

# Geni LLC Service Privacy Policy

**Effective date:** May 1, 2025

Geni LLC (hereafter called "Geni," "us," or "we") knows that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This Privacy Policy describes our collection and use of personal information collected from you through the online and/or mobile services, websites, and software provided on or in connection with Geni.zone (collectively, the "Service"). "You" or "your" means a visitor or a user (whether signed in or not) of our Service. Your use of the Service is conditioned on your acceptance of this Policy.

**A note about Student Data:** This Service is primarily purchased and/or used by providers of educational services, such as schools, school districts, or individual teachers (collectively referred to as "Educational Institutions" or "Educators") that use our services for educational purposes. When Geni contracts with an Educational Institution to provide the Service, we may collect or have access to "Student Data" or "Covered Information" (as defined by applicable laws like SOPPA). Student Data, in the context of Geni's service, primarily consists of de-identified information at the student level (such as a randomly generated username and a student-stated interest) and performance data associated with that de-identified information. This information is provided by the Educator's assignment setup and by the student's interaction with the de-identified platform. We consider such Student Data to be strictly confidential and, in general, do not use such data for any purpose other than improving and providing our Services to the Educational Institution or on the Educational Institution's behalf. Our collection, use, and sharing of Student Data is governed by our contracts with the Educational Institution and any applicable laws and regulations including, in the U.S., provisions of the Family Educational Rights and Privacy Act ("FERPA"), the Children's Online Privacy Protection Act ("COPPA"), and applicable state laws, including without limitation the Illinois Student Online Personal Protection Act ("SOPPA"). If you have any questions about reviewing, modifying, or deleting personal information of a student, please contact your Educational Institution directly.

## 1. What information does Geni collect about you?

Geni collects information in several ways from different parts of the Service.

**Information you provide to us.** The type of personal information we collect may vary depending on your account type and interaction with the Service.

- **Educator Information:** When a teacher, school administrator, or other authorized person associated with an Educational Institution registers for an account on our Service or corresponds with us, we may collect personal information such as a name, e-mail address, payment information (if applicable), username and password, and information about the Educational Institution. Educators also provide the educational topic or learning objective for worksheets (e.g., "Fractions," "Parts of Speech"). Educators are instructed not to input any student's Personally Identifiable Information (PII) into this topic field.
- **Student-Related Information (De-identified by Geni):** Geni is designed to minimize

the collection of PII from students.

- When students access an assignment shared by an Educator (via a unique link or QR code), Geni automatically provides a **randomly generated, anonymous username** (e.g., "User12345," "LearnerXYZ"). **No student PII (such as full name, student ID, email address, or other direct identifiers) is requested from or required of the student by Geni to access or use the worksheet.**
- Students are then asked to type in an interest (e.g., "Fortnite," "princesses") to personalize the theme of their worksheet. This interest is not linked by Geni to any direct student PII.
- The combination of the randomly generated username and the stated interest is used solely to deliver the personalized educational experience for that specific assignment and is not used by Geni to track students in an identifiable way across different assignments long-term.
- **Learning and Activity Information:** During the course of providing the Service, we collect information about your use of the Service (both Educators and students interacting with assignments). This includes student responses to worksheet questions and interaction data (linked to the randomly generated username). We may also collect personal information when you contact our technical support team, send us an e-mail, complete an educator user survey, or otherwise communicate with Geni.

**Information we receive automatically from your use of our Service.** Like most websites and online services, Geni automatically collects certain types of usage information when you visit our website, read our e-mails, use our Service, or otherwise engage with us. This information is typically collected through a variety of tracking technologies, including cookies, web beacons, log files, and similar technology (collectively, "tracking technologies").

This information may include:

- Details about how you access and use the Service (e.g., referring/exit pages and URLs, frequency of access, pages viewed, links clicked).
- Information about your browser and device(s) (e.g., IP address, browser type, language, ISP, device type, operating system, unique identifiers for browser/device/account).
- City-level geographical location data.
- We may collect analytics data or use third-party analytics tools (e.g., Google Analytics) to measure traffic and usage trends and understand user demographics and behaviors. You can learn more about Google's practices at <http://www.google.com/policies/privacy/partners>.

We use or may use the data collected through tracking technologies to:

- Secure and improve the Service.
- Save you time (e.g., by remembering if you are signed in).
- Provide better technical support.
- For promotional purposes (for adult-directed areas of the Service).
- Track website usage for optimization, sales, and billing.
- Remember your settings and preferences.
- Customize function and appearance based on your account (e.g., for Educators).

Most browsers are initially set up to accept cookies. You can reset your browser to refuse

cookies or indicate when a cookie is being sent. However, some Service features may not function properly if cookies are disabled. You may also set e-mail options to prevent automatic image downloading. Deleting cookies does not necessarily delete Local Storage Objects (LSOs).

Although we do our best to honor the privacy preferences of our users, we are unable to respond to Do Not Track signals set by your browser at this time.

## 2. How Geni uses the information we collect

We use the information we collect for the following purposes:

- **To provide and maintain the Service:** We use your information to deliver the Service, including generating personalized worksheets, processing payments (for Educator accounts), providing Educators with information and reports about student performance (linked to de-identified usernames), responding to inquiries, and providing customer support.
- **To improve, personalize, and develop the Service:** We use information to tailor content (e.g., worksheet themes based on student interest), offer personalized learning experiences, and otherwise personalize your experience. We collect statistics to understand Service usage, monitor effectiveness, detect patterns, and diagnose/fix technology problems. We use information (often de-identified or aggregated) to demonstrate Service effectiveness, perform research, and develop, support, and improve our Service and other educational products.
- **To communicate with you (Educators):** We use Educator information to provide transactional notifications (e.g., payment receipts, subscription notices, assignment readiness). From time to time, we may send periodic promotional or informational e-mails to Educator users. **We do not use Student Data to send marketing communications, and we do not send marketing communications to student users.** Educators may opt-out of certain communications (e.g., marketing) by following opt-out instructions. Service-related communications (e.g., account verification, technical notices) are generally not subject to opt-out.
- **To promote safety and security and respond to legal process:** We use information to promote the safety and security of our Service and users. This includes authenticating users (Educators), facilitating secure payments, detecting/preventing fraud, responding to legal requests or claims, and enforcing our terms and policies.

## 3. How does Geni share your information?

Geni may share or disclose your personal information as needed to provide our Service or with your consent or permission. We may also share personal information in the circumstances described below.

- **With Consent or as Instructed by the Educational Institution/Educator:** We share information with consent and at the direction of Educational Institutions or Educators. For example, an Educator shares an assignment link with students.
- **Others within the Educational Institution:** Geni may share information collected from users associated with an Educational Institution (e.g., student performance insights linked to de-identified usernames) with other authorized users designated by the Educational Institution, such as teachers and school administrators.

- **Aggregate or De-Identified Information:** We may share information in aggregated and/or de-identified form that cannot reasonably be used to identify an individual. For example, Geni may disclose aggregated user statistics to describe our Service to partners and for other lawful purposes.
- **Merger or Sale:** If Geni becomes involved in a merger, acquisition, bankruptcy, change of control, or any form of sale of some or all of its assets, your personal information may be transferred or disclosed. We will make efforts to provide notice before personal information is transferred and becomes subject to a different privacy policy. We will not transfer Student Data associated with Educational Institution accounts unless the recipient has committed to similarly stringent privacy protections, or we will provide Educational Institutions with notice and an opportunity to opt-out of the transfer of Student Data by having their data deleted before the transfer occurs, in accordance with SOPPA and other applicable laws.
- **Other Legal Reasons:** Geni may release personal information if it has a good faith belief that access, use, preservation, or disclosure is reasonably necessary to (a) satisfy applicable law, regulation, legal process, or enforceable governmental request; (b) enforce applicable Terms of Service; (c) detect, prevent or otherwise address fraud, security or technical issues; (d) protect the rights, property, or personal safety of Geni, its users, or the public; or (e) as required or permitted by law.

#### **4. Third-party tracking and online advertising**

Geni **does not display any advertising (third party or otherwise) on the student-facing or educator-facing portions of the Service.**

#### **5. How to control e-mail communications**

Geni may, from time to time, send Educators e-mails regarding our products and services. Only Geni will send these e-mails. You can choose not to receive these e-mails by clicking the unsubscribe link in any e-mail or by contacting [contact@geni.zone](mailto:contact@geni.zone). Please note that you are not permitted to unsubscribe or opt-out of non-promotional messages regarding your account, such as account verification, changes or updates to features of the Service, or technical or security notices.

#### **6. How to access, update or delete your personal information**

Educators may edit their account information at any time by signing into their account and accessing their profile or settings. We recommend that you review your personal information periodically.

If you are a parent or guardian of a student who uses the Geni Service through an Educational Institution, please refer all questions and requests regarding access, modification, or deletion of your student's user information or Student Data to your child's Educational Institution. The Educational Institution may, at its discretion, address such requests with Geni, and Geni shall respond promptly to all access, modification, and deletion requests it receives from Educational Institutions.

Please contact [contact@geni.zone](mailto:contact@geni.zone) for further instructions about deleting or deactivating your Educator account or deleting your personal information. We may not be able to comply with your request in all circumstances (e.g., certain requests may be subject to approval by the

Educational Institution, or data may be retained for legal or billing purposes). When account information is deleted or de-identified, certain residual information may remain within our archive records.

### **7. How long does Geni retain your information?**

We will retain personal information for as long as needed to provide the Service and for our internal business purposes, which may extend beyond the termination of your subscription or user account (e.g., for recordkeeping, fraud prevention, or if required by law).

- **Student Data (including randomly generated usernames, student interests, and associated performance data):** We will not knowingly retain Student Data beyond the time period required to support an educational purpose, unless authorized by an Educational Institution or Parent (where applicable for direct accounts, though Geni's primary model is through Educational Institutions). The Educational Institution is responsible for managing its student rosters and identifying Student Data it no longer needs. Unless otherwise directed by an Educational Institution, we will delete any Student Data after a period of inactivity, after the termination of the license subscription, or after termination of our agreement with the Educational Institution, in accordance with our agreements, written requests from authorized administrators, our standard data retention schedule, and SOPPA requirements. Authorized administrators may contact [contact@geni.zone](mailto:contact@geni.zone) for more information.

We may not be able to immediately or completely delete all data in all instances (e.g., from backups or support records). We will not be required to delete information which has been de-identified or disassociated with personal identifiers such that it cannot reasonably be used to identify an individual.

### **8. How does Geni protect your information?**

- **Information Security:** The security of your personal information is very important. We have implemented a variety of physical, administrative, and technological safeguards designed to preserve the integrity and security of the personal information we collect and to protect against unauthorized access. These include internal reviews of data collection, storage, processing practices, and security measures. Access to personal information is restricted to Geni employees who need it to operate, develop, or improve our services and are subject to confidentiality obligations. However, no security system is impenetrable, and we cannot guarantee its absolute security. If personal information under our control is compromised, we will take reasonable steps to investigate and notify as required by applicable laws and our agreements.
- **Maintaining Security:** Your cooperation is also important. Remember to sign out of accounts and close browser windows. Do not use "remember me" features on shared computers. Keep your password secure.
- **Reporting Concerns:** If you have security concerns, contact us at [contact@geni.zone](mailto:contact@geni.zone).
- **Data Storage and Transfer:** Geni is located in the United States. Personal information collected may be stored and processed in the United States.

### **9. Region-specific disclosures**

We may choose or be required by law to provide different or additional disclosures relating to the processing of personal information about residents of certain countries, regions, or states.

- **Notice for California Residents:**  
This section applies if you are a California resident. For purposes of this section, "personal information" has the meaning provided by the California Consumer Privacy Act (CCPA). This section generally does not apply to Student Data that we process on behalf of our Educational Institution customers, as Geni acts as a "School Official" or "service provider" under such laws. We collect, retain, use, and disclose Student Data only for or on behalf of our Educational Institution customers for providing the Services and for no other commercial purpose. If you have questions or wish to exercise California rights regarding Student Data, please contact your Educational Institution. California residents may have rights regarding other personal information we collect:
  - **Right to Know:** Request information about specific pieces/categories of personal information collected, sources, and third parties shared within the last 12 months.
  - **Right to Request Deletion:** Request deletion of your personal information, subject to exceptions.
  - **Right to Opt Out of Personal Information Sales:** Geni does not sell your personal information. We do not display any advertising within our Service, and we do not partner with third parties to collect your information via cookies or other tracking technologies for the purpose of targeted advertising on other sites or services. As we do not sell personal information, there is no need to opt out of sales.  
You have the right to be free of discrimination for exercising these rights. To exercise these rights, please contact [contact@geni.zone](mailto:contact@geni.zone) with "California Rights Request" in the subject. We will need to verify your identity.
  - **Shine the Light:** We do not share your personal information with third parties for their direct marketing purposes without consent.
  - **Minors:** We do not knowingly "sell" the personal information of consumers under 16. Geni's student-facing service does not involve selling PII, and Geni does not sell any personal information.
- **Notice for Nevada Residents:** To exercise your rights under Nevada Privacy Law, contact [contact@geni.zone](mailto:contact@geni.zone) with "Nevada Rights Request" in the subject.
- **Notice for Residents in the European Economic Area ("EEA"):** For personal information subject to GDPR, we rely on legal bases such as contractual necessity, consent (which can be withdrawn), legal obligation, or legitimate interests (e.g., improving the Service, marketing, promoting safety). Contact [Contact@geni.zone](mailto:Contact@geni.zone) for more information or to exercise GDPR rights.

## 10. Children's Privacy (COPPA Compliance)

Geni is committed to complying with the Children's Online Privacy Protection Act (COPPA). The student-facing portion of our Service is designed for use by students under the direction of an Educator or Educational Institution.

- **Consent:** We rely on the Educational Institution to obtain any necessary parental consent for students under 13 to use the Service for educational purposes, as permitted by COPPA. Geni does not require students to provide more personal information than is reasonably necessary to participate in the educational activity.

- **Information Collected from Children:** As described in Section 1 ("Student-Related Information"), Geni does not directly collect PII such as full name, email, or address from students. Students are provided with a randomly generated username and may input an interest to personalize their worksheet theme.
- **Parental Rights:** Parents can contact their child's Educational Institution to review any information the school may have associated with their child's use of Geni, request deletion, or refuse further collection. Geni will work with the Educational Institution to honor such requests.

## 11. SOPPA Compliance (Illinois)

Geni is committed to complying with the Illinois Student Online Personal Protection Act (SOPPA).

- **Data Processing Agreements:** Geni will enter into written Data Processing Agreements (DPAs) or Data Sharing Agreements (DSAs) with Illinois Educational Institutions as required by SOPPA as necessary. These agreements will detail the data collected, purposes, security measures, breach notification, data deletion, and list any subcontractors.
- **Covered Information:** Geni's collection of "Covered Information" from students is limited as described in Section 1.
- **Prohibited Uses:** Geni does not use Covered Information for targeted advertising to students, to build profiles for non-educational purposes, or to sell or rent student information.
- **Parental Rights:** As outlined in Section VII of the original framework (and integrated here), Geni supports Educational Institutions in fulfilling parental rights under SOPPA, including rights to inspect, review, copy, and request corrections to their child's Covered Information.
- **Data Security and Breach Notification:** Geni maintains reasonable security procedures and will notify Educational Institutions of any breach of Covered Information as required by SOPPA.
- **Data Deletion:** Geni will delete Covered Information as required by SOPPA and directed by the Educational Institution.

## 12. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. If we make material changes, we will notify Educational Institutions (e.g., via email to the account administrator or by posting a notice on our platform) in advance of the changes taking effect, as required by law and our agreements. We encourage Educational Institutions to periodically review this policy. Your continued use of the Service after the effective date of any modifications to the Privacy Policy will be deemed to be your agreement to the changed terms.

## 13. Contact Information

If you have any questions or concerns about this Privacy Policy or Geni's data practices, please contact us at:

2501 Chatham Rd, Suite N  
 Springfield, IL 62704  
 Contact@geni.zone

630-664-5406