

Open Letter to New Hampshire Department of Education and School Districts

March 27, 2024

Dear New Hampshire School and SAU Leaders, Faculty, and Staff:

Recent news stories may have created misperceptions about our data-protection practices, which are among the most comprehensive and well-enforced of any in education services. I am writing to provide information and clarification about the robust safeguards and enforcement mechanisms that we have in place at Tutor.com

For more than 24 years and 26 million tutoring sessions, Tutor.com has cultivated lasting, impactful partnerships with K-12 schools. Students' success is at the heart of all we do.

Tutor.com is an American company. We live by the core tenets of transparency, security, and effectiveness. We will always be relentless in our commitment to all three.

Below is an FAQ section that provides further details about our data-protection practices. If you have any questions at any time, please do not hesitate to reach out to our team at clientsupport@tutor.com.

Sincerely,



John Calvello
Interim Chief Institutional Officer

Frequently Asked Questions

Is Tutor.com an American company?

Yes, Tutor.com is and has always been an American company. We were incorporated in the state of Delaware in the year 2000. Our principal place of business is New York City, and all student data is housed in the United States. In 2022, we were acquired by an investment fund controlled by Primavera Holdings Limited, which is based in Hong Kong. We remain an American company, and as such, we abide by U.S. state and federal laws.

Can anyone in the Chinese government access student data from Tutor.com?

No. There are multiple layers of protection to prevent this from happening.

- (1) As an American company, Tutor.com cannot be compelled to release personal data of U.S. students and families to any foreign government. All student data is housed in the United States.
- (2) We have a binding legal commitment to the U.S. government that Primavera will not have access to our IT systems or any personal data of U.S. students and families. We also

have personnel and enforcement mechanisms in place to ensure that personal data is always safeguarded.

- (3) We adhere to all terms of data privacy agreements with our partners.

Has there been an official review and approval of Tutor.com’s data-protection practices?

Yes. We voluntarily initiated a rigorous federal review to ensure that stringent safeguards would be put in place to protect customer and student data, together with mechanisms that provide for constant monitoring and compliance. This review was conducted by the Committee on Foreign Investment in the United States (CFIUS), and it resulted in Tutor.com having some of the most comprehensive and well-enforced data-protection practices of any U.S. education services provider. We are legally bound by our agreement with CFIUS to protect U.S. students’ personal data.

Can you share details about the data-protection measures that are in place?

Absolutely. Our active controls include the following:

- (1) As noted above, we have a binding legal commitment to the U.S. government that Primavera will not have access to our IT systems or any personal data of U.S. students and families.
- (2) Our company has a designated data security officer, who is a U.S. citizen vetted and approved by the U.S. government, to continuously monitor and ensure compliance with data-protection measures.
- (3) Our board has two independent directors, who are U.S. citizens and experts in matters of U.S. national security and data security, also vetted and approved by the U.S. government, whose foremost duty is to ensure that personal data of U.S. students is safeguarded.
- (4) We are required to allow the CFIUS monitoring team, at any time, to inspect our business and operations.
- (5) We adhere to the terms of all data privacy agreements with our partners.
- (6) We comply with the Family Educational Rights and Privacy Act (FERPA) and Children’s Online Privacy Protection Act (COPPA).