

Effective Date: July 1, 2024  
Last updated date: December 31, 2023

## I. INTRODUCTION

This Supplement to Global Privacy Statement for PowerSchool Publicly Accessible Product Headed2 (“**Headed2 Privacy Supplement**”) provides information to you on how PowerSchool Group LLC and its various operating subsidiaries (“**PowerSchool**”) protects the personal information we may collect from you when you access our publicly accessible products. This Headed2 Privacy Supplement describes how PowerSchool Group LLC collects and uses your personal information which is a part of the Collected Data processed by our publicly accessible products. We also describe how you may exercise your personal data rights available under applicable laws.

This Headed2 Privacy Supplement incorporates by reference, sections I, V-XIV of PowerSchool Global Privacy Statement covering our products and solutions licensed to school, districts and other educational institutions, applicability to various International Privacy laws. References to “**us,**” “**we,**” “**our,**” or “**PowerSchool**” in this Headed2 Privacy Supplement, are referring to PowerSchool. References to “**you,**” “**your**” or “**User**” in this Privacy Supplement are referring to the parents of a Candidate, (if a child under 13 intending to use the application); or an over 13-year-old individual who themselves is a Candidate intending to use the application.

## II. PUBLICLY ACCESSIBLE PRODUCTS

PowerSchool makes certain solutions directly available to the public. For these products, an individual voluntarily accepts the license terms to access the solution and expressly consents to PowerSchool’s collection of certain personal information. For these publicly accessible products only, PowerSchool acts as the data collector and data processor of this Collected Data.

### Headed2

This application allows offers services related to career literacy for individuals via self-assessment activities, data on industry sectors, and local opportunities network. The product also provides the ability to connect with Navigators – who help individuals facilitate in better understanding of a specific career path and guide their journey. The product collects Personal Information like name, age, email address, zip code, profession, current job

details, academic details - degrees obtained, ranks, grades, income, investments.

The personal data of the individual is processed to provide them with useful insight, guide the users towards discovery of how they relate to careers, and support exploration and planning process. To ensure the safety of the collected personal data, PowerSchool collects only required minimal data, no excess data is collected or stored in the product. PowerSchool deploys several security measures to ensure the integrity and confidentiality of processed personal data.

The product supports the individual rights in the manner by providing the User Right to access i.e. view and export their own data and the Right to be forgotten i.e. the user can request that their data and the account be deleted. To exercise your privacy rights under state, federal, provincial or country privacy legislation related to this application and the Personal Information it collects and processes submit your request to [Data Subject Access Request](#).

### **III. OTHER PROVISIONS**

#### **A. DATA RETENTION**

PowerSchool retains Collected Data only for the length of time needed to provide services to you. You may submit a request for us to delete your Personal Information from the product. You acknowledge this means once we process this request, you may not be able to use any of the services of the product.

#### **B. USER CONSENT.**

By clicking on “I CONSENT AND ACCEPT” button in response to the Terms of Use (“**ToU**”) presented to you in the Headed2, you consent to our use of your personal information, Collected Data, in accordance with the ToU of Headed2 and the Global Privacy Statement including this Supplement.

#### **C. NOTIFICATION REGARDING PRIVACY POLICY UPDATES**

From time to time, we may update this Headed2 Privacy Supplement and the Global Privacy Statement. We encourage you to periodically review these documents in case we make changes.

If we have your contact information on record, we will also notify you via email of material changes prior to making the change.

## **D. DISCLOSURE OF COLLECTED DATA**

We may share and disclose Information in the following ways or for any other purpose disclosed at the time of collection:

- 1.** Legal and law enforcement purposes. We may disclose Collected Data in response to legal process, for example in response to a court order or a subpoena, or in response to a law enforcement agency's request. We also may disclose such Collection Data to third parties: (i) in connection with fraud prevention activities, (ii) where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, (iii) in situations that may involve violations of our terms of use or other rules, (iv) to protect our rights.
- 2.** Change of control. We may transfer Collected Data in the event of a business transaction, such as if we or one of our business units or our relevant assets are acquired by, sold to, or merged with another company or as part of a bankruptcy proceeding or a business reorganization. Such transfer would not change the scope of your consent given to PowerSchool as data controller of the Collected Data.
- 3. 3.** Additional consent. We may otherwise disclose Collected Data when you provide PowerSchool with additional consent to do so.

## **E. Children's Privacy**

We offer a restricted version of the Headed2 service for children (under 13) and teens (13-16). When users first create an account, we ask for a date of birth which we use to determine the appropriate experience for the age group. The user is asked to provide a username, optional first name, optional last name, date of birth, state, optional school name and optional graduation year. This information helps us create a user profile and provides login credentials to access the account.

We also ask that children provide a parent or guardian email address which we use to deliver notice of the child's participation and to seek consent for the use of Headed2. The parent or guardian would need to click the "I

“I CONSENT AND ACCEPT” button on their children’s behalf to enable completion of the account set up. If the parent does not actively approve the account within 30 days of receiving the email, we will promptly delete all information collected from the child. Teens must provide their consent to opt-in to the application by clicking the “I CONSENT AND ACCEPT” button to evidence their opt-in and to complete their account set up on the application.

Once consent is provided by parents for children, then they and consenting teens can use the resume builder, letter builder and journal features w; however, any content uploaded by a child will not be shared with Navigators or other Explorers.

We do not collect personal information from children without prior parental consent. If we discover that we have collected a child’s information prior to obtaining parental consent, we will take steps to immediately obtain consent or delete the collected information.

Information collected automatically. We collect information about the pages your device’s browser visits and how your browser accesses and uses the Website by using cookies, tracking technologies and other third-party analytics tools. Specifically, we and our service providers use cookies and similar technologies such as local storage (HTML5), web beacons, JavaScript, and eTags on our website. This includes information about the devices you use to access the Websites including, but not limited to, unique device identifiers, IP address, operating system, browser, and cookies. Depending on your device settings, we may also collect information about your approximate geographical location. You can learn about our use of cookies, and set your preferences, in our [Cookie Statement](#).

If you are a teen or parent/guardian of a child and you would like to request to access, review, modify or delete your child’s information, please contact us at the information provided below or by filling the [Data Subject Access Request](#) form.

### **Service providers used in relation to children**

For this application, PowerSchool uses certain service providers. Some service providers assist us in processing the personal information you provide to this application. A summary of the most relevant service providers for the Headed2 application and the services they provide the application is below:

Service Provider	Service	Location
Amazon Web Service (AWS)	Cloud hosting service	United States

We use Google Analytics to give us insights about how you use the service and to help us provide you with the best experience. Google Analytics collects an IP address to determine location at a city level only. Google Analytics does not share any information with any other third parties.

If you or your parent have any questions about the use of service providers, please contact us at [privacy@powerschool.com](mailto:privacy@powerschool.com).

### Security

Headed2 uses generally accepted security measures and safeguards in an attempt to keep the data collected secure and requires that all service providers we work with agree to do the same. The measures and safeguards include limiting access to the data to those persons who need it to complete their work, encryption, using a fire-wall protected environment, and storing all personal information in secure operating systems. However, no security safeguards are 100% secure and we cannot guarantee the security of your information.

### Contact Information

If you have any questions about this policy or our collection and use practices, please contact us at:

#### PowerSchool Holdings, Inc.

150 Parkshore Dr. Folsom, CA 95630

USA

ATTN: Privacy

Chief Privacy Officer