

OKAPI PRIVACY POLICY

Effective Date: January 2024

This Privacy Policy describes:

- the information that Okapi Educational Publishing, Inc. (“Okapi” or “we”, “us” or “our”) collects from you in any form through our applications, online services or Okapi websites (including but not limited to <https://myokapi.com>, <https://flyingstarttoliteracy.com/digital-activities/>, <https://despegando-digital-activities.com>; <https://despegando-hacia-la-lectura.com>, <https://okapi-bookrooms.com>, <https://worldwise-reading.com>, <https://exploramundos-reading.com/>, <https://okapi-digital-literacy.com>, <https://biliteracy-para-todos.com> (collectively “Website”);
- how we collect, use, share, disclose and otherwise process Personal Information (as defined below) that we receive or collect including through our Website; and
- how we store and secure Personal Information.

Definition of Information

As part of this Privacy Policy, the term “Personal Information” is used to describe information that can be used to directly or indirectly identify an individual person, such as a full name, home or other physical address, email address, and telephone number. Personal Information can also include anonymous information that is linked to information that can be used to directly or indirectly identify an individual person. Personal Information does not include information that has been made anonymous or aggregated so that it can no longer be used, whether in combination with other information or otherwise, to identify an individual person.

The term “Non-Personal Information” is used to describe information that cannot be used to directly or indirectly to identify an individual person and that is not linked to information that can be used to directly or indirectly to identify an individual person. Non-Personal Information includes passively collected information about activities on our Website, such as usage data, to the extent that information is not linked to any Personal Information.

The term “information” is used in this Privacy Policy as a generic term and may include both types of information described above.

How to Contact Us

If you have any questions, concerns or complaints about our Privacy Policy or our data collection or processing practices, or if you want to report any suspected security violations to us, please contact us at the following address or email address:

Privacy Officer
Okapi Educational Publishing, Inc.
42381 Rio Nedo, Temecula, CA 92590
privacy@myokapi.com
866-652-7436

Services We Provide

We offer the following services on or through our Website:

- products, services, tools and resources to educators to help support and facilitate the education process;
- tips and practical guidance for literacy teachers;
- on-line educational facilitation tools, including, Flying Start to Literacy Activities. Teachers may use these tools inside and outside the classroom to help students meet educational goals.
- We work with independent sales representatives to make our tools and resources available to educators.

Information We Collect

Information You Provide to Us. We collect certain Personal Information as well as Non-Personal Information from you that you voluntarily provide.

- Account Information.** You can create an account with us to receive newsletters and communications from us and also to track orders, download products, access purchased services, and manage account information. If you choose to register and create a user account with us, we collect your first and last name, e-mail address, professional title, school or district information, street address, and send you a verification email.
- Newsletter/Communications/Sample Request.** You can provide us with your email address, your title or position and school or district information to receive our newsletter and receive information from leading voices in literacy and gain access to tools for immediate use. To request samples of our products, you would also provide mailing address, telephone and appropriate grade level information.
- Purchase Products/Services.** If you would like to purchase a product or service from our on-line store at <https://myokapi.com/okapi-store>, you will be asked to provide your name, address, email address, and school/district information. If you choose to make payment via credit card, you will be prompted to enter credit card information, which will be sent via a secure connection directly to our third-party payment processor. You also will have the option to store your payment information. Our third party payment processor provides the stored payment option. We do not have access to your payment information.
- Contact Us.** If you provide us with feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

Information We Receive From Your Use of Our Website

We may receive certain types of information automatically when you access the Website.

- a. **Derivative Data and Usage Information.** We may obtain information about your browser type and internet protocol (IP) address. Collected IP addresses are obfuscated, and therefore, we do not identify you or match this information with your other Personal Information. Browser type and IP address information is used to diagnose technical problems of the Website, facilitate your use of our Website, or track aggregate traffic patterns on the Website. Additionally, we may automatically collect information pertaining to access times, pages viewed, and interactions with pages on the Website.
- b. **Cookies and Web Beacons.** “Cookies” are small text files that are placed on your device by a Web server when you access a website. To enable our systems to recognize your browser or device and to provide and improve the Website, we may use both session Cookies and persistent Cookies. We may also use Cookies to monitor aggregate usage and web traffic routing on our Website and to customize our Website.

For more information about cookies and how we use them, please read our [Cookie Policy](#).

You can opt out of our use of Cookies to recall information about you by setting your browser not to accept Cookies or to disable Cookies. Most browsers also offer additional built-in tools to help you manage, control, and delete Cookies.

Location of Information

Okapi is based in the United States, and the information we collect is hosted in the United States including, through our third party service provider, Amazon Web Services ('AWS'). Therefore, any information we collect is governed by and our Website are operated in accordance with United States laws. If you are using the Website outside the United States, you consent to having your information and data transferred to the United States. In addition, certain third party service providers from countries other than the United States may access our Website and your Personal Information as part of performing those services. If you are from any jurisdiction outside of the United States with laws or regulations governing the use of the internet, including the collection, use and disclosure of Personal Information, that are different from those of the United States, you may only use the Website in a manner lawful in your jurisdiction. We cannot guarantee or provide any warrant that the Website will comply with any laws outside of the United States, and you should not access or use the Website if your use is not in compliance with the laws of your country.

Personal Information We Receive From Others

We may receive Personal Information about you from third parties providing credit and debit card authorization and fraud screening services as part of any purchase. Further, independent sales representatives may provide your Personal Information to Okapi to process product or service orders. We require these independent sales representatives to collect, maintain or use any Personal Information they collect from you directly in accordance with this Privacy Policy.

Children’s Personal Information

We market and sell our educational materials to school districts who purchase or otherwise subscribe to our products and services. These educational materials can be distributed by teachers to certain of their students, under the direction and supervision of their teachers. Okapi is unaware, however, of when an individual is under the age of 16 and who may be using the Website or materials distributed by teachers, as no log in is required for any student. We do not knowingly collect any Personal Information of a minor under 16 years old, and if we learn that we have collected any Personal Information of a minor under 16 years old, we will comply with applicable legal requirements in the handling of that Personal Information, including deleting it where applicable.

Furthermore, Okapi does not market its Website to children. Okapi does not know when a user on the Website is either a teacher or student because no Personal Information is collected by virtue of using the Website, and any IP address is obfuscated.

The Website may automatically collect certain derivative and usage information, however, we would not be able to identify or match any information with a child's Personal Information. This derivative data and usage information may also be used to diagnose Website technical problems, facilitate use of our Website, or track aggregate Website traffic patterns, but no effort is made to identify any other Personal Information in such cases.

Links to and from Third Party Websites

Our Website may contain links to third party websites and services and some of those third-party websites may be co-branded with our logo (the "**Third Party Services**"). For example, our Website automatically directs you to a third party payment processor when you are paying for products or services on-line. If you decide to visit and submit any information to a Third Party Service, you are subject to the third party's privacy policy and practices and not this Privacy Policy. Similarly, you may be directed to our Website from third party websites, including Clever, as part of a single sign on service through a school district that has contracted with us for the Services. To the extent you are directed to our Website via a third party interface or link, you acknowledge that you may also be subject to the terms of the applicable third party privacy policy and other contractual requirements. We encourage you to review carefully the legal and privacy policies of all other digital services that you are directed to or from as a result of our Website.

How We Use Your Personal Information

We do not sell your Personal Information to anyone, and more specifically, we will use your Personal Information as detailed below.

With your consent. We may share your Personal Information with third parties if you have given us your consent to do so.

To perform services. We may use or disclose your Personal Information to third parties in order to perform services you request such as processing an order for the delivery of a Flying Start to Literacy product.

To communicate with you. We use your Personal Information to send you information about our products or services, to respond to you when you contact us, to call you as a part of secondary fraud

protection, or to solicit your feedback. If you provided us with an email address, we may also send newsletters, surveys, offers, and other promotional materials related to our products or services. You can control these marketing communications by using your notification preferences in account settings or via the “Unsubscribe” link in an email.

With Independent Sales Representatives. If you provided us with your Personal Information and indicated an interest in learning more about our products or services, we may use or disclose your Personal Information with an independent sales representative who may contact you. We require independent sales representatives who receive Personal Information from us to use and maintain your Personal Information in accordance with this Privacy Policy.

With third party service providers performing services on our behalf. We may disclose your Personal Information with our third-party service providers to perform the functions for which we engage them. For example, a third-party payment processor collects all credit card information for secure processing and storage. Further, we may provide third party service providers with information as needed to operate other related services. For example, we may work with Google Analytics so that Google Analytics can provide us with information about Website usage, or we may work with MailChimp so that they can send out the newsletters and other marketing materials on our behalf.

To improve, personalize, and develop our Website. We use the information we collect to improve and personalize our Website and to develop new products, services and benefits.

Corporate Affiliates and Corporate Restructuring. We may share some or all of your Personal Information with our corporate affiliates, including in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, we may transfer your Personal Information as a business asset. If another company acquires our company, business, or assets, that company will possess the information we collected and will assume the rights and obligations regarding your Personal Information as described in this Privacy Policy.

For legal purposes. We may preserve or disclose Personal Information about you to comply with a law, regulation, legal process, or governmental request; to assert legal rights, in response to a subpoena, or defend against legal claims; or to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, or threats to the security of the products or services, violation of our Terms of Use, or the physical safety of any person.

Your Options Regarding Your Information

Opt-Out

We may periodically send you newsletters and e-mails to the e-mail address that you provided that directly promote the use of our Website or products or services. You may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you service-related communications, including notices of any updates to our Terms of Use or Privacy Policy.

Change Your Personal Information

All users may review, update, correct or delete the Personal Information in their user account by contacting us <https://myokapi.com/contact-us>. If you completely delete all of your Personal Information with us, then your user account will be deactivated. We may retain an archived copy of your records.

Data Retention

We retain Personal Information we collect only for as long as needed as part of the products or services we provide. We will retain and use this Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements with users, and/or the period required by laws in applicable jurisdictions.

Information Security

Okapi takes a number of precautions — including administrative, technical, and physical measures — designed to safeguard your Personal Information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction. However, security risk is inherent in all internet and information technologies, and we cannot guarantee or warrant the security of your Personal Information and we cannot be responsible for the theft, destruction, loss or inadvertent disclosure of any Personal Information. If you have a security-related concern, please contact us. Always be sure to secure your login credentials for on-line access. In order to protect you and your Personal Information, we may suspend your use of the Website, without notice, pending an investigation, if we suspect any breach of security.

Do Not Track

The term “Do Not Track” refers to a HTTP header offered by certain web browsers to request that websites refrain from tracking the user. We take no action in response to Do Not Track requests.

CA Consumer Privacy Rights

California Civil Code Section 1798.83 (known as the "*Shine the Light*" law) requires certain businesses to respond to requests from California residents about Personal Information disclosed to third parties for the third parties' direct marketing purposes. We do not disclose our customers' Personal Information to third parties for third parties' direct marketing purposes. In the event we do so in the future, we will not disclose any of your Personal Information to third parties for third parties' direct marketing purposes unless you consent at the time that you provide your Personal Information. Please note that Okapi is not subject to the California Consumer Privacy Act or the California Privacy Rights Act.

Changes to this Privacy Policy

This Privacy Policy may be updated from time to time for any reason. Any changes to our Privacy Policy would be indicated by posting a newer version of the Privacy Policy and changing the “Effective” date above. You should consult this Privacy Policy regularly for any changes.