### **Frequently Used Terms**

At Story Squad, we believe it is important to use plain, clear language wherever possible. The following terms and definitions are provided in order to clarify the policy's language.

Story Squad - hereafter also referred to as "us" or "we."

**Users** - anyone who accesses or uses the Story Squad app or site. Users may further be categorized into two groups, as follows:

**Parental User** - hereafter also referenced as "you." It is understood that the primary user of an account is an adult over the age of 18, who serves as the parent or legal guardian of a minor or minors who access the site.

**Child(ren)** - the minor or minors, under the age of 13, for whom you are creating a Child Account and to whom the site's content is primarily targeted.

**Parent Account** - your account, through which you will control your subscription, account settings, and privacy options as well as any child accounts that you create.

**Child Account** - a subsection of your parent account. The Child Account consists of any personal information about a minor that you provide, as well as the platform through which a child under your care may interact with the site.

**Personal Information** - information that directly or indirectly identifies a user, such as the user's name, email, or payment details. In addition, anonymous information which is associated with a specific user (or that user's personal details) is also considered personal information for the purposes of this policy.

**Anonymous Information** - information that cannot reasonably be used to identify, directly or indirectly, an individual.

**Aggregate Information** - information about groups or categories of users which cannot be used to identify an individual user.

**COPPA** - COPPA stands for the Children's Online Privacy Protection Act, a federal regulation passed by U.S. Congress in 1998 and enforced by the Federal Trade Commission (FTC). Story Squad operates in full compliance with COPPA. For more information on what the Act entails, please visit the FTC's website. <a href="https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule">https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule</a>

#### **Policy Scope**

Story Squad is committed to protecting the privacy of anyone who accesses our site and app. This Privacy Policy explains the ways in which we collect information from users, what we do

with that information, and how users may remove or modify their information. Story Squad follows this privacy policy in compliance with applicable law in the places where we operate. If necessary, Story Squad may provide additional privacy notices relevant to specific situations; those notices are to be read and considered in conjunction with this policy.

The information that you, the parent, provide to us via a third-party platform (for example, your web browser or mobile device) may be collected separately by those third-party platforms. The information that Story Squad collects is covered by this privacy policy. Privacy choices that you have made with other entities are not related to our privacy policy. We can not control and are not responsible for the privacy practices of entities we do not own.

#### What Information We Collect

Story Squad requires and collects from users only that information which is necessary to fulfill the functions of our site and app. This information falls into two categories: *Information Users Provide to Us* and *Information We Collect from Users*. In addition, we may combine these two types of information to create *Aggregate Information*, as defined in the frequently used terms above.

**Information You Provide** - We ask Parental Users for personal information about themselves and their child(ren) in order to provide our services. This information includes the parental user's first and last name, email address, password, and payment information as well as the child's grade level, display name, and site preferences.

**Information Children Provide** - Story Squad features activities which rely on child-generated content. These activities allow children to submit and interact with content such as avatar selection, text fields, and image upload buttons, through which they can submit their own creative content. The types of creative content collected include fictional stories, art, and written reviews of other children's content. All creative work is understood by all parties to be fictional in nature and not a factual account of any real-world experience.

Creation of a child account (which includes a payment process) will be considered 'high-level consent' for the above outlined activities in accordance with COPPA. In the case that we become aware of information collected from a child outside of that outlined in our privacy policy, we will either (a) immediately delete the information or (b) immediately seek high-level consent from the parental account in relation to the collected information.

**Information We Collect** - We may automatically collect certain information from the computers or mobile devices of users, such as type of operating system, IP address, web browser, information about the websites that users visit from and go to after visiting Story Squad, links clicked and pages viewed within the site or app, interactions with e-mail messages we send, ISP info, and other standard server log information. We may use tracking technologies like tokens, software development tools, and program interfaces to collect this information automatically.

#### **How We Use Your Information**

Story Squad uses your information only to provide and improve on our services to you, and to comply with any applicable laws. In order to do this, we may use your information to (a) provide our service to you, (b) communicate with you about your account details and transactions or to request feedback, (c) personalize your experience, (d) use analytical tools to better understand and optimize our service, (e) detect, investigate, and prevent illegal activities or policy violations, and (f) to notify you of and obtain parental consent for children's activities.

In addition, as a child directed application, Story Squad vows to limit the collection and use of children's information to that which is reasonable and necessary in order for the children to participate in our activities. All child-created content will be screened and, should it contain personally identifiable information outside of the scope of pre-existing parental consent, immediately seek to receive consent for the content and/or delete it from our database.

#### When and How We Share Information

The information we share with others (and which entities we share it with) depends on the type of information. In most cases, information we collect is only used internally. Exceptions include child created content which is uploaded for publication as well as display names and avatars which exist on public-facing pages. We may also share information from users, both adult and child, to our service providers if the information is necessary for them to perform a business, professional, or technology support function.

Story Squad will disclose personal information in response to a court order or a subpoena, in compliance with U.S. law. In addition, we may disclose personal information of adults or children within the scope of all applicable laws, either in response to the requests of law enforcement or government agencies and/or if we believe the legal disclosure of such information may prevent the instigation of a crime, facilitate public safety, or protect the welfare of a child using our site or application. We also reserve the right to use personal information to protect the security and integrity of our site and app, and to take precautions against liability.

Story Squad will not share the information we collect with third parties for the purposes of advertisement or monetization outside of the program's stated services.

## **Your Options and Control of Information**

As a parental user, you have a variety of options for controlling, updating, and deleting your information, as well as the information of your child. You may use the controls found across the site and app to update your information and set your preferences, and you may ask us to delete your account at any time. You may also request access to a record of all the personal information we store about you, and ask that we update or delete it.

Likewise, parental users may at any time refuse or revoke permission for us to collect further personal information from your child, and can request that we delete your child's records from our database. This includes asking us to remove some or all of your child's created content.

Please be aware that revoking permissions or deleting information may limit or terminate the ability of you or your child to participate in the service.

## **Weekend Story Contest Entries**

By emailing a photo of your child's handwritten story to enter our free weekend "Story Contests", you grant permission for your child to participate in the contest and allow your child's work to be submitted potential publication in Story Squad's publications, which may include social media and podcasts. Your child's handwritten submission is not required to have an author's name attached, only his or her grade level.

# **Data Retention and Security**

Story Squad highly values the privacy, integrity, and security of your information. As such, we have implemented multiple layers of security designed to protect your information from unauthorized access, use, disclosure, and modification. While we regularly review and update our approaches to security and data management, it is important to be aware that no security measure is foolproof. In consideration of the inherent vulnerability of online data, Story Squad will only retain your information for as long as it is needed to fulfill the functions outlined in this privacy policy, or in accordance with applicable law.

# **Policy Changes**

It may occasionally become necessary to update this policy in order to comply with new laws or regulations, or to accommodate new technologies or business practices. Should our Privacy Policy change, we will provide notice to you and, if necessary, require renewed consent as applicable in accordance with the law. This notification may consist of an email to the address you furnished us with, or as a notification on our own platforms as best suits the circumstances or the policy changes themselves.

#### **Contacting Us**

For any questions or concerns regarding this policy, please do not hesitate to contact us at storysquadHQ@gmail.com.