

# Privacy Policy

Effective on February 11, 2022

We at Braintrust call your attention to our Privacy Policy, which is designed to guide how Braintrust (“we”, “our” or “us”) collects, processes, stores and shares personal information from our Users, and how Users can manage these matters. The terms “User”, “you” or “your” refer to parents, students, tutors and any other person or entity who views, uses, accesses, browses or submits any content or material to our website at [www.braintrusttutors.com](http://www.braintrusttutors.com) (“Site”).

This Privacy Policy applies only to personal information we collect via the Site, online and mobile applications, email, electronic devices or other interactive means (collectively, “Interactive Communications”), as well as personal information transmitted to us by telephone or hard copy mail delivery (collectively, “the Service”).

Providing your personal information to us is your voluntary choice. Your use of the Service after the effective date of this document constitutes your acceptance of this Privacy Policy. If you do not agree to all the terms and conditions of this Privacy Policy, do not engage with the Site or use the Service.

## The Information We Collect

You don’t have to create an account to use some of our Site’s features, such as searching and viewing general descriptions about our tutoring platform and public tutor profiles or searching and creating general, preliminary inquiries to learn more about our portfolio of services. If you do not create an account, we do collect information about your browser and device (IP address, browser version, etc.), but we do not link that information to an identifiable person unless and until you create an account.

If you do choose to create an account, you may be asked to provide us with certain personal information so that we can provide you with the benefits of our platform and related services. This may include information such as:

- registration information when you create a User account;
- profile information, such as city and state, educational level or background, and tutoring goals;
- uploaded content (photographs, essays, lessons, etc.);
- lesson recordings (if you have consented to recording of lessons); and
- questions, comments, or other information when you communicate with us, by phone, email, or via third party social media sites, or participate in interactive features of the Service (including customer support messages)

### *Parents and Students*

We may also collect personal information related to your documentation of and payment for tutoring sessions; tutoring questions related to your studies; school information; teacher feedback of a student (once the parent provides consent for submission); and content you upload for the purposes of transmitting it to another User or for public display on the Site.

### *Tutors/Teachers*

We may also collect your Social Security number (SSN), Federal Employer Identification Number (FEIN), date of birth and address, for tax purposes or to complete a background check through a third party retained for such purpose. We also collect content you upload for purposes related to transmission to other Users or public display on the Site.

### *Financial Information*

If you are a parent/student, who elects to pay for tutoring services with a credit card, we will coordinate to connect you directly with a third party payment administrator, which then may collect your name, credit card number,

expiration date, and address information. We will further refer you to the third party administrator's policies regarding how it processes, stores, encrypts and handles financial and bank information. We do not store credit card numbers.

If you are a tutor/teacher, we may also collect bank account information necessary to facilitate payment and/or coordinate to connect you directly with a third party payment administrator to facilitate payment, which then may ask that you create an account, and in so doing, collect your name, bank account information, SSN or FEIN, date of birth, address and/or other information necessary to facilitate payment. We will further refer you to the third party administrator's policies regarding how it processes, stores, encrypts and handles financial and bank information.

## **Additional Information We Receive About You**

### *Information we collect automatically*

We also may gather additional personal information when you engage in Interactive Communications with us, including type of browser you use, access time, pages viewed, IP address, and, if enabled, geolocation; and we may collect information about the computer or mobile device you use to access the Site, including without limitation operating system and unique device identifiers and mobile network information. This data is used to better understand and enhance Users' experience with the Site. Braintrust may publish aggregate User statistics or share them with third parties.

### *Information we collect from other sources*

We may also obtain personal information from our background check conducted through third party sources and combine that with information we collect through the Service. For example, we may view information about you for the purposes of identity verification (e.g., credit bureau and other background check information), including from publicly available sources, but this information is not stored on our systems. User generated content on the Site that is cross-posted through certain social networking preferences (e.g., pages you "Like" or "Follow") may be viewed by the general public. Accordingly, Braintrust cannot ensure the privacy of any personal information included in such User generated content.

## **How We Use Your Information**

Braintrust may use your personal information for various purposes, including:

- account creation and to provide the Service, including without limitation, access to information about prospective tutors, tutor-student matching services, previous lessons, reporting, and facilitating communication directly between students and tutors;
- to process transactions and billing;
- for identification and authentication purposes;
- to communicate with you concerning the Service, User requests, transactions, security, privacy and administrative issues relating to your use of the Site, and services that we think may be of interest to you;
- personalize and improve the Service; and
- for administration of and troubleshooting regarding the Site and our platform.

## **Information We Share and Disclose**

We do not sell your personal information. To facilitate the utility of the Site, we may need to share some of your personal information with other Users, affiliated entities, third parties, and service providers. This section explains when and why we share your information.

### *User Content*

Your member profile and information that you post or share, such as tutor bio, educational background, city and state, rate, photos, reviews, comments, suggestions, and information about you or your experience, may be seen and shared

with other Users of our platform and services. You should therefore think carefully before deciding what information you share.

#### *Information Shared Between Users*

Braintrust shares some amount of personal information between tutors and students in order to facilitate the arrangement of tutoring sessions, including your first name and last initial, city and state, photo, and details about the tutoring services you seek or provide. Messages to students may also contain tutors' usernames, which include the tutor's first and last name. In the case of teacher feedback of a student and reporting with respect to a tutoring session(s), we will transmit it via email or as you ask us to.

#### *Cookies and Similar Technologies*

Third parties, including Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from our Site and elsewhere on the internet and use that information to provide measurement services and target ads. Most web browsers let you choose whether to accept cookies and let you delete cookies already set. The choices available, and the mechanism used, will vary from browser to browser, but are typically found in the "options," "tools" or "preferences" menu. There also are online tools available for clearing all cookies left behind by the websites you have visited, such as [www.aboutads.info/choices](http://www.aboutads.info/choices) and [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### *Service Providers*

We engage service providers to perform functions and provide services to us in the United States. For example, we use a variety of third-party services to help operate our services to help us understand the use of our services, such as Google Analytics. We may share your private personal data with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions (service providers may use other non-personal data for their own benefit). We share your payment information with payment services providers to process and deliver payments; prevent, detect, and investigate fraud or other prohibited activities; facilitate dispute resolution such as chargebacks or refunds; and for other purposes associated with the acceptance of credit and debit cards.

#### *Affiliates and Change of Ownership*

In the event that we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your personal data may be sold or transferred as part of that transaction. Unless you are notified otherwise, this Privacy Policy will apply to your personal data as transferred to the new entity.

#### *Law and Public Interest*

Notwithstanding anything to the contrary in this Privacy Policy or controls we may otherwise offer to you, we may preserve, use, or disclose your personal data or other safety data if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; to protect the safety of any person; to protect the safety or integrity of our platform, including to help prevent spam, abuse, or malicious actors on our services, or to explain why we removed certain accounts from our Services; to address fraud, security, or technical issues; or to protect our rights or property or the rights or property of those who use our Services. However, nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your personal data.

#### **Data Transmission and Storage**

Braintrust uses industry-standard encryption when collecting and transmitting your information through the Site and the Braintrust network. Once information has been collected, we encrypt sensitive data in our database for added security. Braintrust also uses firewalls and hardware monitoring across our system to protect against unauthorized access. Unfortunately, even with these measures, Braintrust cannot guarantee the security of personal information. By

using the Service, you acknowledge and agree that Braintrust makes no such guarantee, and that you use the Service at your own risk.

## **Managing Your Personal Information with Us**

### *Modifying or correcting your information*

If you have an account with us, you can access, correct, delete, or modify some of the personal information you provided to us in your account settings.

### *Email*

Braintrust may send you email communications periodically detailing new service features, promotions or other information we deem of interest. You may unsubscribe from these messages by using the link at the bottom of the email. We will still send you email messages about the status of your account or any notices as required by law. You may not opt-out of receiving these administrative emails so long as you continue to use the Service. If you wish to terminate your account, please contact us.

### *Location Information*

You can prevent your device from sharing location information through your device's system settings. But if you do, this may impact Braintrust's ability to provide you our full range of features and services.

### *Cookie Tracking*

You can modify your cookie settings on your browser settings. If you delete or choose not to accept our cookies, you may be missing out on certain features of the Service.

### *Do Not Track*

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services that you do not want them to track your online activities. The Service does not currently support Do Not Track requests at this time.

## **California Residents**

The California Consumer Privacy Act provides some California residents with the additional rights listed below.

### *Right to Know*

You have the right to know and see what data we have collected about you over the past 12 months, including:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information is collected;
- The business or commercial purpose for collecting your personal information;
- The categories of third parties with whom we have shared your personal information; and
- The specific pieces of personal information we have collected about you.

### *Right to Delete*

You have the right to request that we delete the personal information we have collected from you (and direct our service providers to do the same). Note that deletion requests are subject to certain limitations. For example, we may keep information as required or permitted by law, to process transactions and certain account-related information, to facilitate User requests, and to protect and fix our system.

### *Other Rights*

You have the right not to be discriminated against for exercising any of the rights listed above.

### *Exercising Your California Privacy Rights*

To request access to or deletion of your personal information, or to exercise any other data rights under California law, please write us at [privacy@braintrusttutors.com](mailto:privacy@braintrusttutors.com). Please include your full name, email address, and phone number associated with your use of the Service, along with why you are writing, so that we can process your request in an efficient manner.

### *Response Timing*

We aim to respond to a consumer request for access or deletion within 45 days of receiving that request. If we require more time, we will inform you of the reason and extension period in writing.

### **Children and Our Site**

*This Site is not intended for use by children under 13 years of age without parental supervision.*

Braintrust does not knowingly collect personally identifiable information from children under the age of 13. If you are under the age of 13, please do not provide your contact information or any other personally identifiable information to Braintrust. If you are the parent or legal guardian of someone under the age of 13 who may have provided us with information without your knowledge or consent, please contact us at [privacy@braintrusttutors.com](mailto:privacy@braintrusttutors.com) to have this information removed. All contact, including tutoring sessions, between a tutor and any minor should, of course, take place only in a supervised setting.

### **Privacy Policy Changes**

Braintrust reserves the right to change or update this Privacy Policy from time to time. We will post any changes here and indicate the new effective date of the Privacy Policy at the top of the document. We encourage you to review the Privacy Policy for any updates while you are an active User of the Service.

The Site is hosted in the United States and is governed by United States law. If you are using the Site from outside the United States, please be aware that your information may be transferred to, stored and processed in the United States where our servers are located, and our databases are operated. The data protection and other laws of the United States might not be as comprehensive as those in your country. By using the Site, you consent to your information being transferred to our facilities and to the facilities of those third parties with whom we share it as described in our Privacy Policy.

### **How to Contact Us**

Questions regarding this Privacy Policy should be directed to [privacy@braintrusttutors.com](mailto:privacy@braintrusttutors.com) or to the mailing address below:

Braintrust  
104 Wooster St, Suite 4S  
New York, NY 10012