

# HablaCloud LLC Privacy Policy

The following Privacy Policy summarizes the ways that HablaCloud LLC treats the information associated with the use of the ChromeMP3 app. Please read this policy carefully. Your and your students' use of the ChromeMP3 app will constitute your agreement to this Privacy Policy.

We reserve the right to revise this Privacy Policy at any time, including to address new issues or reflect changes to our service or product offerings. Such revisions become effective immediately upon notice to you. Notice may be given by any means, including, but not limited to, posting of the revised Privacy Policy. The date of the most recent revisions will appear on this page, so check back often. Your continued access to or use of the ChromeMP3 app constitutes your acceptance of changes or revisions to the Privacy Policy.

## OUR POLICY TOWARD STUDENTS AND CHILDREN

This Privacy Policy deems the procedures and practices that govern the access, use, retention, and deletion of the Personally Identifiable Information (PII) of students to be of paramount importance to respecting and protecting the privacy and security of students. In particular, HablaCloud's ChromeMP3 app is used nationwide in the United States and our information and data use practices comply with the following federal regulatory frameworks enacted to protect and monitor the data privacy, security, integrity, retention, and deletion rights of students, parents, and schools who use ChromeMP3: Family Education Rights and Privacy Act (FERPA); Children's Online Privacy Protection Act (COPPA); Children's Internet Protection Act (CIPA); Protection of Pupil Rights Amendment Act (PPRA).

### Personally Identifiable Information (PII)

We adopt the definition of personally identifiable information set forth under the FERPA regulations, pursuant to 34 CFR § 99.3 ("Personally identifiable information"). Applying this definition, HablaCloud generally and the ChromeMP3 app specifically does not request, receive, collect, store, transmit, share, nor distribute any personally identifiable information.

### Family Education Rights and Privacy Act (FERPA)

In compliance with the Family Education Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99), and with regard to the availability of the ChromeMP3 app in schools in the United States, HablaCloud generally and the ChromeMP3 app specifically does not request access to, receive, collect, store, transmit, share, nor distribute student names, directory information, or any other educational records. As such, HablaCloud does not possess or manage student education records that parents or eligible students could inspect, review, correct, or otherwise access.

### Children’s Online Privacy Protection Act (COPPA)

In compliance with the Children’s Online Privacy Protection Act (COPPA) of 1998, HablaCloud does not request access to, receive, collect, store, transmit, share, nor distribute personally identifiable information from users at any point or for any purpose. As such, HablaCloud does not possess or manage student education records that parents or schools could inspect, review, correct, or otherwise access.

### Children’s Internet Protection Act (CIPA)

The Children’s Internet Protection Act (CIPA) is a federal law enacted by Congress in December 2000 to address concerns about access to offensive content over the Internet on school or library computers. CIPA imposes certain types of on any school or library that receives funding for Internet access or internal connections from the E-rate program – a program that makes certain technology more affordable for eligible schools. In 2001, the Federal Communications Commission (FCC) issued rules implementing CIPA. HablaCloud is in compliance with CIPA because the ChromeMP3 app is self-contained and does not provide links to external resources or chat rooms. Moreover, the ChromeMP3 app does not contain any offensive or inappropriate content or subject-matter. As a result, any school, library, or otherwise E-rate eligible educational facility that uses the ChromeMP3 app will comply with CIPA.

### Protection of Pupil Rights Amendment (PPRA)

The Protection of Pupil Rights Amendment (PPRA) (20 U.S.C. 1232h; 34 CFR Part 98) was enacted in 1978, and applies to student surveys, instructional materials or evaluations funded by the federal government that deal with highly sensitive issues. The PPRA is inapplicable to HablaCloud’s products because HablaCloud is not funded by the federal government.

## **THE INFORMATION WE COLLECT AND HOW WE USE IT**

### App Usage Data

When you use the ChromeMP3 app, the following types of information may be logged automatically ("Usage Information") by Google and shared in summary form with HablaCloud via the Chrome Web Store Developer Dashboard:

- The number of times users have viewed ChromeMP3 in the Chrome Webstore per day,
- The approximate number of Chrome browsers that loaded the ChromeMP3 app in the past seven days including:
  - Geographic Region (country level)
  - Language
  - Operating system (always ChromeOS for the ChromeMP3 app)

- Version of the app they are running.
- The number of install requests per day including:
  - Geographic Region (country level)
  - Language
  - Operating system (always ChromeOS for the ChromeMP3 app)
- The number of uninstall requests per day including:
  - Geographic Region (country level)
  - Language
  - Operating system (always ChromeOS for the ChromeMP3 app)

We use this information only as anonymous aggregate data to determine the number of users of the ChromeMP3 app, to ensure the app is working properly, and to help us make the app more useful. We do not use it to track or record information about individuals.

#### Website Data

When you access the HablaCloud website or the Chrome Web Store ChromeMP3 page, the following types of information may be logged automatically ("Usage Information") by Google and shared with HablaCloud in summary form:

- The name of the domain and host from which you access the Internet
- The Internet protocol (IP) address of the computer you are using
- The general geographic location (e.g. zip code and city)
- The browser software you use and your operating system
- The date and time you access our sites
- The Internet address of the site from which you linked directly to our sites

We use this information only as anonymous aggregate data to determine the number of visitors to different sections of our site, to ensure the site is working properly, and to help us make our site more useful. We do not use it to track or record information about individuals.

#### **DATA LOCATION**

If you reside outside the U.S., the information we collect will be transferred to the U.S. and processed and stored there under U.S. privacy standards. By using the ChromeMP3 app, you consent to the use, transfer and processing of the anonymous information we collect as set forth in this Privacy Policy, all of which activities will take place in the U.S.

#### **CONTACTING US**

If you have any questions about this Privacy Policy, please contact us at [support@hablacloud.com](mailto:support@hablacloud.com)