



## Privacy Policy

**Effective Date: December 8th, 2023**

At Enlighten AI, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

## Our Approach to Data Privacy and Security

We’ve found that there are a few critical things teachers and schools want to know about privacy and security, so we’ve summarized our approach for you below.

- We limit the personal information we collect to only what’s needed to provide you our Service
- We only use the information we collect to provide you with the Service
- We don’t rent, sell, or exchange any data to or with anyone
- We ensure you remain in control of your data
- We follow industry best practices (including using encryption) to keep your data safe



## Data We Collect

### Personal Data

**Teacher Data:** While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to: your name, email address, school affiliation, and other relevant contact information.

**Student Data:** We do not directly collect personal information from students. We rely on the information provided by You, which may include student names and emails for grading purposes. You provide assignment, rubrics, and student responses for grading purposes. This data may include text, images, or other media elements. This may include information defined as “educational records” by the Family Educational Rights and Privacy Act (“FERPA”) or “covered information” under California’s Student Online Personal Data Protection Act (“SOPIPA”), or other information protected by similar student data privacy laws. This data is handled in accordance with FERPA, the Children’s Online Privacy Protection Act (“COPPA”) and applicable federal and state laws, including without limitation the Illinois Student Online Personal Protection Act (SOPPA).

### Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your device’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data



## How We Use Personal Information

### To Provide and Enhance Our Services:

- We use Personal Data to provide and maintain our services, manage user registrations, and enable access to service functionalities for registered users.
- We provide you with the products, services, or information you request, and managing and fulfilling service contracts.
- We offer customer service and respond to requests and feedback.
- We personalize your experience with our services and communications.

### To Communicate and Engage with Users:

- We provide You with updates and announcements, contacting You via email, phone calls, SMS, or other electronic communications for updates, security alerts, and information about our services.
- We tailor our service to your preferences, sending communications based on your settings, including informative communications about our products, services, and promotions.

### To do Research and Development:

- We turn personal information into anonymous data for research purposes to improve our services. This de-identified data may be aggregated and used or shared for lawful business purposes.

### Legal Compliance and Protection:

- We comply with applicable laws, lawful requests, legal processes, and enforcing our terms and conditions.
- We protect the rights, privacy, safety, or property of users, the company, or others; this includes making and defending legal claims and auditing for compliance with legal and contractual requirements.



- We enforce our Terms and Conditions
- We prevent misuse, including preventing, identifying, investigating, and deterring fraudulent, harmful, unauthorized, unethical, or illegal activities, including cyberattacks and identity theft.

## Retention of Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. The Company retains educational records in accordance with FERPA and other applicable regulations and maintains the integrity and security of the educational system.

## Protection of Personal Data

The Company implements reasonable security measures to protect Personal Data from unauthorized access, disclosure, alteration, or destruction. The Company uses encryption technologies, secure storage, access controls, and regularly updates security practices to safeguard Personal Data.

## How We Share and Disclose Personal Information

We do not rent, sell, or exchange your personal information to any third party and do not engage in advertising with your personal data.

### User-Directed Sharing within Educational Institutions:

We share personal information within the same educational institution as directed by you. For instance, teachers can access their students' completed assignments and interactions with the AI chatbot, as authorized by the user.

### Collaboration with Service Providers:



#### Vendors and Service Providers:

We engage with trusted third-party service providers for hosting, data analysis, customer support, and other operational functions. These providers only access necessary information and are bound to confidentiality.

#### Legal and Governmental Compliance:

We may disclose personal information to law enforcement, government authorities, or private parties to comply with the law or valid legal requests.

#### Business Transfers and Partnerships:

In the event of a business transfer such as an acquisition, merger, reorganization, sale of assets, bankruptcy, or dissolution, personal information may be transferred to the new owner. We will endeavor to ensure the new owner adheres to this Privacy Policy.

We share de-identified or aggregated data with business partners to improve our services, ensuring that this data cannot be used to personally identify you.

#### Aggregate or De-Identified Information Sharing:

We may share information in aggregated or anonymous forms that cannot reasonably be used to identify individuals.

#### Your Consent and Instructions:

We share information with your consent and as per your instructions, including with parents when applicable.

For any queries or requests regarding the handling of your Personal Data, feel free to contact us at [info@enlightenme.ai](mailto:info@enlightenme.ai).

#### Third-Party AI Platform:

To provide our grading and feedback Services, the Company shares anonymized information, such as assignment questions, rubrics, and answers, with OpenAI OpCo, LLC. By using the Company's Services, You consent to sharing such information with OpenAI OpCo, LLC. OpenAI OpCo, LLC, is currently the only third-party AI platform the Company uses. Please note that



OpenAI OpCo, LLC has its own privacy policy governing their use and protection of data, **which is fully accessible here**. The Company takes steps to ensure that the data shared with them does not identify individuals and is used solely for the purpose of providing Services.

## Your Rights to Data

- **Access and Update:** You may access and update Your Personal Data by logging into Your Account.
- **Opt-Out:** You may opt-out of receiving non-essential communications from the Company by following the instructions provided in Company communications.
- **Deletion:** If You would like the Company to delete Your Personal Data, please contact us using the information provided at the end of this Privacy Policy. However, please note that the Company may be required to retain certain information for legal or legitimate business purposes.

## COPPA Compliance and Children Under 13

In adherence to the Children's Online Privacy Protection Act (COPPA), we prioritize the privacy and safety of children under 13 years of age ("Child User").

### Consent for Collection of Personal Information:

- **Guardian Consent Requirement:** We require verifiable consent from a parent or guardian before collecting personally identifiable information from Child Users. This includes situations where:
- **Parental Consent:** A parent or guardian provides consent directly through a Parental Consent Form.
- **School Authorization:** The child's school, under a contract with us, obtains parental consent on behalf of the parent or guardian. The school is responsible for maintaining this consent.



#### Use of Personal Information Prior to Consent:

- We only collect the minimal necessary information ("Required Information") to facilitate obtaining Guardian Consent. This information is used solely for that purpose until full consent is obtained.

#### Restrictions and Parental Rights:

- We do not solicit or collect more personal information from Child Users than is necessary for participation in our services.
- If a child under 13 sends personal data to us without Guardian Consent, beyond the Required Information, we will delete it.
- Parents or guardians have the right to request:
  - The cessation of data collection from their child.
  - Deletion of any collected data (retaining only anonymous or aggregated information).
  - Stopping the disclosure of their child's data to third parties, while allowing continued use of data for service-related purposes.

#### Sharing and Disclosure of Student Data

We disclose student data solely as needed to provide the Services on behalf of specific schools and teachers in accordance with our terms of service or with the consent of the school, teacher, or parent. We may also disclose student data to our trusted service providers who have a legitimate need to access such information on our behalf, subject to appropriate contractual terms to protect such data.

#### Compliance Assurance:

- We do not retain personal information from Child Users longer than necessary and ensure participation in our services does not depend on disclosing excessive personal data.



- If we discover that personal information has been collected from a Child User without necessary consent, we will take steps to delete it.

For any queries or actions regarding your child's personal information under COPPA, please contact us at [info@enlightenme.ai](mailto:info@enlightenme.ai).

## State Law Privacy Rights

- California: We are compliant with SB-1177 SOPIPA. We will not use your information for purposes other than those indicated in the Terms of Service and this Privacy Policy. We do not use your information for targeted ads, and we do not sell your data.
- Colorado: We will not use your information for purposes other than those indicated in the Terms of Service and this Privacy Policy. Our privacy and security policies include only providing access to information on an as-needed basis.
- Florida. In the event of a breach, we will notify you in accordance with the Florida Information Protection Act of 2014.
- Illinois. We are compliant with Illinois' Student Online Personal Protection Act (SOPPA).
- Maine. We are compliant with Maine's Student Information Privacy act.
- Maryland. We do not use your information for targeted ads.
- Nevada: We do not sell your Personal Data.
- New York. We are compliant with New York Education Law § 2-d and the Parents' Bill of Rights for Data Privacy and Security.
- Pennsylvania: In the event of a breach, we will notify you in accordance with the Pennsylvania's Breach of Personal Information Notification Act.
- Washington. We will notify you of material changes in this Privacy Policy.

## Changes to this Privacy Policy

The Company may update our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.





## Contact Us

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

- By email: [info@enlightenme.ai](mailto:info@enlightenme.ai)

## Definitions

For the purposes of this Privacy Policy:

**Account** means a unique account created for You to access our Service or parts of our Service.

**Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Enlighten AI, Inc., 425 1st Street #2904 San Francisco, California 94105.

**Personal Data** is any information that relates to an identified or identifiable individual.

**Service** refers to the Website.

**Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

**Website** refers to Enlighten AI, accessible from [enlightenme.ai](http://enlightenme.ai)