

# Tactical Aviation Privacy Policy

Welcome to Tactical Aviation. We're glad you want to use our award winning drone curriculum in your schools. We value the privacy of all of our users and we know you care about your privacy and the privacy of your students, so we created this Tactical Aviation Student Privacy Policy.

This Student Privacy Policy applies to all Tactical Aviation products, including related website, services, software, applications, and/or content made available by Tactical Aviation, llc., Tactical Aviation products are only available for educators, schools, school districts, and other K-12 education institution users (collectively referred to as “**Schools**”) to use with students for a K-12 educational purpose. To be eligible to use Tactical Aviation products, you must use your School email address or authentication service and you represent that you are authorized to permit Tactical Aviation to access, collect, transmit, modify, display and maintain Student Data to provide the Service as described in this policy.

This School Privacy Policy explains how we collect, use and protect personal information through the Tactical Aviation products, including the personal information we collect about students (“**Student Data**”).

Protecting students’ privacy is fundamental to our mission and business. We are committed to the following principles to protect Student Data:

- We use Student Data only for purposes for which we are authorized by the school or the parent/student.
- We have designed our School Privacy Policy and the Tactical Aviation products to meet our responsibilities under COPPA, FERPA and state student privacy laws, including SOPIPA.
- We do not use or disclose Student Data for targeted advertising or marketing purposes.
- We never show third-party ads to students.
- We do not build a personal profile of a student other than for supporting school or educational purposes or as authorized by the parent.
- We believe that schools should have control over their Student Data.

- We will not knowingly retain Student Data beyond the time period necessary to support the School's purpose, unless authorized by the parent.
- We will never sell or rent Student Data to third parties, unless the sale is part of a corporate transaction, such as a merger, acquisition, bankruptcy, or other sale of assets.
- We employ industry-standard network security and encryption technology to protect Student Data.
- We will clearly and transparently disclose our data policies and practices.
- We will not make any material changes to our School Privacy Policy that relate to the collection or use of Student Data without first giving notice to the School and providing a choice before the Student Data is used in a materially different manner than was disclosed when the information was collected.

## 1. Tactical Aviation AND STUDENT DATA

When the Tactical Aviation product is used by a School for an educational purpose, Tactical Aviation may access, collect or receive Student Data that is provided by the School, by the student or by a student's parent or legal guardian (referred to as a "**Parent**"). Tactical Aviation does not own or control Student Data, which belongs to the School and to the student (or the student's Parent).

This School Privacy Policy and Tactical Aviation products are intended to protect Student Data as required by applicable student data privacy laws. For example:

**The Family Educational Rights and Privacy Act ("FERPA").** Student Data collected by Tactical Aviation may include personally identifiable information from education records that are subject to FERPA. Tactical Aviation may collect and process Student Data as a "School Official" (as that term is used in FERPA and its implementing regulations), under the direct control of the school. We agree to work with our School partners to jointly ensure compliance with the FERPA regulations, as well the Protection of Pupil Rights Amendment ("**PPRA**").

**The Children’s Online Privacy Protection Act (“COPPA”).** We do not knowingly collect personal information from a child under 13 unless a School has authorized us to collect such information through the provision of the Service on the School's behalf. When a School uses Tactical Aviation in the classroom or in an educational context using their own LMS we do not collect any information on the student. When using our website for the TRUST certification we rely on the School to provide appropriate consent for Tactical Aviation to collect personal information from a student under 13 for the use and benefit of the School and for no other commercial purpose, as permitted by COPPA. Upon written request, we will provide the School the opportunity to review and delete the personal information collected from their students. If you are a Parent and you have questions about your child's use of Tactical Aviation and any information collected, please discuss your questions with your child's School.

**Student Online Personal Information Privacy Act (“SOPIPA”) and similar state laws.** Student Data is owned by, and under the control of, the School. We do not use or disclose Student Data for targeted advertising purposes or to amass a profile of a student except in furtherance of an educational purpose. We never sell Student Data unless the sale is part of a corporate transaction, such as a merger, acquisition, bankruptcy, or other sale of assets, in which case we make efforts to ensure the successor entity honors the privacy commitments made in this policy and/or we will notify you of such a sale and provide you an opportunity to opt out by deleting your account before the data transfer occurs. Parents may review Student Data and correct erroneous information by contacting their School directly. In the event of an unauthorized disclosure of Student Data, Tactical Aviation will promptly notify the School account administrator.

## **2. INFORMATION WE COLLECT**

We intentionally limit our data collection to only what we need to provide the Tactical Aviation programs. When schools use their own LMS we do not collect any student data at all. In instances where we provide the LMS, we may collect the following:

- Information about educators and Schools: We collect personal information, such as first and last name, email address and password, when an educator creates an account.

- Information about students: Students cannot create an account by themselves on Tactical Aviation but must be invited to join a classroom by an educator or school administrator using a link and a unique code provided to the school or district. Educators submit information about students in the particular classroom, such as first and last names and email address. The Educator may provide student profile names or permit students to add their own first name and last initial to a student profile.
- Use of Service: We collect information about the use of the Services, such as when, and for how long a user accesses our Services, what content a user views, and what actions he or she takes
- Device Information: We and our third-party service providers collect certain information from and about a user's device automatically when you access our Services through cookies, pixel tags or similar technologies. For example, we collect information about your device, such as the device type, browser type and version, operating system name and version, IP address, and referring URL and may collect a persistent identifier or unique ID that allows us to identify your browser, mobile device or account. We may also collect the device's location data, or we may approximate your location by analyzing data like IP address. We collect this data to help us understand usage, to diagnose problems and provide support, to administer our Services, facilitate navigation, display information more effectively, to personalize your experience while using the Services, and to recognize your computer in order to assist your use of the Services and for security purposes. We also gather statistical information about use of the Services in order to continually improve its design and functionality, understand how they are used and assist us with resolving questions regarding them.

We do not permit third-party advertising networks to collect information about students' use of the Tactical Aviation Services for targeted advertising purposes.

### **3. HOW WE USE STUDENT DATA AND PERSONAL INFORMATION**

We only use Student Data to provide our Services to schools and to support, improve and develop the product and specifically to enroll in Tactical Aviation content if a District operated LMS is not available.

### **4. HOW WE DISCLOSE OR SHARE STUDENT DATA AND PERSONAL INFORMATION**

We share or disclose personal information as needed to provide our Service or with the permission of the educator, School or Parent. We also share personal information in the following circumstances:

- We share information within the Service in accordance with the functionality of the Service to a district if requested
- Student Data may be shared among authorized School users such as teachers and school or district administrators, depending on the settings and functionality selected by the School.
- Student Data may also be shared with a student's Parent upon request and verification via the district or school.
- We do not use, disclose, sell, or rent Student Data to third parties for targeted advertising, marketing or other commercial purposes.
- We share information with our trusted third-party service providers who provide services to us or on our behalf, such as website hosting and customer support services.
- We may disclose information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in bankruptcy or similar proceedings). In the event that we sell, divest or transfer our business to a new corporate owner, we will not transfer Student Data unless the new owner has agreed to data privacy standards no less stringent than our own or we will provide Schools with notice and an opportunity to opt out of the transfer of Student Data by deleting the Student Data before the transfer occurs.
- We may use and disclose information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public

and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose information that does not identify or otherwise directly relate to an individual for any purpose, subject to any restrictions imposed by applicable law.

## **5. THIRD-PARTY SERVICES**

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service.

## **6. SECURITY**

We use reasonable organizational, physical, technical, and administrative measures designed to preserve the integrity and security of the personal information we collect and to protect against unauthorized access. Access to Student Data is limited to Tactical Aviation employees who require it to perform their job functions. Our employees may be subject to disciplinary action, including termination, if they fail to meet our privacy and confidentiality standards. However, no security system is impenetrable—for that reason, we cannot guarantee the security of your personal information or Student Data. If personal information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and take all steps required by applicable laws and regulations. If a security incident materially impacts the security or confidentiality of Student Data, we will promptly notify the educator or School.

## **7. USER ACCESS**

You may have the right to access, correct, download for transport to a similar service, or delete any of your personal information collected by Tactical Aviation. If you would like to exercise such rights, please contact us.

## **8. RETENTION PERIOD**

We do not knowingly retain Student Data beyond the time period required to support the School's educational purpose, unless authorized by the School or a Parent. We do not delete or de-identify any Student Data from an active student user account associated with a School except at the direction of the School. The educator and School is responsible for maintaining current student rosters and Identifying students who will enroll in the courses.

We will delete or de-identify Student Data within 60 days of receipt of a deletion request from a School. Even if we do not receive a deletion request from a School, we may delete or de-identify Student Data after a period of inactivity in accordance with our standard data retention schedule.

## **9. UPDATES TO THIS PRIVACY POLICY**

We may update this Privacy Policy as needed to reflect changes to our Service and standard practices.

We will not make any material changes to this Policy that relate to the collection or use of Student Data without first giving notice to the school and providing a choice before the Student Data is used in a materially different manner than was disclosed when the information was collected.

## **11. CONTACT US**

If you have any questions about this Privacy Policy, please contact us.