Privacy Policy of Class Technologies, Inc. (Class) This Application collects some Personal Data from its Users Updated March 2024

1. Introduction

We care about your privacy. We believe that privacy is a fundamental right for all individuals. Our customers trust us with the personal information of their employees and their users, who are often students. We take the obligations that are attached to this information very seriously. We collect and use personal information only to allow us to provide our products and services to our customers and end users and we do so at the direction of our customers. 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.

2. Data Privacy Framework.

Class adheres to the principles of the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Class relies on the EU-U.S. DPF as a legal basis for the transfers of personal information. To learn more, visit our <u>Data Privacy Framework Notice here</u>.

Class will rely on the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF as a legal basis to transfer personal information from the UK and Switzerland once the applicable local authorities approve the Adequacy Decisions. In the meantime, Class shall continue to rely on the SCC's for the purposes of the UK and Swiss data protection law.

In the United States, we comply with applicable state laws, regulations, and other legal binding requirements relating to privacy, data protection, data security, and the processing of Personal Data, including but not limited to and to the extent applicable, the California Consumer Privacy Act, Cal. Ci. Code. § 1798.100 et seq. and associated regulations and amendments, ("CCPA").

We take appropriate safeguards to protect your privacy, your fundamental rights and freedoms, and the ability to exercise your rights. For example, if we transfer personal information from the **EEA**, **the UK**, **or Switzerland** to another country such as the United States, we will implement an appropriate data transfer solution such as entering into "standard contractual clauses" approved by the European Commission or competent governmental authority (as applicable) with you, the data exporter. If your use of Class products or services requires us to process any personally identifiable information (PII" or "Personal Data"), we shall do so at all times in compliance with the Class Technologies, Inc. Data Processing Addendum.

3. Class Privacy Assurances:

- We do not sell your data or student data.
- We do not own the content you share with **Class**, you do.
- We use the latest security best practices to protect you.
- We are compliant with FERPA, COPPA, CCPA, CPRA and GDPR, among other privacy laws.
- We are transparent about our practices and will let you know if things change.
- We do not advertise in Class.
- We are SOC 2 Type II compliant and shall maintain that standing.

4. Children's Privacy - Children's Online Privacy Protection Act (COPPA)

We support the guidelines and regulatory requirements provided in COPPA. We do not knowingly collect any information from children under the age of 13 unless and until the relevant institution has provided consent and authorization for a student under 13 to use the products and services and for us to collect information from such student. Where a customer institution instructs us to collect personal information from children under the age of 13, we collect, use, process and retain such information solely to provide the services on behalf of the customer and for the purposes set forth in our agreement with the customer. We collect only as much information as is necessary to provide the service and the customer may access, delete or withdraw consent for continued processing of the child's information at any time. If you have any questions about reviewing, modifying, or deleting personal information of a child under the age of 13, please contact your educational institution directly.

5. United States - FERPA and State Education Privacy Laws

We provide products and services to schools and other educational institutions. Through the provision of these products and services, we may collect personally identifiable information from or about students ("Student Data"), which may include educational records governed by the Family Educational Rights and Privacy Act (FERPA). We consider such Student Data to be strictly confidential and in general do not use such data for any purpose other than improving and providing our products and services to the educational institution or on the educational institution's behalf. Our collection, use, and sharing of Student Data is 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. If you have any questions about reviewing, modifying, or deleting personal information of a student, please contact your educational institution directly.

6. 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: ClassEDU, Ballindamm 39, 20095 Hamburg, Germany UK: DP Data Protection Services UK Ltd., Attn: ClassEDU, 16 Great Queen Street, Covent Garden, London, WC2B 5AH, United Kingdom

<u>www.dp-dock.com</u> classedu@gdpr-rep.com

Owner and Data PROCESSOR

Class Technologies, Inc. (Class): www.class.com

Owner Contact Email: privacy@class.com

7. Types of Data Collected

Data collected by Class.com may include personally identifiable information from education or employment records. Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies; Usage Data; first name; last name; school/company name; address; state; email address; website, IP address. Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User(s), or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is necessary for its use and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is necessary are welcome to contact their licensing institution. Any use of Cookies – or of other tracking tools – by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

8. Mode and Place of Processing the Data

A. Methods of Processing

Class 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 some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, legal, IT) 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 Class. The updated list of these parties is available in the Class Trust Center.

B. Legal Basis of Processing

We use personal data as necessary for the performance of our Services ("Performance of Contract"); to comply with our legal and contractual obligations ("Legal Obligation"); and to support our legitimate interests in maintaining and improving our Services, e.g., in understanding how our Services are used and how our campaigns are performing, and gaining insights which help us dedicate our resources and efforts more efficiently; in marketing, advertising and selling our Services; providing customer service and technical support; and protecting and securing our Customers, Users, Prospects, ourselves and our Services ("Legitimate Interests"). If you reside or are using the Services in a territory governed by privacy laws under which "consent" is the only or most appropriate legal basis for the processing of personal data as described herein (in general, or specifically with respect to the types of personal data you expect or elect to process or have processed by us or via the Services, or due to nature of such processing) ("Consent"), your acceptance of our License and Services Agreement or Terms of Service and this Privacy Policy will be deemed as your consent to the processing of your personal data for all purposes detailed in this Policy, unless applicable law requires a different form of consent. If you wish to revoke such consent, please contact us at privacy@class.com

Specifically, we use personal data for the following purposes (and in reliance on the legal basis for processing noted, as appropriate):

Customer and User personal data

- To facilitate, operate, enhance, and provide our Services (Performance of Contract; Legitimate Interests);
- To provide our Customers and Users with assistance and support, to test and monitor the Services, or diagnose or fix technology problems, and to train our Customers and Customer-facing staff (*Performance of Contract; Legitimate Interests*);
- To personalize our Services, including by recognizing an individual and remembering their information when they return to our Services, and to provide further localization and personalization capabilities to make our Services easier to use (Performance of Contract; Legitimate Interests);
- Where a Customer has enabled the optional 'AI Teaching Assistant' or other Artificial Intelligence features within the
 Platform, and their User(s) then specifically opt-in and consent to the activation of this feature in their own sessions
 recorded through the Platform (through the designated opt-in process following the Customer-level enabling of this
 feature), then such recordings may be used to identify and note such Users' participation in such recorded sessions, until
 the feature is deactivated by the User or the Customer's account administrator (Consent);
- To facilitate and optimize our marketing campaigns, ad management and sales operations, and to manage and deliver advertisements for our products and services more effectively, including on other websites and applications. Such activities allow us to highlight the benefits of using our Services, and thereby increase your engagement and overall satisfaction with our Services. This includes contextual, behavioral and interests-based advertising based on your activity, preferences or other data available to us or to our business partners (*Legitimate Interests; Consent*);
- To facilitate, sponsor and offer certain events and promotions (Legitimate Interests).
- **C.** Class may process Personal Data relating to Users if one 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 and processing 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 Class 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 Class;
- processing is necessary for the purposes of the legitimate interests pursued by Class or by an authorized third party.
- to better understand how our services are used and improve the content and general administration of our services.

In any case, Class 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.

D. Place

The Data is processed at Class operating facilities and in any other places where the parties involved in the processing are located. 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 and the Class Trust Center.

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 United Kingdom 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 Class 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 Class using the information provided in the contact section.

9. Retention Time

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

- Personal Data collected for purposes related to the performance of a contract between Class and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of Class'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 Class within the relevant sections of this document or by contacting Class.

Class 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, Class 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 expiration of the retention period.

10. The Purposes of Processing

The Data concerning the User is collected to allow Class 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. For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed Information on the Processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- Analytics
- Contacting the User

The Class Service may allow you to access functionalities or content provided by our content and technology partners. For example, Class' use and transfer of information received from Google API's to Class will adhere to the Google API Services User Data Policy, including the Limited Use requirements.

11. Analytics

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

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, to 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. Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

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.

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, to prepare reports on its activities and share them with other Google

track and examine the use of this Application, to 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.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

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.

12. Contact form (this Application)

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. Personal Data processed: address; company/organization name; email address; first name; last name; state; website.

13. The Rights of Users

A. Users may exercise certain rights regarding their Data processed by Class. Users entitled to broader protection standards may exercise any of the rights described below. In all other cases, Users may inquire with Class 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 Class, 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, Class 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 their Data from Class.
- 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.

B. 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 Class or for the purposes of the legitimate interests pursued by Class, 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 Class is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

C. How to Exercise These Rights

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

14. Applicability of Broader Protection Standards

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:

- is performed by Class based within the EU or UK;
- concerns the Personal Data of Users who are in the EU or UK and is related to the offering of paid or unpaid goods or services, to such Users;
- concerns the Personal Data of Users who are in the EU or UK and allows the Owner to monitor such Users' behavior taking place in the EU or UK.

15. Additional Information About Data Collection and Processing

A. Legal Action

The User's Personal Data may be used for legal purposes by Class 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 Class may be required to reveal personal data upon request of public authorities.

B. 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.

C. 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.

D. Information Not Contained in This Policy

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

E. 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.

F. Changes to This Privacy Policy

Class 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 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. We encourage you to check our website frequently to see the current Privacy Policy in effect and any changes that may have been made to prior versions of the Privacy Policy.

16. Information for California Consumers

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The provisions contained in this section apply to all Users who are consumers residing in the state of California, United States of America, according to "The California Consumer Privacy Act of 2018" (Users are referred to below, simply as "you", "your", "yours"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term "personal information" as it is defined in The California Consumer Privacy Act (CCPA).

A. Categories of Personal Information Collected, Disclosed or Sold

In this section we summarize the categories of personal information that we've collected or disclosed 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.

B. Information We Collect: the Categories of Personal Information We Collect

We have collected the following categories of personal information about you: identifiers, commercial information and internet information. We will not collect additional categories of personal information without notifying you.

C. 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.

D. How We Use the Information We Collect: Sharing and Disclosing of Your Personal Information with Third Parties for a Business Purpose

We 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.

E. What Are the Purposes for Which We Use Your Personal Information?

We 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.

We 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 an actual damage. We will not use your personal information for different, unrelated, or incompatible purposes.

F. Your California Privacy Rights and How to Exercise Them

The Right to Know and to Portability

You have the right to request that we disclose to you:

- 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;
- in case of sale of personal information or disclosure for a business purpose, two separate lists where we disclose:
- for sales, the personal information categories purchased by each category of recipient; and
- for disclosures for a 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.

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, 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.

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:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- 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 therefore 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.

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.

17. Definitions and Legal References

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject and is affiliated with the Data Controller.

Data Subject

The natural person to whom the Personal Data refers.

<u>Data Processor (or Data Supervisor)</u>

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy. For the purposes of this Policy, the Data Processor is Class Technologies, Inc.

Data Controller

The natural or legal person, public authority, agency, institution, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. For the purposes of this Policy, Data Controllers are Customers of Class.

This Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookies

Small sets of data stored in the User's device.

Legal Information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation). This privacy policy relates solely to this website and the Class Application, unless otherwise stated within this document.

18. Contact Us

End users of institutions: If you are a user of our 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 Class 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@class.com