WEBSITE PRIVACY NOTICE

SpecialNeedsWare, Inc. dba Ori Learning · Version v2026.09 · Effective September 23, 2026

About this notice

This notice explains how SpecialNeedsWare, Inc. dba Ori Learning ("Ori Learning", "we", "us") handles Personal Information collected through the Marketing Website at orilearning.com, and the contact information we hold about Visitors and about people who work for organizations that use Ori Learning's products or are considering them. Ori Learning decides how that information is used, and is its controller for the purposes of Rhode Island General Laws chapter 6-48.1 and of any other state privacy law that applies to it. From its effective date this notice replaces, for the Marketing Website, the Privacy Policy previously posted at orilearning.com/privacy-policy/ and every earlier privacy policy published by Ori Learning, including under its former names.

This notice does not describe the Platform. Information about the students, teachers and administrators who use the Platform is collected for schools and districts; the Student & Education Privacy Notice describes it from its own effective date, and a Customer's Data Privacy Addendum or other Data Privacy Agreement governs its Student Data. The Website Terms of Use govern your use of the Marketing Website.

Terms we use

Capitalized terms, such as Personal Information, Visitor, Customer, Platform and Student Data, have the meanings given in version v2026.09 of the Ori Learning Definitions (orilearning.com/legal/definitions/), which is archived with this notice. A business day is a Business Day as the Definitions define it. Where the Definitions and this notice differ for a Visitor, this notice controls.

Information we collect

Information you give us. When you submit a form on the Marketing Website, for example to request a demo or a quote, to download a resource such as a scope-and-sequence document or a guide, or to contact us, we collect what the form asks for, such as your name, work email address, telephone number, school or district, role or title, the curriculum you are interested in, the size of your organization, and anything you write in a message.

Information collected automatically. When you use the Marketing Website, we and the providers named below collect your IP address, browser and device information, the pages you view, the links you click, the site that referred you, and the date and time of your visit, through the cookies and similar technologies described below. Our hosting provider keeps server logs of requests to the site.

Information from other sources. We receive contact information about school and district staff from our Customers, for example the contacts named on an Order Form, and from publicly available sources such as school and district websites and directories, and we may also obtain it from providers of educator contact data. We use it to contact educators and administrators about our products, as described under "Marketing communications".

Student information does not belong here. The Marketing Website is designed to collect information about Visitors and business contacts, not about students. Student information is collected and held in the Platform, under the Student & Education Privacy Notice and each Customer's agreement with us. Please do not submit information about a student through the Marketing Website. If information about a student reaches us through it, we set the information apart when we find it, tell the student's school where we can identify it, and either route the information to the school or delete it; we keep only what we must, under restricted use, as a security record, under a legal hold or as the record of a claim. Information from a child under 13 follows "Children".

How we use information

We use the information described above to:

- respond to your request, send you the resource you asked for, schedule a demo or a call, and prepare a quote;
- tell you about our products, research, events and resources, as described under "Marketing communications";
- operate, secure and improve the Marketing Website, and understand how Visitors use it;
- manage our relationship with a Customer, including its support, renewal and billing contacts;
- keep business records, comply with law, respond to lawful requests, and establish or defend legal claims; and
- protect Ori Learning, our Customers and others from fraud, abuse and security threats.

We do not use information from the Marketing Website to make automated decisions that have legal or similarly significant effects on you.

Cookies, analytics and similar technologies

The Marketing Website uses cookies, pixels and similar technologies set by us and by providers, including those below.

- **Site operation and security.** Cloudflare, which delivers and protects the site, may set cookies needed to serve pages, prevent abuse and distinguish people from automated traffic.
- **Analytics.** We use Google Tag Manager and Google Analytics 4 to understand which pages Visitors use and how they reach the site.
- **Marketing and customer relationship management.** We use HubSpot to host our forms, to recognize you when you return to the site, and to connect your visits to your contact record once you submit a form. "Who receives information" states what each of these providers receives.
- **Embedded content and links.** Pages may embed content hosted by others, such as videos and scheduling tools; when a page loads that content, its host receives your IP address and may set its own cookies. The site also links to other sites and to our social media pages, whose privacy practices are their own.

Your controls. You can block or delete cookies through your browser settings; blocking them may affect how some pages work. Google offers a browser add-on that lets you opt out of Google Analytics measurement, at tools.google.com/dlpage/gaoptout. We do not treat a "Do Not Track" browser signal as a request under this notice, because there is no common standard for how sites should respond to it. Where a state privacy law that applies to you requires us to treat an opt-out preference signal, such as Global Privacy Control, as a request to opt out, we will honor it. The providers above may collect information about your online activities over time and across other websites that use their services, under their own privacy policies.

Who receives information

We share Personal Information only with the following recipients:

- **Providers that host and run the Marketing Website and our marketing.** Our web-hosting provider, which stores the site, and so receives what you submit through a form, your IP address and the details of your requests to the site; Cloudflare, which delivers and protects the site, and so receives all traffic to it, including your IP address, device information and form submissions in transit; Google, for tag management and analytics, which receives cookie identifiers, your IP address and page, referral and device information; HubSpot, which stores contact records, hosts our forms and meeting scheduling and sends marketing email, and so receives your name, work email address, telephone number, organization, role, what you submit and your page-visit history; any other service we use to send marketing email, which receives the contact details of the people we email; and a third-party video-conferencing service through which we deliver demos and training, which receives participants' names and contact details. Each provider is authorized to use the information only to perform its function for us, and we remain responsible for the information we give it.
- **Business systems.** Providers of the email, document, accounting and productivity systems we use to run the company, which receive the business contact information and correspondence we keep in them.
- **Professional advisers**, such as lawyers, accountants and insurers, where they need the information to advise us.
- **A successor** in a merger, acquisition or sale of Ori Learning's business or assets, who will handle the information under this notice or give you notice of any change.
- **Authorities and others as the law requires**, to comply with a subpoena, court order or other lawful request, to enforce our terms, or to protect the rights, safety or property of Ori Learning, our Customers or others.
- **Anyone you ask us to share it with**, for example a colleague you copy on a request.

We do not sell Personal Information, and we do not share it with third parties for targeted advertising. Where a state privacy law gives you the right to opt out of the sale of Personal Information, of targeted advertising or of profiling, you may exercise it as described under "Your choices and rights".

Marketing communications

We send marketing email to educators and administrators who submit a form and to contacts obtained from the sources described above. Every marketing email tells you how to opt out, and you can also opt out by writing to legal@orilearning.com, which is read on Business Days; we process an opt-out promptly and within 10 Business Days. Opting out does not stop messages about a request you made or about a Customer's subscription. We may call you about a request you made. We will not make a prerecorded, artificial-voice, autodialed or telemarketing call to you unless you have given consent to that kind of call, captured separately at the point where you give us your number, and every such call will carry a way to tell us to stop; this notice is not that consent.

Children

The Marketing Website is written for adults: educators, administrators, parents and others interested in our products. It is not directed to children under 13, it does not ask for information from them and it is not designed to collect it. If we learn that a child under 13 has submitted Personal Information through the Marketing Website, we stop using and disclosing it at once and delete it promptly, unless the Children's Online Privacy Protection Act rule permits us to keep it or a legal hold applies. If we learn that a person aged 13 to 17 has submitted Personal Information, we delete it within 30 days unless the law permits or requires us to keep it or a legal hold applies. If you believe a child has submitted information to us through the site, write to legal@orilearning.com, which is read on Business Days. A parent who wants to know how a student's information is handled in the Platform should read the Student & Education Privacy Notice and contact the student's school, which administers the student's account.

How long we keep information

We keep Personal Information no longer than we need it for the purposes above. We then delete it, or de-identify it so that it no longer identifies you and cannot reasonably be linked to you, unless a legal hold or a law requires us to keep it. Our retention periods are:

- **Form submissions and lead records:** for as long as we have a business need for them, such as an open inquiry or a continuing relationship with you or your organization, and then deleted or de-identified.
- **Contact records of a Customer:** the life of the relationship. Our retention policy then flags the record as a former Customer's, keeps it for renewal contact subject to your opt-out, and deletes or de-identifies it five years after the relationship ends, except that executed agreements, invoices and tax records are kept for seven years.
- **Website analytics:** for the limited period set in our analytics provider's settings, after which the provider deletes the identifiable event data.
- **Server logs and site backups:** kept by our hosting provider for a limited period and then overwritten.
- **Marketing opt-outs:** a minimal suppression record, your address or a hash of it with the date you opted out, kept for as long as we send marketing email and used only to honor the opt-out.

- **Cookies and similar technologies:** each cookie expires on the schedule set by the provider that placed it, and you can delete cookies at any time through your browser settings.

Copies may remain in backups for a limited period after deletion until they are overwritten.

Security

We use administrative, technical and physical safeguards appropriate to the information we hold, and administrative access to the Marketing Website's host, its content-delivery and security service and our marketing system is limited to the people whose duties require it. No method of transmission or storage is completely secure. If a security incident affects your Personal Information, we will notify you and any regulator as the law that applies to you requires.

Where information is processed

Ori Learning is located in the United States. Our content delivery provider serves the site from a global network, our customer relationship management provider stores data in the data region that hosts our account with it, and other providers may process information where they operate. If you use the Marketing Website from outside the United States, your information is transferred to and processed in the United States, where privacy laws may differ from those of your country.

Your choices and rights

For everyone. You can unsubscribe from marketing email at any time, control cookies through your browser, and ask us to access, correct or delete the contact information we hold about you. Any other request we consider case by case, subject to verifying who you are, to security, to what is feasible and to what the law requires us to keep.

Where a state privacy law applies to you. Depending on where you live and on whether a state privacy law applies to Ori Learning and to you, you may have the right to confirm whether we process your Personal Information and to access it; to correct inaccuracies; to delete it; to obtain a copy in a portable format; to opt out of the sale of Personal Information, its processing for targeted advertising, or profiling in furtherance of decisions that produce legal or similarly significant effects; and to appeal a decision we make on your request. We will not discriminate against you for exercising a right. This notice grants no right that the law applicable to you does not grant.

Student information. We hold Student Data for schools and districts, so a request about a student's information goes to the student's school; the Student & Education Privacy Notice explains how. Where that information is an education record we hold for a school or agency that the Family Educational Rights and Privacy Act covers, that Act governs it; other Student Data is governed by the Customer's agreement with us and the other law that applies. Where a law gives you a right over that information, we help the school answer as its processor, and we rely on an exemption only where the governing law provides one.

How to make a request. Email legal@orilearning.com or write to the address below, telling us what you want and the email address or other information you gave us. We verify a request by matching it to the information we hold and, where needed, by confirming through the email address on record; we

may ask for more information where the law allows. An authorized agent may make a request for you where the law permits, with your signed permission and our verification of your identity. We acknowledge every request within five Business Days and respond within 30 days, or the shorter period the applicable law requires; where the law allows an extension, we will tell you. If we decline a request, we will say why. You may appeal by replying to our response; we will answer the appeal within the time the law allows, and you may also contact the attorney general of your state.

Contact us

SpecialNeedsWare, Inc. dba Ori Learning, Attention: Legal, 66 Summit Ave, Chatham, NJ 07928. Email: legal@orilearning.com, read on Business Days. This is the contact for privacy questions, requests and complaints about the Marketing Website.

Changes to this notice and versions

This notice is published at orilearning.com/legal/website-privacy-notice/. Each version of this notice carries a version tag and an effective date and states which version it supersedes; prior versions remain available at orilearning.com/legal/archive/. We may change this notice as our practices, our providers or the law change. For a material change, we will post a notice on the Marketing Website before the change takes effect. Where a change affects how we use Personal Information we already hold, we will give notice to the people affected and will not apply the change to that information without consent where the law requires consent. A new version applies to information collected from its effective date.