

Choosito Privacy Policy

Last Updated September 30, 2014

All of us in Choosito feel very strongly about protecting your privacy and the privacy of your students or children and are dedicated to treating personal information with care and respect.

This privacy policy describes the treatment of information collected by Choosito on this site. It also explains the treatment of information collected on applications that Choosito makes available on third-party sites or platforms.

Choosito WILL NOT sell, trade, or assign any unaggregated, personally-identifiable information that it collects, to third parties outside of Choosito. If Choosito shares any such information with a third party, it will be in accordance with the terms of this Privacy Policy and for the limited purposes that we discuss below.

If you have any questions, concerns or comments regarding this privacy policy, you may contact us at the email and address posted at the end of this policy statement. We are committed to addressing your privacy or security questions or concerns.

Choosito limits personal information collected to the minimum required to provide a safe, personalized and adaptive service and a pleasant and effective usage experience.

The types of information that we collect is mentioned below.

1. Types of information we collect from teachers, parents & schools.

1. Registration information you provide when you create an account so you can use Choosito's educational services, including user name & password, gender, date of birth, email address so that your registration can be confirmed and phone number in case urgent contact is needed.
2. Registration information you provide when you register Your Users or Your Child which, is similarly, user name & password, gender, date of birth, email address, school grade level and school class.
3. Transaction information you provide when you purchase one or more subscriptions or services, including depending on the way of payment, surname, address, Credit Card Number and accompanying data, Paypal Account and phone number for emergency etc.
4. Student group membership information, for example the students belonging in a school class or in a group assigned a particular exercise or research project.
5. Usage options for children, like pre-selected readability level or thematic filters which facilitate researching, especially for young students.
6. Information you provide to us when you feedback on the relevance or quality of sites you find using Choosito searches, including site-links to include in Choosito Library, material assessments etc. This includes feedback you provide to us regarding the accuracy of Choosito automatic material assessment methods.

7. Information you provide in public forums on our site or on our applications. If you provide personal information when you use any of these features, that personal information may be publicly posted and otherwise disclosed without limitation as to its use by us or by a third party. To request removal of your personal information from a public forum on our site or any of our applications, please contact us using the information at the end of this document.
8. Information sent either one-to-one or within a limited group like, for example a school class, using Choosito message, chat, post or similar functionality. Primary example of such information would be directions or comments to your students regarding their projects. Also information teachers exchange among them regarding educational material, project material etc.
9. Education content created by yourselves.
10. Location information when you visit our site or our applications, including location information either provided by a mobile device or associated with your IP address, where we are permitted by law to collect this information.
11. Usage information like choices and preferences when using Choosito site or applications.
12. Technical data, including your device identifier or IP address, when you visit our site or use our applications.
13. In case we need to verify whether you have actually become aware of an important email notice from us to you, we may monitor whether an email message sent from us to you was opened.

2. Information we collect directly from your student or child.

Choosito applies the principle of keeping the personal information recorded to the minimum necessary, even more strictly for students and especially students under 13.

Choosito permits students to register directly, so they can try Choosito Services and benefit from them. We strongly advise children never to provide any personal information in their usernames.

Consistent with the requirements of [COPPA](#), on any child-targeted site or application, or in any instance where we ask for age and determine the user is age 12 or under, we will ask for a parent or guardian email address before we collect any personal information from the child. If you believe your child has registered to Choosito or is using it, and you or another parent/guardian have NOT received an email providing notice or seeking your consent, please feel free to contact us using [the information at the end of this document](#). We will not use parent emails provided for parental consent purposes for any other reason than requesting the parental consent.

Children below the age of 13, in accordance with [COPPA](#) requirements, are only asked to provide their own name, username, password, email and age and their parent's name and email, so that the parent's consent to the registration is requested by Choosito. We call this state of affairs "Limited Registration". The student under Limited Registration may proceed to the (necessarily limited) use of Choosito Services, but *no additional personal information is requested by the student or recorded relevant to her, unless for the reasons expressly stipulated by COPPA*. These reasons include protection of the security of the student and of the security and integrity of the site, support for the internal operation of our site, precautions against liability and provision of information to law enforcement. Once parental consent confirmation is received the student is considered "Fully Registered", and information about the particular student is kept as for all other students. If parental consent confirmation is not received within reasonable time, the account and all its personal information is deleted, and access of the child to Choosito is not allowed. *Personal information of students below 13 is only used for internal purposes and is not disclosed to third parties.*

With regard to school-based Choosito usage, COPPA allows teachers and school administrators to act in the stead of parents to provide consent for the collection of personal information from children. Schools should always notify parents about these activities and parents can inquire on them. Irrespective of whether a student was registered on each own, through the school or by the parent, parents can always request information about their children's personal information privacy directly to us, using the contact information provided at the end of this document.

In the event Choosito collects personal information from a child that will be posted publicly, we will seek a more secure level of consent than the email described above, such as asking for a credit card or other payment method for verification (with a nominal charge involved), speaking to a trained customer service representative by telephone or video chat, or requiring a signed consent form by mail, email attachment, or fax. After providing such more secure consent, a parent may have the opportunity to use a pin or password in future communications as a way to confirm the parent's identity with less hassle.

Students above the age of 13 do not go through the Limited Registration stage. They are asked to provide the same registration information provided when their teacher or parent registers them. In addition to that, they are asked for a parent's email, so that the parent is informed of the fact that they registered with Choosito.

Choosito collects usage information directly from your Fully Registered student or child, over the internet, in the form of the interactions that she makes when using Choosito services. This includes but is not limited to the queries your student or child submits and the way he responds to the site-links returned by Choosito's results to those queries. We may also collect direct feedback from your student or child, evaluating either the Choosito experience in general or, more specifically, the relevance of the education material Choosito provides to his searches, her research projects, his homework etc.

We use such information to better adapt Choosito services to the needs and abilities of your student or child, primarily regarding the readability and themes of the site-links returned to her by Choosito. We also use it to evaluate and improve the Choosito experience for your student or child.

Moreover we use it to protect you, your students and your children from abuse of our site. We also use it to protect our services' or our applications' security and integrity and to take precautions against liability.

3. How we collect your information.

- We collect information you provide to us when you request products, services or information from us, register with us, participate in public forums or other activities on our site or applications, provide feedback regarding the educational material, provide educational content, respond to customer surveys, or otherwise interact with us. Please keep in mind that when you provide information to us on a third-party site or platform (for example, via our applications), any information you provide may be separately collected by the third-party site or platform. The information we collect is covered by this Privacy Policy and the information the third-party site or platform collects is subject to the third-party site or platform's privacy practices.
- We collect information through technology, such as cookies, when you visit our site or use our applications on third-party sites or platforms. Cookies are pieces of information that a website places on the hard drive of your computer when you visit the website. Cookies are used solely for the required operations of our website and services. We do not use cookies for behavioral advertising, to build a student profile unrelated to the use of Choosito, or for any other reason. We may associate the cookie information with your registration account, in which case we will treat it as *personal information*.
- You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. Please note that if you refuse the Choosito cookie (by turning cookies off in your browser or by clicking "don't accept" if you have set your browser to warn you before accepting cookies), you won't have access to many features that make your and your student's or children's Choosito experience more pleasant & efficient and Choosito Services may not function properly.

4. How we use your information.

- Email Address: In addition to confirming your registration, your email address may be used to send information about your own or your students' or your children's accounts and updates to Choosito policies, services or offers. We may also email information to you regarding your students' or your children's usage of Choosito services.
- Student's Name: Your students' or your children's names will be used to personalize their projects and for them to collaborate with their classmates in group projects.

- Phone Number: Your phone number will serve as an alternate way of contacting you for the same purposes as the email address, in exceptional cases only, for example when there is a technical issue with your email or when we need to contact you urgently. We will never call your children or your students directly.
- Credit Card (or alternative payment method): For payment of subscriptions. Also for parental consent purposes.
- Student's or Child's Date of Birth: We will use a student's age to improve her experience in using Choosito's services, primarily by better adjusting to her needs the readability of the material Choosito provides. Also for improving Choosito's algorithms which assess text readability and, in general, material suitability to different student ages.
- Student's School Grade Level: Similarly to date of birth above, we will use this information for improving the personalized experience of students and for improving Choosito's algorithms for assessing material suitability to different school grade levels.
- Student's Gender: We will use a student's gender to better personalize the Choosito experience for students and for improving the relevant personalization algorithms of Choosito.

Secondary Uses:

- Registration Information and other information may be used by us for demographic profiling and targeted advertising, although in such cases, the information will be aggregated as ANONYMOUS statistical information. Choosito WILL NOT sell, trade, or assign any un-aggregated personal information we collect to third parties outside of Choosito nor will we ever directly target any type of communication to a student.
- Usage information will be primarily used to improve the experience of using Choosito services. Mainly it will be used for personalizing search results to queries, so that their readability and theme is better adapted to you or your students' or your children abilities and needs. It will also be used for improving the relevant adaptive Choosito services themselves. It may be also used for marketing and other operational and business purposes by Choosito; however, such information will neither be disclosed to third parties, nor be published to our site or applications. It will also not be used for advertising directly to your student or child.
- Information relevant to educational material either generated or in any way evaluated by you, may only be published to the site as an attribution to you, and only with your consent.
- Information generated by your students or children will never be published by us in a personalized way without your express consent.
- Information relevant to students' group exercises or group project material will only be made available to the limited group the exercise or project involves. The same applies to answers to group exercises by your students or children, or to group project assignments completed by them or in progress.

5. Opting-out of providing the information we request

As the prime aim of Choosito is to provide educational material and educational services personalized and adapted for each user's interests, needs and abilities, the information we collect is required for you and your student or child to utilize the Choosito services.

At any time, you may revoke your consent to allowing your student or child to use Choosito services or refuse to allow Choosito to further use or collect yours, your student's or child's personal information. In such a case any ANONYMOUS performance data will be retained, but we will no longer use any identifiable information regarding you or your student or child. However, we may, at the same time, be unable to continue providing Choosito services to either you or your student or child.

6. Reviewing and changing your information

You may review and modify your Registration Information at any time by accessing our website using your password. You may also review and modify at any time Registration Information of your students or children.

7. Consent

In order for your student's or children to use Choosito, you will be asked to submit certain personal information about them and yourself, and to authorize Choosito to use that information in a limited number of ways. If you are a parent or legal guardian of a student that will use our site or applications, we will require you to review and submit a Parental Consent as part of the registration process, which will require you to consent to our collection and use of information directly from your child or student over the Internet as described in this Privacy Policy.

8. Password Protection

You will be asked to select a password to access Choosito services through our website or through our applications. If you are a parent or legal guardian of a student that will use our site or applications to access Choosito services, you will be asked to provide a password for the student. All passwords are stored in unrecognizable format by us and should be kept confidential by yourself and your students or children. We will never ask you for your password and neither will anyone authorized by us. Your password will also allow you to review and request changes to the information we collect about you and your students or children.

9. Protecting your information.

No data transmissions over the internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. Choosito has multiple security measures in place to protect the loss, misuse or alteration of information under our control.

Please note that this website is hosted in the United States. If you are visiting from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring your personal data to the United States, which does not have the same data protection laws as the EU or other regions; by providing your personal data you consent to the use of your personal data for the uses identified above in accordance with this Privacy Policy and the transfer of your personal data to the United States as indicated above.

10. Your information and third parties

Except as provided in this Privacy Policy, Choosito WILL NOT disclose your or your students' or children personal information to third parties without your express permission, or where we believe, in good faith, that the law requires us to disclose the information.

Choosito WILL NOT sell, trade, or assign any unaggregated personal information that it collects to third parties outside of Choosito. We, however, may aggregate the information that we collect from users of our website or our applications to create demographic profiles and performance profiles regarding the usage of Choosito by students. Choosito may share aggregated information with advertisers, marketing professionals, or potential investors. This aggregated information will be compiled and reported in the form of ANONYMOUS group statistics only in such a manner that makes individual student users unidentifiable. In addition, in order to offer and improve Choosito services, Choosito may share Registration Information about the parents, legal guardians, and school officials that register with Choosito, along with such registrants' usage data, to *contractual business partners* of Choosito that are directly involved in the sale, distribution, operation, maintenance, and support of our services or applications. A list of such partners is provided at the end of this document.

Notwithstanding anything to the contrary, as Choosito continues to develop its business, it might sell some or all of its assets. In such transactions, customer information is generally one of the transferred business assets. An acquiring company would be required to protect all information that Choosito collects from users of our website and applications, in accordance with the terms of this Privacy Policy.

10. Unsolicited third-party promotional emails

Choosito will not send unsolicited third-party promotional emails neither to you nor to your students or children.

12. Children's Online Privacy Protection Act

Congress has enacted a law called the Children's Online Privacy Protection Act of 1998 ([COPPA](#)) that is designed to protect children's privacy during use of the Internet. Choosito has implemented practices consistent with the guidelines provided by the Federal Trade Commission to date.

Choosito will never knowingly request, obtain, use or disclose personally identifiable information or private content from anyone under the age of 13 without parental consent. For our customers who are individuals, if you subscribe to our services, provided you are 18 years of age or older, you will be asked, at the time of registration, whether you consent to allowing users under the age of 13 to use your subscription and to be subject to this Privacy Policy. You must be the parent or legal guardian to grant such consent. If we receive this parental consent, we may receive personal information from children under the age of 13 listed on your subscription account in order to provide our Programs and services to them. We DO NOT SHARE CHILDREN'S PERSONALLY IDENTIFIABLE INFORMATION WITH THIRD PARTIES. If you are a parent or legal guardian of a user under 13 you may, at any time, revoke your consent to allow your student to use Choosito Services under your subscription, refuse to allow Choosito to further use or collect your student's or child's personal information, or direct Choosito to delete all identifiable information regarding your student's or children that you have provided. To do so, please contact our Privacy Officer at the contact information below. However, if you do any of the foregoing, your students or children will not be able to use the Choosito Services.

For administrative officials of our School Customers, to the extent that Choosito collects, uses, or discloses personal information from children under the age of 13, it is done in strict accordance with this Privacy Policy and for the sole purpose of providing services to the School Customer and student user.

13. The Children's Internet Protection Act

The Children's Internet Protection Act ([CIPA](#)) is a federal law enacted by Congress in December 2000 to address concerns about access to offensive content over the Internet on school and library computers. CIPA imposes certain types of requirements on any school or library that receives funding support for Internet access or internal connections from the "E-rate" program — a program that makes certain technology more affordable for eligible schools and libraries. In developing Choosito services exclude such material from our site and our applications, to the fullest extent that is possible by applying available best practices and technical means.

14. The Family Educational Rights and Privacy Act

For our School Customers: The Family Educational Rights and Privacy Act [FERPA](#) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Choosito helps our School Customers be compliant with FERPA. Specifically:

1. Any sensitive online information is transmitted over secure channels
2. All student data are stored in ways that are not publicly accessible
3. Security audits are regularly performed to ensure data integrity

We do not share information with any third parties that could be used to personally identify students. If a school requests that student data be sent to a third party, with parental consent, we will send the data to the school and never directly to the third party.

15. Amendments

This Privacy Policy may be updated by us from time to time. We will notify you by email regarding any material changes to our privacy and security practices. Please review all revisions to the Privacy Policy. Your continued use of our website or applications after the date we have emailed such notices, will be deemed to be your agreement to the changed terms.

16. Contact Us

If you have any comments, questions or complaints about this Privacy Policy, please contact us at:

Choosito! LLC
462 Ballytore Rd,
Wynnewood,
PA 19096
USA

email: info@choosito.com

Tel: +1-215-8801184

17. List of operators which collect personal information related to Choosito Services or applications.

There are currently no third parties getting access to personal information collected by Choosito.