

WeGrow NYC, LLC

Privacy Policy

WeGrow is committed to supporting growth in children’s minds, bodies, and souls through providing an integrated, individualized curriculum that challenges and elevates all aspects of the child. We want to unleash every child’s superpowers through a transformative School curriculum and opportunities for empowered growth through mentorships and other innovative experiences.

This Privacy Policy (“Privacy Policy” or “Policy”) sets forth the policies of WeGrow NYC LLC (“WeGrow”, “we” or “us”) and its affiliated companies and subsidiaries with respect to Personal Information you provide to us when you interact with our site or submit an enrollment application, inquiry, or other information to WeGrow. This Privacy Policy may be changed at any time, in which case the revised Privacy Policy will apply to information collected after the date the Privacy Policy is posted.

By interacting with our site or submitting an enrollment application or other information you agree that you have read and understand the terms and conditions of this Privacy Policy.

1. Our Policy.

We recognize the value of your privacy and encourage you to read this entire Privacy Policy as it sets forth our policies with respect to Personal Information you provide us.

2. Personal Information Collected.

We call data that identifies, or that could reasonably be used to identify you, or another natural person, as an individual “Personal Information”. Personal Information does not include data that has been aggregated or made anonymous such that it can no longer be reasonably associated with a specific person. The type of Personal Information we collect comes in two categories:

- information collected to enable your interaction with WeGrow, and
- information you submit in an enrollment application.

2.1 Information We Collect.

We collect Personal Information needed to provide you with requested information or enable and manage your access to your account or application, such login credentials you voluntarily create to manage or submit your enrollment application. You can have general access to our WeGrow.com website and browse pages describing our school without providing any creating an account or registering. However, you may not be able to submit an enrollment application or interact with us without supplying Personal Information.

Depending on the permissions you have selected for such devices, we also collect information from and about the computers, phones, and other devices that you use to access or use our application page. For example, the information we collect in this respect includes:

- your browser type and operating system;
- IP address and device identifiers;
- your browsing behavior on the Services, such as the amount of time spent viewing our online Services and the links you click within our online Services;
- websites you visit before or after our websites;
- whether you have opened or forwarded our e-mails or connected to offers or links that we send you; and
- to the extent permitted by the settings of your applicable device(s), your geographic location, such as through GPS, Bluetooth or WiFi signals, and other content files.

2.2 Information You Provide in Your Enrollment Application.

In order to be considered for enrollment, you are required to submit an enrollment application. This application includes Personal Information about the child you are enrolling and yourself (as well as any additional guardians or parents). For example, you may need to provide us with your Personal Information in order to complete online forms, fill out applications or make payments. If you ask to receive additional information, we will ask you to provide us with previously submitted Personal Information so we can contact you to respond to your enrollment. We also will receive your Personal Information if you submit it to us when you e-mail comments or if you complete surveys on our Site. You may also interact with WeGrow affiliated parties or third-party service

providers to process enrollment fees or other transactions related to your application and you should read the section below entitled "*Links and Third Party Web Sites*" and familiarize yourself with the privacy terms of all such non-WeGrow sites before using them. Examples of the Personal Information you may provide include:

- **Family Contact Information.** You may be requested to provide us with Family Contact Information when you apply for admission to WeGrow; or register for or enroll or participate in our Services. Family Contact Information includes name, preferred name, address, city, state, zip code, and phone number, email address, and other information that enables us to contact you. Family Contact Information may also include information about your children that you provide when submitting an application, including their name, preferred name, address, city, state, zip code, phone number, and other information;
- **Personal Verification Information.** You may be requested to provide us with Personal Verification Information when registering for or enrolling or participating in our Services, such as gender, place of birth, a photo ID or government issued identification;
- **Professional Information.** Your occupation, employer, title, role, team, work address, work phone, and other Professional Information may be requested when you register for or enroll or participate in our Services;
- **Payment Information.** Your credit or debit card number and expiration date or bank account information, cardholder name, service code, Code Verification Value Code (e.g., CVV, CVC2, CID number) and other Financial and Transactional Information may be requested when you pay for tuition, make a purchase, or register for or enroll or participate in our Services;
- **Student Information.** In addition to providing your child's Family Contact Information, you may also be asked to provide us with enrollment and registration related information about your child such as their age, grade, gender, ethnicity, photograph, place of birth, date of birth, and languages spoken, social security number, immigration status, free and reduced lunch status, sibling information, photo or personal video, prior school educational record, and health information about their physical or mental health and disabilities or other medical information, including allergies, asthma, vaccinations, medications, and anything else that may be required by Applicable Law or relevant for us to provide Services to or otherwise care for your child(ren);

- **Other Personal Information.** You may provide your instant messenger and social media screen names, relationship to emergency point of contact, vehicle identification, video and other Personal Information in connection with our Services;
- **Other Application and Registration Information.** In relation to your child's enrollment application, you may be asked to upload information and data files such as references, school transcripts, sample schoolwork or other information to support your application. You may also be asked to provide us personal philosophies and reasons for your application; details regarding your Family; whether you are a WeWork Member or Employee, whether you are applying for financial aid.

3. Children's Online Privacy Protection Act.

To the extent applicable, we comply Children's Online Privacy Protection Act of 1998 ("COPPA"). COPPA requires that web site operators never knowingly request any Personal Information from anyone under the age of 13 without requesting verifiable parental consent. In accordance with COPPA, we do not knowingly request or collect any Personal Information directly from children under the age of 13. In the event that we determine that a user of our Enrollment is under the age of 13, we will not maintain or use his or her Personal Information. We will then delete any such Personal Information from our records.

4. Other Information You May Submit to WeGrow.

As part of the Enrollment Process you may have the opportunity to request information from WeGrow, in which case an e-mail or other contact information may be required in order to allow us to comply with your request, and for other purposes as may be disclosed at the time the request is made. If you request information from WeGrow, we may add your e-mail address or other contact information to our mailing list and contact you from time to time. You may elect to opt-out of receiving communications other than those relating to a specific query by following the procedures in "*How to Request Changes or Opt-Out of Future Communications*" (below).

5. Use of Information.

With your submission of an enrollment application as a first step in our relationship, we will only use the Personal Information we collect to:

- (i) Enable your access to the Enrollment Application Page and related services;
- (ii) Manage your Enrollment Application and personalize your child's education experience if your child is accepted;
- (iii) Communicate with you about your application and child and send you materials or information that you have requested; and
- (iv) Notify you of other communications related to your child's enrollment that may be of interest to you.

Subject to applicable law and this Privacy Policy, we may disclose Personal Information:

(i) to companies and organizations affiliated through common ownership with WeGrow;

(ii) to our Community. Our Services include online and offline member communities, forums and networks ("Community") that allow you to share and connect with other WeGrow families;

(iii) to unaffiliated third parties, attorneys, accountants, consultants and advisors who provide WeGrow with assistance or advice or are under contract to perform services for or on behalf of WeGrow (collectively, "Service Providers"), who will be required to uphold and maintain our policies with respect to privacy, confidentiality and the treatment of your Personal Information, provided that any service provider's access to such information will be limited to the purpose for which such information was provided to our Service Provider;

(iv) to persons as permitted by applicable law or regulation;

(v) to other parties in connection with a corporate transaction. We will disclose your Personal Information to an acquiror in the event we sell or transfer all or a portion of a business or assets to that third party, such as in connection with a merger or in the event of a bankruptcy reorganization or liquidation;

(vi) to law enforcement personnel and agencies, as part of a legal process, if otherwise compelled to do so by law or in connection with any government or regulatory request or investigation, in order to protect our property, rights, safety or that of any of our respective affiliates, business partners, members, families, or employees and where otherwise required by law; or in furtherance of an

investigation regarding a breach of the Site rules and policies, unauthorized access to or use of the Site, fraud, or any other illegal activities;

(vii) to third party partners with your consent; or

(viii) to other parties at your direction.

6. WeGrow Data Security.

We are very concerned with the safety and security of your sessions on our Site, the information you provide us online, and any transactions you conduct with us online. We have implemented and maintain physical, electronic, and procedural safeguards consistent with industry standard protocol to help guard your nonpublic Personal Information, including to protect against the loss, misuse, interception, access and alteration of information you send us. We restrict access to Personal Information about you to those of our employees and our agents (including individuals from affiliated organizations) who need to know the information to enable us to process your application or provide related services to you and we emphasize to them the importance of maintaining the security, confidentiality and integrity of your Personal Information.

7. Links and Third Party Websites.

This Policy applies solely to information collected by and through our Application Page. The WeGrow website may contain hyperlinks or "links" to other sites, which may be subject to a separate privacy policy and other terms and conditions. When you follow any such links to a third party's site, you may be subject to a separate privacy policy and other terms and conditions. In some cases, these other web sites are made available via "framing technology", and may appear to be part of our Site. We urge you to familiarize yourself with the individual privacy policy and other terms for each linked or framed site prior to submitting any Personally Identifiable Information. We are not responsible for the data collection, privacy and information sharing policies and procedures or the content of such third-party web sites.

8. Cookies.

Visitors to our Site should be aware that Personal Information may be automatically collected through the use of "cookies." "Cookies" are small pieces

of data sent to your computer browser from our web server and stored on your computer's hard drive. The data identifies you as a unique user and facilitates your ongoing access to and use of the Site. Cookies are used by us to recognize repeat visitors, frequency of visitor use, store user preferences, and to track information and usage behavior. By tracking user trends and patterns of how people search, we can better understand our user base. This helps us deliver better and more personalized services, improve the content and administration of our Site, facilitate use by visitors and generally enhance your online experience. Cookies also help us to diagnose problems with our server. We use "cookie" technology only to compile aggregate data about your visits to our Sites and not to obtain Personal Information. We may use this information to collect demographic information and develop statistics about our user base. Most browsers are initially set up to accept cookies. You can reset your browser to block all cookies from being loaded onto your computer or to indicate when a cookie is being sent. Please be aware, however, that refusing cookies can affect the performance of websites and may cause some parts of our website to not function properly.

9. Rights Relating To Personal Information: Access, Rectification, Erasure and Restriction.

We know things change – it's part of growing! We believe it is important to stay in touch and, where allowed by law, we will provide you the right to

- (i) request confirmation of the information we have about you or your child;
- (ii) access and update information in your enrollment applications;
- (iii) receive (port), including to school from your enrollment applications;
- (iv) restrict or object to further processing of your enrollment application;
- (v) request erasure of your enrollment application.

If you would like to exercise any of these rights, please send an e-mail to privacy@wegrow.com or a letter to Privacy Director, WeGrow NYC LLC, 115 West 18th Street, New York, New York 10011.

Such requests will be processed in line with local laws, including without undue delay and in accordance with any required time frames. Although WeGrow makes good faith efforts to provide individuals with access to their Personal Information, there may be circumstances in which WeGrow is unable to provide access, including but not limited to: where the information contains legal privilege, would

compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question or where it is commercially proprietary. If we determine that access should be restricted in any particular instance, we will endeavor to provide you with an explanation of why that determination has been made within any required time frames (approximately one month), a contact point for any further inquiries and any other legally required information. To protect your privacy, WeGrow will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

10. How to Request Changes, Update, or Opt-Out of Future Communications.

In accordance with applicable law, you may have the right to access, update, or correct inaccuracies in your Personal Information in our custody and control, subject to certain exceptions prescribed by law. In order to stop receiving electronic communications from us, you may unsubscribe to our publications and other communications by following the unsubscribe directions included at the end of each e-mail we send. In addition, you may always contact us via e-mail at privacy@wegrow.com.

11. Your California Privacy Rights.

You may opt out of having your personal information shared with third parties for those third parties' direct marketing purposes by e-mailing privacy@wegrow.com.

Some web browsers may transmit "do-not-track" signals to the websites and other online services with which a user communicates. There is no industry standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established and accepted, we may revisit our policy on responding to these signals.

California residents who are registered members or users of the Services and are under the age of 18 may be entitled under California law to request and obtain removal of content and information that they themselves post on the Services. You may request such removal by emailing us at privacy@wegrow.com. In your request, please provide a description of the material that you want removed and

information sufficient to permit us to locate the material, including your name, email address, year of birth, mailing address (including city, state, and zip code) and the subject line “California Removal Request.” Please note that your request does not ensure complete or comprehensive removal of the material. For example, materials that you have posted may be republished or reposted by another user or third party.

12. Changes.

Any information that is collected by WeGrow is covered by the Policy in effect at the time such information is collected. We reserve the right, at our discretion, to change, modify, add, or remove portions of this Policy at any time and at our sole discretion.

If we make any material changes to this Policy, we will notify you of those changes by posting them on our website or by sending you an email or other notification, as required by applicable law, and we’ll update the “Effective Date” below to indicate when those changes will become effective.

We encourage you to review this Policy periodically to be informed regarding how we are using and protecting your information and to be aware of any policy changes. Your continued relationship with us after the posting or notice of any amended Policy shall constitute your agreement to be bound by any such changes. Any changes to this Policy take effect immediately after being posted or otherwise provided by WeWork.

13. Contact Us.

If you have questions concerning this Policy, please contact us at:

Privacy Director
WeWork Companies Inc.
115 West 18th Street
New York, New York 10011
Email: privacy@wegrow.com

Effective Date: December 6, 2017