

HONORLOCK

EXAM TAKER PRIVACY NOTICE

Last Updated: September 23, 2022

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**”). 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 Exams. 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”).

Please note that this privacy notice does not describe information collected on our website which is addressed in our website privacy policy: <https://honorlock.com/honorlock-privacy-policy/> or information collected directly by the Testing Organizations or how they process the information that we provide. You should review the privacy policies of the applicable Testing Organizations for details on their privacy practices.

EEA/UK Test Takers

If you are located in the European Economic Area or the United Kingdom, 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 behalf of your Testing Organization.

The Information We Collect

Depending on the Services provided to your Testing Organization (and the settings it requests for your Exam), we may collect the following types of information.

1. **Information You Submit**

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. Information Received from the Testing Organization

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 Exam above or another device) in connection with your use of that site, Honorlock may record your IP address, navigation on the site, details about the device used to visit the site, and details regarding how you arrived at the 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 regarding your use of our Services through session cookies (which expire within a day once you close your web browser), pixels, and similar technology. These technologies also enable certain functions provided as part of the Services, such as support and chat capabilities. Please note that you may be required to enable these 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/or your device camera, or from

an external microphone or camera device (for these purposes, we request that you grant us permission to use your browser and device), 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 surrounding workspace area. If you are taking an Exam through our Services at your home or in a personal space, you agree to allow your activity and surrounding workspace area to be recorded by video and audio and then to be viewed by a trained proctor during or after the Exam, and by the instructor or administrator after the Exam as directed by your Testing Organization for the purpose of detecting any indication of cheating on the Exam.

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 store photos and videos, or individualized data about whether a face was or was not detected, for only the period of time directed by your Testing Organization which may not exceed three (3) years after your last interaction with our Services.

9. Use of Browser Extensions, Desktop Apps, etc.

Our Services may be provided through browser extensions such as Chrome (which we require to access Exams), and desktop apps, other online apps, and online services that are selected by your Testing Organization. For example, your Testing Organization may require that you take the Exam on a designated online platform or service.

10. How We Use and Share the Information

We process the information we collect about you via the Services on behalf of the Testing Organization that invited you to take an Exam. Our processing activities include using this information to help the Testing Organization prevent cheating and other misconduct, sharing this information with the Testing Organization, and using this information as otherwise approved in our agreement with the Testing Organization. We may also disclose such information when required by applicable law, court order, or other governmental or regulatory authority, or to protect the rights, property, or safety of Test Takers, the Company, the Testing Organization, other users of our Services, or third parties.

11. Requests for Information

If you want to exercise any rights you have under applicable data protection 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 its' ability to comply with your request pursuant to our agreements with them.

12. External Websites

The Services may contain links to third-party websites ("External Websites") that are selected by your Testing Organization. Honorlock has no control over the privacy practices or the content of

any External Websites, and is not responsible for any such content or privacy policies. You should review the applicable third-party privacy policy and terms of use when visiting any External Websites.

13. Changes to this Privacy Notice

We may change this privacy notice from time to time, and will notify you of such changes by changing the “last updated” date and posting any changes on our website. If you visit our website or use our Services after the revised privacy policy is posted, then you are deemed to have accepted its terms.

14. How to Contact Us

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