



Privacy Policy

Protecting your private information is our priority. This Privacy Policy applies to the www.base-ed.com and BASE Education LLC (“BASE,” “we,” or “us”) and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to BASE Education include www.base.education (the “Site”) and BASE.

The BASE Education application (the “Application”) is an online education website. BASE works with educational, mental health, and other institutions (each, an “Organization”) to provide its educational services to the students and patients of those Organizations (each a “Participant”). BASE may also provide access to the Application to the parents of Participants. By using the Application or the Site, you consent to the data practices described in this Privacy Policy. This Privacy Policy does not apply to websites or practices of companies that BASE does not own or control (even if linked from the Site), or to individuals that BASE does not employ or manage.

Please note that BASE provides its services under the direction and control of the applicable Organization. If you are a Participant or the parent or guardian of a Participant with questions about your or a Participant’s personal information, please contact the Organization that is administering your version of the Application.

This Privacy Policy describes (i) how we use the information we collect, (ii) with whom we share it, (iii) how we protect it, and (iv) the choices we offer you regarding our collection and use of such information. By using the Application or the Site, you consent to the data practices described in this Privacy Policy. If you do not agree with this Privacy Policy, please do not access or use any part of the Site or Application.

Collection and Use of Participant Personal Information

Organization-Uploaded Information. The Application may be used to collect personally identifiable information about Participants. This information is entered into the Application by the Organizations. Organizations choose the types of personal information that they upload to the Application. This personal information generally may include, names, student or patient IDs, dates of birth, grade level, gender identity, and ethnicity. It will also include the courses that have been assigned to each Participant on the Application.

Participant-Provided Information. As part of our services for Organizations and their Participants, Participants directly upload content directly to the Application. This includes the responses to coursework, including potentially deleted responses (as described in BASE’s application introductory materials) as well as communications with the Organization for assistance or potentially with BASE for technical assistance.

Anonymous Surveys. BASE may, from time to time, ask Participants to complete anonymous surveys after completing a course. These surveys may contain personal information, but we anonymize the personal information such that the survey taker cannot be identified. These surveys are used to (a) better understand outcomes and (b) to improve our course offering to Participants. This anonymous data may be compiled and shared for BASE's business purposes, in compliance with applicable laws.

Use of Participant Information. BASE is bound by all state and federal laws governing the exchange, storage, destruction, and dissemination of Participant data. BASE does not use any of the personally identifiable information of Participants for purposes outside of BASE's provision of services to the applicable Organization. BASE also does not create profiles of Participants for its own purposes or engage in behavioral-targeted advertising with Participants.

Collection and Use of Non-Participant Personal Information

BASE may collect personally identifiable information from adult, non-Participant users of the Application and Site, such as parents, teachers, and administrators. The information that we collect from such adult users include names and email address. If you purchase BASE's products and services, we will collect certain billing information. This information is used to complete the purchase transaction. BASE may also collect anonymous demographic information, which is not unique to you, such as your age, gender and education level. This is used to personalize and improve our services.

In certain cases, adults may also participate in coursework, including educators taking additional professional training courses and parents or guardians taking modules similar to those provided to Participants. In these cases, BASE will also receive the information provided by these adults as part of the coursework that they complete.

BASE collects and uses your personal information to personalize and improve our services; to allow users to set up a user account and profile through the BASE application; and to operate the Site and Application and deliver the services you request.

BASE may also use your personally identifiable information to inform you of other products or services available from BASE and its affiliates and to contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

Application Usage and Cookies

In addition to the information directly collected from the customers and users of the Application and Site, we also collect certain information by automated means regarding the usage of our services. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the Application and Site, to maintain quality of our services, and to provide general statistics regarding use of the Application and Site.

The BASE websites may use "cookies" to help you personalize your online experience and perform analysis of the use of the Site. A cookie is a text file that is placed on your Internet-connected device by a web page server. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize BASE pages, or register with the Site or BASE services, a cookie helps BASE to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same page on the Site, the information you previously provided can be retrieved, so you can easily use the BASE features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Site or BASE services or you visit or use.

Additionally, we use certain third-party service providers, including specifically Google Analytics, to assist us by providing analytics information for our Sites. For more information about Google Analytics' privacy practices, see here: <https://policies.google.com/technologies/partner-sites>. You may opt out of Google Analytics by installing the following browser extension from Google: <https://tools.google.com/dlpage/gaoptout>.

Disclosure of Personal Information

BASE does not sell, rent or lease its customer lists to third parties.

BASE may share data with trusted partners, contractors, service providers, and other third parties we use to support our business to help perform statistical analysis, inform such third parties as to how to better serve the students on behalf of whom the Application is used, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using this data except to provide these services to BASE, and they are required to maintain the confidentiality of your information. Where these partners handle personal information of Participants, we require them to meet our commitments to respect the privacy of that information, including in their use of the information, their data retention policies, and their security practices.

While we currently do not have a parent company, any subsidiaries, joint ventures, or other companies under a common control, we may in the future. If we do, we may share some or all information with such affiliates, provided that they honor this Privacy Policy.

Additionally, BASE may disclose your personal information, without notice, only if such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on BASE; (b) protect or defend the rights, safety, or property of BASE, users of the Application and services (including lawful disclosures in the event that an Application course taker indicates plans for self-harm or harming others); (c) to enforce our agreements, policies, and terms of use; (d) in an emergency to protect the personal safety of any person; or (e) to protect against and prevent fraud, unauthorized transactions, claims, and other liabilities, and manage risk exposure, including by identifying potential hackers and other unauthorized users.

We also reserve the right to transfer your personal information to a buyer or other transferee in the event of a merger, divestiture, restructuring, reorganization, dissolution, sale, or other transfer of some or all of our assets. Should such a sale, merger, or transfer occur, we will ensure that the

successor entity, at the time of the closing of the transaction, either: (i) continues to be bound by the terms and conditions of this Privacy Policy, or (ii) agrees to be bound by privacy and security obligations at least as strong as those set forth in this Privacy Policy.

Third-Party Websites

The Site and Application may contain links to third-party websites. These third-party websites are not under BASE's control. We encourage you to review the privacy statements of websites you choose to visit from BASE so that you can understand how those websites collect, use and share your information. BASE is not responsible for the privacy statements or other content on websites outside of the Site.

Security and Retention of your Personal Information

We have implemented physical, administrative, and technical measures to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All of our servers are behind firewalls with limited access to the public internet. We also encrypt all data in transit and at rest. Please note that the electronic transmission of information is not completely secure. We cannot guarantee that the security measures we have in place to safeguard personal information will never be defeated or fail, or that such measures will always be sufficient or effective. Any transmission of personal information is at your own risk.

How long we keep the personal information we collect depends on the type of information, the purpose for which it is used, how sensitive it is, and similar factors. We only maintain the personally identifiable information of Participants for as long as necessary to deliver our services to the applicable Organization. As for other types of personal information, we will retain it for the length of time reasonably needed to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

Do Not Track Signals

Your web browser may let you choose your preference as to whether you want to allow the collection of information about your online activities over time and across different websites or online services. At this time, the BASE application and websites do not respond to the preferences you may have set in your web browser regarding such collection of your information, and we may continue to collect information in the manner described in this Privacy Policy.

Children Under Thirteen

The Application may be used to collect personally identifiable information for children under the age of thirteen, provided that the child's parent(s) consent to the child using BASE's products.

If you are under the age of thirteen, you must ask your parent or guardian for permission to use the Application. If your parent or guardian does not permit you to use the Application, they must opt you out of permission to use the Application by contacting your school administrator.

We may collect personal information from children under the age of 13 who use the Site or Application. When we intend to collect personal information from children under the age of 13, we take additional

steps to protect children's privacy, including:

- Notifying parents/legal guardians about our information practices with respect to such children, including the types of personal information we may collect, how we use that information, and with whom we may share that information;
- In accordance with applicable law, obtaining consent from parents/legal guardians for the collection of personal information from their children;
- Limiting our collection of personal information from children to no more than is reasonably necessary to participate in an online activity; and
- Giving parents/legal guardians access or the ability to request access to personal information we have collected from their children and the ability to request that such personal information be changed or deleted.

If you are a parent and you have questions regarding our data collection practices, please contact us using the information provided at the end of this Privacy Policy.

Data Transfers

We store data in the State of Oregon in the United States. When we obtain information about you, we may transfer, process, and store such information outside of the country in which you reside, including in the United States. By using the Site or Application, you consent to the transfer to and processing and storage of your information in countries outside of your country of residence, which may have different data protection laws than those in the country where you reside.

Changes to this Privacy Policy

BASE may occasionally update this Privacy Policy to reflect company and customer feedback or changing legal requirements or business practices. If we make a material change to our Privacy Policy, we will provide a prominent notice to you (by email to the Organization and/or posting on the Site) that our privacy practices have changed and will provide a link to the new policy. We will not change our privacy practices to be inconsistent with our contractual commitments with our Organizations. By continuing to access or use the Site or Application after those changes become effective, you agree to be bound by the revised Privacy Policy. BASE encourages you to periodically review this Privacy Policy to be informed of how BASE is protecting your information. The date this Privacy Policy was last revised is at the bottom of this page.

Contact Information

BASE welcomes your questions or comments regarding this Privacy Policy. If you believe that BASE has not adhered to this Privacy Policy or if you have any questions about this Privacy Policy, please contact BASE at:

Email Address: support@base.education
Phone: 720-316-9156

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