

# Symphony Classroom Solution Privacy Policy

Last Updated and Effective: April 30, 2022

## INTRODUCTION AND SCOPE OF THIS POLICY

This Privacy Policy describes how Merlyn Mind, Inc. (“**Merlyn Mind**,” “**we**,” “**our**,” or “**us**”) collects, uses, shares, stores, and otherwise processes Personal Information that is submitted to us or that we otherwise obtain or collect through the Symphony Classroom Solution and its services. This Privacy Policy does not apply to other Merlyn Mind websites or applications, including [www.merlyn.org](http://www.merlyn.org), which is governed by the privacy policy available [here](#).

### *Table of Contents*

- [1. DEFINITIONS](#)
- [2. INFORMATION WE COLLECT](#)
- [3. HOW WE COLLECT PERSONAL INFORMATION](#)
- [4. HOW WE MAY USE AND DISCLOSE PERSONAL INFORMATION](#)
- [5. ADDITIONAL INFORMATION REGARDING CHILDREN AND STUDENT DATA PRIVACY](#)
- [6. HOW TO ACCESS AND MODIFY YOUR INFORMATION](#)
- [7. LINKS TO OTHER SITES](#)
- [8. DATA RETENTION](#)
- [9. SECURITY](#)
- [10. UPDATING COMMUNICATIONS PREFERENCES AND WITHDRAWING CONSENT](#)
- [11. ADDITIONAL DISCLOSURES FOR UNITED KINGDOM \(UK\)/EUROPEAN UNION \(EU\)/EUROPEAN ECONOMIC AREA \(EEA\) RESIDENTS](#)
- [12. TRANSFER OF DATA TO THE UNITED STATES](#)
- [13. UPDATES TO THIS PRIVACY POLICY](#)
- [14. CONTACT INFORMATION](#)

## 1. DEFINITIONS

For purposes of this Privacy Policy, the following definitions apply:

- “Instructor” means an instructor, teacher, school official, representative, or agent employed by, working at the direction of, or under the control of the Institution or a school or educational authority under the control of the Institution, who is above the age of majority pursuant to applicable law. The Instructor is authorized by the IT Administrator to use and deploy the Symphony Classroom Solution.
- “Institution” means the school or educational authority that uses or deploys the Symphony Classroom Solution pursuant to Merlyn Mind’s Customer Agreement.
- “Institution Users” refers to Instructors and IT Administrators, collectively. “Institution Users” does not include Participants.
- “IT Administrator” means the individual(s) specifically designated and authorized by the Institution to use the IT Administration Portal to (i) Register Instructors, and (ii) Register and Onboard the Symphony Classroom AI Hubs, and (iii) register any other Symphony Classroom Offerings as required. .

- “Symphony Classroom Solution” means the Symphony Classroom AI Hub, Desktop Application, Browser Extension, Remote, Merlyn Instructor Portal, IT Administration Portal, other Symphony Classroom Offerings and associated software and hardware and Updates made available by Merlyn Mind from time to time, which may include software and technology of Merlyn Mind’s third-party licensors.
- “Participant” means any person, including students, attending or present while the Symphony Classroom Solution is used or deployed. “Participant” does not include an Instructor or IT Administrator.
- “Personal Information” means information that identifies or relates to a specific, natural person that is protected under applicable laws, including Voice Audio.
- “Voice Audio” means spoken or audible speech, utterances, phrases, and sounds from or by a natural person within range of the Symphony Classroom Solution.
- “Wake Word” means the word(s) designated to activate the Symphony Classroom Solution (e.g., “Hey, Merlyn”).

Other capitalized terms not defined in this Privacy Policy have the meaning ascribed to them in our Terms of Use.

## **2. INFORMATION WE COLLECT**

As described in this Privacy Policy, Merlyn Mind collects certain Personal Information from or about Institution Users and Participants (collectively, “you” or “your”) in connection with the Institution’s use and deployment of the Symphony Classroom Solution and provision of its services.

### **Institution Users**

We may collect the following information regarding Institution Users:

- Identifiers and contact information, such as first name and last name, email address, street address, job title, phone number, username, and password;
- Voice Audio from Institution Users that is captured by the Symphony Classroom Solution;

We also generate transcripts of (i) Voice Audio captured by the Symphony Classroom Solution, and (ii) the Symphony Classroom Solution’s responses to recognized commands.

### **Participants**

The Symphony Classroom Solution is designed to support classroom orchestration under the direction of the Institution and its Institution Users. Institutions and their Institution Users may elect to provide certain student roster information and may permit Participants, including students, to interact with the Symphony Classroom Solution in accordance with Merlyn Mind’s Customer Agreement and applicable law. Merlyn Mind may collect the following information regarding Participants:

- Student roster information, such as name and email address, if Institutions or Institution Users submit this information to Merlyn Mind or the Symphony Classroom Solution;
- Voice Audio from Participants that is captured by the Symphony Classroom Solution;

We also generate transcripts of (i) Voice Audio captured by the Symphony Classroom Solution, and (ii) the Symphony Classroom Solution's responses to recognized commands.

In addition, ambient classroom noise and Participant Voice Audio may be captured by the Symphony Classroom Solution, even if the Participant is not directly interacting with or commanding the Symphony Classroom Solution, as further detailed in this Privacy Policy.

MERLYN MIND DOES NOT USE VOICE AUDIO FOR PURPOSES OF IDENTIFYING INDIVIDUAL STUDENTS.

For more information on our commitment to protecting student data privacy, see Section 5 of this Privacy Policy:

[Additional Information Regarding Children and Student Data Privacy Protections.](#)

### **Device Pairing and Usage Information**

When using the Symphony Classroom Solution, we may access and collect information from Institution Users' device or browser, or from other devices in the classroom that connect with the Symphony Classroom Solution. This may include information such as the device's IP address, including device location derived from the IP address, device ID, browser type and machine model, the length of time that the Symphony Classroom Solution is powered on, device settings and configurations, and extended display identification data ("EDID") of devices connecting to the Symphony Classroom Solution. We may also collect information about Institution Users' interactions with the Symphony Classroom Solution, including the quality of the audio processed by the Symphony Classroom Solution and the commands provided, which may include the type and number of requests made of the Symphony Classroom Solution (including via Voice Audio commands and clicks on and interactions with the Remote), browsing history, clickstream patterns, location, and websites stored in the bookmarks or similar section of the browser when interacting with the Symphony Classroom Solution. For purposes of this Privacy Policy, we refer to the various types of information described in this section collectively as "Usage Information." We aggregate Usage Information and use it to deliver, maintain, and improve the Symphony Classroom Solution, including, for example, to understand how the Symphony Classroom Solution is being used, such as to identify common commands, for troubleshooting and customer support, and to help maintain the security of the Symphony Classroom Solution. When Usage Information is not de-identified, or is otherwise in a format that is identifiable or relates to a specific, natural person, we treat such information as Personal Information in accordance with this Privacy Policy.

When an Institution User Pairs their Instructor Device through an Institution's third-party single sign-on provider supported by the Symphony Classroom Solution, we have access to the files and related information within the Institution User's drive that the Institution User shares with Merlyn Mind in order to respond to the Institution User's commands and interactions with the Symphony Classroom Solution. For example, when the Institution User Enrolls with a Google account and agrees to the necessary permissions, Merlyn Mind will be provided with the ability to display files or other content in the Institution User's Google Drive if the Institution User commands it. Merlyn Mind does not store files from Institution Users' Google Drive accounts and does not access such files except as necessary to provide the services and in accordance with the Institution User permissions and commands.

### **De-identified Data**

We may create and retain de-identified data, including de-identified transcript data and Usage Information, and we may use the de-identified data for legally permissible purposes, including product improvement purposes.

### 3. HOW WE COLLECT PERSONAL INFORMATION

We collect Personal Information as described in this Privacy Policy, including when you submit it to us, during the course of the Institution's use and deployment of the Symphony Classroom Solution as described above, and as follows:

#### How We Collect Voice Audio and Transcripts

The Symphony Classroom Solution is activated when: (i) the Symphony Classroom Solution recognizes an utterance as the Wake Word; or (ii) the Remote push-to-talk button is used to communicate with the Symphony Classroom Solution. The Symphony Classroom AI Hub also may include a light indicator and a chime to indicate when the Symphony Classroom Solution is activated.

- **Prior to activation of the Symphony Classroom Solution:** While the Symphony Classroom Solution is powered on and before it is activated, the Symphony Classroom Solution will capture all Voice Audio in order to recognize the Wake Word. Until the Symphony Classroom Solution is activated, any Voice Audio received by the Symphony Classroom Solution is overwritten and deleted programmatically in periodic, brief intervals. Merlyn Mind does not generate a transcript of the Voice Audio unless the Symphony Classroom Solution is activated.
- **Upon activation of the Symphony Classroom Solution:** Once the Symphony Classroom Solution is activated, the Symphony Classroom Solution records Voice Audio that occurs in proximity with the delivery of a recognized command. The Symphony Classroom Solution subsequently generates a transcript of the Voice Audio, and the Symphony Classroom Solution then no longer retains the Voice Audio.

Please note, the Symphony Classroom Solution also may capture, and be activated by, Voice Audio, including background voices, spoken words, or noise, that are not intended as the Wake Word or as a command, but that the Symphony Classroom Solution may misinterpret as the Wake Word or a command (e.g., if the Symphony Classroom Solution misinterprets an utterance as the Wake Word). As noted above, after the transcript is generated, Merlyn Mind no longer retains the Voice Audio.

For additional information on how we use and share Voice Audio, see Section 4 of this Privacy Policy: [How We May Use and Disclose Personal Information](#).

#### How We Collect Other Personal Information

- **Device Onboarding and Enrollment:** We collect Personal Information during the Onboarding and Enrollment process. The Institution or Institution User may also have the option to provide us with student roster information consisting of student first and last names and email addresses during Enrollment. This information may be provided directly from the Institution or Institution Users or through an Institution's third-party provider supported by the Symphony Classroom Solution.
- **Institution Users' Communications with Us:** We may also collect Personal Information when Institutions or Institution Users communicate with or submit information to us, including submitting inquiries, participating in surveys, or requesting information or support for the services. Additionally, we may collect Personal Information when Institution Users subscribe or sign up to receive communications, materials, or other information from us.
- **Third-Party Sources:** We may collect certain Personal Information from third-party sources utilized by an Institution, such as the Institution's single sign-on provider. This Personal Information includes the Institution User's name, email address, and account credentials (e.g., username and password). We may also access files and

other information and content that Institution Users make available in their third-party drives that are Paired with the Solution. As noted above, Merlyn Mind does not store files from Institution Users' Google Drive accounts and does not access such files except as necessary to provide the services and in accordance with the Institution User permissions and commands.

#### 4. HOW WE MAY USE AND DISCLOSE PERSONAL INFORMATION

WE DO NOT USE VOICE AUDIO FOR THE PURPOSE OF IDENTIFYING INDIVIDUALS. WE DO NOT SEND MARKETING MESSAGES TO STUDENTS OR USE OR SHARE STUDENT PERSONAL INFORMATION FOR MARKETING OR ADVERTISING PURPOSES.

We use student Personal Information to provide the Symphony Classroom Solution and services in support of the legitimate educational interests of the Institution as governed by our agreement with that Institution, and subject to the requirement that the Institution obtain any necessary consents to use and deploy the Symphony Classroom Solution.

We use and disclose Personal Information to provide the Symphony Classroom Solution and as described in this Privacy Policy, including for the following purposes:

Categories of Personal Information	How We May Use and Disclose Personal Information
<p><b>Voice Audio</b></p>	<ul style="list-style-type: none"> <li>• <b>To provide and maintain the Symphony Classroom Solution:</b> We use Voice Audio in order to provide the Symphony Classroom Solution and its services, including to respond to recognized commands and Wake Words and to generate transcripts of Voice Audio, as described above. We may share Voice Audio and transcripts with our third-party providers in order to facilitate the delivery of the Symphony Classroom Solution and to provide certain features and services on our behalf, such as voice processing, technical support, and maintenance. As noted above, after Voice Audio is overwritten or a transcript is generated, Merlyn Mind no longer retains that Voice Audio.</li> <li>• <b>To provide customer support,</b> as needed, such as for troubleshooting, debugging, and to resolve customer support issues.</li> <li>• We do <u>not</u> use or share Voice Audio or transcripts for marketing or advertising purposes.</li> </ul>
<p><b>Transcripts and Usage Information</b></p>	<ul style="list-style-type: none"> <li>• <b>To provide and maintain the Symphony Classroom Solution,</b> as described above.</li> <li>• <b>To contact and communicate with Institutions and Institution Users and to provide customer support,</b> including to provide Institutions with aggregate reports on their Institution Users' use of the Symphony Classroom Solution, customize the Institution Users' experiences, provide Institutions and Institution Users with recommendations and training on the Symphony Classroom Solution, such as maximizing their user experience, resolve a problem or support issue, notify Institutions and Institution Users about changes to the Symphony Classroom Solution, and to otherwise communicate and request feedback on Institutions' and Institution Users' experiences with the Symphony Classroom Solution.</li> </ul>
<p><b>Identifiers and Contact Information</b></p>	<ul style="list-style-type: none"> <li>• <b>To provide and maintain the Symphony Classroom Solution,</b> as described above.</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>To contact and communicate with Institutions and Institution Users and to provide customer support</b>, as described above.</li> <li>• <b>To administer and manage account credentials</b>, including to create and validate Institution User accounts, authenticate Institution Users, and maintain and administer Symphony Classroom Solution and Institution User accounts.</li> <li>• <b>To provide Institutions and Institution Users with marketing materials</b>, such as updates and offers about our products, or requests for feedback or participation in surveys. At any time, recipients may unsubscribe from further communication on any electronic marketing communication by using the link labeled “unsubscribe” available in each email communication or by contacting us at <a href="mailto:privacy@merlyn.org">privacy@merlyn.org</a>.</li> </ul>
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### Uses and Disclosures for Legal and Safety Purposes

In certain cases, we may also use or disclose Personal Information:

- **To protect our rights** or the rights and safety of you or other third parties, or as necessary in the event of a court order, regulatory inquiry, or other lawful request.
- **In relation to a known or suspected illegal activity, unlawful use, or violation of our agreements or terms of use, and for fraud, loss, or crime prevention**, including to share Personal Information with entities assisting us in investigations or prevention efforts and as may be required by applicable law.
- **In connection with legal or regulatory obligations:** We may use and disclose Personal Information as necessary or appropriate to protect our rights or the rights and safety of you or other third parties, to enforce agreements and to assert and defend against legal claims, and for legal and compliance purposes or as otherwise necessary in the event of a court order, regulatory inquiry, or other lawful request.
- **In the event of a reorganization, merger, sale, assignment, bankruptcy, or similar business change:** Subject to applicable law, we may need to transfer Personal Information to a re-organized entity or a successor organization in connection with the sale or reorganization, including for purposes of conducting due diligence to determine whether to proceed with any such transaction. If any such transaction occurs, the purchaser will be entitled to use and disclose the Personal Information collected by us in the same manner that we are able to, and the purchaser will assume the rights and obligations regarding Personal Information in accordance with this Privacy Policy.

### Categories of Third Parties With Whom We May Share Personal Information

We will share or disclose your Personal Information with the following third parties or categories of third parties for the purposes described above:

- Providers of single sign-on and authentication services used by an Institution and supported by the Symphony Classroom Solution, whose services may also be used to provide the Symphony Classroom Solution with roster information (including Google, in circumstances where Institution Users Enroll with a Google Account).
- Providers of technology and services that enable the Symphony Classroom Solution to process Voice Audio (for example, Google’s Speech-to-Text Technology).
- Third parties whose services are integrated with the Symphony Classroom Solution to respond to specific commands; for example, to tell you the time, or the weather.

- Cloud service providers (including Amazon), whose services we use to store personal information collected through the Symphony Classroom Solution.
- Companies that assist us with our sales, marketing and customer relationship management activities (such as Salesforce). (We use these companies to maintain our business relationship with the Institution. These companies do not have access to student Personal Information).

Other service providers and sub-contractors, including suppliers of technical and support services, which may require certain Personal Information in order to help us provide the Symphony Classroom Solution and its services. You can find a full list of those third parties [here](#). We may share your Personal Information with our group companies under our common control or within our corporate family for the purposes described in this Privacy Policy.

## 5. ADDITIONAL INFORMATION REGARDING CHILDREN AND STUDENT DATA PRIVACY

As noted above, we use student Personal Information only to support the legitimate educational interests of the Institution as governed by our agreement with that Institution, and we require the Institution to obtain any necessary consents to use and deploy the Symphony Classroom Solution.

### **Family Educational Rights and Privacy Act (FERPA)**

As applicable, we ask Institution customers to designate us as a “school official” as the term is used in FERPA, 34 C.F.R. §99 et. seq. As a “school official,” we agree to be bound by the relevant provisions of FERPA, including that we will remain under the “direct control” of our Institutions with respect to the use and handling of any FERPA-protected “education records.”

### **Participants Under Age 13**

We operate in compliance with the Children’s Online Privacy Protection Act (“COPPA”) and applicable laws covering children’s Personal Information. If our Institutions choose to use the Symphony Classroom Solution in environments with Participants under age 13 or otherwise under the age of consent in their country, we ask the Institution to obtain any necessary prior, verifiable parental consent. If we become aware that a minor Participant has provided us with, or we have otherwise collected, Personal Information without appropriate consent, we will take steps to delete it and comply with other applicable COPPA obligations.

## 6. HOW TO ACCESS AND MODIFY YOUR INFORMATION

Institution Users may review, correct, update, or request that we delete their Personal Information or that of their Participants by contacting us at [privacy@merlyn.org](mailto:privacy@merlyn.org). Institution Users may also update their information in their account settings.

Since the Symphony Classroom Solution is used under the direction of Institutions, parents and legal guardians should work directly with their Institution to review, modify, or request deletion of their child’s Personal Information submitted to and stored by the Symphony Classroom Solution, if applicable. We will work with Institutions as needed to facilitate addressing those requests.

## **7. LINKS TO OTHER SITES**

The Symphony Classroom Solution may contain links or otherwise provide access to third-party websites, solutions, applications, or Internet location (collectively “Third-Party Sites”). For example, when Institution Users Enroll through a supported third-party single sign-on provider, they are providing information (including Personal Information) directly to third parties outside of Merlyn Mind. Please note that we have no control over and are not responsible for Third-Party Sites, their content, or any goods or services available through the Third-Party Sites. Our Privacy Policy does not apply to Third-Party Sites. We encourage you to read the privacy policies of any Third-Party Site with which you choose to interact.

## **8. DATA RETENTION**

We retain Personal Information for as long as is necessary to fulfill the purposes for which we obtained the Personal Information, including to provide the Symphony Classroom Solution and its services, or for such longer period as may be required or permitted by applicable law. We will also retain Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and policies.

Subject to applicable law, it is our policy to delete Personal Information within 90 days of contract termination, or within 30 days of a valid deletion request or notification from an Institution of an Institution User account termination, unless we are required by law to retain such information for a longer period. As noted above, after Voice Audio is overwritten or a transcript is generated, Merlyn Mind no longer retains that Voice Audio. It is our policy to de-identify transcripts within six (6) months of the transcript being generated.

We retain de-identified information, including aggregated, de-identified information for legally permissible purposes, including to develop and improve our educational products and to demonstrate the effectiveness of the Symphony Classroom Solution, including in our marketing materials.

## **9. SECURITY**

We implement information security safeguards designed to protect Personal Information against risks of loss, unauthorized access, destruction, misuse, modification, or inadvertent or improper disclosure. Please note, however, the Internet is not perfectly secure, and we cannot fully eliminate security risks associated with the storage and transmission of Personal Information.

## **10. UPDATING COMMUNICATIONS PREFERENCES AND WITHDRAWING CONSENT**

Where consent is the basis of processing, you may at any time withdraw the consent you provided for the processing of your Personal Information by contacting us at [\*\*privacy@merlyn.org\*\*](mailto:privacy@merlyn.org).

We may send emails to Institutions and Institution Users with information about the Symphony Classroom Solution or other information that we believe may be of interest. Recipients may unsubscribe from receiving email messages from us by contacting us at [\*\*privacy@merlyn.org\*\*](mailto:privacy@merlyn.org) or by clicking on the “unsubscribe” link found at the bottom of every email that we send. Please be advised that you may not be able to opt-out of receiving certain service or transactional messages from us, including legal notices or other essential communications regarding the service.



## 11. ADDITIONAL DISCLOSURES FOR UNITED KINGDOM (UK)/EUROPEAN UNION (EU)/EUROPEAN ECONOMIC AREA (EEA) RESIDENTS

When we provide the Symphony Classroom Solution to Institutions and Institution Users located in the UK and EU/EEA, we generally function in the capacity of a “data processor” under the European Union General Data Protection Regulation (GDPR) and the UK GDPR, and our processing of Personal Information is governed by our agreement with that Institution and in accordance with this Privacy Policy.

### *Legal Bases for Processing Where Merlyn Mind Acts as Controller*

Merlyn Mind does not function in the capacity of a data controller for any student Personal Information. In limited cases, we function in the capacity of a data controller with respect to Institution User Personal Information, as provided below, each as further described in Section 4 (How We May Use and Disclose Personal Information):

- To administer and manage Institution User account credentials. Our legal bases for these practices are performance of a contract, to enable us to perform our obligations, and to provide you with access to the Symphony Classroom Solution.
- When communicating with Institutions and Institution Users (other than for support purposes), such as to provide Institutions and Institution Users marketing materials or to request feedback or participation in surveys. Our legal basis for these practices is consent, where legally required.
- If necessary, when processing Personal Information for legal and safety purposes. Our legal basis for these practices is compliance with our legal obligations.

### *Data Subject Rights*

If you are based in the UK or EU/EEA, subject to applicable law, you may have the following rights regarding your Personal Information: the right to request confirmation from us as to whether or not we are processing your Personal Information, and where we are processing your Personal Information; the right to, access, update, or modify or correct your Personal Information; to request deletion of such Personal Information; and to object to or request that we restrict certain processing, including that related to marketing, to receive a machine-readable copy of the Personal Information concerning you that you provided to us; or request us to transfer such data to an applicable third-party in certain circumstances. You also have the right to lodge a complaint with a supervisory authority and may also make a request to restrict how we use your information while a complaint is being investigated.

In addition, where you provided your consent in respect of any processing by us of your Personal Information, you may withdraw such consent by sending an email to **privacy@merlyn.org**.

If you have any queries or complaints about our collection, use, or storage of your Personal Information, or if you wish to exercise any of your rights in relation to your Personal Information, please contact us at **privacy@merlyn.org**.

Please note, the above rights may be subject to various exclusions and exceptions under the law, and, under certain circumstances, certain data elements may not be subject to access, modification, portability, restriction, and/or deletion. We will respond to reasonable requests as soon as reasonably practicable and as required by law. To protect your privacy and security, we may take steps to verify your identity in order to address the request. Where we have received your information through our customers, or where we are otherwise operating as a processor, we may refer you to the entity with whom you have a direct relationship in order to implement your request, pursuant to applicable law.

If you have additional questions regarding the rights described above, you can contact us by sending an email to **privacy@merlyn.org** or by using the details provided in the “Contact Information” section.

## **12. TRANSFER OF DATA TO THE UNITED STATES**

If you are located outside of the United States, please be aware that your information may be transferred to, processed, and/or maintained in the United States. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. If you are located outside of the United States, the transfer of Personal Information may be necessary to provide you with the requested information and services and/or to perform any requested transaction. If we transfer your Personal Information outside of the United Kingdom or EEA, we will take measures to ensure that your Personal Information is transferred and protected adequately in accordance with this Privacy Policy.

## **13. UPDATES TO THIS PRIVACY POLICY**

We may update this Privacy Policy in the future. If we make non-material changes, we will provide notice of the updated Privacy Policy as required by applicable law. If we make material changes to this Privacy Policy, we will provide the notice as described above, and will also request consent as required by applicable law. The “last updated” date at the top of this policy indicates when the Policy was last revised. We encourage you to review this Privacy Policy often to stay informed of how we may process your information.

## **14. CONTACT INFORMATION**

For additional information regarding our privacy practices, please contact us by email at [privacy@merlyn.org](mailto:privacy@merlyn.org) or by mail at:

Merlyn Mind, Inc.  
405 Lexington Avenue, Suite 3504  
New York, NY 10174

Our UK representative is:  
Merlyn Mind UK Limited  
3<sup>rd</sup> Floor, Chancery House St Nicholas Way  
Sutton  
Surrey  
United Kingdom  
SM1 1JB

**You can contact our UK representative at [uk\\_representative@merlyn.org](mailto:uk_representative@merlyn.org).**

[Back to top of Privacy Policy](#)