

# Privacy Policy

The IntelliBoard platform imports personal data from its clients' learning management systems, other client-permitted integrations, and client-uploaded data to the IntelliBoard platform.

## Introduction

IntelliBoard cares about your privacy. Privacy is a fundamental right for all individuals, globally. Our clients trust us with the personal information of their employees, students, and other users within their respective systems.

We take the obligations that are attached to this information very seriously.

IntelliBoard imports information from learning management systems, other client-permitted integrations, and client-uploaded data to the IntelliBoard platform, for the explicit purpose of providing that information in a format to be used exclusively by the client. We do not and will not sell or rent your data to third parties unless this is required in the context of changes to our business structure such as a merger or acquisition.

- IntelliBoard Privacy Principles
- IntelliBoard does not sell client data.
- IntelliBoard does not own the content you export to the IntelliBoard platform. Clients are the only owners of their own data.
- IntelliBoard consistently updates its security best practices to ensure ongoing protection.
- IntelliBoard is compliant with FERPA, COPPA, CCPA, and GDPR, among other privacy laws.
- IntelliBoard is transparent about our practices.
- IntelliBoard does not advertise within the IntelliBoard platform.
- IntelliBoard uses security practices that guide the certifications for both SOC II and ISO compliance.

## 1. General

IntelliBoard, Inc., its subsidiaries, and affiliates ("we" or "us") value our clients and respect their privacy, and are committed to ensuring the privacy and security of personal information ("Personal Data") shared or collected while using our website, our applications, and any services we offer (collectively, the "Services"). This privacy policy ("Privacy Policy") informs you about how we collect, use, and disclose your Personal Data. Terms capitalized but not defined in this Privacy Policy shall have the meaning ascribed to them in our Terms of Use.

This Privacy Policy does not govern privacy practices associated with offline activities, websites other than ours, or practices of third parties that we do not own or control, such as our partners, or other third-party service providers appearing through the Services. If you have objections to the Privacy Policy, you should immediately discontinue the use of the Services and follow the procedure described in the section entitled "Opting-Out or Updating Your Personal Data and Privacy Preferences."

The Services are intended for adults with organizational/institutional permissions to view the content displayed through the Services. The Services are not intended for the administration and creation of accounts for Services for anyone under 13 years of age, or those without the Client's express permission(s) to access or view the content provided to them.

Personal Data that is processed by the Services is done so through explicit permission of the subscriber(s) of the Services. Data processed from any user data shared by the subscriber(s), including those under 13 years of age, is done so through the explicit permission of the subscriber(s) of the Services. This data is only accessible by the subscriber(s) of the Services, and the acceptable use of this data by the subscriber(s) is implied through the use of the Services.

**1.1. Children's Privacy: Children's Online Privacy Protection Act (COPPA)**

IntelliBoard supports the guidelines and regulatory requirements provided in COPPA. Wherein a client or institution exports data (instructs the IntelliBoard platform to import or "collect" it) regarding children under the age of 13, IntelliBoard processes and retains such information solely to provide the services on behalf of the customer and for the purposes set forth in the agreement with the customer.

**1.2. United States: FERPA and State Education Privacy Laws**

IntelliBoard provides a service to institutions. Through the provision of these services, we collect personally identifiable information from or about students ("Student Data"), which includes educational records governed by the Family Educational Rights and Privacy Act (FERPA). IntelliBoard considers Student Data (and all other data) to be strictly confidential and in general does not use individual student data for any purposes. Our collection, use, and sharing of Student Data are governed by our contracts with the educational institutions, the provisions of FERPA, the Children's Online Privacy Protection Act ("COPPA"), and other applicable laws that relate to the collection and use of personal information of students, but not by the provisions contained in this Privacy Statement.

**1.3. General Data Protection Regulation (GDPR)**

Individuals and data protection supervisory authorities in the EU and the UK may contact our data protection representatives according to Articles 27 EU and UK GDPR:

- EU: DP-Dock GmbH, Attn: IntelliBoard, Inc., Ballindamm 39, 20095 Hamburg, Germany
- UK: DP Data Protection Services UK Ltd., Attn: IntelliBoard, Inc., 16 Great Queen Street, Covent Garden, London, WC2B 5AH, United Kingdom
- [dp-dock.com](https://dp-dock.com)
- [IntelliBoard@gdpr-rep.com](mailto:IntelliBoard@gdpr-rep.com)
- Owner and Data Processor: IntelliBoard, Inc. [IntelliBoard.net](https://IntelliBoard.net)
- Owner Contact Email: [privacy@IntelliBoard.net](mailto:privacy@IntelliBoard.net)

## **2. Changes in Privacy Policy**

Any Personal Data that we collect and maintain will be subject to this Privacy Policy, as amended from time to time. We may change the Privacy Policy at our sole discretion. However, if at any time we make material changes to the Privacy Policy, we will notify you of those changes through the Services and through the publishing of an updated Privacy Policy. If as a result of such changes you want to alter the ways in which we are allowed to use your Personal Data, you can do so by following the procedure described in the section entitled "Opting-Out or Updating Your Personal Data and Privacy Preferences."

## **3. Collection of Information**

**3.1.** IntelliBoard collects the Personal Data you provide us when you register or use the Services, including name, address, email address, organization name, and other contact information. We also collect your payment information as well as other information required to configure, use, pay for, and receive support for the Services.

**3.2.** Data imported by IntelliBoard includes personally identifiable information from education records that are subject to the Family Educational Rights Privacy Act, “FERPA” (FERPA Records). Any data imported by IntelliBoard has been exported to IntelliBoard via the following ways: direct connection to the IntelliBoard platform, integration with another third-party tool authorized by the Client, and/or other data directly uploaded/exported into the IntelliBoard platform.

**3.3.** Unless specified otherwise, the data imported by the IntelliBoard platform is exactly that: a copy of primary sources of data. The results provided by IntelliBoard are dependent upon the quality and accuracy of the data from which it reads, for which IntelliBoard is not liable.

**3.4.** IntelliBoard automatically collects certain kinds of non-personal information from you when you visit or use the Services, including device, browser type, operating system, CPU speed, referring or exit webpages, click patterns, Session ID, and your computer’s IP address.

**3.5.** IntelliBoard, may on occasion, supplement or correct the Personal Data you submit to us and your IP address with information in our other databases or information from third-party sources in order to reduce errors in our database, authenticate our users, prevent fraud and prevent abuse of the Services, as well as to provide more consistent, relevant experiences to our users.

**3.6.** IntelliBoard may collect general information about the use of the Services, such as what pages visitors access, the number of visits, average time spent on using the Services, and other similar factors. This information is generally collected in aggregate form, without identifying any user individually, although IP addresses and Session ID in relation to downloads may be tracked as part of our fraud prevention efforts.

#### **4. Location-Based Services**

Some Services may contain functionality that can enable us to access your location and tailor your experience based on your location (“Location-based Services”). To use Location-based Services, you must enable certain features of your mobile device (e.g., GPS, WiFi, or Bluetooth) to allow us to identify your location. To the extent your location is collected through Wi-Fi or Bluetooth sensors, such sensors, and the associated data services, may be provided by a third party that may access such information for the purpose of providing such data services to us. You agree to such access by such third parties. You may enable or disable such Location-based Services at any time via a menu within the Services. If you choose to disable any Location-based Services on your device and/or opt out of any Location-based Services through the menu, you will not be able to utilize certain features of the Services. By enabling Location-based Services on your device, you agree and acknowledge that (i) device data we collect from you is directly relevant to your use of the Services, (ii) we may provide Location-based Services related to and based on your then-current location, and (iii) we may use any such information collected in connection with the provision of Location-based Services in providing the Services. PLEASE NOTE THAT LOCATION DATA MAY NOT ALWAYS BE ACCURATE, AND WE DISCLAIM ANY AND ALL WARRANTIES RELATED TO LOCATION-BASED SERVICES.

#### **5. How Client Information is Used**

The information we collect is used in the following ways:

**5.1.** To conduct routine business operations such as billing, identification, authentication, contact purposes, and general research. As part of our routine business operations, we may transfer your Personal Data to certain third parties such as accounting software and/or customer relationship management software. Any transfer of Personal Data is transferred to service providers obligated to protect your information, and they do not use your Personal Data for their own commercial purposes.

**5.2.** To employ internal marketing techniques such as tracking customer preferences to provide a customized experience and communicating with you about Services, special offers, and other services.

**5.3.** To enhance the Services.

**5.4.** To gather generic product, location and other contributed information to make reports based on aggregate anonymized data, which we may use internally.

**5.5.** To comply with court and governmental orders.

**5.6.** Aggregated, non-personally identifiable data may be used by us to help with the development and improvement of the Services.

IntelliBoard takes reasonable measures, including technical, physical, and administrative measures and training, designed to protect personal information from loss, misuse, and unauthorized disclosure, access, alteration, and destruction. We safeguard personal information according to established security standards and periodically assess new technology for methods of protecting information.

## **6. Tracking, Use of Cookies, Web Beacons and Similar Devices**

In order to improve the Services and provide more convenient, relevant experiences to our customers, we and our agents may use “cookies,” “web beacons,” and similar devices to track your activities. A cookie is a small amount of data that is transferred to your browser by a web server and can only be read by the server that gave it to you. It functions as your identification card and enables us to record your passwords and preferences. It cannot be executed as code or deliver viruses. A web beacon is a small transparent .gif image that is embedded in an HTML page or email used to track when the page or email has been viewed. Most browsers are initially set to accept cookies, and most services that include similar devices are typically initially activated to collect data. You can set your browser to notify you when you receive a cookie, giving you the chance to decide to accept it. We do not support browsers’ Do Not Track features. You can enable or disable Do Not Track by visiting the preferences or settings page of your browser.

## **7. Mode and Place of Processing the Data**

### **7.1. Methods of Processing**

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT-enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, email carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### **7.2. Legal Basis of Processing**

The Owner may process Personal Data relating to Users if own of the following applies:

- Users (or their Parents/Guardians in the event Users are also Minors) have given their consent for one or more specific purposes. Note: Under some legislations, the Owner may be allowed to process
- Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply whenever the processing of
- Personal Data is subject to European data protection law; Provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- Processing is necessary for compliance with a legal obligation to which the Owner is subject;
- Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- Processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party. In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular, whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### **7.3. Place**

Depending on the User’s location, data transfers may involve transferring the User’s Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

If broader protection standards are applicable, Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data. If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

## **8. Retention Time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected.

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner’s legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority. Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

## **9. The Purposes of Processing**

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics and Contacting the User.

### 9.1. Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

- **9.1.1. Google Analytics (Google LLC).** Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Application, prepare reports on its activities, and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.
  - **9.1.1.1.** Personal Data processed: Cookies; Usage Data.
  - **9.1.1.2.** Place of processing: United States.
  - **9.1.1.3.** Category of personal data collected according to CCPA: Internet information. This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.
- **9.1.2. Google Analytics with anonymized IP (Google LLC).** Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Application, prepare reports on its activities, and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.
  - **9.1.2.1.** Personal Data processed: Cookies; Usage Data.
  - **9.1.2.2.** Place of processing: United States
  - **9.1.2.3.** Category of personal data collected according to CCPA: Internet information. This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

### 9.2. Contacting the User

By filling in the contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

- **9.2.1.** Personal Data processed: address; company/organization name; email address; first name; last name; state; website.
- **9.2.2.** Category of personal data collected according to CCPA: identifiers; commercial information; internet information.

## 10. The Rights of Users

Users may exercise certain rights regarding their Data processed by the Owner. Users entitled to broader protection standards may exercise any of the rights described below. In all other cases, Users may inquire with the Owner to find out which rights apply to them. In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of the Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

## **11. Details About the Right to Object to Processing**

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner, or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

## **12. How to Exercise These Rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within forty-five days.

## **13. Applicability of Broader Protection Standards**

**13.1.** While most provisions of this document concern all Users, some provisions expressly only apply if the processing of Personal Data is subject to broader protection standards. Such broader protection standards apply when the processing: (i) is performed by an owner based within the EU; (ii) concerns the Personal Data of Users who are in the EU and is related to the offering of paid or unpaid goods or services to such Users; (iii) concerns the Personal Data of Users who are in the EU and allows the Owner to monitor such User's behavior taking place in the EU.

**13.2.** GDPR. We comply with the provisions of the Regulation (EU) 2016/679 of the European Parliament, known as the General Data Protection Regulation (GDPR). For purposes of Article 14(2) of the GDPR, we



rely on the following lawful basis for processing Personal Data: consent, compliance with the law, and legitimate interests.

- **13.2.1.** All conditions laid down in Chapter 5 of GDPR are complied with by IntelliBoard, including for onward transfers of personal data from the third country or an international organization to another third country or to another international organization. All provisions in Chapter 5 of GDPR are applied in order to ensure that the level of protection of natural persons guaranteed by GDPR is not undermined.
- **13.2.2.** Under GDPR, we act as a Data Processor vis-a-vis data provided to it through the Services. We act as a Data Controller with regard to data collected as part of our marketing activities.
- **13.2.3.** All transfers of data internally in the European Economic Area is done in accordance with the Standard Contractual Clauses. IntelliBoard will execute Standard Contractual Clauses (also known as Model Clauses) as defined in (EU) 2016/679.

## **14. Additional Information About Data Collection and Processing**

### **14.1. Protecting Your Information**

We use a variety of security measures, including SSL, encryption, and authentication tools, to help protect your information. We do not retain your Personal Data for longer than is necessary for our business purposes unless a longer retention period is required by law.

### **14.2. Legal Action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

## **15. Additional Information About User's Personal Data**

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

## **16. System Logs and Maintenance**

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

## **17. Information Not Contained in this Policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## **18. How "Do Not Track" Requests are Handled**

This Application does not support "Do Not Track" requests. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.



## **19. Changes to this Privacy Policy**

IntelliBoard reserves the right to make corrections, changes, or amendments to this Privacy Policy at any time. A notice will be posted on our homepage for 30 days whenever this Privacy Policy is changed in a material way, and the date of the last update will be indicated at the bottom of the Privacy Statement. If you do not refuse the changes in writing within that notice period, this shall mean that you have consented to the Privacy Policy as changed, including with respect to personal information provided to us prior to the changes in the Privacy Policy.

## **20. Information for California Consumers**

### **20.1. Categories of Personal Information Collected, Disclosed or Sold**

In this section, we summarize the categories of personal information that we've collected, disclosed, or sold and the purposes thereof. You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.

### **20.2. How we Collect Information: What are the Sources of the Personal Information we Collect?**

We collect the above-mentioned categories of personal information, either directly or indirectly, from you when you use this Application. For example, you directly provide your personal information when you submit requests via any forms on this Application. You also provide personal information indirectly when you navigate this Application, as personal information about you is automatically observed and collected. Finally, we may collect your personal information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

### **20.3. How we use the Information we Collect: Sharing and Disclosing your Personal Information with Third-Parties for a Business Purpose**

IntelliBoard may disclose the personal information we collect about you to a third party for business purposes. In this case, we enter into a written agreement with such third party that requires the recipient to both keep the personal information confidential and not use it for any purpose(s) other than those necessary for the performance of the agreement. We may also disclose your personal information to third parties when you explicitly ask or authorize us to do so, in order to provide you with our Service.

### **20.4. Sale of your Personal Information**

For our purposes, the word "sale" means any "selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer's personal information by the business to another business or a third party, for monetary or other valuable consideration." This means that, for example, a sale can happen whenever an application makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

### **20.5. Your Right to Opt-out of the Sales of Personal Information**

You have the right to opt out of the sale of your personal information. This means that whenever you request us to stop selling your data, we will abide by your request. Such requests can be made freely, at any time, without submitting any verifiable request, simply by following the instructions below.

### **20.6. Instructions to Opt-out of the Sale of Personal Information**

If you'd like to know more or exercise your right to opt-out in regard to all the sales carried out by this Application, both online and offline, you can contact us for further information using the contact details provided in this document.

#### **20.7. What are the Purposes for which we use your Personal Information?**

IntelliBoard may use your personal information to allow the operational functioning of this Application and features thereof ("business purposes"). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes. IntelliBoard may also use your personal information for other reasons such as for commercial purposes (as indicated within the section "Detailed information on the processing of Personal Data" within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer actual damage. IntelliBoard will not use your personal information for different, unrelated, or incompatible purposes without notifying you.

#### **20.8. Your California Privacy Rights and How to Exercise Them**

- **20.8.1. The Right to Know and to Portability.** You have the right to request that we disclose to you: (i) the categories and sources of the personal information that we collect about you, the purposes for which we use your information and with whom such information is shared; (ii) in case of sale of personal information or disclosure for a business purpose, two separate lists where we disclose: sales, the personal information categories purchased by each category of recipient and business purpose, the personal information categories obtained by each category of recipient. The disclosure described above will be limited to the personal information collected or used over the past 12 months. If we deliver our response electronically, the information enclosed will be "portable," i.e., delivered in an easily usable format to enable you to transmit the information to another entity without hindrance; provided that this is technically feasible.
- **20.8.2. The Right to Request the Deletion of Your Personal Information.** You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on this Application, to detect security incidents and protect against fraudulent or illegal activities, the information is used by an educational entity entrusted to warrant educational attainments, to exercise certain rights etc.). If no legal exception applies, as a result of exercising your right, we will delete your personal information and direct any of our service providers to do so.
- **20.8.3. How to Exercise Your Rights.** To exercise the rights described above, you need to submit your verifiable request to us by contacting us via the details provided in this document. For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must: (i) provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; (ii) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We will not respond to any request if we are unable to verify your identity and cannot confirm the personal information in our possession actually relates to you. If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf. If you are an adult, you can make a verifiable request on behalf of a minor under your parental authority. You can submit a maximum number of 2 requests over a period of 12 months.
- **20.8.4. How and When we are expected to Handle your Request.** We will confirm receipt of your verifiable request within 10 business days and provide information about how we will process your request. We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request. Our disclosure(s) will cover the preceding

12-month period. Should we deny your request, we will explain to you the reasons behind our denial. We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee, or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind it.

## **21. Governing Law**

The terms of this Privacy Policy are governed by and in accordance with the laws of the state of Connecticut, and, where applicable, the laws of the countries where our servers are located. You should not provide us with any Personal Data unless you consent to the application of United States law and, where applicable, Connecticut law, and to the use and disclosure of your information in accordance with the terms of this Privacy Policy.

This privacy policy relates solely to this Application unless otherwise stated within this document.

## **Contact Us**

End users of institutions: If you are a user of the products and services we provide on behalf of your institution, contact your institution first as your institution's privacy statement and data privacy practices will determine how IntelliBoard uses personal information on your institution's behalf.

If you have any questions or concerns about our privacy policy or our data privacy practices, contact us at [privacy@IntelliBoard.net](mailto:privacy@IntelliBoard.net).