# LANSCHOOL

## PRIVACY STATEMENT

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### **About this Statement**

This statement was last updated on March 25, 2025. To view the previous LanSchool Privacy Statement, please click here.

# What this statement applies to:

**Your privacy is important to Lenovo**. This privacy statement applies to data collected through products and services provided by Stoneware, Inc. (a Lenovo company) ("Stoneware" or "we"), including LanSchool Air; LanSchool Classic with third party rostering sync solutions; and LanSchool Student ("LanSchool Products"); and applies to available Windows, Mac, Chromebook, Android, and iOS versions of these products. This privacy statement describes the information practices for LanSchool Products, including what types of identifiable information are collected, how Stoneware and

Lenovo use information and for what purposes; with whom information is shared; and how Stoneware and Lenovo protect the information. It also describes your choices regarding use, access, correction, and deletion of your personal information, among other topics. For further information regarding LanSchool Products, please review the LanSchool Air Terms of Service, the LanSchool License Agreement, and additional applicable Stoneware policies at <a href="https://lenovosoftware.com/legal">https://lenovosoftware.com/legal</a>.

### What this statement does not apply to:

Lenovo and Stoneware also collect personal information via Lenovo's websites and other products and services. To learn more about our website privacy practices, please visit the Lenovo and Stoneware website privacy statement <a href="here">here</a>. In addition, this statement does not apply to other products and services provided by Stoneware; Lenovo's Intelligent Devices Group (IDG); Lenovo's Infrastructure Solutions Group (ISG); Lenovo's Service & Solutions Group (SSG); the Motorola Mobility business; or to third-party software and other services you install on or access through your LanSchool Products. Please see those third parties' privacy statements and terms of use for more information on their privacy practices. Furthermore, this statement does not apply to certain products licensed by Lenovo to other companies.

### Changes to this statement:

If we make a change to this statement, we will make previous versions available so that you can see when changes occurred and what they are. If we make any material changes to this statement, as appropriate, we will notify you by means of a notice on the lenovosoftware.com website; in an applicable LanSchool Product experience; or by an email (sent to the email address specified in your account) at the time the change becomes effective. Where applicable data protection laws require us, we will also seek your consent to any material changes that affect how we use or transfer your personal information. We encourage you to review this page periodically for the latest information on our privacy practices. *To view the previous LanSchool Privacy Statement, please click here*.

# What information do Stoneware and Lenovo collect and how is the information used?

Stoneware and Lenovo collect information about you and your LanSchool Product(s) and use this information to keep your LanSchool Product(s) working their best and to help you make the most of them. Please note that, in certain circumstances, if you do not provide us with personal information where needed, we may not be able to provide you with the LanSchool Products, experiences or functionalities that you have requested. The following describes how we collect, use, and share identifiable information, including personal information, in certain LanSchool Product contexts.

# Product Registration & Account Creation:

When a customer registers its LanSchool product(s) or service(s) with Stoneware or Lenovo and creates an account with us, we will collect identifiable information, including personal information such as the customer contact's name, address, email address, language, region/country, product type/model, product serial number, date of product registration, activation data about your operating system, and username. The customer also creates a password during registration and account creation. We will use this information to administer your account or profile; authenticate you when you login to LanSchool; provide services that you have requested; and to provide you with communications, including marketing, that you choose to receive from Stoneware and Lenovo.

## Keeping Your Products and Services Up-To-Date:

We automatically collect and use certain limited non-personally identifiable information about your LanSchool Product to identify whether the software you are using is the most up-to-date version. We use this information to provide you with software updates (including security updates), to develop new products and software features, and to fix bugs so that your products run smoother and more efficiently.

## Helping to Improve Our Products and Services:

We may collect device identifiers and related information, such as device id, serial number, IMEI, MAC address, IP address, and domain names. We use this information to measure use and to improve the content of our sites, products, and services. Aggregated information in this case is not used in such a form that would enable direct connection of any personal information to our visitors or users.

We may also collect certain data on our visitors and users' demographics, interests, and behavior based on the information provided to us when using LanSchool, during a promotion, from surveys, and from our server log files. This information is collected to better understand and serve our users and customers, as well as to determine how we can improve our products and services. This research is compiled and analyzed on an aggregated basis to prevent identification of personal information relating to any one individual.

### Customer Service & Quality Monitoring:

Certain LanSchool product and service support activities may also involve you contacting Stoneware and Lenovo or Stoneware and Lenovo contacting you, including by phone, email, or chat. Please note that, in these cases, we may record calls and chat session transcripts for staff training and quality assurance purposes. To provide you with the service or support that you have requested, such as requesting technical support or repair under a warranty for your LanSchool product, Stoneware and Lenovo customer service personnel may also collect and access personal information about you, such as your user profile, account information, contact information, LanSchool product and service identifiers, and information about how you use your LanSchool product(s) and service(s).

Some Stoneware and Lenovo customer service personnel work for service providers that supply such services to Stoneware and Lenovo and its customers and may have access to information about you in this context. Stoneware and Lenovo use data hosting, processing, and communications service providers, such as online chat tools, including those that may be powered by artificial intelligence (AI), to support these activities.

In addition, authorized Stoneware and Lenovo distributors, resellers, or repair providers for LanSchool Products may also have access to certain customer service, quality assurance, and product information described herein to support your product or to provide a service that you have requested, such as repair services under a warranty for your LanSchool Product.

# Sales, Marketing, Promotions, Surveys, & Events:

If you choose to receive marketing, advertising, promotional, or event communications from Stoneware, Lenovo, and/or its partners - such as via e-mail or in-product push notifications - or if you choose to participate in an event, contest, or survey, we will collect personal and

nonpersonal information about you to help us manage these campaigns and communications, or to facilitate your participation. We may collect your name, address, email address, phone number, age/date of birth, LanSchool product information and additional personal information you choose to provide. We may also use this information to send you product support notices; announcements; newsletters; and, when allowed by applicable laws, invitations to complete customer satisfaction surveys.

Stoneware, Lenovo, and selected service providers or partners – including marketing, advertising, surveys, and events companies - may also use the information you provide to conduct promotional, customer satisfaction, or product support activities on Stoneware's or Lenovo's behalf or as part of a joint event or promotion between Stoneware or Lenovo and that company. Stoneware and Lenovo may also use data hosting and processing service providers to support these activities, as well as external tools to help us learn more about customer trends, marketing email open/click rates, and so forth. In addition, we may acquire data from third-party sources, such as consumer research firms, to supplement the information that we collect from you.

You will receive transactional communications from Stoneware or Lenovo such as order confirmations. You are not required to subscribe to receive marketing communications to purchase a product from Stoneware or Lenovo. You may choose to unsubscribe by following the instructions included in those communications; by changing your preferences in your account settings; or you can submit a request.

## Cookies & Tracking Tools:

To provide an effective, efficient, and customized experience, LanSchool Air,and Stoneware and Lenovo websites may use or may allow our partners to use Internet cookies, clickstream capture, tags, web beacons, web collection forms, analytics, website session replay tools, and related solutions and techniques. These solutions are usually supplied to Stoneware and Lenovo by third parties. Most browsers are initially set up to accept cookies. However, if you prefer not to store cookies, you can choose to:

- · not use our sites/services
- set your browser to notify you when you receive a cookie
- set your browser to refuse to accept cookies
- utilize the cookie consent and control options offered by a Stoneware or Lenovo website or product experience (if available and as required by applicable law)
- delete our cookies after visiting our site/service
- use your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Edge, "Private Browsing" in Firefox and Safari etc.)

Where required by applicable law, Stoneware and Lenovo will acquire consent from you prior to using certain cookies during your Stoneware or Lenovo website experience and/or will offer you the opportunity to choose which types of cookies to enable or disable. You should understand that some features of LanSchool Air might not function properly if you do not accept cookies. Also, please note that certain Stoneware and Lenovo websites, applications, and services may not respond to Do Not Track signals sent by certain browsers.

For additional information on how cookies and related tools may be used on Lenovo's websites, please visit the Lenovo Website Privacy <u>Statement</u> and review the section entitled "Does Lenovo use cookies, tags, pixels, web beacons, analytics and related technologies for online advertising and other purposes?".

## Information Collected from Students (including Minors):

#### **LanSchool Air**

LanSchool Air is a classroom device management service. It allows instructors a degree of control over classroom devices using an agent that is installed on the device. LanSchool Air may only be used with minors aged 12 and under by schools (as described in this privacy statement). Customers and companies that are not schools may not use LanSchool Air with minors aged 12 and under. LanSchool Air is not intended or designed for such use.

Schools may choose to use LanSchool Air products for classroom management in an educational setting. Where a school elects to use LanSchool Air, we provide LanSchool Air as a service provider to that school. The account, information, and content associated with LanSchool Air are controlled by the school – not by Stoneware or Lenovo. Stoneware and Lenovo may collect the following information from students through LanSchool Air: Name, Email address, School or system identifier, Username, screenshots, tab metadata, and active tab page content. This information is used to match students using classroom devices with a classroom list created by an instructor or school administrator, and also within the optional feature On-task monitoring (please, refer to the Artificial Intelligence section below for more information) in order to provide a real-time assistance for educators.

Stoneware and Lenovo collect personal information from students through LanSchool Air products for the use and benefit of the school, and for no other commercial purpose. To the extent that a school determines consent from a student's parent or legal guardian is required, Stoneware and Lenovo rely on the school to obtain such consent (including, where applicable, relying on the school to act as the parent's agent and consent to the collection of information from minors on the parent's behalf).

Also, please note that websites operated by Stoneware and Lenovo (including www.lanschool.com) are intended for use by adults only. They are not intended for use by minors aged 12 and under. No information should be submitted to or posted on Stoneware or Lenovo websites by minors aged 12 and under.

If you are a parent or guardian, and you have questions about any of the above, please contact your school. If you believe your child aged 12 and under has provided personal information via LanSchool Air outside of an educational context, please contact Stoneware and Lenovo using the contact information provided below.

#### LanSchool Air with Student Activity History

LanSchool Air also provides customers, including K-12 schools, with the ability to monitor and react to end-user URL requests (web filtering) and other behaviors such as search and messaging activity that violate customers' appropriate use policies for the devices they control, including in a school/classroom environment. Supported devices will collect and transmit certain data, including data of minors aged 12 and under, to a web application hosted by Lenovo for analysis and, ultimately, policy enforcement by the customers when configured customer policies are violated or conditions met. To provide this functionality, LanSchool Air will host and process/analyze such information as first and last name of the students, employees, or other end-users; email addresses of the end-users; chat messages between teachers and students;

browsing, web search, application usage, and browsing histories of students; and certain other device-identifiable data. The collection, use, sharing, and retention of this information is controlled by the LanSchool Air customer that chooses to install LanSchool Air on supported student devices. This will enable users/teachers, authorized by the customer admin, to monitor student device usage. Therefore, the customer is responsible for providing notice and acquiring any required consents from end-users and/or parents or guardians of minors, including those aged 12 and under.

#### LanSchool Classic with Third-Party Rostering Sync Solutions

LanSchool Classic on-premises products and services collect, use, and safeguard information where customers integrate LanSchool with third-party rostering sync solutions. Stoneware may collect the following information from students through LanSchool with third-party rostering sync solutions: Name, Email address, School or system identifier, and Username. This information is used to match students using classroom devices with a classroom list created by an instructor or school administrator.

LanSchool Classic may only be used with minors aged 12 and under by schools (as described in this privacy statement). Customers and companies that are not schools may not use LanSchool with minors aged 12 and under. LanSchool is not intended or designed for such use. Schools may choose to use LanSchool products for classroom management in an educational setting. When a school elects to integrate LanSchool with a third-party rostering sync solution, we provide this integration as a service provider to that school. The account, information, and content associated with LanSchool are controlled by the school – not by Stoneware and Lenovo. Stoneware and Lenovo may collect the information set forth above from students who are aged 12 and under through the LanSchool with third-party rostering sync solution integration. This information is used to match students using classroom devices with a classroom list created by an instructor or school administrator.

Stoneware and Lenovo collect personal information from students through LanSchool products for the use and benefit of the school, and for no other commercial purpose. To the extent that a school determines consent from a student's parent or legal guardian is required, Stoneware and Lenovo rely on the school to obtain such consent (including, where applicable, relying on the school to act as the parent's agent and consent to the collection of information from minors on the parent's behalf).

If you are a parent or guardian, and you have questions about any of the above, please contact your school. If you believe your child aged 12 and under has provided personal information via LanSchool outside of an educational context, please contact Stoneware and Lenovo using the contact information provided below.

#### LanSchool Student (for LanSchool Classic)

LanSchool Student (for LanSchool Classic) operates within the LanSchool environment for Mac, Windows, iOS, Android, and Chromebook. LanSchool Student can obtain a snapshot of a current tab. When requested by a teacher, this snapshot will be transmitted and displayed on the teacher's console. The image will not be stored. This is done to allow teachers to gauge that students are paying attention and staying on-task in a classroom environment and following the school's acceptable use policy. Student snapshots can be viewed by authorized users of the LanSchool Teacher and Tech Consoles. Students' snapshots are only viewable by authorized teachers or administrators within the school. This information is not disclosed to any third

parties. Snapshots are only transferred between Student and Teacher devices on the school's local network.

#### LanSchool Web Helper Extensions (for LanSchool Classic)

LanSchool Classic uses third-party web extensions (including Google Chrome, Microsoft Edge, and Mozilla Firefox) to collect and store student web browsing histories. This is done to allow teachers to gauge that students are paying attention and staying on task in a classroom environment and following the school's acceptable use policy. Authorized teachers can also block or allow access to websites from student computers based on this information. Only the specific website URLs that are visited are recorded. Student web history information collected by LanSchool Classic is stored securely on student computers and optionally on a LanSchool Reporting Server on the school's local network. This information can be viewed by authorized users of the LanSchool Teacher and Tech Consoles. This information is not disclosed to third parties.

## Artificial Intelligence

Certain Lenovo products, applications, and services may use technologies and tools that are powered by machine learning and artificial intelligence. The purpose of these technologies and tools is to deliver and improve our products and services in an ethical way. If a particular Lenovo product, application, or service uses artificial intelligence to process personal data of our customers, consumers, or users, we will describe those practices to the extent applicable and as required by law.

LanSchool provides an optional On-Task Monitoring feature that allows teachers to monitor if students are on track completing tasks assigned to the students. It is to provide real-time assistance for educators, and is not used for any purpose of assessments or decisions that may impact students' rights. Anonymized data is temporarily stored for 45 days.

#### Additional Information:

Lenovo and Stoneware do not use or disclose sensitive personal information. For consumers located in California, United States, Lenovo and Stoneware adhere to Section 7027(m) of the California Consumer Privacy Act Regulations. Lenovo and Stoneware do not use sensitive personal information to infer characteristics about consumers.

# Do Stoneware and Lenovo share personal information with third parties?

Yes. Stoneware and Lenovo contract with other companies, who act as our suppliers to perform services for Stoneware and Lenovo, such as data hosting, processing, marketing, promotions, event sponsorship, product development, and analytics. Such services may require Stoneware to share your information with our service providers. In such cases, we take

steps to ensure that these suppliers to Stoneware are adhering to Stoneware's standards for robust privacy and strong security. Stoneware also relies on other Lenovo businesses and operations globally to provide services to support LanSchool products and services, including for those services listed immediately above.

LanSchool may also contain various links to third-party websites or services that may provide additional information, services, or promotions. These sites and services may be operated independently of Stoneware and Lenovo and have their own separate privacy and data collection practices. Any information you provide to these websites and services will be governed under the terms of their privacy policy, if any. Stoneware and Lenovo have no responsibility or liability for the actions or policies of these independent sites and services and are not responsible for the content or privacy practices of such sites.

The following provide additional details regarding additional third parties who may receive information from Stoneware and Lenovo or via LanSchool products and services:

## Google API Service:

Google API is an application programming interface that allows interaction between Google products and services and non-Google products. LanSchool Air utilizes Google sign-in's API to authenticate, authorize and admit the user into the LanSchool Air product. Google end-users who agree to use the API service submit their Google user credentials to Google sign-in to establish a secure connection to the user's Google data. While LanSchool Air does store the instructor's first name, last name, email addresses and Google IDs, LanSchool Air does not store any of the user's Google data. Google's Privacy Policy can be found at https://www.google.com/policies/privacy/.

# Mergers & Acquisitions:

Circumstances may arise when Stoneware and Lenovo decide to sell, buy, merge, or otherwise reorganize businesses in some countries. You will be notified via email and/or a prominent notice on our website of any change in ownership or use of your personal information, as well as any choices you may have regarding your personal information. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers or receiving it from sellers.

# Legal Requirements and to Enforce Stoneware's and Lenovo's Rights:

It is possible that personal information will be subject to judicial or other government subpoenas, warrants, orders, or criminal and anti-fraud investigations. Therefore, when we believe in good faith that the law requires it, we may disclose personal or other information to regulatory or government bodies, courts of law, tribunals, and law enforcement agencies. We may also need to disclose personal or other information to protect our rights, protect your safety or the safety of others, or to investigate theft or fraud. In addition to the above, there may be circumstances that require us to disclose your personal information to other parties, including, but not limited to, legal advisers or debt collection agencies.

# Do Stoneware and Lenovo sell personal information?

Neither Stoneware nor Lenovo sell personal information in the context of LanSchool. As described in the sections above, Stoneware and Lenovo may share personal information with third-party service providers and partners so that they may support LanSchool Products, or to provide additional services to Stoneware and Lenovo and its customers and product users. In doing so, Stoneware and Lenovo take appropriate steps to ensure that these service providers and partners are meeting Stoneware's and Lenovo's standards of robust privacy and strong security. If Stoneware or Lenovo decide to sell personal information at any point, we would provide appropriate prior notice and consent opportunities as required by applicable law. Additionally, Lenovo does not share or otherwise communicate to a third party any LanSchool user's personal information for cross-context behavioral advertising purposes.

# Do Stoneware and Lenovo transfer personal information internationally?

Lenovo (of which Stoneware is a part) is a global organization, with legal entities, business processes, management structures, and technical systems that cross borders. Therefore, where permitted by law, we may share your personal information within Lenovo (including to subsidiaries, affiliates, and parent companies) or our service providers and business partners and may transfer it to countries in the world where we do business (including, but not limited to, the United States of America, Australia and China). Regardless of where your information is transferred to and resides, our privacy and security practices are designed to provide protection for your personal information globally.

Some countries have privacy laws that are not equivalent to privacy laws in your own country and that your data could be requested by law enforcement agencies in those jurisdictions. In such countries, Lenovo will still handle information in the manner we describe here and will take such measures as are necessary to comply with applicable data protection laws when transferring and processing your information. Where required, Lenovo will also maintain agreements between Lenovo group companies or with Lenovo partners or service providers to govern the transferring, processing, and protection of personal information. To help effectuate transfers of personal information globally including from and within the European Union, European Economic Area, Switzerland, and United Kingdom, Lenovo uses different means to comply with local requirements, including but not limited to Standard Contractual Clauses and government approvals. You can review our basic Data Processor Agreement templates for LanSchool Air Products here.

# How long will Stoneware and Lenovo retain personal information?

Stoneware and Lenovo intend to retain information, including personal information, only as long as necessary for business or other compelling purposes; and to securely delete personal information when those purposes of use have been satisfied. We will retain your information, including personal information, for as long as any of the following circumstances apply:

- your account or subscription is active
- to provide you with services or support that you may request
- to ensure required functionality and performance of Stoneware and Lenovo products and websites, including responsibilities under our product warranties

- to comply with applicable laws, including for tax and audit purposes
- to enforce Stoneware's and Lenovo's rights, including litigation and debt collection

Specific data retention practices may be addressed in further detail in the LanSchool Data Processor Agreement and/or other applicable agreements between Stoneware and the customer.

# **How does Stoneware and Lenovo protect information?**

Stoneware and Lenovo use standard technical and organizational measures when we transmit information from our products to our servers, when we store data, and when we share it with third parties. For example, we use encryption when necessary while transmitting sensitive information to keep your information secure. When sharing your information with third parties, we will take reasonable and appropriate steps to contractually require that such parties will protect and use your information responsibly.

LanSchool Products and services may also include security features designed to help you protect the information you store on your Product(s). These may include solutions like encryption; passwords (including strong password creation), PINs, multifactor authentication, and remote control over your Product(s).

However, please remember that no product, software, or data transmission can be guaranteed to be one-hundred percent secure. As a result, while we have taken appropriate steps to protect your product(s) and your information, Stoneware and Lenovo cannot ensure or otherwise warrant the security of your Product(s) or any information you provide to us. By using LanSchool Products, you do so at your own risk.

# What are my data protection rights?

Applicable data protection laws may give you the right to control our use and processing of your personal information. These may include the right to (i) request confirmation of, access to, and a copy of your personal information, (ii) request rectification or erasure of your personal information; (iii) object to processing of your personal information; (iv) withdraw your consent\*; (v) restrict processing or to opt-out of any sale of your personal information; (vi) data portability; (vii) opt-out of profiling in furtherance of producing legal or significant decisions concerning a consumer (we do not engage in such profiling); (viii) ask us for a list of the third parties to which we disclosed personal information; and appeal any decision regarding your privacy request.

\* Where we are using your personal information with your consent, you also have the right to withdraw your consent at any time, though this will not affect our use of your personal information prior to the withdrawal of your consent. In addition, you may have the ability to review, correct, or delete certain personal information via your Lenovo account if you have one and/or via your Lenovo Product or application settings.

In addition, you may have the ability to review, correct, or delete certain personal information of yours via a Stoneware or Lenovo account if you have one. You may also be able to restrict collection or processing of certain information of yours via device or application settings on your Product.

To further exercise your rights as described above, please <u>submit a privacy request</u>. We will review, respond to, and act upon any such requests in accordance with applicable data protection laws. You also have the right to not be discriminated against for exercising your privacy rights.

<u>If you are an instructor or a school administrator</u>, you have the right to request access to, review, and receive a copy of your personal information or a student's personal information. You may have the right to request that a minor's personal information be deleted, or to prevent further use or online collection of a minor's personal information. If you wish to exercise any of these rights, please <u>submit a privacy request</u>.

<u>If you are a parent or a student</u>, and you wish to exercise rights to review, access, delete, or prevent further use of a minor's personal information, please contact your school.

Please note that we will take steps in accordance with applicable law and our privacy and security standards to verify your identity before granting you access to your personal information or by otherwise complying with your request. If you have a Stoneware or Lenovo account, we may verify your identity by requiring you to sign into your account. If you do not have a Stoneware or Lenovo account or an email address on file with us, then we may request additional limited information from you to verify your identity. Please note that if you do not have an account with Stoneware or Lenovo, or an email address on file, or we are unable to verify your identity in our records, we may deny your request.

You may also use an authorized agent to submit a request under this section on your behalf. If you choose to have an authorized agent submit such a request on your behalf, Stoneware and Lenovo will require: (i) You to provide the authorized agent written permission to do so; and (ii) your agent to verify their identity directly with Stoneware or Lenovo. Stoneware or Lenovo may deny a request from an agent that does not meet these requirements.

In addition, you have the right to raise questions or complaints with your applicable national data protection authority at any time.

# **How may I contact Stoneware and Lenovo?**

To exercise your privacy rights described above, please **submit a privacy request**.

If you have any additional questions about this privacy statement you can contact us at privacy@lanschool.com, or via U.S. postal mail or other means at the following:

Stoneware, Inc.

Attn: Privacy Department 8001 Development Drive, Morrisville, NC 27560

#### For Brazil:

Lenovo Tecnologia (Brazil) Ltda. Acc: Brazilian Privacy and Data Protection Team Rua Werner Von Siemens, 111 Lapa de Baixo, São Paulo/SP CEP 05069-900 Data Protection Officer: Diogo Manganelli

## For Singapore:

Lenovo Attn: Singapore Data Protection Officer 151 Lorong Chuan, #02-01, New Tech Park, Singapore 556741

## For Japan:

privacy jp@lenovo.com

For additional LanSchool support resources and contact points, please visit <a href="https://lenovosoftware.com/support/">https://lenovosoftware.com/support/</a>.