

INSTRUCTIONLENS PRIVACY POLICY

Last Updated: August 31, 2026

Shine Early Learning, Inc. is committed to protecting your privacy and, for that reason, we have adopted this Privacy Policy to explain our data collection, use, and disclosure practices for our websites located at <https://instructionlens.vercel.app> (the “**Sites**”). The Sites are owned and operated by Shine Early Learning, Inc. (“**we**”, “**us**” or “**our**”).

This Privacy Policy applies solely to information Shine Early Learning, Inc. collects through the Site, as well as other information provided to us online or offline by third parties when we associate that information with users of the Site (but not to information collected from our employees, contractors, or vendors). Certain third parties may also be able to collect information via the Site. The data collection and use practices of these third parties may be governed by those third parties’ own policies, including their own privacy policies, as further described in Sections 2(A), 4, and 5, below.

This Privacy Policy describes, among other things:

- Personal and other information we collect about you;
- How we use your information;
- How we may share your information with third parties; and
- Your choices regarding the Personal Information we collect about you.

1. Consent

By accessing or using the Site, you consent to this Privacy Policy. If you do not agree with this Privacy Policy, please do not access, or use the Site. Information gathered through the Site may be transferred, used, and stored in the United States or in other countries where our service providers, our affiliates, or we are located. If you use the Site, you agree to the transfer, use, and storage of your Personal Information (as defined below) in those countries. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. You agree that all transactions relating to the Site are deemed to occur in the United States, where our servers are located.

2. Collection of Your Personal and Other Information

When you use the Site we collect Personal Information. By “Personal Information” we mean information that can identify an individual, such as:

- Your first and last name
- Your email address
- Account credentials, which are handled by our authentication provider and are never stored by us in readable form
- Your display name and profile picture, including the name and picture supplied by Google if you sign in with a Google account
- The role assigned to your account and the coalition it belongs to
- The program or coalition you name when you request access, and anything you write in that request
- The assessment and attendance files you upload, and the report structures your coalition defines for reading them
- The documents your coalition contributes to the Knowledge Layer, and the review decisions recorded against them
- A record of administrative actions affecting your account, including access requests, approvals, role and coalition changes, and deletions

You may choose not to provide Personal Information, but this may prevent you from receiving certain features of the Site.

We may also collect non-Personal Information relating to the Site, that is, information that does not personally identify an individual. The non-Personal Information we may collect includes how you interact with the Site, information generally collected or “logged” by Internet websites or Internet services when accessed or used by users, and information about your web browser or device accessing or using the Site.

Examples of the non-Personal Information we may collect are:

- Information about your computer or mobile device, such as its maker or operating system version, and HTTP header information
- The pages of our website that you viewed during a visit;
- What information, or content you view or interact with using the Site; and
- The city, state, province and/or country in which you are located.

We will not use non-Personal Information to try to identify you, and if we associate any non-Personal Information with information that personally identifies you, then we will treat

it as Personal Information. As discussed in more detail below, we sometimes use cookies and other automatic information gathering technologies to gather non-Personal Information.

Information collected by the Site may be collected by us or one of our service providers, but in either case, this Privacy Policy will govern the collection, use, and sharing of the information.

3. Use of Your Information

We may use the information we collect to:

- Assist us in providing, maintaining, and protecting the Site;
- Set up, maintain, and protect your use of the Site;
- Improve our online operations;
- Process transactions;
- Administer contests and sweepstakes that you enter, as further described in any applicable official rules;
- Provide customer service;
- Communicate with you, such as provide you with transaction-related communications, or other newsletters, and/or other communications relating to the Site;
- Send or display offers and other content that is customized to your interests or preferences;
- Perform research and analysis aimed at improving our products and services and developing new products or services; and
- Manage and maintain the systems that provide the Site.

4. Disclosure of Your Information

We may disclose your Personal Information to third parties as described below.

We may disclose Personal Information to provide services to you, or when you authorize or instruct us to do so, for example when you use the Site to sign up for one of our newsletters. We may also disclose Personal Information and non-Personal Information to companies, agents, contractors, service providers, vendors, licensors, analytics providers, advertising partners, marketing partners, or others engaged to perform functions on our behalf or support our Site and outreach activities, such as processing payments, providing data storage, hosting our website, marketing our products and services, conducting audits,

performing web analytics, measuring advertising performance, delivering or helping deliver advertising, protecting the Site, and processing or managing communications and form submissions. We may license third party software to include in or use with the Site, in which case we may disclose Personal Information and/or Non-Personal Information to the licensor. Some of these third parties may collect information directly through cookies, pixels, tags, web beacons, and similar technologies, and they may use information collected from the Site and other websites or online services to provide analytics, measurement, advertising, marketing, and targeted advertising services. The collection and use of Personal Information and non-Personal Information by such third parties are subject to their own privacy policies. When you fill out a form on the Site we may share the information you provide with third parties with whom we work to carry out services in Florida, such as:

Google Cloud Platform, including Firebase Authentication, Cloud Firestore and Cloud Storage, which hold the accounts and content of this service

Vercel, which hosts and serves this website

These parties' collection and use of Personal Information and non-Personal Information are subject to their own privacy policies.

We may also disclose Personal Information to other third parties upon your consent to such disclosures.

In addition, we may disclose your Personal Information to third parties when we believe, in good faith and in our sole discretion, that such disclosure is reasonably necessary to (a) enforce or apply the terms and conditions of the Site, including investigation of potential violations thereof, (b) comply with legal or regulatory requirements or an enforceable governmental request, (c) protect the rights, property or safety of Shine Early Learning, our users, or other third parties, (d) prevent a crime or protect national security, or (e) detect, prevent or otherwise address fraud, security or technical issues.

We reserve the right to transfer information (including your Personal Information) to a third party in the event of a sale, merger, or transfer of all or a portion of the assets of our company relating to the Site, or in the unlikely event of a bankruptcy, liquidation, or receivership of our business. We will use commercially reasonable efforts to notify you of such transfer, for example via email or by posting notice on our website.

Lastly, we may also disclose non-Personal Information, aggregated with information about our other users, to our business partners, merchants, investors, potential buyers and other

third parties if we deem such disclosure, in our sole discretion, to have sound business reasons or justifications.

5. Cookies and Automatic Information Gathering Technologies

To assist us in collecting and storing certain Personal and non-Personal Information, we may employ a variety of technologies, including “Cookies,” local browser storage, and “Web Beacons.” A “Cookie” is a small amount of data a website operator, or a third party whose content is embedded in that website, may store in your web browser and that the website operator or, as applicable, the third party, can access when you visit the website.

Cookies on the Site may contain user preferences, unique identifiers, and other non-Personal Information. A “**Web Beacon**” is a small, usually transparent image placed on a web page that allows the operator of that image, which may be the operator of the website you visit or a third party, to read or write a Cookie.

We, or our vendors may use Cookies to determine whether you have seen a particular piece of content before on the same or different device, to track the movements of individual users through the Site and elsewhere on the web or across apps, devices, and geographic locations, to help diagnose problems with servers, to gather broad demographic information, to conduct research, to record registration and personalization information, and to otherwise administer the Site.

In addition, Shine Early Learning and/or our vendors may use Cookies in our communications with you, such as within email and text messages and push notifications, and to determine which messages have been opened by recipients.

Your operating system and web browser may allow you to erase information stored in Cookies and local browser storage. You may also be able to set your browser to refuse all website storage or to indicate when it is permitted, but some features of the Site may not function properly without it.

More information about managing Cookies is available [here](#). Cookie management tools provided by your browser may not affect Flash Cookies. More information about managing Flash Cookies is available [here](#). To learn how to manage privacy and storage settings for your local browser storage, please refer to the end user documentation for your browser.

6. Analytics, Advertising and Tracking Technologies

We and our third-party partners may use cookies, pixels, web beacons, and similar technologies to collect information about your interactions with the Site and other websites

or online services. These technologies may collect information such as your IP address, device identifiers, browser type, pages viewed, links clicked, referring URLs, interactions with our advertisements, and other information about your use of the Site.

We may use these technologies to help operate and improve the Site, understand how visitors use the Site, measure effectiveness of our communication and advertising campaigns, prevent fraud and abuse, and deliver or help deliver advertising that may be more relevant to your interests.

The third parties that provide these technologies may use the information collected over time and across different websites and online services for their own purposes, including to provide analytics, measurement, advertising, and targeted advertising services.

7. Transparency and Choice

You may request access to your Personal Information by sending an email to privacy@shineearly.com. We will try to locate and provide you with your Personal Information and give you the opportunity to correct this data, if it is inaccurate, or to delete it, at your request. But, in either case, we may need to retain it for legal reasons or for legitimate business purposes.

We ask individual users to identify themselves and the information requested to be accessed, corrected, or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, would be extremely impractical (for instance, requests concerning information residing on backups), or relate to information that is not associated with your Personal Information. In any case, where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

Please be aware that if you request us to delete your Personal Information, you may not be able to continue to use the Site. Also, even if you request that we delete your Personal Information, we may need to retain certain information for a limited period of time to satisfy our legal, audit and/or dispute resolution requirements.

You can opt out of receiving marketing emails and/or newsletters from us by clicking on the “unsubscribe” link in the emails. Please note that it may take several business days for opt-out requests to be processed. Also, even if you opt out of marketing emails, we may continue to send you certain emails, such as confirmations of transactions you have requested. (if applicable)

8. Children

The Site is geared toward a general audience and is not directed to children under 13 years of age in the United States, and children under the applicable minimum age in other countries at which children can legally provide their Personal Information without parental consent. We do not knowingly collect Personal Information from children who are not legally permitted in their countries to provide their Personal Information without parental consent. If we become aware that we have collected Personal Information from a child under the legal minimum age to provide Personal Information without parental consent in a particular country, we will promptly delete the information, unless we are legally obligated to retain such information. If you believe a child under the legal minimum age may have provided us with Personal Information, please contact us as specified in the “How to Contact Us” section of this Policy.

9. Information Security

We utilize reasonable information security measures to safeguard your Personal Information against unauthorized access, modification, or destruction. For example, we utilize Secure Socket Layer (SSL), Transport Layer Security (TLS), or similar encryption technology when sensitive data is transmitted over the Internet and use firewalls to help prevent external access into our network. However, no data transmission over the Internet and no method of data storage can be guaranteed to be 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its security.

Within Shine Early Learning, we restrict access to Personal Information to our employees, contractors, and agents who need to know that information in order to operate, develop, improve or support the Site. If we share Personal Information with service providers, we require that they also use reasonable information security measures to safeguard your Personal Information and only use your Personal Information for the purposes for which we share it with them.

10. U.S. State Law Privacy Rights

Depending on where you live and subject to applicable law, you may have certain rights regarding the Personal Information we collect about you. These rights may include the right to request that we:

- confirm whether we process Personal Information about you;
- provide access to or a copy of the Personal Information we maintain about you;

- correct inaccurate Personal Information;
- delete Personal Information;
- provide information about the categories of Personal Information we collect, the categories of sources from which we collect it, the purposes for which we use it, the categories of Personal Information we disclose, and the categories of third parties to whom we disclose it; and
- provide a portable copy of certain Personal Information, where required by applicable law.

Depending on where you live and subject to applicable law, you may also have the right to opt out of certain processing activities, such as the sale of Personal Information, the sharing of Personal Information for cross-context behavioral advertising, targeted advertising, certain profiling activities, or certain uses or disclosures of Sensitive Personal Information.

We do not sell Personal Information for money. However, we and our third-party partners may use analytics, advertising, and tracking technologies, such as cookies, pixels, tags, web beacons, and similar technologies, which may collect and receive information from the Site and elsewhere on the internet and use that information to provide measurement services, analyze advertising performance, deliver or help deliver advertisements, or support targeted advertising. Depending on the applicable law, these activities may be considered a “sale”, “sharing” or processing of Personal Information for targeted advertising.

When required by applicable law, you may opt out of the sale or sharing of your Personal Information or the processing of your Personal Information for targeted advertising by contacting us at privacy@shineearly.com. We will also honor legally recognized opt-out preference signals, such as Global Privacy Control, where required by applicable law.

We do not knowingly sell or share Personal Information of individuals under 16 years of age.

To exercise applicable privacy rights, please contact us at privacy@shineearly.com. We may need to verify your identity before processing your request, and we may request additional information from you for that purpose. You may also authorize another person to submit a request on your behalf when permitted by applicable law.

We will not discriminate against you or retaliate against you for exercising privacy rights available to you under applicable law. If we deny your request, you may have the right to appeal our decision by contacting us using the same method described above.

11. Third Party Websites

Please note that the Site may link or integrate with third-party sites, services, or apps. We are not responsible for the privacy or security policies or practices or the content of such third parties. Accordingly, we encourage you to review the privacy and security policies and terms of service of those third parties so that you understand how those websites collect, use, share and protect your information.

12. Changes to this Policy

We may modify or update this Privacy Policy periodically with or without prior notice by posting the updated policy on this page. You can always check the “Last Updated” date at the top of this document to see when the Privacy Policy was last changed. If we make any material changes to this Privacy Policy, we will notify you by reasonable means, which may be by e-mail or posting a notice of the changes on our website prior to the changes becoming effective. We encourage you to check this Privacy Policy from time to time.

13. Questions

To ask questions about our Privacy Policy or to lodge a complaint, contact us at:

Shine Early Learning, Inc.

1923 Green Street

Racine, WI 53402

Email: privacy@shineearly.com

Addendum: European Union Residents

If you reside in a country in the European Economic Area or in Switzerland, then information we collect from you may be subject to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “GDPR”) and the following additional information is provided for your benefit.

The controller of the personal data collected through the Site is:

Shine Early Learning, Inc.

1923 Green Street

Racine, WI 53402

If you use the Site, you acknowledge that your personal data is being processed pursuant to the following lawful bases: your consent, Shine Early Learning's legitimate interests, to fulfil requests made by you, and compliance with applicable law. You further acknowledge and consent to your information that is gathered through the Site being transferred to, used in, and stored in the United States.

You hereby consent to the processing of your personal data as described in this Privacy Policy. You may withdraw your consent at any time by following the instructions in the Accessing/Updating/Deleting Your Personal Information section below, but this will not affect the lawfulness of processing based on consent before its withdrawal. However, if you withdraw your consent or decline to provide personal data to us, you may be unable to use the Site. You have the right to file a complaint relating to the processing of personal data with a supervisory authority.

Accessing/Updating/Deleting Your Personal Information

If you would like to delete, update, or access the Personal Information we have collected from you, you may do so by sending an email to privacy@shineearly.com. Additionally, if your Personal Information is subject to the GDPR, you may have certain additional rights, including the right of restriction of processing of personal data, and the right to object to the processing of personal data. Please send e-mail to privacy@shineearly.com for more information.