### Cascadia Sky Privacy Policy

Effective Date: October 1st, 2024

#### 1. Introduction

Welcome to Cascadia Sky, an AI-powered educational platform. We understand the importance of privacy and the trust you place in us by sharing your personal information. Whether you are an educator, student, parent/caregiver, school administrator, or a member of an educational institution, we are committed to safeguarding your data.

This Privacy Policy ("Policy") describes how Cascadia Sky (referred to as "we," "our," or "Company") collects, uses, and protects your personal information through our website (cascadiasky.com) and related services (collectively, the "Services"). At Cascadia Sky, we prioritize user privacy and data security. By accessing or using our Services, you consent to the data practices described in this statement.

Thank you for allowing us to be part of your educational journey. We're here to support you—and your privacy—every step of the way.

## 2. Scope

This Policy governs the collection and use of personal data through various Cascadia Sky services, including:

- Web Application
- Educational Tools and Learning Platforms
- Support and Customer Assistance Systems
- AI-driven Features and Personalization Services
- Other relevant services offered by Cascadia Sky

This Policy does not extend to third-party websites or services linked from our platform.

#### 3. Information We Collect

#### 3.1 Personal Data

We collect personal information that you voluntarily provide when using our Services, including:

- **Personally Identifiable Information (PII):** First and last name, email address, date of birth, mailing address (if payment for Services is required), and any additional details you may provide.
- **Student Data:** Information related to assignments, progress, and AI-generated content provided under the direction of educators, institutions, or parents/caregivers.
- **Technical Data:** IP address, browser type and version, operating system, device identifiers, and timestamps (primarily for data analytics).
- Anonymous Demographic Information: Non-identifiable data such as age range, gender, and interests for aggregate analysis.

• Cookies and Tracking Technologies: If enabled, we use cookies and pixel tags to improve platform functionality, analyze user interactions, and enhance the overall experience. These technologies help us understand how users navigate our Services and enable us to provide a more personalized experience.

# **3.2 Payment Information (For Paid Services)**

If you order paid services:

- **Secure Processing:** Payment information is processed through secure, certified third-party processors (e.g., Stripe).
- **Limited Retention:** We retain only the minimal billing information necessary to maintain your transaction records and do not store complete payment details.

#### 4. How We Use Your Information

Your personal information is used for purposes including:

- **Service Delivery & Enhancement:** To operate, maintain, and improve our Services and provide personalized educational experiences.
- **Communication:** To send account updates, notifications, product announcements (additional Service features), and important alerts.
- **Transaction Processing:** To process billing and payment transactions securely.
- **Research & Development:** To analyze usage trends, enhance our AI-powered tools, and develop new features.
- **Legal Compliance:** To fulfill legal obligations, enforce our rights under applicable contracts, and protect the safety and security of our users.

# **5. Sharing Your Information**

We share your data only in the following circumstances:

- Third-Party Services and Data Use: The Company does not sell, rent, or lease its customer lists to third parties. We do not share personally identifiable information (PII) such as name, email, or address with third-party services like AWS, Google Analytics, or OpenAI. However, we use these services to enhance functionality, analytics, customer support, and AI capabilities. All such third parties are prohibited from using your personal information except to provide these services to the Company, and they are required to maintain the confidentiality of your information.
- **Payment Processing via Stripe:** Stripe is the only third-party service that receives PII, as it is necessary for securely processing payments.
- **Legal or Safety Compliance:** We may disclose personal information if required by law or when necessary to protect the rights, property, or safety of our Company or its users.

## **6. Security of Your Personal Information**

We employ a range of security measures designed to protect your data:

- **Encryption:** Data transmitted between your device and our servers is secured via SSL/TLS encryption.
- **Authentication:** Robust authentication practices—including strong password policies to help protect your account.
- **Regular Audits:** Ongoing security audits and vulnerability assessments are conducted to identify and address potential risks.
- **Rate Limiting:** To prevent abuse and ensure fair use of our Services, we implement rate limiting on API requests and platform interactions. This helps protect against automated attacks, excessive usage, and unauthorized access attempts.
- **Data Minimization and Anonymization:** We collect only the information necessary for our services and anonymize data where possible.
- **Secure Payment Processing:** Sensitive payment information is managed by our certified third-party processor, and only essential billing details are retained.
- AI and OpenAI Usage: We utilize OpenAI's services to enhance our application's functionality, including natural language processing and other AI-related tasks. OpenAI follows stringent security practices to ensure data protection. In these interactions, personal information is not shared as part of API requests, and users are advised to avoid including sensitive or confidential data when interacting with our AI tools.

### 7. FERPA Compliance Statement

Cascadia Sky is dedicated to protecting student data in accordance with the Family Educational Rights and Privacy Act (FERPA). Our FERPA practices include:

- **Data Ownership & Access:** Schools, parents, caregivers, and eligible students have the right to review, modify, or delete student personal data stored within our platform.
- **Restricted Use for AI Training:** Student data is not used to train AI models; it is processed solely to deliver educational services.
- **Data Retention & Deletion:** Upon request, we will permanently delete student records—except when retention is required by law. Requests can be submitted to **privacy@cascadiasky.com**.
- **Third-Party Security:** We partner with reputable technology providers to ensure that student data is securely stored, encrypted, and accessed only on a need-to-know basis.
- **Controlled Sharing:** Student data is not shared with third parties without appropriate parental or institutional consent, except when legally mandated.

For any FERPA-related inquiries, please contact us at <u>privacy@cascadiasky.com</u>.

#### 8. Content Guardian Feature

Cascadia Sky offers a feature called **Content Guardian**, which allows parents, educators, or districts to moderate user requests. This feature ensures compliance with our platform policies, as well as the policies of schools, districts, courses, and parents. Content Guardian is designed to provide an added layer of oversight, ensuring that AI interactions align with educational and safety standards.

# 9. Children's Privacy (COPPA, CIPA & GDPR Compliance)

We adhere to COPPA, CIPA, and GDPR regulations regarding the protection of children's data:

- Parental Consent: Children under 13 require verifiable parental consent before using our Services. Account creation and data collection for minors involve parental notification and/or consent where required by law.
- **Data Collection Limitations:** Personally identifiable information from children under 13 is collected only with parental authorization. If we discover that data has been collected from a child without consent, we will delete it unless legally required to retain it.
- **Content Safety:** AI interactions are designed to provide age-appropriate content while restricting harmful or inappropriate material.
- **Parental Controls:** Parents have the ability to monitor and manage their child's interactions within our platform, ensuring responsible use of our services.
- **Data Review Requests:** Parents can request access to review, update, or delete their child's personal data at any time by contacting **privacy@cascadiasky.com**.
- **Third-Party Restrictions:** Personal information of children under 13 is not shared with third parties for marketing or commercial purposes.
- Educational Institution Agreements: Schools using Cascadia Sky on behalf of students can provide consent in place of a parent, as allowed under COPPA.
- Compliance and Transparency: We provide clear disclosures on data collection practices for children, ensuring that parents and guardians can make informed decisions about their child's participation in our Services.

For any inquiries regarding children's privacy, please contact <a href="mailto:privacy@cascadiasky.com">privacy@cascadiasky.com</a>.

# 10. Your Rights and Choices

You have rights regarding your personal data, which may include:

- Access: Requesting a copy of your personal data.
- **Correction:** Requesting that we correct any inaccuracies.
- **Deletion:** Requesting that we delete your personal data, subject to applicable legal exceptions.
- Data Portability: Receiving your data in a structured, commonly used, machine-readable format.

To exercise these rights, please contact **privacy@cascadiasky.com**. Identity verification may be required before processing your request.

#### 11. Changes to This Policy

The Company reserves the right to modify this Privacy Policy from time to time. Updates may occur due to changes in our services, adjustments to our data protection practices, or new legal requirements. When significant modifications are made, we will notify users via email, through a prominent notice on our platform, and/or by updating relevant privacy information. Your continued use of our services after such updates constitutes acknowledgment of the revised Policy and agreement to abide by its terms.

## 12. Contact Information

For any questions, concerns, or requests regarding this Privacy Policy, please contact us at:

• Email: privacy@cascadiasky.com

• Mail: 18102 76th Ave E, Puyallup, Washington 98375

• **Phone:** 425-550-5543