![iKeepSafe logo]

**iKeepSafe Product Profile
Peekapak Inc.
Peekapak Curriculum
myPeekaville**

Introduction

The iKeepSafe Privacy Program is available to operators and service providers of websites and online services, data management systems and other technologies that are, in whole or in part, intended for use in and by schools, and which may collect, store, process or otherwise handle student data.

This *iKeepProfile* is intended to assist you in determining whether the Peekapak complies with COPPA. It indicates that Peekapak has been assessed for alignment with the iKeepSafe COPPA Guidelines.

Product Overview

Peekapak Curriculum and myPeekaville:

Peekapak's curriculum is aligned to CASEL's framework of five social emotional learning competencies. Students learn these important skills through fun stories and games, then re-visit them often so they become truly internalized.

Story-Based Learning:

Journey along with Cody, Leo, Menka, and the other Peekapak Pals in Peekaville on their many adventures. Experience Leo's first day of school, build a robot in space with Apollo, compete for the Berry Ball Championship with Zoey, and so much more!

Available in 4 guided reading levels, in English and Spanish, and with recorded narration. Peekapak books explore topics like empathy, respect, and teamwork and are perfect for read-alouds, or independent reading in-class or at home.

80+ Classroom Lesson Plans Per Grade Level
Each of Peekapak's units come with detailed, fully planned in-class activities, each with their own at-home component available in English and Spanish. These English Language Arts aligned and evidence-based activities reinforce crucial SEL skills. Lessons are available in English, and come equipped with classroom-ready printable templates and posters.

Detailed Analytics & Reports
Teachers receive access to various analytical insights into student activity and progress in myPeekaville and in-class lessons. myPeekaville allows students to check-in daily by selecting how they're feeling, providing teachers with a moodboard of student sentiment data. We allow teachers to see how much progress each student has made, how many berries they have collected (in-game currency), and which books they have read.

myPeekaville

myPeekaville uses beautiful visuals to bring learning to life. It incorporates literacy-based learning, and game-based learning to engage students. The learning elements in myPeekaville were designed using evidence-informed practices and researched in districts and after-school programs.

In myPeekaville students (and teachers) gain agency by creating diverse, personalized avatars, and customizing their experience in an immersive open world. Interact with the Peekapak Pals by helping them solve problems through quests, activities and games that incorporate social-emotional learning skills and link back to improve reading and writing skills.

Teachers receive access to various analytical insights into student activity and progress in myPeekaville. In myPeekaville students check-in daily by selecting how they're feeling, providing teachers with a heatmap of student sentiment. We allow teachers to see how much progress each student has made, how many berries they have collected (in-game currency), which books they have read, and areas in which they are struggling.

Agreement

Children's Online Privacy Protection Act ("COPPA") (15 U.S.C §§ 6501- 6506)

1. Peekapak contracts directly with schools and, as such, may rely on consent from the school instead of the parents for collection of personal information from students when data is collected for the use and benefit of the school, and not for any other commercial purposes.

2. Peekapak makes available clearly written policies explaining what data it collects from users, how such data is used, stored and to whom it may be disclosed.

3. Peekapak makes available a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product.

4. Peekapak provides the school a description of the types of personal information collected; an opportunity to review the child's personal information and/or have the information deleted; and the opportunity to prevent further use or online collection of a child's personal information.

5. Peekapak collects limited data from or about children that is reasonably needed to provide users with a feature or activity, or to perform a valid business function that meets the strict definition of support for internal operations.

6. Peekapak does not/will not condition a child's participation in an activity on the child disclosing more personal information than is reasonably necessary to participate in such activity.

7. Peekapak maintains reasonable procedures to protect the confidentiality, security, and integrity of personal information collected from children. It takes reasonable steps to release children's personal information only to service providers and third parties who can maintain the confidentiality, security and integrity of such information, and who provide assurances that they will maintain the information in such a manner.

8. Peekapak will retain personal information collected online from a child only as long as is reasonably necessary to fulfill the purpose for which the information was collected. It must delete such information using reasonable measures to protect against unauthorized access to, or use of,

the information in connection with its deletion.

9. Peekapak will conduct annual training related to data privacy and security, including COPPA requirements, for all employees responsible in whole or in part for design, production, development, operations and marketing of their products. Such training will include all employees who are directly or peripherally involved in collection, use, storage, disclosure or any other handling of data.

10. Peekapak will not make material changes to its privacy and security policies, including adding practices around new or additional data collection, or changes that may lessen the previously noted protections without prior notice to the school, separate from any notice in a "click wrap" agreement. It will notify schools and obtain the prior verifiable consent for any material changes to its privacy policy that affect the collection or use of personal information from students.

Data Review Process

Right to Access and Correction of Data: Peekapak supports access to and correction of student personal information by the student or their parent or legal guardian, either by 1) assisting the school in meeting its requirements for access by responding to requests Peekapak receives from schools, or 2) directly responding to requests from parents when the information is collected directly from a student and Peekapak obtains the parental consent (not the school). Teachers, parents and other users can contact us as described below, to correct or update their personal information, or they can use the features in their account settings to do so.

General inquiries related to privacy may be directed to:

hello@peekapak.com

192 Spadina Ave, Suite 300

Toronto, ON M5T 2C2

1-888-513-6418

Security Protocols

Peekapak has a comprehensive Security Program in place designed to protect the confidentiality, integrity and availability of systems, networks and data. The following is a general overview of data security protocols:

Data in Transit:

HTTPS encrypted over SSL/TLS

Data at Rest:

Encryption methodology is inherent in their data storage systems. And, is replicated in encrypted form for backup and disaster recovery.

Data Center Security:

Peekapak uses AWS for all Data Storage.

AWS has certification for compliance with ISO/IEC 27001:2013, 27017:2015, and 27018:2014.

AWS aligns with the CSA STAR Attestation and Certification based on the determinations in our third-party audits for System and Organization Controls (SOC) 2 Reports and ISO 27001:

https://aws.amazon.com/security/?nc1=f_cc

Personnel:

<u>Background Checks</u>: All employees with access to student data have undergone criminal background checks.

<u>Training</u>: Employees of Peekapak will receive annual privacy and security training that includes FERPA and COPPA

<u>Access</u>: Access to student data is role-based; limited to those employees who need access to perform job responsibilities.

Employees are given access to the minimum services that are required for their job function.

Access to Audit

Once per year, Peekapak will provide schools with:

X   audit rights to the school's data

X   access to the results of Peekapak or its third-party security audit

Data Breach

In the event of an unauthorized disclosure of a student's records, Peekapak will promptly notify users unless specifically directed not to provide such notification by law enforcement officials. Notification shall identify:

       a. the date and nature of the unauthorized use or disclosure;

b. the Private Data used or disclosed;
c. general description of what occurred, including who made the unauthorized use or received the unauthorized disclosure;
d. what Peekapak has done or shall do to mitigate any effect of the unauthorized use or disclosure;
e. advice to the impacted user on how they can best protect themselves.
f. what corrective action Peekapak has taken or shall take to prevent future similar unauthorized use or disclosure; and
g. who at Peekapak the user can contact. Peekapak will keep the user fully informed until the incident is resolved.

Peekapak will <u>notify</u> impacted user (s) within 72 hours upon the discovery of a breach of security that results in the unauthorized release, disclosure or acquisition of student information,

Data Deletion

You have the right to "forget ability", i.e., we will remove all your information from our systems if you so wish. If you would like to delete your Peekapak account or any content submitted to Peekapak, please send an email to hello@peekapak.com. We will notify you by email before deleting your account from our database.

If for some reason you ever want to delete your account (or your Child's account, if you are his or her Parent), you can do that at any time by contacting us as described in the **Contacting Peekapak** section below.

Peekapak stores your personal information for as long as it is necessary to provide products and Services to you and others. Personal information associated with the user account will be kept until the account is deleted, unless we no longer need the data to provide products and services.

Peekapak may have to retain some information after your account is closed, to comply with legal obligations, to protect the safety and security of our community or our Service, or to prevent abuse of our Terms. At Peekapak, a user may delete their account at any time, as per the **Data Retention** section in their privacy policy.

hello@peekapak.com

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Research

Peekapak stated we use de-identified data for usage patterns and for product design purposes.

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Third Parties

Peekapak does not sell, trade, lease or loan the personal information they collect or maintain, in the course of providing the service, to any third party for any reason, including direct marketers, advertisers, or data brokers.

Peekapak contracts with other third-party companies to perform business functions or services on their behalf and may share PII with such third parties as required to perform their functions. Peekapak has agreements in place with all third parties with access to student personal information to ensure they only use the information for purposes necessary to deliver the authorized service and to ensure they maintain the confidentiality and security of the information. The agreements align with Peekapak' data privacy and security policies and expectations.

Peekapak utilizes the following third-party vendors:

- Amazon Web Services, Inc. - hosts all Personal Information that we collect;
- Intercom, Inc. - processes Identity and Contact Data on our behalf for the purpose of providing user support;
- Mixpanel, Inc. - processes Technical Data for the purpose of ease of use of Service;
- Stripe, Inc. - processes payment Information on our behalf; and
- Zoho Corporation Pvt. Ltd. - processes Contact Data on our behalf for the purpose of providing user support.

Product Data List

Peekapak collects the following data from Students or Children:

Data element	Purpose of Data Collected
Student First and Last Name	Product Functionality
Student Email Address	Product Functionality
Student Password	Product Functionality
Parent First and Last Name	Product Functionality
Parent Email Address	Product Functionality
School Name	Product Functionality
School Address	Product Functionality
Geolocation Data	Product Functionality
Hobbies	Product Functionality
TEACHER'S NAME	Email communication and analytics dashboard
TEACHER'S EMAIL	Email communication and analytics dashboard
SCHOOL DISTRICT NAME	Email communication and analytics dashboard

STUDENT GAME PROGRESS	Analytics for assessment
STUDENT MOOD	Analytics for assessment
STUDENT HOMEWORK SUBMISSIONS	Analytics for assessment
Access Time	Statistics
Time spent on Site	Statistics
Page Views	Statistics
Referring URLs	Statistics

Accuracy Statement

Peekapak hereby confirms the accuracy and truthfulness of all information contained in the Peekapak profile and has authorized iKeepSafe to make the profile available to any interested schools.

Signed and agreed:
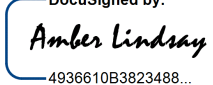
_____
(Signature)

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10/18/2021

The Peekapak service has been reviewed and found in alignment with iKeepSafe's COPPA Privacy Program Guidelines as indicated by this product profile. Peekapak has been awarded the iKeepSafe COPPA Privacy Program badges.

DocuSigned by:

Amber Lindsay
—4936610B3823488...
_____
(Signature)

Amber Lindsay
President & CEO
iKeepSafe

10/18/2021

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