

When Does Skyrocket Share Non-Personally Identifiable Information? When allowed by law, Skyrocket may share or sell Non-PII, such as aggregate or de-identified user statistics, demographic information, and usage information with nonaffiliated third parties. Skyrocket may also share Non-PII: (i) when required by law, such as by a court order, (ii) when allowed for law enforcement, health or safety purposes, (iii) for the use of your or your child's Local School, (iv) for the use of other companies that help Skyrocket provide the Services, or (v) where permitted, to protect Skyrocket's legal rights.

How Does Skyrocket Use "Cookies"? When you use the Services, the server creates a piece of text known as a "cookie" to put on your device. The cookie is unique to your browser. It lets the server remember information about your visit. Cookies do not collect PII. Skyrocket uses cookies to follow how you use the Services to adapt content accordingly. Skyrocket may use cookies from other companies to provide relevant information to you. These cookies may record that you used the Services and the websites you visited immediately before using the Services. These cookies can be

used to provide relevant information to you on other websites. You can accept or decline cookies. Web browsers have settings allowing you to reject cookies, or selectively accept cookies, or delete cookies previously accepted. If you decline cookies when using the Services, you may not be able to see or use the interactive features of the Services and some services may not function the way they should.

Does Skyrocket Share Information Collected from Cookies? Skyrocket will not share or sell individual information contained in cookies to any third party, except if required by law or permitted to do so for law enforcement purposes.

What Personally Identifiable Information Does Skyrocket Collect? Skyrocket uses PII to provide the Services to students enrolled in a Local School, and to otherwise support the Local School for things such as testing, academic progress, attendance, customer service, communication services with teachers and/or other users, student affairs or for health or safety purposes. Skyrocket may also use PII to protect its own legal rights. Skyrocket or your Local School may use PII provided by students to contact parents/legal guardians about the student's progress, testing, attendance, or other school issues or for customer service, and quality control. The PII is also used to provide services to you or your Local School or to carry out activities that you or your Local School has requested. Skyrocket also uses PII you supply to satisfy requests for information, and to deliver requested services to you. Skyrocket will use or share PII if required to do so by law, such as a court order, or permitted to do so for law enforcement, health or safety purposes or to protect Skyrocket's legal rights. If permitted by law, Skyrocket may use your information to provide you with information about new products or services available through Skyrocket and may analyze PII to improve the educational experience or to determine how Skyrocket's educational products and services may interest other people.

What Requirements Apply to Users Under the Age of 13? The Children's Online Privacy Protection Act ("COPPA") is a federal law that requires website operators and online service providers to obtain verifiable parental consent before gathering any Sensitive Information online from children under the age of 13. Skyrocket is required to obtain parental consent before knowingly collecting Sensitive Information from children under 13 years old. When the Services are used by a Local School in an educational setting, Skyrocket relies on the Local School to create an account for the child and provide consent on behalf of the parent/legal guardian. Your child's Local School, on your behalf as the child's parent/legal guardian, has provided Skyrocket with consent to receive Sensitive Information from your child when using the Services. This is in alignment with the Federal Trade Commission's position that schools have the ability to consent on a parent's behalf but only when limited to educational purposes only and for no other commercial purpose.

Skyrocket does not knowingly collect or ask for any Sensitive Information from children under 13 except directly from a child's parent/legal guardian or through the child's use of the Services as a student enrolled in a Local School. Skyrocket may receive Sensitive Information directly from your child, such as information your child provides when using the Services as part of his/her educational program including, but not limited to, test answers, class discussions, and User Content. Skyrocket

does not intentionally contact or collect Sensitive Information from children under 13 except as noted above.

If we learn that we have collected Sensitive Information from a person under 13 that does not comply with COPPA, we will delete that information. If you believe that a child under the age of 13 has given Sensitive Information to us without complying with COPPA, please contact us at support@lylaeducation.com. If you would like to review or request deletion of any data collected by Skyrocket from your child while using the Services, please contact us at support@lylaeducation.com.

What Are My Additional Privacy Rights if I Am a Resident of Certain States? If you are a California resident, or a resident of a state with similar statutory or regulatory requirements as those of California, as a consumer you may have several specific privacy rights that supplement this Privacy Policy. This section describes those rights and applies them to the extent required by the laws of those states.

If you are a student in the state of California, or a student of a state with similar statutory or regulatory requirements as those of California, the Student Online Personal Information Protection Act (“SOPIPA”) or similar state law protects the use and disclosure of “covered information.” To the extent required by law, Skyrocket complies with SOPIPA, FERPA and other applicable student privacy laws.

You can request information about the disclosure of your PII for commercial or marketing purposes to other entities. You can also tell us not to disclose PII to unaffiliated third parties for their commercial or marketing purposes. Please contact us at support@lylaeducation.com to do so.

As a resident of California or of the states mentioned above, those consumers have certain additional rights related to their PII collected by and on behalf of a business subject to the state’s privacy laws. Generally, these state consumer privacy laws, including the California Privacy Rights Act (“CPRA”) statutes, do not apply to non-profit or public educational institutions. Much of the information collected by Skyrocket is collected for the benefit of nonprofits and public education institutions. Depending on whether information is collected for Skyrocket’s business or for the benefit of nonprofit and public education institutions, some of what is described below may not be applicable to at least some of your information that Skyrocket collects.

Over the past 12 months, Skyrocket may have collected and disclosed some or all of the following types of PII in connection with providing services to you. The type of information, how it is collected, why it is collected and to whom it is disclosed can vary from person to person depending on the Services used by the person and how the person interacts with the Services.

1. **Non-Public Education Information.** If you are enrolled in or applying for enrollment in a Local School using the Services, we collect “education records” from you that are not publicly available PII as defined in FERPA. This information is also collected from your Local School, other curricular software and other third parties. This information can include past and present education, including institutions attended, years of attendance, courses

of study, grades, and awards earned, as well as assignments and other student-generated work.

2. Identifiers. This information is collected from you and is used to identify users and includes such things as names, email addresses, telephone numbers, usernames, IP addresses or other identifiers.
3. Audio, Photo and Video Data. Skyrocket collects audio, photo, video and other electronic information from you when using the Services.
4. Customer Records. If you purchase Skyrocket's products or services, Skyrocket collects from you information about what products or services you are considering, purchasing or using. This may include your name, signature, education history, and payment information. Skyrocket collects this information from you in order to provide the Services and for business purposes.
5. Protected Class Characteristics. Skyrocket collects information about protected classification characteristics under federal, state or local laws, such as race, ethnicity, national origin, disability, veteran or military status.
6. Network Activity. Skyrocket collects information about your interactions with websites and the internet from you and third parties.
7. Geolocation Data. Skyrocket collects information about the geographic location from where your device accessed the Services from you and third parties.
8. Inferences Drawn from Other Personal Information. Skyrocket may make inferences to create a profile about a consumer reflecting the consumer's preferences, characteristics, predispositions, behavior, attitudes, abilities, and aptitudes. Depending on your relationship with us,

Skyrocket may use your PII for one or more of the following purposes: administering applications and enrollment, providing educational services, providing support and services you requested (including AI-Enabled Services such as chatbots, large language models, and other customer facing tools enabled by artificial intelligence technologies), personalizing content and experiences, analyzing and improving the Services, content, functionality and the usability of the Services, securing and protecting Skyrocket's assets and rights and preventing misconduct and violations to the terms of this Agreement, complying with legal obligations, inviting you to participate in surveys and provide feedback, having a better understanding of your needs and interests, contacting you with information that may be of interest to you, improving marketing and promotional efforts and supporting Skyrocket's general business.

Skyrocket may share your PII with the Local School in which you are enrolled, other entities that perform certain functions for Skyrocket, your parent or legal guardian, analytics and service providers, transaction processors, regulators, child and human service agencies, the National Center for Missing and Exploited Children ("NCME"), law enforcement (if appropriate or necessary), and when required by law. Skyrocket may also share it with its affiliates, third party social media platforms (e.g., if you "comment" on a post), and other carefully selected business partners for commercial and/or marketing purposes, or as part of a business transfer.

Adherence with Partner Limited Use Requirements

AgBlox's use and transfer to any other application of information received from Google APIs will adhere to the [Google API Services User Data Policy](#), including the Limited Use requirements therein.

As a resident of one of the states mentioned above, you have several rights regarding the collection, use, transfer, and processing of your PII. Skyrocket has the right to reasonably verify your identity, to limit your rights to the extent they adversely affect the rights and freedoms of others and, if your request is excessive, repetitive or unfounded, to require payment from you. If a fee applies, Skyrocket will advise the person making the request before completing the request, explain why a fee applies and provide an estimate. Skyrocket may have additional rights under law and does not waive them.

Only you, your parent or legal guardian (if you are not yet 18 years of age) or a person registered with the applicable Secretary of State that you authorize to act on your behalf may make a request related to your PII. To verify your identity as a resident of one of the states mentioned above, Skyrocket may request PII from you to compare against our records. Skyrocket will only use PII provided in your request to verify your identity and will delete any PII you provide after processing the request. If Skyrocket believes that your request is fraudulent, additional steps may be taken as necessary to verify your identity as a resident of the applicable state. Skyrocket may also request that you sign a declaration under the penalty of perjury. Making a verifiable consumer request does not require you to create an account with us.

If you choose a person registered with the applicable Secretary of State to act on your behalf to submit your requests, Skyrocket will require that you provide the agent, and that the agent provide us with written permission to allow them to submit your request. Skyrocket will also require that you verify your identity directly with us.

Our goal is to respond to requests within 45 days. If an additional 45 days is needed, Skyrocket will advise the person making the request within 45 days after receiving the request.

You have the right to request Skyrocket inform you of the PII collected, used, and disclosed about you to third parties over the previous twelve months. If you make such a request, Skyrocket will provide you with information about the categories of your PII collected, the categories of sources from which your PII is collected, the business purpose for collecting or selling the information, and the categories of third parties to which your PII is shared or sold. If you request it, Skyrocket will provide you with information about specific pieces of PII collected about you. You may request this information twice in a 12-month period. Skyrocket will inform you if an exception to your right to this information is applicable.

You have the right to request that Skyrocket and its service providers delete your PII that Skyrocket has collected from you and retained. This right is also subject to certain exceptions. Skyrocket will let you know if an exception applies. These exceptions include where Skyrocket or a service provider uses the PII to complete a transaction for which the PII was collected, provide goods or services that you requested or reasonably should have anticipated within the context of Skyrocket's relationship

with you, use the information internally in a way that is compatible with the purpose for which you originally provided the information, detect or protect against security incidents, or malicious, deceptive, fraudulent, or illegal activity or otherwise comply with law. As a resident of California or a resident of a state with similar statutory or regulatory requirements as those of California, if Skyrocket decides not to act on your request you have the right to appeal our denial of your request. Skyrocket will provide you with an explanation for such denial and instructions on how to appeal our decision.

You have the right to opt-out of the sale of your PII by a business subject to certain laws and regulations. To the extent that third party advertising cookies and related technologies are ultimately determined to be a “sale” Skyrocket may engage in that activity.

If you would like to request a copy of your PII, that your PII be deleted or that your PII not be sold, please send the request to support@lylaeducation.com. If you are a Nevada resident, you may notify us to put you on a list of persons who have opted-out of the sale of PII by contacting support@lylaeducation.com. Please be aware that we may require you to verify your identity before processing any such request.

IMPORTANT: Please direct all requests related to education records and to course data directly to the Local School in which the student is enrolled. As a service provider to those schools, Skyrocket cannot delete or modify education records or other records collected or processed for, or on behalf of, a school, unless directed to do so by the school.

You also have the right not to be discriminated against for exercising your privacy rights under the applicable state statutes. Skyrocket will not discriminate against you (by, for example, denying goods or services to you or providing a different level of quality of goods or services to you) because you exercised any of these privacy rights.

What Information is Collected About My Communications When Using the Services?

Skyrocket may have tools or services that help users interact with others using the Services such as message boards, chat rooms, video chats, image or screen sharing, or electronic mail. The information you share is not private and may be available to all users of the Services. Skyrocket or others may store, display, reproduce, publish, or otherwise use such posts and other User Content, and may or may not attribute it to you. Others may have access to your User Content and may have the ability to share it with third parties. Skyrocket cannot promise privacy of information that you disclose online in public areas or place in private communications with others. Disclosure is at your own risk. Skyrocket reserves the right, but not the duty, to monitor your activity, your communications with others and to publish your posts or interactions in other places on the Internet or in other formats. Skyrocket may, in its sole discretion, use third party service providers to assist with content moderation, and/or support user safety. Skyrocket may use artificial intelligence technologies, including but not limited to, large language models, machine learning models, generative artificial intelligence models, or any other artificial intelligence enabled models to monitor communication or activity when using the Services. Skyrocket or any of its third party service providers may, at their discretion, choose to turn over or make content available to the Local School, parents or legal guardians, the National Center for Missing and Exploited Children (“NCME”), child or human

protection agencies or services, law enforcement agencies, if necessary or required by law, and/or other applicable agencies or personnel.

What Happens When I Link to Other Websites When Using the Services? The Services may link to other third-party services, applications and websites (collectively, "Linked Sites"). Any such links do not suggest that Skyrocket recommends the Linked Sites. The Linked Sites may have their own terms and policies, and your use of them will be ruled by those terms and policies. Skyrocket does not control Linked Sites and is not liable for your access to the Linked Sites. Access to the Linked Sites is at your own risk. Except for Linked Sites that are included in courses, Skyrocket provides access to them only as a convenience to you and does not review or make any representations with respect to Linked Sites.

What is Skyrocket's Commitment to Data Security? To reduce the risk of unauthorized access, maintain data accuracy, and secure the correct use of information, Skyrocket uses commercially reasonable physical, electronic, and managerial procedures to protect the information Skyrocket collects. Skyrocket also uses Secure Sockets Layer (SSL) protocol on your account information and registration pages to protect personal information. No security system for data is completely secure. Therefore, Skyrocket cannot promise that PII you supply will not be intercepted by others.

What if I Do Not Live in the U.S.? Skyrocket provides the Services in the United States. If you are not located in the United States, you are not authorized to use the Services and are directed not to do so. If you are located outside of the United States, please be aware that information we collect will be transferred to and processed in the United States. By downloading, accessing or using the Services, or providing Skyrocket with any information, you fully understand and unambiguously consent to this transfer, processing, and storage of your information in the United States, a jurisdiction in which the privacy laws may not be as comprehensive as those in the country where you are located, reside and/or are a citizen.

Will This Privacy Policy Change? Skyrocket may change this Privacy Policy to be consistent with the law and our practices. Skyrocket reserves the right to do that at any time. Skyrocket will post any changes to this Privacy Policy.