

CircleIn Privacy Policy

Overview

CircleIn ("CircleIn," "we," "us," or "our") provides educational technology services, including websites, mobile applications, AI-enabled tutoring, study and collaboration tools, and related support services (collectively, the "Services"). This Privacy Policy explains how we collect, use, disclose, retain, and protect personal information when people visit our public website, create an account directly with CircleIn, or use an account provided or sponsored by a college, university, school, school district, tutoring center, learning center, employer, nonprofit organization, or other organization (each, an "Institution").

This Policy is designed to address two different service relationships. For Direct Users, CircleIn generally decides why and how personal information is processed. For Institution-Provided Users, the Institution generally determines the educational purposes for which student or user information is processed, and CircleIn processes that information on the Institution's behalf under the applicable agreement. Some information, such as security logs, billing records, and business contact information, may be processed by CircleIn for its own legitimate operational and legal purposes.

This Policy does not replace an Institution's own privacy notices, student-record policies, acceptable-use rules, or contractual obligations. Institution-Provided Users should contact their Institution with questions about the Institution's decisions, including account provisioning, access to records, course participation, and use of reports.

1. Scope and Key Terms

Direct User

A person who visits CircleIn's public website, creates or purchases an account directly from CircleIn, participates in a CircleIn-sponsored event, communicates with CircleIn, or otherwise uses the Services outside an Institution-Provided Account.

Institution-Provided User

A student, faculty member, tutor, advisor, staff member, administrator, parent, or other person whose access is created, sponsored, managed, or authorized by an Institution.

Institution Data

Personal information, education records, course or roster information, learning activity, communications, files, reports, and other information provided by or on behalf of an Institution or generated through an Institution-Provided Account.

Personal Information

Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked to an individual or household. It does not include information that has been deidentified or aggregated so that it cannot reasonably be linked to an individual.

This Policy applies to the Services and related communications. It does not apply to third-party websites, products, or services that have their own privacy policies, or to CircleIn employee and job-applicant information covered by a separate notice.

2. Personal Information We Collect

Account and identity information

Name, username, email address, password or authentication credentials, profile photo, state or country, school or Institution, role, and account identifiers. We may receive single sign-on or directory identifiers from an Institution or identity provider.

Institutional and educational information

Institution name, student or employee identifier, course and section enrollment, academic program, instructor, tutoring or support assignment, grades or assessment information when provided by the Institution, and other records the Institution authorizes CircleIn to process.

Content and communications

Messages, posts, comments, questions, AI Tutor prompts and responses, tutoring interactions, uploaded assignments and files, images, feedback, survey responses, support requests, and other content submitted through the Services. Depending on the feature and account settings, content may be visible to selected classmates, tutors, instructors, Institution personnel, or other authorized users.

Usage, device, and technical information

Internet Protocol address, device and browser type, operating system, mobile device identifiers, language, application version, referring and exit pages, dates and times of access, feature usage, clicks, session activity, crash reports, diagnostics, security events, and approximate location derived from an IP address. We do not collect precise geolocation unless a feature clearly requests it and the user or Institution authorizes it.

Marketing and event information

Business contact information, communication preferences, event registrations, webinar participation, contest or incentive entries, and responses to marketing communications. We do

not send behavioral advertising to students through authenticated educational areas of the Services.

Sensitive information

The Services are not designed to require highly sensitive personal information unless an Institution has determined it is necessary for an authorized educational purpose. Users should not submit Social Security numbers, financial account credentials, health records, disability information, biometric identifiers, precise geolocation, or other highly sensitive information.

3. How We Collect Personal Information

- Directly from users, parents, guardians, faculty, tutors, administrators, and other people who interact with the Services.
- From Institutions, including rosters, directories, learning-management systems, single sign-on providers, student-information systems, and other systems the Institution authorizes.
- Automatically from devices and browsers through logs, cookies, software development kits, pixels, and similar technologies.
- From service providers and integration partners that support authentication, communications, analytics, customer support, security, hosting, and educational features.
- From publicly available sources and business contacts for institutional outreach, subject to applicable law.

4. How We Use Personal Information

- Create, authenticate, administer, and secure accounts.
- Provide AI tutoring, peer study groups, class discussions, messaging, content sharing, practice activities, feedback, academic-support tools, and other requested features.
- Personalize learning support, recommend relevant resources or activities, and maintain continuity across sessions.
- Provide Institutions with authorized administration, implementation, support, engagement, outcomes, and service reports.
- Process rewards, subscriptions, and other transactions.
- Respond to questions, provide customer support, troubleshoot, maintain the Services, and communicate service updates.
- Detect, investigate, and prevent fraud, abuse, harmful conduct, security incidents, and violations of applicable terms or Institution rules.
- Measure performance, conduct quality assurance, debug, research, and improve the Services using information permitted by contract and law, including deidentified or aggregated information.

- Comply with law, enforce agreements, protect rights and safety, and establish, exercise, or defend legal claims.
- Send marketing communications to adult Direct Users and business contacts where permitted. Institution Data, student data, and children's personal information are not used for unrelated marketing.

5. AI-Enabled Features and Automated Processing

CircleIn uses artificial intelligence and automated systems to deliver tutoring, generate explanations or practice materials, support content moderation and safety, recommend learning activities, summarize activity, and improve service reliability. AI-generated content may be inaccurate or incomplete and should be reviewed by users, educators, or other qualified people as appropriate.

When a user submits a prompt, file, message, assignment, or other content to an AI-enabled feature, CircleIn and its contracted AI service providers may process that information to generate the requested output, maintain context, detect misuse, support security, and evaluate service quality. Third-party AI service providers are contractually restricted from using Institution Data or children's personal information to train or improve their general-purpose models or for their independent advertising or commercial purposes.

6. Institution-Provided Accounts and Student Data

When an Institution provides or sponsors access, the Institution generally controls the educational purpose of the account and determines what Institution Data is provided to CircleIn, which features are enabled, who may access reports, and how long the account remains active. CircleIn processes Institution Data under the agreement with the Institution and the Institution's documented instructions.

Where the Family Educational Rights and Privacy Act (FERPA) applies and the Institution designates CircleIn as a school official or contractor, CircleIn uses education-record information only for the purposes for which it was disclosed, remains under the Institution's direct control with respect to the use and maintenance of the records, and does not redisclose the information except as authorized by the Institution, permitted by the agreement, or required by law.

Institution personnel may be able to view account status, course membership, participation, engagement, messages or content available within authorized features, tutoring activity, and reports, depending on the Institution's configuration and permissions. Users should not assume that activity in an Institution-Provided Account is private from the Institution.

Requests to access, correct, export, restrict, or delete Institution Data generally must be submitted to the Institution. CircleIn will assist the Institution in responding as required by contract and applicable law. If a request is submitted directly to CircleIn, we may refer it to the Institution or require Institution authorization before acting.

If an Institution's agreement conflicts with this Policy regarding Institution Data, the agreement controls to the extent of the conflict, except where applicable law requires otherwise.

7. Children and Minors

Children under 13

CircleIn complies with the Children's Online Privacy Protection Act (COPPA) when it applies. A child under 13 may use the Services only through an authorized Institution or with verifiable consent from a parent or legal guardian, unless an exception permitted by law applies.

When a school authorizes CircleIn to collect information from a child under 13 for the use and benefit of the school and for no other commercial purpose, the school may provide consent on the parent's behalf as permitted by COPPA. CircleIn provides the school with notice of the information practices applicable to children, and the school may request access, review, deletion, or cessation of further collection. Parents should contact the school first for school-provided accounts.

For a direct child account authorized by a parent or guardian, the parent or guardian may review the child's personal information, request correction or deletion, refuse further collection or use, and consent to internal use while declining non-integral disclosures. CircleIn does not condition a child's participation on providing more personal information than is reasonably necessary.

CircleIn does not sell children's personal information, use it for targeted advertising, or use it to train third-party general-purpose AI models. Children's personal information is retained only as long as reasonably necessary for the specific purpose for which it was collected and is deleted using reasonable measures when no longer needed. CircleIn maintains a written retention schedule for children's information.

Users ages 13 to 17

Minors may use the Services only as permitted by their Institution, parent or guardian, and applicable law. We encourage parents, guardians, and Institutions to help minors understand responsible and safe use of online services and AI tools.

8. How We Disclose Personal Information

Institutions and authorized users

We disclose Institution Data to the sponsoring Institution and its authorized personnel. We disclose profile information, posts, messages, or collaboration content to other users only as needed for the feature selected by the user or Institution. Users should avoid posting personal information that is not necessary for the educational activity.

Service providers and subprocessors

We disclose personal information to contracted providers that support hosting, cloud infrastructure, AI processing, authentication, communications, analytics, customer support, content moderation, security, and other operations. They may use personal information only to provide services to CircleIn and must protect it under contractual and legal obligations.

Integrations directed by users or Institutions

We disclose information to learning-management systems, single sign-on services, productivity tools, or other integrations when the Institution or user enables the connection. The recipient's privacy practices may apply after the information is transferred.

Legal, safety, and compliance disclosures

We may disclose personal information when we reasonably believe disclosure is necessary to comply with law or legal process; respond to lawful requests; protect the rights, safety, and property of CircleIn, users, Institutions, or others; investigate fraud, security incidents, or abuse; or enforce agreements.

Corporate transactions

We may disclose personal information in connection with a merger, financing, acquisition, reorganization, bankruptcy, sale of assets, or similar transaction. Any successor will be required to handle personal information consistently with applicable law and the commitments that apply at the time of transfer.

With direction or consent

We may disclose personal information for another purpose when the user, parent, guardian, or Institution directs us to do so or provides legally valid consent.

CircleIn does not sell personal information and does not share personal information for cross-context behavioral advertising.

9. Cookies, Analytics, and Similar Technologies

CircleIn and its service providers use cookies, pixels, local storage, software development kits, and similar technologies to operate the Services, remember preferences, authenticate users, maintain security, understand performance, and improve usability.

- Essential technologies are necessary for authentication, security, network management, accessibility, and core functionality.
- Functional technologies remember settings and improve user experience.
- Analytics technologies help us understand how the public website and Services perform. Where required, analytics technologies are used only after consent or in a privacy-protective configuration.
- Marketing technologies may be used on CircleIn's public website for adult business audiences, subject to consent and applicable law. They are not used to behaviorally target students or children within authenticated educational areas.

Users may manage non-essential cookies through device settings or browser controls. Blocking some technologies may affect functionality. CircleIn does not respond to legacy "Do Not Track" browser signals that are not legally recognized opt-out preference signals.

10. Deidentified and Aggregated Information

CircleIn may create deidentified or aggregated information by removing or transforming identifiers and applying measures designed to prevent the information from being reasonably linked to an individual. We may use this information to improve educational products, evaluate effectiveness, conduct research, prepare benchmarking and outcomes reports, and communicate service impact.

We will not attempt to reidentify information that we maintain as deidentified, except as permitted by law to test whether deidentification processes are effective. When deidentified student information is disclosed, we use contractual or technical safeguards designed to prevent reidentification.

11. Data Retention and Deletion

We retain personal information only for as long as reasonably necessary for the purposes described in this Policy, the Institution's instructions and agreement, security and fraud prevention, dispute resolution, backup and disaster recovery, and legal obligations. Retention periods depend on the type of information, the sensitivity of the information, the account relationship, and legal or contractual requirements.

Public or shared content may remain visible if another user has copied, quoted, or incorporated it into content that the user controls, or if retention is required to preserve an educational or

institutional record. We will take reasonable steps to delete or deidentify information under our control when the applicable retention period ends.

12. Security

CircleIn maintains administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, loss, misuse, alteration, and disclosure. Measures may include encryption in transit and at rest, access controls, least-privilege practices, logging and monitoring, secure software development, vendor reviews, incident-response procedures, workforce training, vulnerability management, and business-continuity controls.

No method of transmission or storage is completely secure. Users are responsible for maintaining the confidentiality of credentials, using secure devices and networks, and promptly reporting suspected unauthorized access. Institution-Provided Users should also follow their Institution's security policies.

13. Privacy Rights and Choices

Account information

Users may review or update certain account information in the Services. Additional requests may be submitted to [Hello@CircleInApp.com](mailto>Hello@CircleInApp.com).

Institution-Provided Accounts

Contact the Institution to request access, correction, export, restriction, or deletion of Institution Data. CircleIn will assist the Institution as required by law and contract.

Direct User requests

Depending on location and applicable law, Direct Users may request access to personal information, correction of inaccuracies, deletion, a portable copy, restriction or objection to certain processing, withdrawal of consent, or information about disclosures. Users may also have the right to opt out of sale, sharing, targeted advertising, or certain profiling; CircleIn does not sell personal information or share it for cross-context behavioral advertising.

Marketing communications

Recipients may unsubscribe from promotional emails using the link in the message or by contacting us. CircleIn may continue to send transactional, security, support, and policy communications.

Verification, authorized agents, and appeals

We may verify identity and authority before completing a request. Authorized agents may submit requests where permitted by law. If we deny a request, residents of certain states may appeal by replying to the decision or contacting us with “Privacy Appeal” in the subject line. We will not discriminate against a person for exercising an applicable privacy right.

Limitations

Privacy rights are subject to legal exceptions. We may retain or decline to delete information where necessary to provide a requested service, protect security, comply with law, exercise legal rights, complete transactions, or maintain information that is exempt from a particular privacy law.

14. Additional U.S. State Privacy Disclosures

This section supplements the Policy for residents of states with comprehensive consumer privacy laws, including California. The categories of personal information collected are described in Section 2; the sources are described in Section 3; the business and commercial purposes are described in Sections 4 and 5; the categories of recipients are described in Section 8; and retention criteria are described in Section 11.

Subject to applicability thresholds and legal exemptions, state residents may have rights to know or confirm processing, access, correct, delete, obtain a portable copy, opt out of sale or sharing, opt out of targeted advertising or certain profiling, limit certain uses of sensitive personal information, and appeal a decision. CircleIn does not sell personal information, does not share it for cross-context behavioral advertising, and does not use student or child information for targeted advertising.

California residents may also request information about the categories of personal information collected, disclosed, sold, or shared during the applicable lookback period. CircleIn may disclose the categories listed in Section 2 to the categories of recipients listed in Section 8 for business purposes. CircleIn does not knowingly sell or share the personal information of consumers under 16.

To exercise a right, email Hello@CircleInApp.com with the subject “Privacy Request.” When a state law applies, we will respond within the period required by that law. Institution Data and information protected by FERPA may be exempt from some state consumer privacy-law requirements or may need to be handled through the Institution.

15. International Users

CircleIn is based in the United States, and personal information may be processed in the United States and other countries where CircleIn or its service providers operate. Where required, we use lawful transfer mechanisms and contractual protections for cross-border transfers.

For Direct Users in the European Economic Area, United Kingdom, or other jurisdictions with similar laws, CircleIn may process personal information to perform a contract, comply with legal obligations, pursue legitimate interests that are not overridden by individual rights, protect vital interests, perform a task in the public interest where applicable, or based on consent. Legitimate interests may include providing and securing the Services, supporting users, improving products, preventing fraud, and communicating with adult business contacts.

Eligible users may have rights to access, rectify, erase, restrict, port, or object to processing; withdraw consent; and complain to a data protection authority. Institution-Provided Users should normally contact their Institution, which may be the controller responsible for the request.

16. Third-Party Services and Links

The Services may contain links to or integrate with third-party services. CircleIn is not responsible for the privacy practices of services that an Institution or user chooses to access outside CircleIn's control. Review the third party's privacy notice before providing personal information.

17. Contact CircleIn

Questions, complaints, security reports, parental requests for Direct User Accounts, and privacy-rights requests may be submitted to:

CircleIn

Email: Hello@CircleInApp.com

Mailing address: 1131 15th St, Washington, DC 20005

Institution-Provided Users should contact their Institution first for requests concerning education records, account access, course data, or the Institution's use of reports.