<u>**HONORLOCK**</u>

<u>**EXAM TAKER PRIVACY NOTICE**</u>

Last Updated: May, 2021

This Exam Taker Privacy Notice explains how Honorlock Inc. ("**Honorlock**," "**we**" or "**us**") processes the information we collect about you in connection with the exam proctoring services ("**Services**") we provide for our testing organization customers ("**Testing Organizations**"). Our Services may be provided through browser extensions, desktop apps, and other online apps and services, including websites where we host seeded test questions to help detect use of secondary devices or other conduct prohibited by Testing Organizations (called "seed sites").

We process the information we collect about you via our Services on behalf of each Testing Organization pursuant to our agreement with that organization. Testing Organizations include schools, companies or other organizations that use our Services to help administer and proctor an exam. Please note that this privacy notice does not describe information collected directly by the Testing Organizations or how they process the information they receive from us. You should review their privacy policies for details on their privacy practices.

<u>**EEA/UK users**</u>
Please note that your Testing Organization is the controller of the personal data we collect about you via the Services. We process the personal information we receive via our Services as a data processor on their behalf.

<u>**The Information We Collect**</u>

We may collect the following types of information, depending on the Services you use, and the settings requested by your Testing Organization.

    1.   <u>Information You Submit</u>

Prior to the start of an exam, you may be asked to submit certain information about yourself via our Services. This information may include your name, and information contained on an identification card, such as student ID number or other identification number (such as driver's license number), home address, photo, and date of birth. We may also ask you to take a picture of yourself with your device's camera or take a video recording of the area around you.

Additionally, if you communicate with Honorlock, such as via live chat, phone, or email, we collect information provided in those communications. This may include, for example, recordings of phone calls or transcripts of live chats with your proctor or our support staff.

    2.   <u>Information Received from the Testing Organization</u>

Your Testing Organization may also provide us with information about you, including via its learning management system. This information may include your name, student ID, email address, and the name of the course for which we have been directed to proctor an exam.

3.   Device Information

We automatically collect information about the devices you use with our Services. This information includes the type of device, screen size, operating system and version (e.g., iOS, Android or Windows), browser type and language, IP address, carrier and country location, network type (such as WiFi or type of cell coverage), and related device information. We may also approximate the location of your device from your IP address.

4.   Usage Information

Our Services also automatically collect certain information about your device activity. This information includes referring URL (the webpage you visited before navigating to our Services) and other information about your use of our Services, including date and time of access, amount of time spent on particular pages or features, frequency of visits, last seen dates, question navigation on the exam, and similar usage information. If enabled by your Testing Organization, we also receive information about web sites you visit during an exam or about other apps on your device that you use (or attempt to use) to help your Testing Organization detect any use of prohibited apps during an exam.

5.   Seed Site Information

In addition, as part of our Services, we operate "seed sites," which are websites created by Honorlock designed to show up in search results for exam content. If you visit any of our seed sites (whether through the device you are using to take an exgd above) in connection with your use of that site. Additionally, if enabled by your Testing Organization, we also use cookies and similar technologies to better understand how you navigated through the seed site. See below for more details on information collected from those technologies.

6.   Information from Cookies and Similar Technologies

We collect information using "cookies," pixels and similar technology. We may use session cookies (which expire once you close your web browser) and persistent browser storage (which stays on your device until you either delete the data or refresh or remove our browser extension from your device) to store session data and collect information about your use of our Services. Please note that you may be required to enable cookies in order to take an exam that utilizes our Services.

7.   Recordings

If requested by the Testing Organization, our Services may record your activity during the exam by taking audio and visual recordings from your microphone and device camera, as well as a recording of the screen of your device. We may also receive a transcript of any audio detected by your device microphone. Please note that these recordings may capture images or audio of other people who are in or around your room.

8.   Person Detection Feature

If requested by the Testing Organization, our Services may utilize a face detection feature to help

detect if the faces of one or more people are visible within the device camera (without trying to identify any person). We use this feature solely to provide our Services to the Testing Organization and we do not store photos and videos or individualized data about whether your image was or was not detected for longer than three years after your last interaction with our Services.

How We Use and Share the Information

As noted above, we process the information we collect about you via the Services on behalf of the Testing Organization that invited you to take an exam. This includes using this information to help the Testing Organization prevent cheating and other misconduct and sharing this information with the Testing Organization and as otherwise approved in our agreement with them (such as where required by law or to our third-party service providers).

Requests for Information

If you want to exercise any rights you have under applicable privacy laws with respect to the information we collect via the Services, you should contact your Testing Organization directly. We will cooperate with each Testing Organization to facilitate their ability to comply with your request pursuant to our agreements with them.

External Websites

The Services may contain links to third-party websites. Honorlock has no control over the privacy practices or the content of any of our partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should review the applicable third-party privacy policy and terms of use when visiting any other websites or services.

Changes to this Privacy Notice

We may change this privacy notice from time to time, and will notify you of such changes (e.g., by changing the "last updated" date and posting any changes on our website, e-mailing you, or prompting you via a popup notice).

How to Contact Us

If you have questions about this privacy notice, please e-mail us at privacy@honorlock.com.