

# SmartWithIt, Inc.

## Privacy Policy

**Last Updated:** Oct. 31, 2025

### Introduction

Welcome to SmartWithIt ("we," "our," or "us"). We are committed to protecting the privacy and security of our users' personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website and use our educational web application.

This policy applies to information we collect through our website and web application (collectively, the "Services").

### Information We Collect

#### Information You Provide Directly

##### Account Registration:

*For Teacher and Adult Accounts:*

- First name
- Email address
- Password (stored in encrypted form)
- Phone number (optional, for messaging service)

*For Student Accounts:*

- First name
- Email address
- Password (stored in encrypted form)
- Phone number (optional, for messaging service)
- Class access code (associates student with teacher's class)

## **Contact and Inquiry Forms:**

- Name
- Email address
- Company (if applicable)
- Phone number (if provided)
- Preferred method of contact (if applicable)
- Information about your needs and interests
- School or district affiliation (if applicable)
- Any other information you choose to provide in your inquiry

## **Usage of Our Services:**

- Course progress data
- Text message content: When students respond to educational prompts via SMS or iMessage, or WhatsApp chat features, we collect and store the content of their response message
- Content you create within our platform
- Communication preferences

## **Information Collected Automatically**

When you access our Services, we may automatically collect:

- Device information (type, operating system, browser type)
- IP address and general location information
- Usage data (pages visited, features used, time spent)

## **How We Use Your Information**

We use the information we collect to:

### **Provide and Improve Our Services:**

- Create and manage your account
- Deliver curricular materials and educational content
- Enable classroom instruction features for teachers
- Send educational messages (only if you opt in)
- Track learning progress of each class you create or join
- Respond to inquiries and provide customer support
- Process requests for our pilot programs

**Communication:**

- Send service-related notifications
- Provide updates about our products and services
- Send educational content and learning reminders via SMS, iMessage or WhatsApp (with your consent)
- Respond to your requests for information

**Analytics and Improvement:**

- Analyze usage patterns to improve our Services
- Conduct research to enhance educational outcomes
- Develop new features and products

**Legal and Safety:**

- Comply with legal obligations
- Protect the rights and safety of our users
- Prevent fraud and abuse

## **Teacher and School Responsibilities**

Teachers and schools who use our Services to facilitate student access have important legal responsibilities:

**Before Sharing Class Access Codes:**

- Obtain all required parental or guardian consents for students under 13 in compliance with COPPA
- Obtain any required consents for students of any age as required by state law or school policy
- Provide parents with notice of our data collection practices and this Privacy Policy
- Ensure compliance with FERPA and all applicable student privacy laws
- Verify you have authorization under school or district policies to use our Services with students

**Ongoing Responsibilities:**

- Respond to parent requests regarding student data
- Notify us if parental consent is withdrawn
- Ensure students use the Services in accordance with our Terms of Use
- Protect class access codes from unauthorized use

Teachers and schools represent and warrant that they have fulfilled these responsibilities before sharing class access codes with students.

## How We Share Your Information

We do not sell your personal information. We may share your information in the following circumstances:

### **With Teachers, Schools, and Districts:**

- If you are a student who created an account using a class access code, we may share your usage data, progress information, and assessment results with the teacher who provided the access code and their school or district. This allows teachers to monitor student progress and provide appropriate instruction.
- If you are a teacher using our Services through a school or district account, we may share relevant usage and performance data with your educational institution as required by our agreement with them.

**With Service Providers:** We work with third-party service providers who perform services on our behalf, such as:

- Cloud hosting providers
- Email, SMS, and chat messaging delivery services
- Analytics providers
- Payment processors (if applicable)

These providers are contractually obligated to protect your information and use it only for the purposes we specify.

**For Legal Reasons:** We may disclose your information if required by law, court order, or governmental request, or if we believe disclosure is necessary to:

- Comply with legal obligations
- Protect our rights or property
- Prevent fraud or security issues
- Protect the safety of our users or the public

**Business Transfers:** If we are involved in a merger, acquisition, or sale of assets, your information may be transferred as part of that transaction.

**With Your Consent:** We may share your information for other purposes with your explicit consent.

## Children's Privacy

Our Services may be used by students under the age of 13. We comply with the Children's Online Privacy Protection Act (COPPA) and similar laws.

**How Students Access Our Services:** Teachers or schools may provide students with class access codes that allow students to create accounts on our Application.

When students use a class access code to register, they provide:

- First name
- Email address
- Password
- Phone number (optional, for our messaging service)

When students use our messaging service, we collect text message responses that students sent to educational prompts. These messages contain student work, answers to questions or other content students choose to send.

**School and Teacher Responsibilities:** Teachers and schools are solely responsible for obtaining all required consents before sharing class access codes with students. See the “Teacher and School Responsibilities” section above for complete details.

**Our Responsibilities:** When we collect personal information from children under 13 through account registration and through our messaging service, we:

- Rely on schools and teachers to obtain verifiable parental or school consent before students create accounts
- Collect only the minimum information necessary to provide our services
- Do not condition participation on providing more information than necessary
- Provide parents, guardians, and schools with the ability to review and delete children’s information
- Do not knowingly allow children under 13 to make their personal information publicly available

**Parents' and Guardians' Rights:** If you are a parent or guardian, you have the right to:

- Review your child's personal information
- Request deletion of your child's personal information

- Refuse further collection or use of your child's information
- Request we stop sending messages to your child (reply STOP to any message)

To exercise these rights, please contact us at [info@smartwithit.com](mailto:info@smartwithit.com). We may need to verify your identity and relationship to the child before processing your request.

## Data Security

We implement appropriate technical and organizational security measures to protect your personal information, including:

- Encryption of data in transit and at rest
- Secure password storage using industry-standard hashing
- Regular security updates
- Access controls limiting who can view personal information
- Staff training on data protection

However, no method of transmission over the internet or electronic storage is 100% secure. While we strive to protect your information, we cannot guarantee absolute security.

## Your Rights and Choices

Depending on your location, you may have certain rights regarding your personal information:

**Access and Portability:** You can request a copy of your personal information.

**Correction:** You can request correction of inaccurate information.

**Deletion:** You can request deletion of your personal information, subject to certain exceptions (e.g., legal obligations, legitimate educational interests).

### Opt-Out:

- You can opt out of messaging at any time by replying STOP to any message or updating your preferences in your account
- You can opt out of marketing emails by using the unsubscribe link in our emails

**Account Deletion:** You can delete your account at any time by contacting us.

To exercise any of these rights, please contact us at [info@smartwithit.com](mailto:info@smartwithit.com)

## **Cookies and Tracking Technologies**

We use cookies and similar tracking technologies to:

- Remember your preferences and settings
- Analyze how you use our Services
- Provide personalized content
- Improve our Services

You can control cookies through your browser settings. However, disabling cookies may limit your ability to use certain features of our Services.

## **Third-Party Links**

Our Services may contain links to third-party websites. We are not responsible for the privacy practices of these external sites. We encourage you to review their privacy policies.

## **International Data Transfers**

SmartWithIt is headquartered in the United States. Your information may be transferred to, stored, and processed in the United States or in other countries where our service providers operate. By using our Services, you consent to such transfers.

## **Data Retention**

We retain your personal information for as long as necessary to:

- Provide our Services
- Comply with legal obligations
- Resolve disputes
- Enforce our agreements

When you delete your account, we will anonymize or delete your personal information within a reasonable timeframe, except where we are required to retain it for legal or legitimate business purposes.

## **Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. When we make changes, we will:

- Update the "Last Updated" date at the top of this policy

- Notify you via email or through our Services if the changes are material
- Obtain consent where required by law

We encourage you to review this Privacy Policy periodically.

## Contact Us

If you have questions about this Privacy Policy or our privacy practices, please contact us:

**Email:** [info@smartwithit.com](mailto:info@smartwithit.com)

**Mail:** SmartWithIt, Inc.

3717 Boston St. Unit 357

Baltimore, MD 21224

## Additional Information for Specific Jurisdictions

**California Residents:** If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA), including the right to know what personal information we collect and how we use it, and the right to opt out of the "sale" of personal information. We do not sell personal information.

**European Union Residents:** If you are in the European Union, you have rights under the General Data Protection Regulation (GDPR), including the right to access, rectification, erasure, and data portability. Our legal basis for processing your information includes consent, contractual necessity, and legitimate interests.

For more information about your specific rights, please contact us.