

PRIVACY POLICY

VRSim Inc. (“VRSim,” “we” or “us”) values all our customers – the students, parents and education professionals who utilize our platform for online learning, remote learning, virtual learning, blended learning and other services. Your safety and privacy are important to us, so we have developed and adopted the following policies to cover the use of our products and services. Please familiarize yourself with our policies. The following Privacy Policy applies to all VRSim products (including, but not limited to, SimSpray, VRNA, Performance Portal) corporate website and any other related public or private website provided by VRSim, including: SimSpray.net, SimBuild.com et al.

We suggest you read this Privacy Policy as well as VRSim’s Terms of Use for important information on the use of VRSim’s products and services, and how VRSim protects customer and student information (visit <https://vrsim.com/privacy-terms/>).

HOW INFORMATION IS COLLECTED AND USED

Information about Schools: We request certain information when a School administrator registers a School with VRSim, and when we communicate with administrators and other education professionals online or via email. Typical information collected may include a name, school name, school district, school email address and/or account name and password, phone number, message content, and information relating to the School’s information systems. We may also gather information provided by a School if the School sends us a message, posts content to our website or through our Service, or responds to emails or surveys. Once a School has enrolled with VRSim courseware, instructional services or professional development services, we will keep records of activities related to the Service. This information allows VRSim to provide, operate, maintain, and improve the features and functionality of the Service, to analyze our Service offerings and functionality, and to communicate with our Schools and website visitors.

Student Data: Once students are enrolled in VRSim courses (including training content, scores and performance data), we may have access to personally identifiable information about students (“Student Data”) through the courses used by the Students. We consider Student Data to be confidential and do not use data for any purpose other than to provide the courses and other services on the School’s behalf. The Schools may provide for students to log into a VRSim product platform to access courses that have been authorized by the School, often at a school facility or from a student’s personal computer. The School is responsible for providing each student with login credentials and confirms that it has obtained appropriate parental consent, as needed, before the student is permitted to access the VRSim product platform. Students (or Parents or legal guardians of the Student), retain ownership and control of all Student Data that is provided or accessed through VRSim’s course, and title to such Student Data never passes to VRSim. VRSim has access to Student Data only on a need-to-know basis, as requested by the School and only for the purposes of providing the students with the ability to use the VRSim courseware and related services. VRSim will not use Student Data for any purposes other than those authorized pursuant to VRSim’s contract with the School.

Students or parents should direct questions about the School’s use of technology service providers like VRSim to their School administrator. If a Student contacts VRSim with a question about our Service, we will collect personal information from that Student only as necessary to respond to the Student’s request and direct the Student to contact the Student’s School, and we will then delete or anonymize the personal data of the Student after providing our response.

Automatically Collected Information: In some instances, VRSim may send a small text file containing a string of alphanumeric characters, known as “cookies”, to your computer that uniquely identifies your browser and lets you log in faster and enhance your navigation through VRSim’s website and platform. A cookie may also convey information to us about how you use the Service (e.g., the pages you view, the links you click and other actions you take on the Service), and allow us to track your usage of the Service over time. We may collect log file information from your browser or device each time you access the VRSim platform or courseware. The information collected through the use of cookies is anonymous and may include information such as your Internet Protocol (“IP”) address, web request, browser type, number of clicks and how you interact with links on the VRSim

platform, pages viewed, and other such information. The information allows for more accurate reporting and improvement of the VRSim Platform. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service. However, VRSim never sells Student Data for any reason, does not allow third party advertisers to collect information about the users of our Site or Service, and never shares such information with outside third parties unless expressly authorized to do so by the School or the affected student or parent.

We may use automatically collected information to: (a) remember information so that a user will not have to re-enter it during subsequent visits; (b) provide custom, personalized content and information; (c) to provide and monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and usage on our website and our Service; (e) diagnose or fix technology problems; and (f) help users efficiently access information after signing in.

VRSim is committed to adhering to the highest standards for protecting Student Data and privacy. Student Data is used only for educational purposes at the discretion of the School.

HOW WE SHARE YOUR INFORMATION

VRSim only shares personal information in a few limited circumstances, described below. We never rent or sell information for marketing purposes.

In limited circumstance, we may share information with others as follows:

We may share information with technology service providers (e.g., web hosting and analytics services), but strictly for performing their work for us.

We may share information with law enforcement or other third parties when compelled to do so by court order or other legal process, to comply with statutes or regulations, to enforce our Terms of Use, or if we believe in good faith that the disclosure is necessary to protect the rights, property or personal safety of our users.

In the event of a change of control: If we sell, divest or transfer our business, we will not transfer personal information of our customers (including Student Data) unless the new owner intends to maintain and provide the Service as a going concern, and provided that the new owner has agreed to data privacy standards no less stringent than our own.

How Student Data is shared: In addition to the actions described above, VRSim may facilitate the sharing of Student Data with third parties, though only when instructed and authorized to do so on behalf of the School. Some elements of our Service enable Schools to interact with parents, students, teachers and third-party applications, for the benefit of the student's education. VRSim does not facilitate the sharing of any Student Data with third parties on the VRSim platform except on behalf of the School after the School has authorized a third party or application to access Student Data through the Service. Please remember that this Privacy Policy applies to the VRSim Services, and not to other services or third party applications which may have their own privacy policies. We believe it is the School's responsibility to carefully read the privacy practices of each third party application before agreeing to engage with the application through the Service.

We store our data in the United States and we take redundant and secure measures to keep data safe.

HOW WE STORE AND PROTECT YOUR INFORMATION

Storage and processing: Any information collected through the VRSim platform is stored and processed in the United States. If you use our Service outside of the United States, you consent to have your data transferred to the United States.

Comprehensive Information Security Program: VRSim takes actions designed to ensure the security and confidentiality of Student Data, and maintains strict administrative, technical and physical procedures to protect information stored in our servers, which are located in the United States. Access to information is limited (through user/password credentials) to those employees who require it to perform their job functions. We use industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process and sign-up information. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls to building and files.

In addition, whenever VRSim vendors or consultants may be given access to the VRSim platform, we require such vendors and consultants to adhere to the same standards above and meet all other customer-imposed requirements for the protection of Student Data.

In the event of any unauthorized release, disclosure or acquisition of Student Data, VRSim maintains policies and procedures for identifying and mitigating data security breaches. VRSim will conduct an investigation to determine the nature and scope of any unauthorized release, disclosure or acquisition, and VRSim will promptly notify school officials, affected students, parents and/or legal guardians of unauthorized access to Student Data to the fullest extent required by applicable law.

YOUR CHOICES ABOUT YOUR INFORMATION

Account information and settings: If you have any questions about reviewing or modifying account information, contact us directly by emailing or calling VRSim's customer service department at privacy@vrsim.net.

Access to Student Data: Schools are responsible for providing access to and controlling Student Data, and you should contact your School directly if you have any questions about reviewing, modifying, or deleting personal information of a student.

How long we keep User Content: Following termination or deactivation of a School or Student account, VRSim may retain profile information and content for a commercially reasonable time for backup, archival, or audit purposes, but any and all Student Data associated with the School will be deleted promptly. We may maintain anonymized or aggregated data, including usage data, for analytics purposes.

We do not collect any information from students without consent.

COMPLIANCE WITH FEDERAL AND STATE LAWS

VRSim is committed to compliance with all other federal and state laws and regulations governing student data privacy, including the federal Family Educational Rights and Privacy Act (“FERPA”), the California Student Online Personal Information Protections Act (“SOPIPA”), the Connecticut Student Data Privacy laws (C.G.S. §§ 10-234aa through 10-234dd), and other similar state laws.

CHILDREN’S PRIVACY

VRSim does not knowingly collect any information from children under the age of 13 unless and until the School has obtained appropriate parental consent for the student to use the Service. Because VRSim collects and uses Student Data at the direction of and under the control of a School, VRSim relies on each School to provide appropriate notice to parents of the School’s use of third-party service providers such as VRSim, and for the Schools to provide consent, if necessary, and authorization for VRSim to collect Student Data, as permitted by the Children’s Online Privacy Protection Act (“COPPA”). Please contact us if you believe we have inadvertently collected personal information of a child under 13 without proper consent so that we may delete such data within a reasonable period.

OTHER WEBSITES AND SERVICES

We are not responsible for the practices employed by websites, applications or services linked to or from our Service. We recommend that the School review the privacy policies of other applications before authorizing a third party to access data through the Service.

CHANGES TO OUR PRIVACY POLICY

VRSim may modify or update this Privacy Policy from time to time. If we change the policy in a material manner, we will provide at least 30 days' notice to the Schools so that you have sufficient time to evaluate the change in practice. You can always opt-out by deleting your account before the changes take effect.

YOUR CALIFORNIA PRIVACY RIGHTS

This section provides additional details about the personal information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act ("CCPA").

VRSim collects and shares personal information for the business and commercial purposes described in Section 1 above ("HOW INFORMATION IS COLLECTED AND USED"). Details about the personal information we have collected over the last 12 months can also be found in Section 1. VRSim does not sell (as such term is defined in the CCPA) the personal information we collect.

Subject to certain limitations, the CCPA provides California consumers the right to request more details about the categories or specific personal information we collect including how we use and disclose this information, how to delete their personal information, and how to opt-out of any "sales" of this information. The CCPA also protects consumers from discrimination for exercising these rights.

Pursuant to rights under the CCPA, California consumers may submit a request to VRSim. We will verify your request using the information associated with your account, including your email address.

Government identification may be required. Consumers may also designate an authorized agent to exercise these rights on their behalf.