

Web Site

www.kokomo247.com

PRIVACY POLICY

For **Kokomo24/7 Safety Cloud's** privacy policy, click [here](#) including services available at the following domains:

safetycloud.kokomo247.com
www.safetyclouds.com

For the **website privacy policy** www.kokomo247.com, please read on.

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WHO ARE WE?

Kokomo Solutions is the product owner of Kokomo24/7® School Safety Cloud™. It is a SaaS (Software-as-a-Service) solution provider based in Glenview, Illinois. Kokomo24/7® is a safety cloud with comprehensive safety solutions encompassing Incident Management (IMS) that not only tracks but also helps intervene future incidents from happening with the use of artificial intelligence. Its IMS is seamlessly integrated with Anonymous Reporting System (ARS) that ingests and vets reports from public. Then, both IMS and ARS feed its collected insights into the modern Emergency Operation Center (EOC) Support system tailor-made for education settings to handle real time emergencies.

Kokomo Solutions updated its Privacy Policy effective May 25, 2018 to coincide with the new EU General Data Protection Regulations (GDPR). We appreciate the importance of privacy and commit to protecting it by following the practices described in this policy.

This Privacy Policy applies to you and Kokomo Solutions, including its affiliates and describes our practices for collecting, using, maintaining, protecting, and disclosing the personal data we may collect from you or that you may provide when you visit our websites at www.kokomo247.com or any other Kokomo Solutions websites or forms that link or refer to this Privacy Policy (collectively referred to as our “Websites”). By visiting, using and submitting information to our Websites you are accepting the practices described in this Privacy Policy and our Agreement of Terms of Use. This Privacy Policy applies to the personal data collected through our Websites, regardless of the country where you are located.

Kokomo Solutions encourages you to provide feedback regarding this Privacy Policy.

This Privacy Policy may change from time to time at Kokomo Solutions’ discretion. Such changes will be posted on this page. Kokomo Solutions will not adopt a change that would limit your rights under this Privacy Policy without providing notice. You are encouraged to revisit this Privacy Policy each time you visit www.kokomo247.com or any of our Websites, in order to review any changes that have been made.

WHAT INFORMATION DOES KOKOMO SOLUTIONS COLLECT?

We collect two types of information when you are using our Websites – information you provide us and information collected by tracking and

monitoring, which may include, for example, training plans, courses taken and completed, certifications earned, and the like.

The personally identifiable information that Kokomo Solutions requests from you may include your name, address, email address, telephone number, driver's license number and professional license number. Much of www.kokomo247.com and our Websites are accessible to you without your providing personally identifiable information. However, Kokomo Solutions requires that you register and provide personally identifiable information to enable you to utilize certain features of www.kokomo247.com, including subscribing for Kokomo Solutions' courses and being issued a username or password. The personally identifiable information that you provide must be accurate, complete and current.

In addition, you submit your personally identifiable information to Kokomo Solutions in order to receive company updates, press releases, or other special offers from Kokomo Solutions and select business sponsors. Your provision of such information will always be on a voluntary basis. Kokomo Solutions will obtain your consent for any use of your personally identifiable information not described in this Privacy Policy or any use beyond the original use for which you provided it.

HOW DOES KOKOMO SOLUTIONS USE THE INFORMATION COLLECTED?

Kokomo Solutions uses your personally identifiable information within Kokomo Solutions internal organization to process any selections that you may make using www.kokomo247.com or any of our Websites and to create, develop, operate, deliver and improve our products and services. Kokomo Solutions may de-identify and aggregate your personally identifiable information and license, and sell or otherwise disclose the aggregated information to third parties.

Kokomo Solutions may share your personally identifiable information with select third parties for fulfillment of services and features. For example, we

will share your personally identifiable information with (i) credit card companies for processing your subscription if you sign up for Kokomo Solutions solution services (ii) professional organizations who refer you to www.kokomo247.com or any of our Websites; (iv) vendors whose products you order via www.kokomo247.com or any of our Websites.

Kokomo Solutions may share or disclose your personally identifiable information when it determines, in its sole discretion, that the disclosure of such personally identifiable information is necessary to identify, contact, or bring legal action against you if you may be: (i) causing intentional or unintentional injury to another; (ii) interfering with another's rights or property, including Kokomo Solutions' rights or property; (iii) violating any applicable law, rule or regulation; or (iv) such disclosure is required by any applicable law, rule or regulation.

Your personal information may be accessible to the United States government, courts or law enforcement or regulatory agencies through the laws of the United States.

If you transmit, submit or post information to www.kokomo247.com or any of our Websites that is not, or does not contain, personally identifiable information, you automatically grant Kokomo Solutions the royalty-free, non-exclusive right and license to use, copy, format, adapt and/or to incorporate the same in other data and content viewable on, contained in, or downloadable from, www.kokomo247.com or any of our Websites.

WHAT IS KOKOMO SOLUTIONS' OPT-OUT POLICY?

You may at any time request a copy of the personally identifiable information that you provided and elect to revoke ("opt-out") the information provided, In order to opt-out, you may contact your employer, your System Administrator, or Kokomo Solutions at info@kokomo247.com. Kokomo Solutions will

accordingly furnish you with a copy of your personally identifiable information, or change its records to remove your personally identifiable information. If you opt-out of providing your personally identifiable information, Kokomo Solutions will no longer use your personally identifiable information or share it with third parties. However, keep in mind that your opting-out of providing personally identifiable information may inhibit or cancel your ability to fully utilize www.kokomo247.com or any of our Websites to subscribe for Kokomo Solutions courses and to access or use some other features.

HOW CAN INFORMATION BE CORRECTED OR UPDATED

You may correct, update or change your personally identifiable information or change any selections you have made with regard to our use of that information after you have provided such information or selections to Kokomo Solutions via www.kokomo247.com, by contacting your employer, your System Administrator or Kokomo Solutions at info@kokomo247.com.

DOES KOKOMO SOLUTIONS USE COOKIES?

Yes, Kokomo Solutions uses “cookies”. Cookies are small files that are written to the user’s hard drive or device through your Web browser (if you allow). This enables the site’s or service provider’s systems to recognize your browser and capture and to track and store anonymous preferential information about you as you use www.kokomo247.com or any of our websites. Cookies can be used so that users don’t have to re-enter data with each visit to our Websites. Cookies track your personal preferences and activities and to compile aggregate data about how our service is used, but in no way contain or refer to any personally identifiable information.

The aggregated information helps Kokomo Solutions to serve you better by compiling user preferences to improve the features

of www.kokomo247.com or any of our Websites. Kokomo Solutions may also share, loan, rent or sell this aggregated information to third parties, but keep in mind that the aggregated information contains absolutely no personally identifiable information.

If you do not want www.kokomo247.com or any of our Websites' cookies to be inserted into your hard drive, you can disable your hard drive's ability to accept and receive cookies through your web browser. However, keep in mind that if you disable your hard drive's ability to accept and receive cookies, you may not be able to fully utilize all of the convenience features of www.kokomo247.com or any of our Websites. For instance, you may have to log in your username or password more than once per session.

DOES KOKOMO SOLUTIONS ISSUE USERNAMES AND PASSWORDS?

You may be issued a username or password by Kokomo Solutions to utilize certain features of www.kokomo247.com or any of our Websites. In order to receive a username or password from Kokomo Solutions for use on www.Kokomo247.com, you will be required to submit personally identifiable information. You are responsible for keeping your usernames and passwords, if any, confidential. You are responsible for any access, use or activities on www.kokomo247.com of any of our Websites under your username or password. For that reason, be sure to log off when you are finished using a shared computer.

WHAT KIND OF SECURITY DOES KOKOMO SOLUTIONS USE?

The security of your personal data is very important to us. We use physical, electronic, and administrative safeguards designed to protect your personal data from loss, misuse and unauthorized access, use, alteration or disclosure. Where we have given you (or where you have chosen) a password for access to certain parts of our Websites, you are responsible for keeping this

password confidential. We ask you not to share your password with anyone. We urge you to take care when providing information in public areas of our Websites like message boards, which any website visitor can view.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Websites. Any transmission of personal data is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on our Websites.

DOES KOKOMO SOLUTIONS USE LINKS TO OTHER INTERNET WEBSITES?

As part of our routine business operations, our Websites contain links to third party websites, plug-ins, services, social networks or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. Kokomo Solutions does not control these third-party websites, and we encourage you to read the privacy notice of every website you visit, as its privacy policy may differ substantially from that of this Privacy Policy.

WHAT IS KOKOMO SOLUTIONS' CHILDREN'S ONLINE PRIVACY POLICY?

With respect to minors, www.kokomo247.com and any of our Websites are not intended to be accessed or utilized by persons under the age of 18, except as provided in the Kokomo Solutions Privacy Policy for Children Under the Age of 13 Section below. We do not specifically market to children under 13. Kokomo Solutions does not intend or purposefully attempt to gather information from children under the age of 13.

FERPA

Kokomo24/7 IMS and its Clients are subject to the Family Educational Rights and Privacy Act (“FERPA”). As such, Kokomo24/7 IMS acknowledges that: (a) Kokomo24/7 and its Clients are each providing educational services to the other that they would otherwise have to provide for themselves using faculty and staff; (b) each has a legitimate educational interest in the student education records that may be disclosed; and (c) Kokomo24/7 IMS will be under the direct control of each Client User with respect to the use and maintenance of information from student education records. Kokomo24/7 acknowledges that the student education record it may receive is confidential and will use the information only for the purposes for which the disclosure was made. Kokomo24/7 will not re-disclose the information to any third party without prior written consent from the student and client. Kokomo24/7 works together with its Clients to share student education records in a manner that protects such records from disclosure.

Limited Reporting

In addition to the security provided by the Client/Server technical design, Kokomo24/7 IMS has a feature designed to prevent Kokomo24/7 IMS Client users from uniquely identifying the personal data from any individual user. For each Client (e.g., each school), an administrator is provided with access to an online portal that provides information about that Client’s User’s progress. The administrator has access to a Report, which includes user-specific information as discussed above. In addition, each time the full raw data report is opened the information is randomized. These protections ensure that a Client is not able to review the Users that have completed the program each day and try to match it up with data in the raw data report, thereby identifying the personal data from any individual User.

Kokomo Solutions Privacy Policy for Children Under the Age of 13 – Kokomo24/7 IMS and AR Mobile Application

Kokomo Solutions' general website and Services are not intended for use by children under the age of 13, however, we are committed to protecting children who make use of our Kokomo24/7® Safety Cloud IMS or Kokomo24/7 Safety Cloud AR for reporting, managing, tracking and resolving incidents in compliance with applicable regulations in our efforts to keep children safe.

The Children's Online Privacy Protection Act of 1998 and its rules (collectively, "COPPA") require us to inform parents and legal guardians (as used in this Section of our Privacy Policy), ("parents") about our practices for collecting, using, and disclosing personal information from children under the age of 13 ("children"). It also requires us to obtain verifiable consent from a child's parent for certain collection, use, and disclosure of the child's personal information. Children may access and use our Kokomo24/7 Safety Cloud IMS and AR Mobile App to track, manage and resolve incidents in our web-based system. This Section only applies to children under the age of 13 and supplements and is a part of the general Kokomo Solutions Privacy Policy. Only our general Privacy Policy applies to teens and adults. Terms that are defined in the Kokomo Solutions Privacy Policy have the same meanings as used in this Section for Children Under the Age of 13.

Information We Collect from Children

Your child's School District has chosen to make the Kokomo24/7® Safety Cloud and associated Kokomo24/7 Safety Cloud™ AR Mobile Application (the "App") available to its students (collectively referred to in this Section as the "Service"). Based on the School Districts' authorization, this Service is made available on the premise that the School District has obtained any requisite parental consent. Children can access many parts of the Kokomo24/7 Safety Cloud AR via the Mobile Application and our Website and they can use its tip and incident reporting feature anonymously and

without providing us with any personal information. We do not require sensitive or otherwise protected data about the user however, we have no way to restrict users from entering information in the free form text areas of the App or via the Website. While children may voluntarily include personal information when they visit our Website or use the App to report an incident, Kokomo Solutions has no control over this. If the child chooses to share personally identifiable information when submitting a tip or reporting an incident, such information will be shared with the School District. We only collect as much information about a child as is reasonably necessary for the child to participate in providing a tip or reporting an incident, and we do not condition his or her participation on the disclosure of any personal information or other information than is reasonably necessary. Your child, at his or her option, can elect to remain anonymous. The App only allows users to communicate with their School District's administration and does not allow users to communicate with each other.

Information We Collect Directly

When first using the App, a child will be requested to provide us with the Organization Code provided by the child's School District and the child's confirmation that he/she is associated with the School District.

When your child uses the App, we may automatically collect information such as the IP address, browser type, operating system and device/hardware, general location and other log in information, including the date and time of any reports made through the App.

Automatic Information Collection and Tracking

We use technology to automatically collect information from our users, including children, when they access and navigate through the App or the Website and use certain of its features. The information we collect through

these technologies may include a unique identification for the user's device for installation of the App and the tip or report data provided by the user.

How We Use Your Child's Information

We use the information we collect from your child to transmit the incident report to your child's School District by an "anonymous user" unless the child has elected to include personal information. Your child may voluntarily provide information in a report or when using the Service or the App, that allows the School District to identify them, but the Service and the App do not require or encourage children to provide personal information. Any information provided by the child is used to manage, track, and resolve reported incidents for the purpose of keeping children safe.

Our Practices for Disclosing Children's Information

We do not share, sell, rent, or transfer children's personal information other than as described in this section.

We may disclose aggregated information about many of our users, and information that does not identify any individual or device. In addition, we may disclose children's personal information:

- If we are required to do so by law or legal process, such as to comply with any court order or subpoena or to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Kokomo Solutions, our customers or others, including to:
 - protect the safety of a child;
 - protect the safety and security of the App or our Services or
 - enable us to take precautions against liability.

- To law enforcement agencies or for an investigation related to public safety.

In addition, if Kokomo Solutions is involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Kokomo Solutions' assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding or event, we may transfer the personal information we have collected or maintain to the buyer or other successor.

Accessing and Correcting Your Child's Personal Information

The Service and the App are designed to be used anonymously so parents may not be able to review reports. If the child has voluntarily submitted personal information as part of a report, parents may contact the School District directly to review such information. Parents have the right to refuse to permit further use or collection of their child's personal information.

You may contact your child's School District Administrators directly if you have any questions regarding how your child's data is collected and used or if you would like to correct or remove your child's information or to change or withdraw your consent to use such information.