



# Privacy Policy

Last Updated: June 16, 2020

Welcome to the website (the “Site”) of Bilingual Bridges, LLC. (“Bilingual Bridges”). Bilingual Bridges is a service that allows parents, guardians, and schools to enroll students in online small-group and 1-on-1 classes, and for teachers to create, publicize, and provide those classes (the “Services”). This Privacy Policy sets forth Bilingual Bridges’ policy with respect to the information collected from visitors and users of the Bilingual Bridges Services.

If you are visiting us from the European Union or European Economic Area, please be sure to read the section entitled “Additional Information for Users in the European Economic Area” for information on how we comply with privacy laws applicable to you.

## Information We Collect

When you interact with us through the Services, we may collect information that, alone or in combination could be used to identify you (“Personal Data”) and other information from you, as further described below:

**Personal Data That You Provide Through the Site:** We collect Personal Data from you when you voluntarily provide such information, such as when you contact us with inquiries or register for a Bilingual Bridges account to access the Services. We may collect the following information from you in order to provide our Services:

- Email address;
- Phone number;
- Zip code or city and state you are located in;
- Credit card or other payment information;
- Student’s first name;
- Student’s age or birthday;
- Student’s email address;

- Video recordings of the student during classes;
- Information voluntarily provided through reviews; and
- Notes you provide to teachers about yourself or the student when enrolling a student.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data to our Services, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of Bilingual Bridges and the authorized third parties referred to herein.

### **Other Information:**

**Passively Collected Data:** When you interact with us through the Site, we receive and store certain data automatically. Bilingual Bridges may store such passively collected data itself or such information may be included in databases owned and maintained by our affiliates, agents or service providers. We may use such information and pool it with other information to track, for example, the total number of visitors to our Sites, the number of visitors to each page of our website, and the domain names of our visitors' internet service providers.

In operating our Sites, we and third parties that provide certain functionality to the Bilingual Bridges Services may use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Services gives to your browser when you access the Site. Our cookies help provide additional functionality to our Services and help us analyze Site usage more accurately. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of our Services' features. For more information about our use of cookies, please see the section entitled "Cookie Policy," below.

**Aggregated Personal Data:** We may aggregate data, including Personal Data, and use such aggregated data for any purpose. This aggregate information does not identify you personally.

# Our Use of Your Personal Data and Other Information

We use your information to:

- provide the Bilingual Bridges Services;
- process your payment for the Services;
- send you emails or newsletters that you signed up for;
- improve the Bilingual Bridges Services; and
- analyze website usage.

Bilingual Bridges Teachers receive recordings of their classes and may use the recording to improve their curriculum and classes and may provide the recording to Parents, Schools, and the participants in the class to view. Bilingual Bridges and its affiliates may use your Personal Data to contact you in the future to tell you about Services we believe will be of interest to you. If we do so, each promotional communication we send you will contain instructions permitting you to "opt-out" of receiving future promotional information. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, please contact us at [support@bilingualbridges.com](mailto:support@bilingualbridges.com). Please note that we will continue to contact you via email to respond to requests and provide our Services.

## Storage

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there.

## Our Disclosure of Your Personal Data and Other Information

We may share your Personal Data with certain third parties without further notice to you, as set forth below:

**Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your information may be transferred to a successor or affiliate alone or as part of that transaction along with other assets.

**Vendors and Service Providers:** We engage third party vendors and service providers to perform certain functions on our behalf (such as payment processing). These third parties may have limited access to databases of user information or registered member information solely for the purpose of helping us to provide and/or improve the Services and they will be subject to contractual restrictions prohibiting them from using the information about our Users for any other purpose. Such agents or third parties do not have any rights to use Personal Data beyond what is necessary to assist us.

**Legal Requirements:** Bilingual Bridges may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Bilingual Bridges, (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (iv) protect against legal liability.

## **Publicly Posted Information**

You may be able to share Personal Data with third parties, including with the general public, through use of the Services.

**Public Forums:** Our Services provide you the opportunity to share information on a variety of topics with other Bilingual Bridges Users through Groups and Communities (the “Groups and Communities”). Use of the Groups and Communities is entirely voluntary. But please be aware that any information you include in the Groups and Communities will become available to all Bilingual Bridges Users without restriction.

We do not systematically monitor the content of information that is published in the Groups and Communities. Any information published in Groups and Communities becomes available to the public. After publishing, we have no control over how such information is used or its further dissemination. We urge you to think carefully about what, if any, Personal Data you include in your posts in our Groups and Communities.

## Children

This section explains our information collection, disclosure, parental consent practices and parental choice procedures with respect to information provided by children under the age of 13 (“Child” or “Children”). This policy is in accordance with the U.S. Children’s Online Privacy Protection Act (“COPPA”), and outlines our practices in the United States regarding Children’s personal information. For more information about COPPA and general tips about protecting Children’s online privacy, please visit OnGuard Online.

**Collection:** Bilingual Bridges collects information about students directly from Schools and Parents, who provide us with the Child’s first name, age, type of schooling, location, and additional notes for the Teacher. In addition, Children may share information about themselves during classes. The Bilingual Bridges class sessions may take place over online videos in which video images and audio of the Children are recorded. No information is collected directly from Children until they are in the class session. Children cannot post personal data publicly on the Bilingual Bridges Services.

**Use and Disclosure:** Bilingual Bridges shares the name, age, location, and any notes Schools and Parents have provided about their Child to the course Teacher, in order to allow the Teacher to provide classes. This information shall also be treated as part of the School and Parent’s Personal Data and may be shared as described in the Disclosure section above for business transfers; to vendors and service providers; and to comply with legal requirements. Children may also share information about themselves with the Teacher and the rest of their class during the class session voluntarily. While Bilingual Bridges expects Teachers and all others Users to abide by our standards of conduct, please note that we cannot control or monitor what personal information a Child shares with Teachers or other classmates, nor what those third parties ultimately do with that information, and disclaim all responsibility in that regard.

**Class Video Recordings:** As described above, Bilingual Bridges records videos of Students and Teachers during Bilingual Bridges classes (“Class Recordings”). The Class Recordings are made available by Bilingual Bridges to the Teacher of the class and may be shared by the Teacher for the entire class (and their Schools and Parents) to view (the “Permitted Recipients”). Bilingual Bridges may also use Class Recordings to provide feedback to Teachers, for customer support, and for compliance purposes. Bilingual Bridges will obtain additional school or parental consent before we use any Class Recordings for promotional or other purposes. We utilize reasonable means to (i) limit the ability of Teachers to create copies of the Class Recordings or to share the

Class Recordings with anyone aside from Permitted Recipients, and also (ii) limit the ability of Permitted Recipients to download or re-share the Class Recordings. While we expect Teachers and Permitted Recipients to abide by our standards of conduct, please note that we cannot control or monitor what such third parties ultimately do with Class Recordings, and disclaim all responsibility in that regard.

**Parental Consent:** Bilingual Bridges obtains verifiable parental consent before collecting Personal Data from a Child. Bilingual Bridges requires that the School or Parent provide credit card information in order to register a Child for and pay for a Bilingual Bridges Class. If a Parent does not consent, then we will not collect, use or disclose any personal information about the Child, and the Child will not be allowed to use the Services in any way.

**Parental Choices and Controls:** At any time, the School or Parent can refuse to permit us to collect further Personal Data from the Children in association with the account, and can request that we delete from our records the Personal Data we have collected in connection with that account. Please keep in mind that a request to delete records may lead to the termination of an account, membership, or other Service. You may update a Child's information by logging into the account. You can contact Bilingual Bridges to request access to, change, or delete a Child's personal information by sending an email to us at [support@bilingualbridges.com](mailto:support@bilingualbridges.com). A valid request to delete personal information will be accommodated within a reasonable time. In addition to the foregoing, we will exercise commercially reasonable efforts to delete personal information belonging to Children when it is no longer needed for the purpose for which it was collected.

## **Links to Other Websites**

This Privacy Policy applies only to the Bilingual Bridges Services. The Services may contain links to other websites not operated or controlled by us (the "Third Party Sites"). The policies and procedures we describe here do not apply to the Third Party Sites. The links from our Services do not imply that we endorse or have reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

## **Security**

We take reasonable steps to protect the Personal Data provided via the Services from loss, misuse and unauthorized access, disclosure, alteration, or destruction. However, the internet cannot be guaranteed to be fully secure and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for disclosures beyond our reasonable control. You are also responsible for helping to protect the security of your account credentials. For instance, never give out your password, and safeguard your user name, password and personal credentials when you are using the Services, so that other people will not have access to your Personal Data. Furthermore, you are responsible for maintaining the security of any personal computing device on which you utilize the Services.

## **Do Not Track**

Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser. While we do not currently support Do Not Track signals, we treat the data of everyone who comes to our site in accordance with this Privacy Policy, whatever their Do Not Track setting.

## **Access and Accuracy; Correcting Personal Data**

You have the right to access the Personal Data we hold about you in order to verify the Personal Data we have collected with respect to you and to have a general account of our uses of that information. Upon receipt of your written request, we will provide you with a copy of your Personal Data, although in certain limited circumstances we may not be able to make all relevant information available to you, such as where that information also pertains to another user. In such circumstances, we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner.

We will make every reasonable effort to keep your Personal Data accurate and up-to-date, and we will provide you with mechanisms to correct, amend, delete, or limit the use of your Personal Data. As appropriate, this amended Personal Data will be transmitted to those parties to which we are permitted to disclose your information.

Having accurate Personal Data about you enables us to give you the best possible service.

In certain circumstances, you have the right:

- To access and receive a copy of the Personal Data we hold about you
- To rectify any Personal Data held about you that is inaccurate
- To request the deletion of Personal Data held about you

You have the right to data portability for the information you provide to us. You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it.

Please note that we may ask you to verify your identity before responding to such requests.

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of Personal Data which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: [support@bilingualbridges.com](mailto:support@bilingualbridges.com).

## **Cookie Policy**

### **What are cookies?**

Cookies are small text files containing a string of characters that can be placed on your computer or mobile device that uniquely identify your browser or device.

### **What are cookies used for?**

Cookies allow a site or services to know if your computer or device has visited that site or service before. Cookies can then be used to help understand how the site or service is being used, help you navigate between pages efficiently, help remember your preferences, and generally improve your browsing experience. Cookies can also help ensure marketing you see online is more relevant to you and your interests.

## **What types of cookies do we use?**

There are generally four categories of cookies: “Strictly Necessary,” “Performance,” “Functionality,” and “Targeting.” We routinely use all four categories of cookies on the Service. You can find out more about each cookie category below.

1. **Strictly Necessary Cookies.** These cookies are essential, as they enable you to move around the Service and use its features, such as accessing logged in or secure areas. Because these cookies are essential, they cannot be disabled.
2. **Performance Cookies.** These cookies collect information about how you have used the Service, for example, information related to the unique username you have provided, so that less strain is placed on our backend infrastructure. These cookies may also be used to allow us to know that you have logged in so that we can serve you fresher content than a user who has never logged in. We also use cookies to track aggregate Service usage in an anonymized fashion and experiment with new features and changes on the Service. The information collected is used to improve how the Service works.
3. **Functionality Cookies.** These cookies allow us to remember how you’re logged in, whether you chose to no longer see advertisements, when you logged in or out, and the state or history of Service tools you’ve used. These cookies also allow us to tailor the Service to provide enhanced features and content for you and to remember how you’ve customized the Service in other ways. The information these cookies collect are anonymous, and they are not used to track your browsing activity on other sites or services.
4. **Targeting Cookies.** Us, our advertising partners or other third party partners may use these types of cookies to deliver advertising that is relevant to your interests. These cookies can remember that your device has visited a site or service, and may also be able to track your device’s browsing activity on other sites or services other than ours. This information may be shared with organizations outside of ours, such as advertisers and/or advertising networks to deliver the advertising, and to help measure the effectiveness of an advertising campaign, or other business partners for the purpose of providing aggregate Service usage statistics and aggregate Service testing.

## **How long will cookies stay on my device?**

The length of time a cookie will stay on your computer or mobile device depends on whether it is a “persistent” or “session” cookie. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted.

## **How to control and review cookies**

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Services.

## **Changes to Our Privacy Policy**

We reserve the right to change this Privacy Policy at any time. If we decide to change this Privacy Policy in the future, we will post or provide appropriate notice. Any non-material change (such as clarifications) to this Privacy Policy will become effective on the date the change is posted, and any material changes will become effective 30 days from their posting on this page or via email to your listed email address. Unless stated otherwise, our current Privacy Policy applies to all Personal Data that we have about you and your account. The date on which the latest update was made is indicated at the top of this document. We recommend that you print a copy of this Privacy Policy for your reference and revisit this policy from time to time to ensure you are aware of any changes. Your continued use of the Services signifies your acceptance of any changes.

## **Contact Us**

Please feel free to contact us if you have any questions about Bilingual Bridges' Privacy Policy or the information practices of our Services.

You may contact us as follows: You may send an email to [support@bilingualbridges.com](mailto:support@bilingualbridges.com) or send mail to:

Bilingual Bridges, LLC.  
6491 N. Park Avenue  
Indianapolis, IN 46220  
United States

# **Additional Information for Users in the European Economic Area**

## **Personal Information**

References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

## **Controller**

Localize Corporation is the controller of your personal information for purposes of European data protection legislation.

## **Lawful Basis for Data Processing**

We will only collect, store, and process your personal information where a lawful basis for such processing exists, which will typically fall under one of the following scenarios:

1. You, the Data Subject, have given consent to the processing of your personal information for one or more specific purposes, for example by consenting to terms and conditions on our website, and consenting to the terms of this Privacy Notice;
2. Processing is necessary for the performance of a contract to which you, the Data Subject, are party;
3. Processing is necessary for compliance with a legal obligation to which we as a Controller is subject;
4. Processing is necessary for the purposes of the legitimate interests pursued by us as the Controller, or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of you, the Data Subject, which requires protection of your personal information. The legitimate interests that underlie our processing of personal data include research and development, marketing and promoting the Services, and protecting our legal rights and interests.

## **Use for new purposes**

We may use your personal information for reasons not described in this Privacy Notice where permitted by law and the reason is compatible with the purpose for which we collected it.

## Retention

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. For example, we keep account information for as long as the account is active, and for a reasonable period thereafter to ease reactivation if you choose to reactivate your account. If the Services are made available to you through an organization, e.g., your Child's School, we retain your information as long as required by the administrator of your account on their behalf.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

## Your rights

European data protection laws give you certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

- **“Opt-out”**. Stop sending you direct marketing communications. You may continue to receive Service-related and other non-marketing emails.
- **“Access”**. Provide you with information about our processing of your personal information and give you access to your personal information.
- **“Correct”**. Update or correct inaccuracies in your personal information.
- **“Delete”**. Delete your personal information.
- **“Transfer”**. Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **“Object”**. Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.
- **“Withdraw Consent”**. If our processing is based on your consent, you have the right to withdraw such consent at any time.

You can submit these requests by email to: [support@bilingualbridges.com](mailto:support@bilingualbridges.com). We may request specific information from you to help us confirm your identity and process your

request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us as described in the preceding section of our Privacy Policy or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

### **Cross-Border Data Transfer**

Whenever we transfer your personal information out of the EEA to countries not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be based on either use of approved standard contractual clauses or one of the safeguards recognized by the European Commission as providing adequate protection for personal information, where required by EU data protection legislation.

