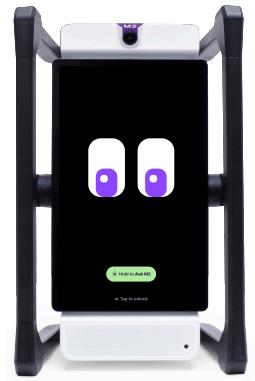


# Privacy statement



Swivl boasts extensive expertise in crafting cloud infrastructures tailored to the exacting standards of major school districts and education departments. Our leading solution, Reflectivity, has successfully navigated a myriad of industry security evaluations, third-party assessments, and rigorous penetration tests. This wealth of experience positions us adeptly for the development of our MirrorTalk software.

In our commitment to ensuring the safety of student and teacher Personally Identifiable Information (PII) when considering the adoption of MirrorTalk, we have implemented several protective measures:

## Data anonymization

We make sure that we strip all PII prior to using their services. This makes the data we pass as anonymous as possible. For example, we do not send videos or audio. We convert all recordings into transcripts which are devoid of PII.

## Data governance

We make sure not to store or allow any of the data to be used for training or other purposes by the AI partners.

## Secure cloud infrastructure

We are deploying our own AI services where possible using our own secure cloud infrastructure.

## Native AI services

We are developing a number of AI services that will be able to run natively on M2 hardware, which will not only optimize the performance but also reduce the privacy risks.