

## EXHIBIT C NOTICE OF COPPA PRACTICES

Impero US, Inc. (“**Impero**”) provides its customer educational institutions (“**Schools**”) with cloud-based services which enable the Schools to administer their systems, student systems, track student progress and welfare concerns, enhance School staff collaboration, and organize student information (the “**Services**”). Consistent with our obligations under the FTC’s Children’s Online Privacy Protection Act (“**COPPA**”) we provide this Notice of COPPA Practices (this “**Notice**”) to better assist Schools, students, parents, and teachers in understanding how we receive, store, and manage the information we collect in the Services.

**1. Consent.** Impero relies on Schools to obtain consent from parents for the collection and use of personal information of Students (of any age), in compliance with FERPA and their local legal and policy requirements.

**2. Impero’s Required Notices Under COPPA.** Impero is required by COPPA to provide the following information, which Schools may also provide to their students and parents in order to effectively inform the consent requirements under laws applicable to the School. The rest of this Notice is designed to provide further information to Schools, students, and parents about how information collected by the Services is used.

**2.1. Collection & Contact Information.** Impero collects and maintains any personal information received through the Services. Impero may utilize subcontractors and its affiliates to assist it in the delivery of the Services, including for purposes of storing personal information received through the Sites and Services. As of the date of this Notice, Impero utilizes Microsoft’s Azure Cloud to host elements of the Sites and Services and Impero’s UK affiliate, Impero Solutions Limited may assist in the delivery of the Site and Services. Impero handles all requests relating to its provision of the Services. Impero will respond to any inquiries from a School or Parent directed to: [support@imperoftware.com](mailto:support@imperoftware.com)

**2.2. Information Collected & Disclosure Practices.** Impero makes use of the information collected in order to provide the Services to Schools as agreed in their given service orders, and for no other commercial purpose.

Children *can not* choose to make their information publicly available, although they can provide information to teachers and the School using the Services.

Impero does not disclose collected information other than to the School, to our subcontractors as necessary to provide the Services in accordance with applicable law, or as required to respond to valid legal process issued by a court of competent jurisdiction.

The information collected by Impero varies by product and by School based on the specific implementation and selected usage. Each Impero service may collect common information about devices and users including names, online contact (username/email), last known IP address, and the machine name of the device last used. Example categories are detailed below by Service:

- **Impero EdProtect:** Monitoring of devices and usage to identify inappropriate behavior and technical issues, keyword detection and monitoring, online activity logging, context capture (screenshot/video recording), self-submitted student information.
- **Impero EdLink:** Monitoring of devices and usage to identify inappropriate behavior and technical issues, utilization monitoring, student identification and device usage, geolocation data, internet usage (including to enable filtering controls).
- **Impero EdTeach:** Student name and identity, testing administration, curriculum completion, active viewing of current device usage, messaging and live chat content.
- **Impero EdAware:** Student profile and demographic information, full name, welfare history, medical history, sibling identity, home address, persistent identifiers, student images.

- **Impero EdAdmin:** Monitoring of devices and usage to identify inappropriate behavior and technical issues, utilization monitoring, student identification and device usage.

**2.3. Review & Deletion.** Schools and parents may review or have children's personal information deleted and may refuse to permit further collection or use of a child's information. If you are a parent and have concerns, we suggest that you contact your child's School or teacher so that they can respond directly to your concerns. You may also contact Impero as identified above. Impero may engage in validation procedures, including relaying your request to the School, in order to protect collected information from unauthorized disclosure or deletion.

**3. What Types of Information Does Impero Collect from Students?** This varies by both the Services purchased and a School's implementation of those Services. Please see the lists above in Section 2.2 (Information Collected & Disclosure Practices) for details by Impero Service.

**4. How Does Impero Use this Personal Information?** Impero uses the collected personal information solely for the purposes of providing the Sites and Services to the School, in accordance with the agreement with the School and applicable law.

**5. Does Impero Use or Share the Information for Commercial Purposes Not Related to the Provision of the Services Requested by the Customer?** No. Impero only collects and uses personal information collected from students for the use and benefit of the School and for no other purpose. This enables Schools to obtain consent directly from parents. We require that Schools provide administrative contacts authorized to consent on behalf of parents and implement identity management controls to ensure that the School officials are providing the consent (and not a student pretending to be a teacher, for example).

**6. Does Impero Enable the School to Review and Have Deleted the Personal Information Collected From Their Students?** Yes. Schools remain directly in control of the majority of information collected by the Services and are the primary administrator of such data. Where Impero's Services also collect usage data or similar analytics which are presented to the School, Impero will provide review of the raw data to the School upon their request and will delete such information upon the Schools request.

**7. What Measures Does Impero Take to Protect the Security, Confidentiality, and Integrity of the Personal Data that it Collects?** Impero implements administrative, technical, and physical access controls designed to protect the security, confidentiality, and integrity of the personal data it collects, the systems which store such personal data, and the locations in which such data or systems are stored.

As a global provider of educational technology services and solutions, Impero takes data security and privacy seriously and complies with the EU General Data Protection Regulation (the "GDPR") where applicable. The controls required to comply with the GDPR are implemented throughout Impero's service delivery model.

**8. What are Impero's Data Retention and Deletion Policies for Children's Personal Information?** As a global provider of educational technology services and solutions, Impero takes data security and privacy seriously and complies with the GDPR where applicable. The controls required to comply with the GDPR are implemented throughout Impero's service delivery model. In addition, Impero will delete any personal information of Student's as requested by a School or parent pursuant to COPPA or other applicable law.

**9. What is the Date of this Notice / When Was it Last Revised?** This Notice is current as of January 22, 2019.