# Squirrel Ai Learning, Inc. Privacy Policy

Last updated: 10/01/2026, 2026

Please click here for a printable PDF version of this notice.

## About Squirrel Ai Learning, Inc.

Squirrel Ai Learning, Inc. provides an artificial intelligence ("AI")-enabled educational device and related software services for K-12 learners and their parents and guardians. Our devices and software are offered in company-operated or franchised Squirrel Ai Learning, Inc. learning centers ("Learning Centers").

## Scope of this Policy

This Privacy Policy applies to:

- Squirrel Ai Learning, Inc. and our affiliates ("Squirrel Ai," "we," "us," "our").
- Squirrel Ai's online properties (including our websites and online services that link to it), our social media pages or handles, and our learning devices and services (the "Services").
- Our handling of information about identifiable individuals ("personal information").

This Policy applies when you interact with us, including through our Services or as a Learning Center operator. It also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

We may change this Policy from time to time. If we make material changes, we will notify you by posting the updated version on this page with a revised effective date. We encourage you to review this Policy periodically.

**Parents of learners under 14 years of age should read our Children's Privacy Notice for information about how we handle the personal information of learners under 14 years of age**.

### Information We Collect

We collect information from you directly, from the devices you use to interact with us, and from other sources. We may combine information from the Services together with other information we obtain from our business records. The types of personal information we collect depend on how you interact with us and the information you choose to provide. We also collect different types of personal information depending on your relationship with us, including whether you are a learner, a parent or guardian, or in another group.

#### *Learners*

We collect information from learners (students using our educational Services) to provide personalized learning experiences. This may include:

- **Account and profile information**, including name, username, date of birth, grade level, gender, school, and region, which we use to set up learner profiles and match educational content to the learner's context.

- **Learning records and educational data**, including learner answers, responses, mistake records, progress records, study duration, performance data, and related activity information used to deliver learning functions, generate reports, and improve educational recommendations. This also includes technical information about how our Services are used.

- **Audio and voice information**, including voice input and related interaction data collected when learners use voice-enabled features such as speech-to-text, oral practice, voice assistant functions, and voice-based learning interactions.

- **Images and visual data**, including images of learner work captured through the device camera for features such as QR code scanning, uploading homework or assignments, and visual learning functions. If you choose to enable it, this can also include biometric information. See "Note on learner facial data" below for more information.

- **User-submitted content**, including materials uploaded to support educational services and content created through interaction with the Services.

- **Device location,** if you choose to enable it. We may collect device location information and location-related technical data, such as IP address, nearby Wi-Fi hotspots, and cellular signal parameters, to determine the location of a learning device. Location information is used to: (i) enable device recovery features that help parents locate or recover a lost or stolen device; (ii) detect cross-region use of the device; and (iii) support location-based features. You may revoke consent to location collection at any time by disabling location permissions on your device. If location permissions are disabled, location-dependent features may not function properly.

***Note on learner facial data***

If you choose to enable it, we may collect information about learners' facial features, which we use to create face prints. Face prints are used to verify the learner's identity when they log in and enable account security features. We can also use facial data to assess how a learner responds to lessons through our focus and emotion analysis features. This helps us further personalize their learning.

We take the collection of this information seriously. We obtain express opt-in consent before collecting biometric information. Biometric data is processed locally on the device [or encrypted during transmission]. We only use this data for the purposes described above.

You may disable biometric features at any time through your device settings.

For more information about how we handle the personal information of learners, please review our Children's Privacy Notice.

### *Parents and Guardians*

We collect information from parents and guardians to facilitate account management, communications, and to obtain consent for the collection of information from learners under 14 years of age. This may include:

- **Contact information,** including name, email address, and telephone number, used to communicate about the learner's progress, account management, and service updates.

- **Consent and verification information** provided when enrolling a learner under 14 years of age, including acknowledgment of privacy notices and consent to our data practices.

- **Payment information**, including credit card or payment method details, which are collected directly by our payment processor service provider.

- **Communications with us**, including inquiries, feedback, and support requests.

### *Other groups*

We also collect information from anyone else who interacts with us or our Services, including website visitors and Learning Center operators:

- **Website visitors:** We collect device, browsing activity, and other technical information when you visit our websites. This includes the following:

- *Device information*, including IP address, device identifiers (such as MAC address and IMEI), operating system and web browser details, device serial number, hardware model, device telemetry, connectivity data, system status, and technical diagnostics for the learning device.
- *Analytical information*, including details about your interaction with our Services, website, and learning device, such as pages visited, time on site, referral source, features accessed, and search history.
- *Diagnostic information*, including web traffic logs, crash data, error logs, performance data, bandwidth usage, and related technical records needed to maintain and troubleshoot the Services.

Please see "Cookies and Similar Technologies" below for details on how we collect this information.

- **Learning Center operators**: We collect business contact information, franchise application details, and information necessary to operate a Learning Center, which may include credit history information from credit reporting agencies for potential franchise owners. We may also collect information about you that is available publicly.
- **Job applicants**: If you apply for a job with us, we collect information you provide in connection with your application, including employment history, qualifications, and references. We also collect your contact information, and information about your background. We may also collect information about you that is available publicly.

### *Information we collect from other sources*

We may collect the following information about you from third-party sources.

- Information provided by our local Learning Centers, including enrollment information, learner profiles, learning history, and learning outcomes.
- Information provided by parents or guardians of learners.
- Information provided by service providers that support our platforms or perform intake support and may collect information directly from you.
- If you are a potential Learning Center owner, we may collect information about your credit history from credit reporting agencies.
- If you are a job applicant, we may collect information about you from organizations that conduct background checks.

**You may revoke your consent at any time in whole or in part.** If you wish to revoke your consent, you may contact us at info@squirrelai.com.

## How We Use Your Information

We may use the information we collect for the following purposes. The specific information used depends on how you interact with our Services and the features you use.

- **Providing our Services**: To provide you with our products and services, including to create and manage your account, authenticate your identity, provide speech-to-text functionality and related audio-based learning functions, deliver personalized learning content, communicate with you about your account or transactions, send you information about features and enhancements, and notify you of updates.

- **Identity verification and facial recognition**: With your express consent, we may use your biometric information (i.e., face prints) to verify your identity, enable secure account login, and assess learner engagement and response to lessons through focus and emotion analysis features.

- **Service improvement and development**: To improve and develop our Services, including to maintain, support, enhance, evaluate, analyze, diagnose, and demonstrate the effectiveness of the Services; develop new products and services; understand how our Services are used; respond to customer service and technical support requests; and understand our customer base. We may create de-identified or anonymized data from personal information and use it for these purposes, including for aggregate reporting, analytics, general research, developing new educational technologies and programs, and improving educational services.

- **Personalization and adaptive learning**: To personalize content and learning recommendations based on learner performance, progress, strengths, and challenges. Our AI-driven Services analyze learner data to develop personalized lessons that adjust in real time to each learner's needs.

- **Marketing**: To market our Services directly to parents and guardians via email. We do not direct marketing to learners. You may opt out of marketing communications at any time by following the unsubscribe instructions in our emails or by contacting us.

- **Security**: To protect and secure our Services, assets, network, and business operations; detect, investigate, and prevent theft, unauthorized use, or abuse of the Services; and protect against fraudulent, harmful, unauthorized, unethical, or illegal activity.

- **Device recovery and risk control**: With your consent, we use your precise geolocation information to enable you to locate and recover a lost or stolen device and for business risk control purposes, such as detecting cross-region use of the device.

- **Legal compliance**: To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal and regulatory requirements.

- **Protection**: As otherwise needed to protect us, our rights, property, or interests. This may include investigating or preventing unlawful or otherwise harmful activities.

For a more detailed understanding of how your information is used, please read our product design feature disclosures.

## How We Share Your Information

We may share the information we collect as described below. We do not sell personal information.

- **Affiliates**: We may share information with other members of our corporate group, including our parent company, Shanghai Squirrel Cloud Artificial Intelligence Technology Co., Ltd., Squirrel Ai Learning, Inc., a corporation organized under the laws of the People's Republic of China, and its affiliates. We do not share identifiable personal information with our parent company or affiliates located outside of Canada. Any sharing of information is for purposes such as aggregate reporting, analytics, research, and service improvement, and cannot be used to identify any individual.

- **Service providers**: We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are contractually obligated to use information that we share only for the purpose of providing these business functions, which include:
    - *Supporting Service functionality*, such as vendors that support payment processing, customer service and customer relationship management, account management, freight services, software development, postal mailings, and communications.
    - *Auditing and accounting firms*, such as firms that help us create our financial records.

- *Professional services consultants*, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
- *Analytics and marketing services*, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
- *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
- *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
- *Marketing vendors*, such as entities that support distribution of marketing emails.

- **Learning Centers**: We may share your information with local Learning Center operators, tutors, coaches, administrators, or authorized personnel as needed to provide requested educational services, scheduling, parent communications, progress visibility, and support.

- **Social media and marketing platforms**: If you interact with us on social media platforms, the platform may collect information about you and your interaction with us. If you interact with social media features on our Services (for example, by clicking a Facebook "like" button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform. We may also share personal information as part of our online advertising activities, as described under "Cookies and Similar Technologies" below.

- **Government entities and law enforcement**: We may share information when we believe in good faith that we are legally authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests; where necessary to protect our property, rights, or the health and safety of our employees, contractors, customers, or other individuals; or to comply with applicable laws.

- **Business transactions**: We may share personal information with third parties as part of a business transaction, such as the sale of part or all of our business or assets, or as part of a financing transaction.

We may also share your information to protect us, including our rights, property, or interests. This may include investigating or preventing unlawful or otherwise harmful activities.

## Cookies and Similar Technologies

We and our service providers use cookies and similar technologies to operate our Services, enhance performance and functionality, and perform analytics. This section explains the types of technologies we use and how you can manage your preferences.

### *Types of cookies and similar technologies*

We use the following types of cookies and similar technologies:

- **Essential cookies**: These cookies are essential to enable basic functionality of our Services, such as enabling persistent logins, maintaining user preferences, and authenticating your identity. These cookies cannot be disabled.

- **Statistics cookies**: These cookies help us understand how visitors interact with our Services by collecting information about pages visited, time spent on pages, and any errors encountered. We use this information to improve our Services and diagnose technical issues.

- **Marketing cookies**: We use marketing cookies to advertise to you and others who may be interested in our Services. This can be based on your interests, online activities, and other information we or our advertising

partners may collect. This may include sharing information with our online advertising partners to improve and measure the effectiveness of our marketing.

For more information on the types of cookies and similar technologies that we use, and to enable or disable them, click here. You may also be able to disable cookies in your browser or mobile device using their settings menus. Because we use cookies to support Service functionality, disabling cookies may also disable some elements of our Services.

### *Google Analytics*

We use Google Analytics and similar services to measure traffic and usage trends for our Services and to understand more about user demographics. These services collect information about how you use our Services, including pages visited, time on site, and referral source. To learn more about how Google uses data, visit www.google.com/policies/privacy/partners/. You can opt out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on, available at tools.google.com/dlpage/gaoptout.

## Special Information for Job Applicants and Potential Franchise Owners

When you apply for a job with us or request information about owning a Squirrel Ai franchise, we may collect information from you, including:

- Information you provide in connection with your application.
- Information about you that is available publicly.
- Information that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

## Other Important Information

### *Cross-border transfers*

Personal information may be stored and processed in the United States or other countries where our service providers maintain facilities. When personal information is transferred outside of Canada, we take steps to ensure that it receives an equivalent level of protection through contractual arrangements with our service providers. However, personal information stored in another jurisdiction may be accessible by local governmental and law enforcement agencies pursuant to the laws of that jurisdiction. Please note that we do not store or handle personal information in China.

### *Data retention*

We may store information about you for as long as we have a legitimate business need for it. We determine the retention period for the personal information that we collect based on (1) the length of time we need to retain the information to achieve the purposes for which we collected it, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated litigation or investigation.

We generally retain learner data for one year after account closure or inactivity.

### *Automated decisions about learners*

Our AI-driven Services analyze learner data to develop personalized lessons that adjust in real time to each learner's strengths and challenges. Automated processing is used for the following purposes:

- **Adaptive learning**: Our algorithms analyze learner responses, performance patterns, and progress to automatically select and sequence learning content tailored to each learner's current level of understanding and learning needs.

- **Performance assessment**: Automated systems evaluate learner answers and responses to assess understanding, identify knowledge gaps, and measure progress over time.

- **Focus and engagement analysis**: With consent, automated systems may analyze visual data to assess learner focus and emotional engagement during learning sessions.

If you have a question or concern regarding a specific automated decision we have made, please contact us using the information under "Contact Us" below.

### *Security*

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services based on the sensitivity of the information. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that others operate on our behalf.

## Your Rights and Choices

Depending on your jurisdiction, you may have certain rights with respect to your personal information. Below we describe certain rights and choices, and how to exercise them.

- **Email unsubscribe**: If you do not wish to receive marketing information from us or wish to opt out of future email promotions from us, you can click the "unsubscribe" link in the email or contact us.

- **Withdraw consent**: You can request to withdraw your consent at any time. When we receive a request from you, we will inform you of the potential consequences of withdrawing your consent based on the circumstances. In some cases, it may mean that we are no longer able to provide you with our Services.

- **Request access**: You can request access to the personal information we hold about you and receive a copy of that information, subject to certain exceptions.

- **Update or request correction:** To update your account information, you can visit your account page. For other information, you can request that we correct inaccurate or incomplete personal information we hold about you.

- **Request deletion**: You can request that we delete your personal information, subject to certain exceptions.

- **Request transfer**: In some jurisdictions, you can request that we transfer your personal information to a third party in certain formats.

To submit a request described above, you can contact us using the information below.

## Contact us

Please contact us if you have questions, requests, or concerns regarding this Policy or how we handle your personal information using the information below.

Email: info@squirrelai.com

Telephone: 213-316-6586 or 213-260-1585

Mail: Squirrel Ai Learning Inc., 800 Bellevue Way NE, Suite 500, Bellevue, WA 98 004

For requests to access, correct, or transfer your personal information, you can also submit a form using this page.

Please note that we may need to verify your identity before responding to your request.