Privacy Policy

Last Updated: October 22, 2026

Centric Learning, Inc. ("CENTRIC LEARNING") is committed to protecting your privacy. We have prepared this Privacy Policy to describe our practices regarding the personal information that may be collected from users of our websites which post this Privacy Policy, including https://centric.school ("SITE") and www.centriclearning.net, Centric Learning's iOS, Android, and other mobile applications ("APPS"), and other related educational services ("SERVICES"). By submitting personal information through our Site, Apps, or Services, you expressly consent to the processing of your personal information in the U.S. in accordance with this Privacy Policy. The use of personal information collected through our Services shall be limited to the purposes described in this Privacy Policy.

Centric Learning complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Centric Learning has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Centric Learning has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

Centric Learning is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

DISPUTE RESOLUTION

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Centric Learning commits to resolve DPF Principles-related complaints about our collection and use of your personal information. European Union, United Kingdom, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the DPF should first contact Centric Learning at:

Phone (USA): (866) 498-3533 Email: info@centriclearning.net

Centric Learning has further committed to refer unresolved privacy complaints under the DPF Principles to a U.S.-based independent dispute resolution mechanism, BBB NATIONAL PROGRAMS. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbbprograms.org/dpf-complaints for more information and to file a complaint. This service is provided free of charge to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See

https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction for more information on this process.

PERSONAL DATA RECEIVED UNDER THE DATA PRIVACY FRAMEWORK

What we collect. Centric Learning receives the following types of personal data from the European Union, the United Kingdom, and Switzerland in reliance on the DPF:

- **Student and educator data** provided by partner schools and educational institutions, or by users directly: first and last name, email address, user ID, login credentials, grade level, course enrollment, coursework and files submitted, messages, grades, test scores, and attendance.
- **Customer and contact data**: name, email address, mailing address, professional title, and organization name of school administrators, partner staff, and individuals who contact us.
- **Technical and usage data**: IP address, browser type, operating system, device identifiers, and activity within the Centric Learning Platform, such as navigation through curriculum.
- **Human resources data**: name, contact details, and employment and payment records of employees and contractors located in the EU, UK, or Switzerland, in the context of the employment relationship.

Why we collect it. We use this data to create and manage user accounts; deliver online courses and instruction on behalf of partner schools; record and report academic progress to those schools; provide help-desk support; secure the platform and prevent fraud; comply with legal obligations; and, for human resources data, to administer employment and contractor relationships.

Who we share it with. We share personal data only with (1) the school or educational institution that enrolled the user; (2) service providers acting as our agents, including cloud hosting (Amazon Web Services), website analytics (Google Analytics), and a scheduling service used to arrange live tutoring sessions; (3) public authorities when required by law; and (4) a successor entity in the event of a merger or acquisition, as described below. We do not sell personal data, and we do not use student data for marketing or advertising.

IMPORTANT NOTICE FOR SCHOOL USERS

If you are a user (or a parent, carer, or guardian of a user) who was given access to the Services by the organization you are affiliated with, this Privacy Policy does not govern your organization's collection, use, or disclosure of personal information through the Site, Apps, or Services. We are not responsible for your organization's collection, use, or disclosure of your personal information. Please contact your organization to better understand its privacy practices. Centric Learning will retain personal information we process on behalf of organizations for as long as needed to provide services and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Centric Learning uses only de-identified and aggregated data for its own purposes.

IMPORTANT NOTICE REGARDING CHILDREN UNDER 13

This Privacy Policy generally applies to the users of our Services. If, however, a user identifies themselves as under the age of 13 (a "CHILD"), we will collect, use, and share the Child's information as described in the subsection below entitled "A Special Note About Children."

DATA YOU PROVIDE TO US

We collect information from you, such as: first and last name, gender, email and mailing addresses, professional title, company name, and password when you create an account to log in to our network. We also may retain information on your behalf, such as files and messages that you store using your account. If you provide us feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email. We also collect other types of personal information and demographic information that you provide to us voluntarily.

DATA COLLECTED VIA TECHNOLOGY

To make our Site, Apps, and Services more useful to you, our servers (which may be hosted by a third-party service provider) collect information from you, including browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, unique device identifiers, and/or a date/time stamp for your visit.

Like most Internet services, we automatically gather this data and store it in server log files, but we do not link any of this automatically collected data to personally identifiable information in the Centric Learning Platform.

The Centric Learning Platform uses cookies and sessions (as described below) and navigational data like Uniform Resource Locators (URLs) to identify logged-in users and gather information regarding your Centric Learning Platform experience while logged in. This tracking monitors user activity in the Centric Learning Platform, such as navigation through curriculum, but does not include geographic identifiers such as location or IP address, nor does it include operating system or other device identifiers.

"COOKIES and SESSIONS" are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. We use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) as security to identify logged-in users as well as track their experience and activity in the Centric Learning Platform.

ANALYTICS

We use analytics services to help analyze how users use the Site and Apps. These services use cookies and scripts to collect and store information such as how users interact with our Apps, errors users encounter when using our Apps, device identifiers, how often users visit the Site, what pages they visit, and what other sites they used prior to coming to the Site. We use the information we get from Google Analytics only to improve our Site, our Apps, and our Services. For more information about Google Analytics, please see https://policies.google.com/privacy and https://marketingplatform.google.com/about/analytics/terms/us/.

FORUMS

The Centric Learning Platform offers community discussion forums. You should be aware that any information you provide in these areas may be read, collected, and used by other Centric Learning Platform users who access them.

USE OF YOUR DATA

Personal information entered into the Centric Learning Platform is used for data warehousing, your school's individual data needs, help desk requests, and to otherwise help us serve you better. Centric Learning uses your personal information in the following ways: to create and maintain your Centric Learning Platform account; to identify you as a user in the Centric Learning Platform; to operate, maintain, and improve the Centric Learning Platform website, Apps, and help desk services; to personalize and improve your Centric Learning Platform experience; to send you administrative email; to respond to your comments or inquiries; to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and to otherwise communicate as part of secondary fraud protection or to follow up on information requests.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We will share your personal information with third parties only in the ways that are described below or with your express consent.

AFFILIATES

Centric Learning operates together with the entities listed under "Covered Entities" in the Data Privacy Framework section below (collectively, "AFFILIATES"). We may share some or all of your information with these Affiliates, each of which follows this Privacy Policy. If we add affiliates in the future, we will require them to honor this Privacy Policy.

Centric Learning's accountability for personal data that it receives under the DPF and subsequently transfers to a third party is described in the DPF Principles. In particular, Centric Learning remains responsible and liable under the DPF Principles if third-party agents that it engages to process personal data on its behalf do so in a manner inconsistent with the Principles, unless Centric Learning proves that it is not responsible for the event giving rise to the damage.

THIRD-PARTY SERVICE PROVIDERS

We may share identifying information (such as a Centric Learning Platform user ID number and name) with third-party service providers for the sole purpose of providing you with Services offered through Centric Learning Platform partners ("INTERNAL PURPOSES"). For example, we may share a user's Centric Learning Platform ID number with a third-party scheduling service the Centric Learning Platform uses to set live tutoring appointments. This information is not used for marketing purposes and is very limited in scope. We do not share addresses, demographics, birth dates, or other such personal information with these providers.

OTHER DISCLOSURES

Centric Learning may disclose information about you if it believes such disclosure is necessary to:

(a) comply with laws or to respond to lawful requests and legal process;

(b) protect or defend the rights, safety, or property of Centric Learning, users of the Services, or any person, including to enforce our agreements, policies, and terms of use; or

(c) in an emergency, to protect the personal safety of any person (collectively, (a), (b), and (c) are "ENFORCEMENT PURPOSES").

We may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements. We may also share information about you in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction, or proceeding involving the sale, transfer, divestiture, or disclosure of all or a portion of our business or assets to another company. In these circumstances, we will only share information with a company that has agreed, via contract, to data privacy standards no less stringent than those set out in this policy. In the event that information is shared in this manner, notice will be posted on our Site. We may also share de-identified and aggregated data with others for their own uses.

SOCIAL NETWORKING PLATFORMS

You may choose to independently connect with and share your own information with certain social networking platforms ("SOCIAL NETWORKING PLATFORMS") (e.g., a Facebook application) concerning Centric Learning or the Centric Learning Platform. By choosing to publicly post on these Social Networking Platforms, you allow Centric Learning to share public posts within the Social Networking Platform. For example, you might use an application to publish Centric Learning-related notices on your Facebook wall.

We do not provide your Centric Learning Platform information to any Social Networking Platform, and it is the user's responsibility to manage their usage and privacy settings within the Social Networking Platform.

We also do not control the privacy practices of the Social Networking Platforms and sign-in services you choose to independently use, and this Privacy Policy does not cover their practices. You should visit the privacy policies of any Social Networking Platform or sign-in service you choose to use to understand their practices.

YOUR CHOICES REGARDING YOUR PERSONAL INFORMATION

CHOICES

We offer you choices regarding the collection, use, and sharing of your personal information. When you receive communications from us outside of the Centric Learning Platform, you may "opt out" by following the unsubscribe instructions provided in emails you receive from us or by contacting us directly at the contact information below. Please note that Centric Learning will not use Centric Learning Platform information for marketing or sales, and will not contact students outside of the Centric Learning Platform or the Centric Learning Platform help desk.

When you visit the Site, we and others give you the following choices about the use of mechanisms for tracking, including tracking of your online activities over time and across different websites and online services by third parties.

Most web browsers are set to accept cookies by default. If you prefer, you can typically remove and reject cookies from our Site with your browser settings. If you remove or reject our cookies, it will affect how our Site and Services work for you.

You may also render some web beacons unusable by rejecting their associated cookies. If you choose to decline cookies, certain features of the Site and Services that placed the cookie may not function

properly or at all as a result.

If you do not wish for us to track emails we send you, some email services allow you to adjust your display to turn off HTML or disable download of images, which should effectively disable our email tracking, or you may unsubscribe from our marketing emails as described above.

You may opt out of tracking of certain information collected by Google Analytics, one of our analytics providers discussed above, by installing the Google Analytics opt-out browser add-on at https://tools.google.com/dlpage/gaoptout.

For personal data received under the DPF, we will offer you the opportunity to opt out before we (i) disclose your personal data to a third party other than our agents, or (ii) use it for a purpose materially different from the purpose for which it was originally collected or subsequently authorized by you. For sensitive data, we will obtain your affirmative opt-in consent before any such disclosure or use.

While we and others give you the choices described in this Privacy Policy, there are many ways web browser signals and other similar mechanisms can indicate your choice to disable tracking, and we may not be aware of or honor every mechanism. To limit the use and disclosure of your personal information, please submit a written request to info@centriclearning.net.

CHANGES TO PERSONAL INFORMATION

You may change some of your personal information in your Centric Learning Platform account by editing your user profile within the Services. You may also request changes or deletions by contacting your school staff, local administrator, or the Centric Learning Platform help desk. All requests made directly to the Centric Learning Platform help desk must be verified in conjunction with authorized personnel at your school. Active schools/clients will always have access to and control of their staff and student information, as well as the ability to modify the information themselves.

We will retain your information for as long as your personal account or school-wide client is active, or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, student data retention laws, dispute resolution, and enforcement of agreements. We will delete information that resides in our archives when allowed by these external limitations.

Centric Learning acknowledges that EU, UK, and Swiss individuals have the right to access the personal information that we maintain about them. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data or data processed in violation of the DPF Principles, should contact their school staff, local administrator, or direct a formal request to info@centriclearning.net. We will respond to such requests within a reasonable timeframe.

SECURITY OF YOUR PERSONAL INFORMATION

Centric Learning takes reasonable steps to help protect your personal information in an effort to prevent unauthorized access, use, or disclosure. The Centric Learning Platform employs SSL web security, as well as AWS server security, to protect your stored data and web browser transmission of data. A hierarchy of user roles ensures only authorized users can view information appropriate to their role and school/client affiliation.

The Centric Learning Platform requires a secure password upon a user's first login and will require routine password changes as an additional measure of security. Since Centric Learning Platform access is based upon a username and password, it is up to the user to ensure they do not intentionally share credentials with any other individual. Users must contact their local administrator or the Centric Learning Platform help desk if they suspect unauthorized access.

Despite these measures, you should know that Centric Learning cannot fully eliminate security risks associated with personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure. If you have any questions about security on our Site or Apps, you can contact us at the contact information set forth below.

A SPECIAL NOTE ABOUT CHILDREN

NOTE TO PARENTS, CARERS, OR GUARDIANS

We are required under the Children's Online Privacy Protection Act (COPPA), with limited exceptions, to obtain verifiable parental consent in order to collect, use, or disclose personal information from Children. COPPA allows the Child's school, school districts, and other educational institutions (collectively, "SCHOOLS") to obtain consent for the online collection of personal information from Children who are students of the School.

If a Child wants to use our Services, he or she must first obtain an account for our Services from the School ("ACCOUNT"). Before an Account is provided to a School, we require that the School (on behalf of the Child's parent, carer, or legal guardian ("PARENT")) (a) consent to the collection, use, and disclosure of personal information of the Child through the Services, in accordance with this Privacy Policy, and (b) agree that the Child's online activities are subject to our terms of service.

As required under COPPA, we allow Parents to make certain choices regarding the personal information submitted by their Children as described in this subsection.

For example, if a representative of the Child's School contacts us and provides the Account information we request, we may assume that the person calling is acting on behalf of the Child's Parent.

INFORMATION WE COLLECT, USE, AND SHARE

In general, we collect the same information from student/child users that we collect from other Centric Learning Platform users, and use and internally share such information for the same non-marketing purposes. In addition, our Services also allow Schools to access and interact with their students and their Parents. If your Child's School creates an Account for your Child, the School may share your Child's personal information, such as your Child's grades, test scores, attendance levels, and other information, with us. We may add all of this information to the information we have already collected from your Child via the Services, and we may use it as described in this Privacy Policy. We also may share your Child's personal information with the Child's Parent's consent, or with your Child's School or those directed by your Child's School. We are not responsible for any errors in information your Child's School provides to us. It is ultimately the client/school's decision as to what information they enter into the Centric Learning Platform beyond the user's name and grade level.

PARENT'S CHOICES REGARDING INFORMATION

In general, we offer Parents the same choices that we generally offer to other users with respect to the collection, use, retention, and disclosure of their Child's information. In addition, a Parent has the right to review the Child's personal information, which the Parent may obtain by contacting the Child's School. After reviewing the Child's personal information, the Parent may ask us to update or delete the Child's personal information by requesting such changes through the Child's School. A Parent may prohibit us from sharing a Child's personal information with a third party by requesting such prohibition through the Child's School. Notwithstanding any such requests, we may continue to share a Child's personal information for Internal Purposes and Enforcement Purposes.

If a Parent chooses to prohibit any future collection, use, or disclosure of the Child's personal information, the Parent may do so by terminating the Child's Account through the School and requesting the deletion of the Child's personal information through the School. Upon receiving such a request from the Child's School, we will delete the Child's Account information from our live databases and all information and data stored for such Account. Centric Learning will not have any liability whatsoever for any termination of the Account or related deletion of the Child's personal information. When we delete personal information, it will be deleted from our active databases but may remain in our archives.

DATA PRIVACY FRAMEWORK: HUMAN RESOURCES DATA

With respect to human resources data transferred from the European Union, the United Kingdom, and Switzerland in the context of the employment relationship, Centric Learning commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs), the UK Information Commissioner's Office (ICO), and the Swiss Federal Data Protection and Information Commissioner (FDPIC). Centric Learning commits to comply with the EU-U.S. DPF Principles and the Swiss-U.S. DPF Principles with respect to all such data.

If your complaint involves human resources data transferred to the United States from the European Union, the United Kingdom, or Switzerland in the context of the employment relationship, and Centric Learning does not address it satisfactorily, you may contact the relevant authority listed above. Complaints related to human resources data should not be addressed to BBB NATIONAL PROGRAMS.

COVERED ENTITIES

The following U.S. entities connected to Centric Learning through common-control ownership are covered by Centric Learning's DPF certification and follow these same practices:

- Centric Learning Online
- Central Operations
- Centric Learning Academy
- Go PBL Academy
- C.L.E.A.R. Georgia

CONTACT INFORMATION

Centric Learning welcomes your comments or questions regarding this Privacy Policy. Please email us at info@centriclearning.net or contact us at the following address:

Centric Learning, Inc.
220 S Main Street, Suite 300
Ann Arbor, MI 48104
USA

CHANGES TO THIS PRIVACY POLICY

Centric Learning may change this Privacy Policy from time to time. If we make any changes to this Policy, we will change the "Last Updated" date above, update the link on the Centric Learning Platform login page at https://centric.school, and post an announcement in the Centric Learning Platform along with a link to express concerns. Any changes that would expand Centric Learning's use of users' Centric Learning Platform information beyond the current agreement will prompt the user for consent within the Centric Learning Platform.

If such changes are material, a notice of the changes will be posted along with the revised Privacy Policy prior to the change becoming effective. We encourage you to visit this page from time to time for the latest on our privacy practices.