

JUNTO101 PRIVACY POLICY

Last Updated: November 20, 2025

1. INTRODUCTION.

This Privacy Policy (“**Privacy Policy**”) describes how Junto 101 LLC and our parent, subsidiary, and affiliate companies (collectively, “**Company**”, “**we**”, “**us**”, or “**our**”) use Personal Information (defined below) that we collect, receive, and store about each visitor, user, or customer (each, a “**user**,” and specifically you, “**you**” or “**your**”) of our owned and operated website, <https://junto101.org>, and of our other affiliated websites, subdomains, mobile versions, applications (including mobile applications), and online media under our operation and control, as well as all backup, mirror, replacement, or substitute websites or webpages we make available as part of the services we provide (collectively, the “**Platform**”), the use of which shall be subject at all times to the Terms of Use.

We are committed to respecting the privacy and privacy rights of our users and recognize the need for appropriate protection and management of information that may be used, either alone or in combination with other information, to personally identify an individual or household (“**Personal Information**”) and, as a subset thereof, Personal Information that may be considered sensitive personal information under Data Privacy Laws (defined below) (“**Sensitive Personal Information**”) that is shared with us in connection with users’ use of the Platform. You may choose whether to provide or disclose Personal Information in connection with your use of the Platform. If you choose not to provide the Personal Information we request, you may still visit and use parts of the Platform but may be unable to access or use certain features, options, programs, and services thereof. If you do not agree with any of the terms of this Privacy Policy, please do not use the Platform.

The Platform may contain links to, or advertisements for, websites or mobile applications operated by third parties, including, without limitation, third party social media platforms, and, therefore, not owned or controlled by Company. The links to, and advertisements concerning, such third-party websites/mobile applications are provided for your convenience only. We are not responsible for the content, performance, or privacy practices of these third-party websites/mobile applications or for your interactions with them, and you visit them at your own risk. Our inclusion of links to, or advertisements for, such third-party websites/mobile applications does not imply any endorsement of the material, products, or services provided by such third-party websites/mobile applications or any association with such third-party websites/mobile applications or their owners or operators whatsoever.

2. CHANGES TO THIS PRIVACY POLICY.

We reserve the right, at any time and from time to time, for any reason in our sole discretion, to add to, delete, and/or modify any or all of this Privacy Policy. We display the effective date of this Privacy Policy at the top of this page, indicated by the “Last Updated” legend. UNLESS OTHERWISE INDICATED, ANY CHANGES TO THIS PRIVACY POLICY WILL APPLY IMMEDIATELY UPON POSTING TO THE PLATFORM. If you use the affected Service after the changes become effective, it means you agree to the changes to this Privacy Policy. You should review the provisions of this Privacy Policy on a regular and frequent basis so that you are aware of your rights.

3. CHILDREN’S PRIVACY.

In accordance with the Children’s Online Privacy Protection Act (COPPA), we do not knowingly collect Personal Information and/or Sensitive Personal Information from children under the age of thirteen (13) without the express verifiable consent of a parent or legal guardian. For users between the ages of thirteen (13) and sixteen (16), we may require affirmative consent from the user or, in some cases depending on applicable laws, consent from a parent or legal guardian prior to collecting, using, or disclosing any Personal Information and/or Sensitive Personal Information. We encourage parents and guardians to monitor their children’s online activities and to contact us at info@juntto101.org if they believe we have inadvertently collected Personal Information and/or Sensitive Personal Information from a child without proper consent.

If a child registered under your account is under the age of thirteen (13) years old at the time of registration, we will send an email request to your account’s associated parental email address for your express verifiable consent to collect your child’s Personal Information and/or Sensitive Personal Information. You may, in your sole discretion, respond to our email request with your verifiable consent for our collection of your child’s Personal Information and/or Sensitive Personal Information, which may include, without limitation, the provision of your credit card, driver’s license, or other government-issued identifier (collectively, “**Verification Materials**”). Upon our receipt of your express verifiable consent, we will send you a confirmation email prior to collecting your child’s Personal Information and/or Sensitive Personal Information. Once parental consent has been verified, we promptly delete any Verification Materials and all copies thereof to protect your privacy and comply with data minimization principles under Data Privacy Laws (defined below).

Subject to our receipt of your express verifiable consent as set forth above, we may collect the following categories of Personal Information and/or Sensitive Personal Information from you and/or your child:

- Identifiers, such as your child’s first and last name, account username, email address, mailing address, date of birth, and Internet Protocol (IP) address;
- Sensitive Personal Information, including your child’s account password, and information about your child’s learning disabilities, if any;
- To the extent applicable, therapy notes and artifacts, some of which may constitute Personal Information and/or Sensitive Personal Information, including, without limitation, clinical notes, written reflections, work sheets, drawings or other materials generated during or related to your child’s therapy sessions via the Platform (**Please note:** these materials are uploaded to the Platform by the licensed specialists rendering requested therapeutic services to your child via the Platform (“**Specialists**”). These materials are securely stored on the Platform in accordance with Data Privacy Laws. They serve to support the therapeutic process, maintain continuity of care, and document progress, and will not be disclosed to any third party without your further express verifiable consent); and
- Network activity, such as information collected from cookies and similar tracking technologies (as described below), and marketing and communication preferences

Please note that some of the Personal Information and/or Sensitive Personal Information provided by children via the Platform may constitute “protected health data” as such term is defined under various U.S. Data Privacy Laws. To learn more about the rights afforded to you and your child in connection with the provision of Personal Information and/or Sensitive Personal Information, which may include “protected health data,” please see Section 14 of this Privacy Policy (“U.S. Consumer Privacy Rights”).

By providing us with your express verifiable consent as set forth above, you expressly consent to our collection and use of your child's Personal Information and/or Sensitive Personal Information solely for the internal purpose of providing the Platform. You may revoke your consent at any time by emailing us at info@juntoto101.org.

4. STATEMENT ON PROTECTED HEALTH INFORMATION.

Company facilitates virtual therapy services and operates as a “business associate” – not a “covered entity” – as those terms are defined under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). In this role, we may receive, process, or transmit protected health information (“PHI”) on behalf of covered healthcare providers, including Specialists. We are committed to safeguarding PHI in accordance with applicable HIPAA requirements.

5. INFORMATION COLLECTED AND HOW WE COLLECT IT.

We may from time to time receive and/or collect the following categories of Personal Information:

- Identifiers, for all users, such as your first and last name, date of birth, gender, account username, email address, mailing address, telephone number, IP address, government-issued identifiers (such as your driver's license or passport), and, if applicable, student identification cards. If you register an account as a **parent**, we may also collect your child's first and last name, date of birth, and photograph.
- Employment information, if you register an account as a Specialist and/or use the Platform's job application feature, such as your professional role, job title, area of specialization, years of experience, employer type and name, employer address, photograph, and resume, and, if applicable, your professional license number, additional professional certification information, and/or relevant supporting documentation.
- Sensitive Personal Information, such as your account password, and, if you register an account on the Platform as a **parent**, information about your child's learning disabilities and/or existing medical conditions, if any;
- Network activity, such as information collected from cookies and similar tracking technologies (as described below), marketing and communication preferences; and
- Any other information reasonably necessary to facilitate your dealings with us, some of which may constitute Personal Information.

Other than as expressly set forth above, we generally do not request on or through the Platform Sensitive Personal Information, such as financial account information (e.g., credit report information, bank account numbers) or, with the exception of Verification Methods for the limited purpose of COPPA compliance, government-issued identification (e.g., your social security card, driver's license, or passport), although we reserve the right to do so when such information is necessary to provide the services offered through the Platform and to fulfill your requests made through the Platform. Pursuant to US Data Privacy Laws (defined below), you have the right to request that Company limit the use or disclosure of your Sensitive Personal Information. To do so, please contact us at info@juntoto101.org.

The sources from which we obtain Personal Information are described below.

5.1 Personal Information You Provide to Us Through the Platform.

If you register an account; purchase a subscription; participate in sessions with a Specialist; apply for employment via the Platform's job application feature; sign up to receive email newsletters from Company; or otherwise contact us, via the Platform, then you may provide us with, and we may collect, certain information that may constitute Personal Information and/or Sensitive Personal Information. Additionally, upon registering an account, we may request proof of identity, which may include government-issued identification or, if applicable, student identification cards, to verify your identity before granting access to the Platform. If you register an account and/or purchase a subscription, we may from time to time request supplementary information from you via email, which you may provide in your sole discretion, some of which may constitute Personal Information and/or Sensitive Personal Information.

5.2 Information Provided by Third Parties.

We may from time to time collect information, including Personal Information, about you through non-affiliated third parties, including SSO Platforms and our Payment Processor (each as defined below).

You may access the Platform using Single Sign-On (SSO) through third-party platforms such as Facebook or Google (collectively, "**SSO Platforms**"). If you choose to do so, we will receive certain account information from the SSO Platforms, which may include Personal Information, such as your name and email address. This information is provided in accordance with the SSO Platforms' privacy policies and your account settings with them. We use this information solely to create and manage your account on the Platform.

When you purchase a subscription, via the Platform, our third-party payment processor, presently, Stripe, Inc. (the "**Payment Processor**"), may collect your transaction information, such as the form of payment and the associated account number and billing address used to purchase your subscription, which may be shared with us via encrypted and tokenized methods. To learn more about the Payment Processor's data privacy practices, please visit the Payment Processor's privacy policy located at: <https://stripe.com/privacy>.

5.3 Information Collected Automatically.

We may from time to time automatically collect certain information when you access or use the Platform by means of various software tools described below (depending on your choices). In such circumstances, we use such information for log-in and systems administration purposes, information security and abuse prevention, to track user trends, and to analyze the effectiveness of the Platform and to otherwise personalize the Platform to you. Alone or in combination with other information, such automatically collected information may constitute Personal Information.

We may automatically collect the following information, some of which may constitute Personal Information, when you access or use the Platform:

- **Log Files on the Platform.** The information inside the log files may include, amongst other similar types of information, IP addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages, and any other information your browser may send to us.
- **Cookies.** When you use or visit the Platform, our servers may send a cookie to your computer. Cookies are small pieces of data that a website asks your browser to store on your computer or mobile device. A cookie contains an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies do not typically contain information that individually identifies you, but Personal Information that we store about you may be linked to the information stored in and obtained from cookies. We use cookies to make interactions with the Platform easy and meaningful. We may use cookies that are session-based and persistent. Session cookies exist only during one session and disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. Please note that, if you disable your web browser's ability to accept cookies, you will be able to navigate the Platform but you may not be able to successfully use all the features of the Platform.

Information regarding how we may use different categories of cookies and your options for managing cookie settings is set forth below.

Type of Cookie	Description	Managing Settings
Required Cookies	Required cookies enable you to navigate the Platform and use features, such as accessing secure areas of the Platform and using our Service. If you have chosen to identify yourself to us, we use cookies containing encrypted information to allow us to uniquely identify you. Each time you log into the Platform, a cookie containing an encrypted, unique identifier that is tied to your account is placed on your browser. These cookies allow us to uniquely identify you when you are logged into the Platform and to process your online transactions and requests.	Because required cookies are essential to operate the Platform, there is no option to opt out of these cookies.
Performance Cookies	These cookies collect information about how you use the Platform, including which pages you go to most often and whether you receive error messages from certain pages. These cookies do not collect information that individually identifies you. All information collected by these cookies is aggregated and anonymous. They are used only to improve how the Platform functions and performs. From time-to-time, we may engage third parties to track and analyze usage and volume statistical information from individuals who visit the Platform.	To learn how to opt out of performance cookies using your browser settings, click here. If you are located in the UK or the EEA, these will only be set if you consent.
Functionality Cookies	Functionality cookies allow the Platform to remember information you enter and choices you make (such as your username, language, or your region), and to provide enhanced, more personal features. These cookies also enable you to optimize your use of the Platform after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize.	To learn how to opt out of functionality cookies using your browser settings, click here. If you are located in the UK or the EEA, these will only be set if you consent.

5.4 Other Tracking Technologies.

When you use or visit the Platform, we may collect your IP address to track and aggregate information. For example, we may use IP addresses to monitor the regions from which you navigate the Platform. We may also use, either alone or in conjunction with cookies, clear electronic images called “web beacons” (including pixels and tags) that can recognize certain types of information on your computer, such as cookies, when you view a particular site tied to the web beacon. This is used to compile information about your usage of the Platform, your interactions with email communications from us, the effectiveness of our advertising campaigns, and to operate and improve the Platform, our email communications, and our advertising campaigns. For example, we may place web beacons in email communications (including, without limitation, marketing emails) that notify us when you click on a link in the email that directs you to the Platform, or when you use or access the Platform.

6. PURPOSES FOR WHICH WE USE PERSONAL INFORMATION.

If you submit or we collect Personal Information through the Platform or as otherwise described above, we may use such Personal Information for the following general purposes:

- To provide you with the Platform and its related features, and to analyze, administer, improve, and personalize the Platform;
- To communicate with you in connection with the Platform and products or offerings made available through the Platform;
- To send you updates and promotional materials pertaining to Company or the Platform;
- To identify and authenticate your access to the parts of the Platform that you are authorized to access;
- For research and development relating to the Platform and the offerings we make available to you through the Platform;
- For electronic direct marketing in compliance with Applicable Law (defined below);
- To protect our rights and/or our property and to ensure the technical functionality and security of the Platform;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- Where you have given consent; and
- To comply with applicable law, including, without limitation, under U.S. federal, state, local, and foreign laws, regulations, rules, judicial or governmental orders or requests, legal process, and treaties (as may be amended from time to time, collectively, “**Applicable Law**”).

7. HOW WE DISCLOSE PERSONAL INFORMATION.

7.1 Our Third-Party Providers.

We may transfer Personal Information you provide to us through the Platform to our third-party service providers and business partners to perform tasks on our behalf and to assist us in providing the Platform,

including, without limitation, Specialists, potential employers to whom you've applied for job openings, and our email marketing partner.

We will comply with Applicable Law regarding Personal Information transfers and use commercially reasonable efforts to only engage or interact with third-party service providers and business partners that take appropriate measures to protect your Personal Information; however, it is the responsibility of each of those third-party service providers and business partners to comply with Applicable Law and their respective privacy policies, and we take no responsibility for their privacy practices or compliance therewith.

7.2 In the Event of Merger, Sale, or Change of Control.

Company may assign or transfer its rights and/or delegate its obligations under this Privacy Policy and transfer any Personal Information to any third-party company or entity that either acquires or is acquired by Company, or is merged with or into Company, as part of a merger, acquisition, sale, bankruptcy proceeding, or other change of control.

7.3 Other Disclosures.

We may disclose Personal Information about you if required to do so by Applicable Law or if we believe in good faith that such disclosure is reasonably necessary or helpful to (i) comply with legal process, (ii) enforce the Terms of Use, including investigations of potential violations thereof, (iii) detect, prevent, or otherwise address fraud or security issues, or (iv) protect the rights, property, or personal safety of Company, other Service users, and the public.

8. RETENTION OF PERSONAL INFORMATION.

We will keep your Personal Information while you have an account with us or while we are providing services to you. Thereafter, subject to any Applicable Law, we may hold Personal Information about you for as long as is reasonably necessary:

- To fulfill the purposes described in Section 6 above ("The Purposes For Which We Use Personal Information"), including, without limitation, to comply with Applicable Law; or
- To respond to any questions, complaints, or claims made by you or on your behalf.

We will not retain your Personal Information for longer than reasonably necessary for the purposes set out in this Privacy Policy.

9. EMAIL NOTIFICATIONS AND OPT OUT.

We maintain a strict "no-spam" policy. Unless you requested otherwise in your account settings at the time of your initial registration or specifically opt out as provided herein, by accepting this Privacy Policy, you expressly agree that we may use your information to contact you by email to deliver information that is relevant to your use of the Platform such as administrative notices, newsletters you have registered for, or marketing and promotional information related to the Platform and/or Company. You may choose to stop receiving these email communications from us by following the instructions included in such communications or by contacting us at info@juntto101.org. If a third-party vendor provides such newsletters, you may unsubscribe in accordance with the instructions provided in such newsletters or by such vendor.

If you are located in the United Kingdom or the European Economic Area, we will not contact you by email to deliver marketing and promotional information unless we have obtained your prior consent to do so, or if otherwise permitted by law (for example, what is known as the ‘soft opt-in’).

If you are having problems unsubscribing, please forward the relevant email communication to info@junto101.org and include in the Subject line the word "Unsubscribe". You will then be removed within ten (10) business days. Please note that we will not process any unsubscribe requests submitted as direct replies to an email communication from us.

10. DATA SECURITY.

The security of Personal Information is important to us. We follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it. For example, we have implemented an information security program that contains administrative, technical, organizational, and physical controls that are designed to reasonably safeguard Personal Information from unlawful use, unauthorized access, or disclosure. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect Personal Information, we cannot guarantee its absolute security.

11. HOW WE RESPOND TO DO NOT TRACK SIGNALS.

As explained above in Section 5.4, the technologies used through the Platform may be used to track Service users’ activity on the Platform. How browsers communicate user preferences related to the Do Not Track signal is not yet uniform, so a standard technological response has not yet been developed. For this reason, the Platform may not respond to Do Not Track signals at this time.

12. TRANSFERS OF PERSONAL INFORMATION FROM THE EUROPEAN UNION (EU) OR EUROPEAN ECONOMIC AREA (EEA), THE UNITED KINGDOM (UK), OR SWITZERLAND TO THE UNITED STATES OF AMERICA.

To communicate with you or provide the Platform or our other products and offerings, the information (including Personal Information) that we collect from you may be transferred to, stored, used, and processed by Company in the United States of America or by one of our service providers based inside or outside of the United States of America. Such entities may be engaged in, among other things, preparing and sending notifications and the provision of support services.

If you are visiting from the European Union, the broader European Economic Area, the United Kingdom or other regions with laws governing information collection and use that may differ from those of the United States of America, or any one or more of its individual States, please note that you are transferring your Personal Information to the United States of America. The laws of some countries may not provide the same levels of protection of Personal Information as your home country, particularly if you are resident in the European Union, the broader European Economic Area or the United Kingdom.

We will take reasonable steps to ensure that information about you is treated securely in accordance with this Privacy Policy, and that all information you provide to us is stored on our secure servers or those of our service providers and business partners.

YOU ACKNOWLEDGE THAT THE LAWS OF THE UNITED STATES OF AMERICA AND ITS INDIVIDUAL STATES TREAT YOUR INFORMATION IN A MANNER THAT MAY BE SUBSTANTIALLY DIFFERENT FROM, AND LESS PROTECTIVE THAN, THE TREATMENT REQUIRED UNDER THE LAWS OF OTHER COUNTRIES AND JURISDICTIONS. IF YOU DO NOT

WANT YOUR INFORMATION TRANSFERRED TO THE UNITED STATES OF AMERICA, YOU SHOULD NOT SHARE YOUR INFORMATION WITH US, OR MAKE USE OF THE PLATFORM.

TO THE EXTENT ALLOWED BY THE LAW OF THE COUNTRY IN WHICH YOU ARE LOCATED, YOU EXPRESSLY WAIVE ANY RIGHT YOU MAY HAVE TO REQUIRE US TO TREAT YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE LAWS OF ANY COUNTRY OR JURISDICTION OTHER THAN THE UNITED STATES OF AMERICA. HOWEVER, THE FOREGOING WAIVER MAY NOT BE LEGALLY BINDING IN SOME COUNTRIES, SUCH AS THE MEMBER STATES OF THE EUROPEAN UNION, THE BROADER EUROPEAN ECONOMIC AREA OR THE UNITED KINGDOM. TO THE EXTENT IT IS NOT LEGALLY BINDING IN THE COUNTRY IN WHICH YOU ARE LOCATED, THE FOREGOING WAIVER DOES NOT APPLY TO YOU.

13. NOTICE TO RESIDENTS OF THE EUROPEAN UNION, EUROPEAN ECONOMIC AREA, AND UNITED KINGDOM

European Economic Area and United Kingdom data protection law requires a “lawful basis” for collecting and retaining Personal Information from citizens or residents of the European Economic Area and the United Kingdom, respectively. Our lawful bases for collecting such information about you are permitted under Article 6, Section 1 of the EU general data protection regulation 2016/679 (as amended from time to time, and as adopted by the United Kingdom, the “**GDPR**”) and are summarized below.

- **Consent:** In certain cases, you have affirmatively provided us with your consent to collect your Personal Information for a specific purpose, such as providing your Personal Information when you contact us through the Platform or enter into a contract with us.
- **Contract:** We may need your Personal Information to comply with our contractual obligation to you to deliver the Platform, such as fulfilling any future transactional services.
- **Legal Obligations:** Sometimes the law requires us to collect and use your Personal Information, such as applicable tax laws that may require us to retain records of payments made through the Platform or through our contract with you.
- **Legitimate Interests:** This is a technical term that means we have a good and fair reason to use your Personal Information and we do so in ways which do not harm your interests and rights, such as to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and that do not materially impact your rights, freedom, or interests.

For example, we (i) use identity, device, and location information to prevent abuse of the Platform by users and to keep the Platform secure, and (ii) analyze how users interact with our Service so we can understand better what elements do or do not work well, what services/functionalities may be necessary or desirable to provide you with the best user experience on the Platform, and to ensure the safety and security of the Platform, which allows us to improve and develop the quality of the online experience we offer all our users.

In accordance with the GDPR, as a resident of the European Union, European Economic Area, or the United Kingdom, you may have the following rights with respect to your Personal Information:

- If the processing of Personal Information is based on your consent, the right to withdraw consent at any time for the processing of such Personal Information. This will not affect the lawfulness of any processing carried out before the consent was withdrawn;

- The right to request access to and rectification of your Personal Information;
- The right to object to or request restriction of the processing of your Personal Information;
- The right to request erasure of your Personal Information; and
- The right to receive, in a structured, commonly used and machine-readable format, the Personal Information you have provided to us based on your consent or a contract and that is processed by automated means, and to have such Personal Information transmitted to another company where technically feasible (i.e., data portability).

To make a request pursuant to your GDPR rights, you can contact Company's Privacy Officer either by email at info@junto101.org or by mail at 100 Jerciho Quadrangle, Suite 339, Jericho, New York, 11753, United States of America.

If you are not satisfied with our response to any applicable request made pursuant to your rights under the GDPR, you have the right to lodge a complaint about the processing of your Personal Information with your local data protection authority. If you are located in the United Kingdom, this is the Information Commissioner's Office (ICO). If you are located in the European Economic Area, you can contact the Commission Nationale Informatique & Libertés (CNIL).

14. U.S. CONSUMER PRIVACY RIGHTS

Depending on your U.S. state of residence, you may have additional privacy rights with respect to your Personal Information, which may include Sensitive Personal Information and/or protected health data. These rights may be accorded to you pursuant to, respectively, the California Consumer Privacy Act; the California Privacy Rights Act; the Colorado Privacy Act; the Connecticut Personal Data Privacy and Online Monitoring Act; the Oregon Consumer Privacy Act; the Texas Data Privacy and Security Act; the Utah Consumer Privacy Act; the Virginia Consumer Data Protection Act; the Montana Consumer Data Privacy Act; the Delaware Data Protection Act; the Iowa Data Protection Act; the Nebraska Data Privacy Act; the New Hampshire Privacy Act; the New Jersey Data Privacy Act; the Tennessee Information Protection Act; the Minnesota Consumer Data Privacy Act; the Nevada Consumer Health Data Privacy Law; the Washington My Health My Data Act; the Maryland Online Data Privacy Act; the Indiana Consumer Data Protection Act (*effective January 1, 2026*); the Kentucky Consumer Data Protection Act (*effective January 1, 2026*); and the Rhode Island Data Transparency and Privacy Protection Act (*effective January 1, 2026*) (collectively, as may be amended from time to time, "**US Data Privacy Laws**," and together with the GDPR, "**Data Privacy Laws**") you may have certain rights with respect to your Personal Information. For the purposes of this Section 14, Personal Information shall have the same meaning as "personal data" as such term is used under US Data Privacy Laws.

14.1 Requests to Know.

You have the right to request that we disclose:

- The categories of Personal Information we have collected about you;
- The categories of sources from which we have collected Personal Information about you;
- Our use of the Personal Information we have collected about you;
- The business or commercial purposes for selling or collecting Personal Information about you;

- The categories of Personal Information sold, shared, or disclosed about you, as well as the categories – and, if you are a resident of Oregon or Colorado, the names – of third parties to whom the Personal Information was sold, by category of Personal Information for each party to whom Personal Information was sold; and
- The specific pieces of Personal Information collected about you for the twelve (12) months prior to the date of your request.

The delivery of our response to your request to know may take place electronically or by mail. We are not required to respond to requests to know more than twice in a twelve (12)-month period.

14.2 Requests to Delete.

You have the right to request that we delete any Personal Information about you that we have collected from you and retained, subject to certain exceptions. We may deny your deletion request if retaining the Personal Information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by Applicable Law;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with an obligation under Applicable Law; and/or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

14.3 Right to Opt Out of the Processing, Sale, or Sharing of Personal Information and/or the Sensitive Personal Information.

You have a right to opt out of the sale or sharing of Personal Information and/or Sensitive Personal Information we have collected about you to third parties. If you exercise this right, we will not sell or share Personal Information and/or Sensitive Personal Information about you. Please note that we will process Sensitive Personal Information about you only where we have obtained your prior consent to do so.

Further, you have a right to opt out of the processing of your Personal Information where you have previously provided us with your consent for purposes not otherwise compatible with Section 6 of this Privacy Policy (“Purpose for Which we use Personal Information”). Please note that we will process Personal Information about you for purposes other than those set forth in Section 6 only where we have obtained your prior consent to do so.

We will act upon your request as soon as reasonably practicable, but in no event later than fifteen (15) days from the date of our receipt of your request. Any Personal Information and/or Sensitive Personal Information collected in connection with your request will be used only to facilitate that request. You may submit opt out requests by emailing us at info@junto101.org.

14.4 Requests to Correct Inaccurate Personal Information.

You have the right to request that we correct inaccurate Personal Information that we maintain, or which pertains to you. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate Personal Information.

14.5 Right to Opt Out of Profiling.

You have the right to opt out of “profiling.” This opt out applies to the automated processing of Personal Information that is used to render decisions that could have a legal or similarly-significant effect on a user. Examples of such decisions include those related to credit and access to fundamental goods or services. Company does not engage in profiling as described above.

14.6 Right to Non-Discrimination.

You have the right not to be discriminated against for the exercise of your US Data Privacy Laws rights described above. Unless permitted by US Data Privacy Laws, we will not as a result of such exercise:

- Deny you services;
- Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of services; or
- To the extent applicable, suggest that you may receive a different price or rate for goods or services or a different level or quality of services.

14.7 Authorized Agents.

You may designate an authorized agent to make requests on your behalf. You must provide an authorized agent written permission to submit a request on your behalf, and we may require that you verify your identity directly with us. Alternatively, an authorized agent that has been provided power of attorney may submit a request on your behalf.

14.8 Methods for Submitting Consumer Requests and Our Response to Requests.

To make a request pursuant to your US Data Privacy Laws rights, you must contact Company’s Privacy Officer either by email at info@junto101.org or by mail at 100 Jericho Quadrangle, Suite 339, Jericho, New York, 11753, United States of America.

Company reserves the right to verify all requests made pursuant to US Data Privacy Laws. Upon receipt of such request, we may ask you for additional information to verify your identity. Any additional information you provide will be used only to verify your identity and not for any other purpose. We will acknowledge the receipt of your request within ten (10) days of receipt. Subject to our ability to verify your identity, we will respond to your request within forty-five (45) days of receipt. To protect your privacy and the security of Personal Information about you, we verify your request by requesting for additional identifying information that will only be used to verify your identity and for no other purpose.

If you are a resident of Colorado, Connecticut, Delaware, Iowa, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, or Virginia, you may appeal our denial of your request pursuant to your US Data Privacy Law rights. To do so, you must email us at info@juntol01.org within forty-five (45) days of your receipt of our denial therefor. We will respond to an appeal within sixty (60) days of receipt for residents of Connecticut, Delaware, Iowa, Maryland, Montana, Nebraska, New Hampshire, Texas, Tennessee, and Virginia, and within forty-five (45) days of receipt for residents of Colorado, Minnesota, New Jersey, and Oregon.

- If your appeal is denied and you are a Connecticut resident, you may contact the Connecticut Attorney General to submit a complaint at: <https://portal.ct.gov/AG/Common/Complaint-Form-Landing-page>.
- If your appeal is denied and you are a Texas resident, you may contact the Texas Attorney General to submit a complaint at: <https://www.texasattorneygeneral.gov/consumer-protection/file-consumer-complaint>.
- If your appeal is denied and you are a Maryland resident, you may contact the Maryland Attorney General to submit a complaint at: <https://www.marylandattorneygeneral.gov/Pages/CPD/Complaint.aspx>.
- If your appeal is denied and you are a Montana resident, you may contact the Montana Attorney General to submit a complaint at: <https://dojmt.gov/office-of-consumer-protection/consumer-complaints/>.

14.9 Categories of Personal Information We Have Sold or Shared in the Last Twelve (12) Months.

We have not sold or shared (as such terms are defined under US Data Privacy Laws) any categories of Personal Information during the last twelve (12) months.

14.10 Categories of Personal Information We Have Disclosed for a Business Purpose in the Last Twelve (12) Months.

We have disclosed the following categories of Personal Information for a business purpose during the last twelve (12) months:

- Identifiers, such as your and your child's first and last name and email address;
- Employment information, such as your resume, to potential employers pursuant to your job applications submitted via the Platform; and
- Solely to Specialists, Sensitive Personal Information, including information about your child's learning disabilities, if any.

14.11 Shine the Light Law.

California's "Shine the Light" law allows California residents to obtain a list of third parties to whom a business has disclosed Personal Information for their direct marketing purposes. However, if a business adopts and discloses in its privacy policy a policy of not disclosing customers' Personal Information to third parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure, the business may comply with the law by notifying the customer of his or her right to prevent disclosure of Personal Information and by providing a cost-free means to exercise that right.

Personal Information submitted will only be used for marketing and promotional purposes. Whenever you agree to allow us to collect Personal Information, we provide you with an option to prevent such information from being shared for marketing and promotional purposes with third parties. Furthermore, you may exercise this cost-free option at any time by sending an email to info@junto101.org.

Because we include a comprehensive Privacy Policy and provide you with details on how you may opt out of the use of your Personal Information by third parties for direct marketing purposes, we are not required to provide you with the third-party list.

15. CONTACT US.

If you have any questions about this Privacy Policy, please contact Company by email at info@junto101.org or by mail at 100 Jericho Quadrangle, Suite 339, Jericho, New York, 11753, United States of America.

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