#### ELITE ACADEMIC ACADEMY WEBSITE PRIVACY POLICY

Effective Date: Match 7, 2024

Elite Academic Academy ("EAA," "we," "us" or "our") recognizes the importance of protecting the privacy of our online visitors. The following privacy policy ("Privacy Policy") is the way we handle information learned about you from your visits to our website available at <a href="https://www.eliteacademic.com/">https://www.eliteacademic.com/</a> (the "Site").

PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY. When you submit information to or through the Site, you consent to the collection and processing of your information as described in this Privacy Policy. By using the Site, you accept the terms of this Privacy Policy, confirm that you are not located outside the United States, and consent to our collection, use, disclosure and retention of your information as described in this Privacy Policy. As we are a TK-12 charter school in California, we only accept students residing in California.

## **Personal Information**

EAA collects personally identifiable information from you, which may include information about you, as a parent or legal guardian to a student, or a student, such as name, email address, phone number, county of residence, student's date of birth, student's current grade level, academy of choice, username and password, photographs, how you heard about us and any additional information you may provide to us when you contact us through the Site's "Contact Us" page or engage with the Site's chat functionality. This information is collected when you join our interest list, create an account with us, contact us through the Site's "Contact Us" page or engage with us through the Site's chat functionality.

We may also combine your personal information with information we receive about you from other sources, such as our service providers.

#### **Information Collected Automatically**

In addition, information about your computer hardware and software is automatically collected by EAA when you use the Site. This information may include: your IP address, browser type, type of operating system, device type, access times, geographic location based on your IP address and other technical information such as protocol status and substatus, bytes sent and received, and server information. We may also collect information about how you interact with the Site. This information is used by us for our business purposes, including for the operation and improvement of the Site, for technical troubleshooting, to maintain quality of the Site and to provide general statistics regarding use of the Site.

#### **Cookies and Other Information Collection Tools**

What are cookies? A cookie is a small file containing a string of characters that is sent to your computer when you visit a website or use an online service. When you visit the website or use the service again, the cookie allows that website or online service to recognize your browser or device. Cookies may store unique identifiers, user preferences and other information.

**Duration of Cookies.** We may use "session cookies" or "persistent cookies." Session cookies are temporary and expire once you close your browser or once your session ends. Persistent cookies remain on your device for much longer or until you or your browser erase them. Persistent cookies have varying durations that are dependent on their expiration date.

Why do we use them? Cookies help us improve the Site by providing us with information about which parts of the Site are most popular, enabling us to analyze technical and navigational information about the Site, and helping us to detect and prevent fraud. We also use cookies and other data collection tools (such as pixels, web beacons and server logs) to help improve your experience with the Site. For example, we use Google Analytics to help analyze how users use the Site. These tools use cookies to collect standard Internet log information and visitor behavior information in an anonymous form. The information generated by the cookie about your use of the Site (including IP address) is transmitted to our data collection tool service providers. This information is then used by us to evaluate visitors' use of the Site and to compile statistical reports on website activity for EAA. If you would like to opt-out from the use of your information by Google analytics, you may use Google Analytics' opt-out browser add-on designed for this purpose. Third parties, such as Meta, may also use cookies, pixels web beacons and other storage technologies to collect or receive information from our Site and elsewhere on the Internet to use such information to enable us to create targeted advertisements and measure the effectiveness of our ads. For additional information on ad targeting and to opt-out of the collection and use of information for ad targeting, please visit https://optout.aboutads.info/?c=2&lang=EN.

How do I control cookies? Web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to manage and delete cookies, visit <a href="www.allaboutcookies.org">www.allaboutcookies.org</a>. Some web browsers provide settings that allow a user to reject cookies or to alert a user when a cookie is placed on the user's computer, tablet or mobile device. Most mobile devices also offer settings to reject mobile device identifiers. Although users are not required to accept cookies or mobile device identifiers, blocking or rejecting them may prevent access to some features available through the Site.

## **Interest Based Advertising**

We may collect information about your online activities on our Site to provide you with advertising about products tailored to your individual interests. We also may obtain information for this purpose from third-party websites on which our advertisements are served.

You may see certain advertisements on other websites because we work with advertising partners (including advertising networks) to engage in remarketing and retargeting activities. Our advertising partners allow us to target our messaging to users through demographic, interest-based and contextual means. These partners track your online activities over time and across websites, including our Site, by collecting information through automated means, including through the use of third-party cookies, web server logs and web beacons. They use this information to show you advertisements that may be tailored to your individual interests. The information our advertising partners may collect includes data about your visits to websites that participate in the relevant advertising networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our Site and on

third-party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts. For example, we utilize certain of our advertising partners' targeted advertising services to show you our advertisements on other websites based on your prior visits to our Site and other online activity.

Provided that a company participates in industry-developed programs designed to provide consumers choices about whether to receive targeted advertising, you may opt out of interest-based advertising generally through the Network Advertising Initiative website or by visiting <a href="http://www.aboutads.info/choices/">http://www.aboutads.info/choices/</a> (web-based advertising) or <a href="http://www.aboutads.info/appchoices">http://www.aboutads.info/appchoices</a> (for mobile advertising). To learn more, please visit the websites operated by the Network Advertising Initiative and Digital Advertising Alliance at <a href="www.networkadvertising.org/choices">www.networkadvertising.org/choices</a>. Opting-out does not mean that you will stop receiving advertisements from us. It means that you still stop receiving advertisements from us that have been targeted to you based on your visits and browsing activity across websites over time.

# **How Information is Used**

We may use the information we collect for any of the following purposes:

- to provide the Site to you and to improve the Site;
- to process application, registration and enrollment requests when you apply, register or enroll for with us or our events, programs or services, or otherwise administer your participation in our events, programs or services;
- to process registration for sports, cultural, educational, and other EAA events;
- to create an account to an EAA portal;
- to allow you to join our interest list;
- to give each user a more consistent and personalized experience when interacting with us;
- to provide information about EAA and send you related information including brochures and other EAA materials, EAA news, academic notices, updates, confirmations and support and administrative messages;
- for security, to detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Site;
- for analytics purposes;
- to fulfil your requests, such as responding to your inquiries;
- to communicate with you;
- For our other business purposes, such as data analytics, audits, enhancing our Site, improving our services, identifying Site usage trends, and determining the effectiveness of our promotional campaigns;
- As we believe to be necessary or appropriate: (i) under applicable law; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities; (iv) to enforce this Privacy Policy; (v) to protect our operations; (vi) to protect our rights, privacy, safety or property, and/or that of you or others; and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.

### **Sharing of Information**

• With Third Party Service Providers Performing Services on Our Behalf. We share your personal information with our service providers to perform the functions for which we engage them. For example, we may use third parties to host the Site or assist us in

- providing functionality on the Site, provide analytics on the Site and send out email updates about the Site and provide you with information about EAA.
- For Legal Purposes. We also may share information that we collect from users as needed to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose personal information as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process. We may also share personal information as required to pursue available remedies or limit damages we may sustain.
- Changes of Control. We reserve the right to transfer or assign the information that we have collected from users in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

#### **Links to External Websites**

Our Site may contain links to third party websites. Any access to and use of such third party websites is not governed by this Privacy Policy, but is instead governed by the privacy policies of those third party websites, and we are not responsible for the information practices of such third party websites.

# **Security Used & Retention of Personal Information**

EAA uses reasonable security measures designed to prevent unauthorized intrusion to the Site and the alteration, acquisition or misuse of personal information, however, we will not be responsible for loss, corruption or unauthorized acquisition or misuse of personal information that you provide through the Site that is stored by us, or for any damages resulting from such loss, corruption or unauthorized acquisition or misuse. It is your responsibility to protect the security of your login information.

#### Do Not Track

Our Site does not currently take any action when it receives a Do Not Track request. Do Not Track is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on Do Not Track, visit <a href="https://www.donottrack.us">www.donottrack.us</a>.

#### Children

EAA receives personal information about children who are under the age of 13 strictly from their parents or guardians when those children are enrolled or interested in enrolling with EAA.

The Site does not ask children under 13 to provide personal information and we do not intentionally or knowingly collect personal information from children under 13.

If you think we may have unknowingly collected personal information of a child under age 13 or if you have reason to believe that a child under age 13 has provided personal information to us via our Site, please contact us immediately at <a href="webmaster@eliteacademic.com">webmaster@eliteacademic.com</a> and we will endeavor to delete the child's personal information as required by applicable law.

# **Questions / Contact Us**

If you have any questions regarding this Privacy Policy, please contact us at webmaster@eliteacademic.com.

# **Notification of Changes**

Any changes to our Privacy Policy will be posted to this page so users are always aware of the information we collect and how we use it. Accordingly, please refer back to this Privacy Policy frequently as it may change.