

EFFECTIVE DATE: JUNE 6, 2007

ePals, Inc. Privacy Policy

ePals, Inc. (“ePals”) is committed to protecting the privacy of students, parents, and educators, while providing students and schools with a dynamic learning and teaching environment made possible by the Internet. This privacy policy addresses the online privacy practices of ePals.

ePals offers the following products and services:

- **In2Books® is a research-proven, curriculum-based product for classroom and home use. The program fosters reading, writing, and critical thinking skills across the curriculum. Through the pairing of learners with mentor pen pals, In2Books® produces real dialogue and real learning.**
- **ePals' SchoolM@il™ is the leading school-safe email product, enabling learners around the world to connect and collaborate.**
- **ePals' award-winning SchoolBlog™ product makes it easy to create and maintain safe blogs for schools and classrooms.**
- **The ePals Global Community™ is the largest online community of K-12 learners, enabling more than 120,000 classrooms across 191 countries to safely connect, exchange ideas, and collaborate.**

The privacy policy is divided into two sections – the first addressing information collected from users who are under 13 years of age; the second addressing information collected from all other users. While many of ePals' products and services are intended for students, these products and services also include significant involvement by parents, teachers, and other adults as well. This policy is applicable to all ePals products and services.

I. PRIVACY NOTICE FOR CHILDREN UNDER 13

It is ePals' policy to limit the collection of personal information from children to only that which is necessary to obtain parental consent or to participate in an ePals program or activity after we have obtained parental consent. Children under 13 years old are not allowed to subscribe or create an account without a parent, guardian, or teacher's permission and in most cases the adult creates the account for the child.

Parental Consent

We require a parent or guardian to consent before a child under the age of 13 can become a member of ePals or to use any of ePals products or services. In addition, during the registration process, we collect only enough personal

information (i.e., parent's name and email address) necessary to obtain a parent's permission for his/her child to become a member of ePals.

For some ePals' products and services, teachers and school administrators may provide consent on behalf of parents. Parents should consult the school's Acceptable Use Policy for more information about the school's policies and practices for protecting children on the Internet.

Parents can provide consent by email, fax, or postal mail for their children to use the following ePals products and services: SchoolMail™, SchoolBlog™, and the Global Community™. Complete email instructions are provided in the parental consent form available at <http://www.epals.com/privacy/forms/>.

To provide consent by fax or post, parents should fill out the parental consent form, sign it and either fax it toll free from North America to 1-703-885-3491 or mail it to:

ePals Legal Department
13625-A Dulles Technology Drive
Herndon, VA 20171
USA

If we receive consent from a parent, teacher or school administrator, an authorized ePals Administrator will activate the child's membership.

We will seek consent from parents for their children to use In2Books® products and services through use of a credit card verification during the registration process, or parents will receive an email from ePals/In2Books® asking for their consent. Parents will be asked to provide consent by email, or fax. If a parent provides email consent, ePals will follow up with a confirmatory email to the parent.

What Information Do We Collect From Children?

For all ePals products and services (i.e., SchoolM@il™, SchoolBlog™, In2Books®, and the Global Community™): we may collect the following types of personally identifiable information directly from children: first name; last name; date of birth; email address; ePals email address; password; nickname; IP address; grade level; mailing address; and parent's name and email address. We may also generate a login ID for the child that is different than the child's actual name.

We may also passively collect any personally identifiable information that children choose to post on our online forums as well as cookies from children's computers. See the "Cookies" section for more.

Non-Personally Identifiable Information: We may collect certain non-personally identifiable information from visitors to our site, such as the date and time of their visit, the type of browser used (e.g., Netscape, Internet Explorer), the type of operating system used (e.g., Windows 2000 or Mac OS), the ISP from which the visitor receives Internet access, and aggregate information regarding what pages users of the site access or visit.

We may also collect non-personally identifiable information from registered members (such as the member's favorite pet or favorite book) and match it to personally identifiable information (such as the member's name) in our database. Such combined information is kept in our internal database under the member's user name.

How Do We Use the Information We Collect From Children?

We may use the personally identifiable information that we collect from a child to determine whether he or she is eligible to use our site, to obtain consent from his or her parent, teacher or school administrator for him or her to use the service, to provide an interactive online experience, to send newsletters, to make reading recommendations, to provide educational content that we believe that the child may be interested in or would benefit from, and to fulfill requests for products or services.

We may use non-personally identifiable information such as cookies and Web surfing habits associated with IP addresses to improve the design, content and performance of our site. We also may use this information in the aggregate to analyze site usage and the popularity of our Web pages.

We may also collect non-personally identifiable information from registered members (such as the member's favorite pet or favorite book) and match it to personally identifiable information (such as the member's name) in our database. Such combined information is kept in our internal database under the member's user name. We do not share such information with third parties, but we may use it for statistical purposes later, such as to say, 25 percent of In2Books® third-graders have goldfish!

Will ePals Share My Child's Personal Information with Third Parties?

Yes, but only in limited circumstances. We may disclose personally identifiable and/or non-personally identifiable (i.e., aggregate, anonymous) information obtained from children for educational research purposes. In addition, we may share such information with affiliates, trusted technology partners, and third party vendors who generate educational content, provide customer service or billing services, process parental consents, and/or monitor online forums and

chatrooms. These third parties have agreed to maintain the confidentiality, security and integrity of personally identifiable information, and the information is not shared with any of these third party technology partners or vendors for their marketing purposes.

We may disclose personally identifiable and non-personally identifiable information in response to legal process--for example, in response to a court order or a subpoena. We also may disclose such information where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law. In addition, we may transfer personally identifiable information if we are acquired by or merged with another company, or as part of a bankruptcy proceeding.

Here is how the consent process works:

- For the ePals' Global Community™, SchoolM@il™, and SchoolBlog™, teachers and/or school administrators will provide consent on behalf of the parents whose children attend school in those districts.
- For In2Books® programs, consent will be obtained from parents, who have been notified about our information collection practices, and parents will be required to use a credit card to register a child for the program, or parents will receive an email from ePals/In2Books® asking for their consent. Parents will be asked to provide consent by email, or fax. If a parent provides email consent, ePals will follow up with a confirmatory email to the parent.

Please note that by their very nature email accounts, greeting cards, chatrooms, blogs, message boards, and other interactive services allow children to disclose personally identifiable information (such as their real names, addresses or phone numbers) about themselves or others. We strive to prevent children from disclosing personally identifiable information through our products and services. For example, we caution children not to disclose this information while using our products and services, and we endeavor to monitor our online forums and use filters, among other things, in order to prevent this information from appearing in public areas such as blogs and chatrooms on the sites when we see it. However, these methods are not foolproof, and children may nevertheless still sometimes disclose personally identifiable information with their correspondents (e.g., in their exchange of letters in the In2Books® programs), and in our online forums. **Parents and teachers should advise their children and students not to share any personally identifiable or contact information online, even if such personal information is provided in correspondence only between individuals.**

How Can I Review, Change or Delete the Personal Information ePals has Collected From My Child?

You can review your child's personal information at any time. You can also have your child's personal information deleted and refuse to permit further collection of such information by us. If you wish to view, delete or modify this information:

- For ePals' Global Community™, SchoolM@il™, and SchoolBlog™ : Members (including parents) can review, edit, or delete any personal information (such as their name, phone number, email or postal address) by logging in to the Global Community™, SchoolM@il™, or SchoolBlog™ and going to the preferences or settings page. Parents can also request that a child's account be deleted at any time by contacting ePals Support at <http://www.epals.com/feedback/form/form.e>.
- For In2Books®: Members (including parents) can log into their accounts on www.In2Books.com, click the "Manage Account" button in the navigation bar, and then click on the "Personal Information and Security" link under the My Children column. To protect your child's personal information, you will be required to enter a user name and password and answer an account security question.

II. INFORMATION THAT WE COLLECT FROM INDIVIDUALS 13 YEARS OLD AND OVER

Our privacy practices for data that we collect online from individuals 13 years old and over are generally similar to those for information that we collect from users under 13 years old.

What Information Do We Collect From Individuals 13 Years Old and Over?

For all ePals' products (i.e., SchoolM@il™, SchoolBlog™, In2Books®, and the Global Community™): We may collect personally identifiable and non-personally identifiable information including, but not limited to: first and last name, date of birth, credit card information, security question and answer, nickname, information related to hobbies and preferences, email address, unique login name and password, home street address and/or telephone number, grade level, school name and address, and school telephone number. We may also generate a unique login ID for use on the ePals site.

Teachers who register on our site may create and post an online profile, with fields for name, school name, school URL (optional), grade level taught, range of ages of students, languages spoken, total number of students in the class, any additional communication capabilities (optional), school street address, and a brief description of their class(es) for matching purposes. The profile can be viewed by any visitor to the site, though only registered ePals members can

attempt to make contact with the teacher who created the profile. It is our policy not to create profiles for any user identified by our system as being under 13 years old or identified as a student.

We may allow ePals' members 13 years old and over to refer friends to the site. If this feature is used, we will ask the member for the friend's name and email address. ePals will automatically send the friend a one-time email inviting them to visit the site. If the recipient chooses not to register, he or she may contact ePals and ask us to remove his or her name and email address from our database.

Non-Personally Identifiable Information: We may use non-personally identifiable information that we collect from users over 13 years old to improve the design and content of our site and to enable us to personalize your Internet experience. We also may use this information in the aggregate to analyze site usage.

We may also collect non-personally identifiable information from registered members (such as the member's music tastes or hobbies) and match it to personally identifiable information (such as the member's name) in our database. Such combined information is kept in our internal database under the member's user name. We do not share such information with third parties, but we may use it for statistical purposes.

How Do We Use Information that We Collect From Individuals Over the Age of 13?

We may use the personally identifiable information that we collect online from users over the age of 13 to obtain parental, teacher or school administrator consent for children to use the service, to provide an interactive online experience (including interactive features such as greeting cards and chatrooms), to send newsletters, to make reading recommendations, to facilitate collaborative projects, to provide educational content that we believe that the child may be interested in or would benefit from, and to collect, fulfill, and bill for books, products or services.

Will ePals Share Teens' and Adults' Personal Information with Third Parties?

Yes, but only in limited circumstances. We may disclose personally identifiable and/or non-personally identifiable (i.e., aggregate, anonymous) information for educational research purposes. In addition, we may share such information with affiliates, trusted technology partners, and third party vendors who generate educational content, provide customer service or billing functions, process

parental consents, and/or monitor online forums/chatrooms. These third parties have agreed to maintain the confidentiality, security and integrity of personally identifiable information.

III. LINKS TO THIRD PARTY WEB SITES

For the benefit of our members, our site links to other sites. We are not responsible for the data collection practices on those other sites. We advise you to carefully review those sites' privacy policies before submitting personal information there.

IV. COOKIES

Cookies are small data files that a Web site writes to your computer hard drive for record-keeping purposes. Cookies identify you as a unique customer and store your personal preferences, as well as technical information (including click through and click stream data). Cookies can either be permanent (i.e., they remain on your computer until you delete them) or temporary (i.e., they last only until you close your browser).

We may write "cookies" to your computer, primarily to personalize the site and to make it easier to use during each session, for example by keeping track of your preferences, such as what language you use. We may also use cookies to record session information, record user-specific information on what pages users access or visit, alert visitors to new areas that we think might be of interest to them when they return to our site, record past activity at a site in order to provide better service when visitors return to our site, ensure that visitors are not repeatedly sent the same banner ads, or to customize site content based on visitors' browser type or other information that the visitor sends. If you choose to furnish the site with personally identifiable information, this information can be stored in or linked to other data stored in the cookies.

You may adjust your browser to reject cookies from us or from any other Web site. If you just wish to browse our site without logging in or registering as a member, you can set your browser not to accept cookies. Please consult the "Help" section of your browser for more information. However, there are certain features on our site that can be accessed only in conjunction with cookies or similar devices and you should be aware that disabling cookies or similar devices might prevent you from accessing some of those features.

V. SECURITY PRACTICES

We strive to protect the confidentiality, security and integrity of the personal information we collect from children and adults. We have put in place physical, electronic and administrative procedures to safeguard and to help prevent unauthorized access to and maintain the security of personally identifiable information collected through this site. This information is maintained on secure servers and is accessible to authorized personnel only on a “need to know” basis.

VI. NOTICE OF CHANGES TO THIS POLICY

If we make changes to this Policy, we will post the changes here with a new effective date at the top. Please check back to this page periodically and look at the effective date at the top of this privacy policy to see if it has changed so that you can always know what information we collect, how we use it, and to whom we disclose it.

If we intend to use or disclose members' personal information in a manner materially different from that stated at the time of collection we will notify members via email. Members age 13 and over will have a choice as to whether or not we can use their personal information in this different manner. If members opt out of receiving any communications from ePals, or have deleted/deactivated their account, then we will honor that request within a reasonable time.

VII. FOR MORE INFORMATION

Please let us know if you have any questions or comments regarding our privacy policy. You can contact us at:

ePals Legal Department
13625-A Dulles Technology Drive
Herndon, VA 20171
Tel.: (703) 885-3401
[Contact ePals](#)