

Eduling International LLC  
Privacy Policy  
Last updated: April 20, 2022

**Eduling International LLC (“we”, “us”, or “our”)** is committed to protecting your privacy. We have prepared this Privacy Policy (“**Privacy Policy**”) to describe to you our practices regarding the information that we collect from users on our Website (“**Website**”), our Application (“**App**”), and the services offered through the Website and App (collectively, the “**Services**”).

### **Information Collected**

**Information You Provide to Us.** When you create an account for our Services on our Website or App (an “Account”), you provide us your name, your username, email address or parent’s email address if you are younger than sixteen years old, date of birth, primary language, target language, language proficiency, and possibly financial information depending on the types of Services you choose.

We retain information on your behalf, such as messages you send (including the content of the message and the recipient data), using your Account information.

We may collect the unique device id number of the mobile device on which you use the Website or App.

We may also collect personal information at other points in our Services that state that personal information is being collected.

**Speaking on App.** During each speaking session, we will use your microphone to enable you to speak with another Learner or Tutor. Only your username will be shown to your speaking partner. You are completely anonymous to your partner or Tutor by default, and you can freely choose whether to tell them any personal details such as your name during the conversation. If you allow recording of your speech, during a particular session, you can click on the "record" button. A request will be sent to your speaking partner, who may agree or decline the recording request. Only when both of you agree to be recorded will the speaking session be recorded. In this case, we will record your speech and convert the speech to text in order to give you feedback on your language use. The recording and text will be stored for a year only. Only you have access to this recording and text. We will also store your streaks, completed tasks, the number of minutes spent speaking, and the number of words produced. If you choose not to have your speech recorded, the audio recording, text, and number of words will not be recorded or available.

**Course Registration.** When you register for a course from Eduling, we collect information (including name, email, date of birth, and other information) for admission decisions in the application form. We will use this information to place you in appropriate courses and communication within the courses you attend. If you are under sixteen years of age, your parent’s email is required in the application form.

**Event Registration.** When you register to attend an event from Eduling, we collect information (including name, email, and other information) to invite you to the event. If you are under sixteen years of age, your parent’s email is required in the registration form.

**Information Collected from Third Party Companies.** We may receive information about you from other sources. We may add this information to the information we have already collected from you via our Services in order to improve the Services.

### **Information Collected Automatically**

Generally. When you use our Services, some information is automatically collected. For example, when you use our Services, your geographic location, how you use the Services, information about the type of device you use, your mobile network information, your Open Device Identification Number (“ODIN”), date/time stamps for your visit, your unique device identifier (“UDID”), your browser type, operating system, Internet Protocol (IP) address, and domain name are all collected. We use this information to help us deliver the most relevant information to you and administer and improve the Services.

**Log Files.** We gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to maintain and improve the performance of the Services.

**Cookies.** We use cookies to collect information. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We, and some third parties, may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Services. You may set your Internet web browser to refuse cookies or to remove cookies from your hard drive, but our App does not recognize “Do Not Track” signals. You can also learn more about Cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) which includes additional useful information on Cookies and how to block them using different browsers. By blocking or deleting Cookies used on our App, you may not be able to take full advantage of our Services.

**Marketing Companies.** We work with a number of companies that assist in marketing our Services to you on third party websites. These companies may collect information about online activities conducted on a particular computer, browser, or device over time and across third-party websites or online services for the purpose of delivering advertising that is likely to be of greater interest to you on our Website, our App, and those of third parties.

**Analytics Companies.** We work with a number of third-party analytics companies that collect information anonymously and report trends without identifying individual visitors. These services allow us to view a variety of reports about how visitors interact with the Services so we can improve our Website and App and understand how people find and navigate it.

### **Use of Your Personal information**

**General Use.** In general, personal information you submit to us is used either to respond to requests that you make, aid us in serving you better, or market our Services. We use your personal information in the following ways:

- respond to comments, requests, and questions and provide customer service;
- facilitate the creation of and secure your Account on our network;
- identify you as a user in our system;
- provide, process, and deliver the Services you request;
- improve the quality of experience when you interact with our Services;
- send you administrative e-mail notifications;
- resolve disputes and/or troubleshoot problems;
- develop, improve, and deliver marketing and advertising for the Services; and
- send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes.

**Creation of Anonymous Data.** We may create anonymous data records from personal information by excluding information that is personally identifiable to you, such as your name. We use this anonymous data to analyze request and usage patterns so that we may enhance the content of our Services and improve Website and App navigation. We reserve the right to use anonymous data for any purpose and disclose anonymous data to third parties in our sole discretion.

**User Feedback.** We may post user feedback on the Services from time to time. If you make any comments on a blog, social networking website, or forum associated with the Service, you should be aware that any information you submit there can be read, collected, or used by other users of these forums and could be used to send you unsolicited messages. We are not responsible for the information you choose to submit in these blogs and forums.

#### **Disclosure of Your Personal information**

We disclose your personal information as described below and as described elsewhere in this Privacy Policy.

**Third Parties Designated by You.** When you use the Services, the personal information you provide will be shared with the third parties that you authorize to receive such information.

**Third Party Service Providers.** We may share your personal information with third party service providers to provide you with the Services, provide updates and technical support, and market the Services. We will provide personal data to hosting providers such as Google Web Services, search engine providers such as Google, analytics providers such as Crashlytics, and support providers such as ZenDesk.

Eduling may occasionally send you service related and product change announcements through the general operation of the Service. We will send you reminder notifications to support the Eduling teaching methodology by reinforcing the learning cadence and help maintain your learning streak. We process your data to help provide you with the Service and offer

personalized features, to understand and improve our Service and to keep our Service safe and secure.

When we utilize service providers for processing any personal data, we implement contractual protections limiting the use of that personal data to the provision of services to Eduling. We will be required to access and disclose personal data in response to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws.

**Other Disclosures.** Regardless of any choices you make regarding your personal information (as described below), we may disclose personal information if we believe in good faith that such disclosure is necessary (i) in connection with any legal investigation; (ii) to comply with relevant laws or to respond to subpoenas or warrants served on us; (iii) to protect or defend the rights or property of Eduling International LLC or users of the Services; and/or (iv) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

**Product Research and Development.** We may contact you to participate in product research activities. These may include surveys, interviews, and other types of feedback sessions. When you participate in these research activities, the information you provide will be used to test, improve, and develop our products. We will record the video, audio and text transcriptions of this feedback together with any additional contact information you provide and will retain this data for two years. Please contact us at [info@eduling.org](mailto:info@eduling.org) to:

- Request more information about the research activities you have volunteered for;
- Opt out of being contacted for research activities; or
- Request a copy of any research related data you have provided to us.

#### **General Data Protection Regulation (GDPR)**

- Right to Access – the right to be provided with a copy of your personal information (the right of access).
- Right to Rectification – the right to require us to correct any mistakes in your personal information.
- Right to be Forgotten – the right to require us to delete your personal information—in certain situations.
- Right to Restriction of Processing – the right to require us to restrict processing of your personal information—in certain circumstances, e.g., if you contest the accuracy of the data.
- Right to Data Portability – the right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.
- Right to Object – you have the right to object:
  1. at any time to your personal information being processed for direct marketing (including profiling); and
  2. in certain other situations to our continued processing of your personal information, e.g., processing carried out for the purpose of our legitimate interests.

- Right Not to be Subjected to Automated Individual Decision-Making – the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner’s Office (ICO) on individual rights under the General Data Protection Regulation.

### **California Consumer Privacy Act (CCPA)**

You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:

Disclosure of Personal Information We Collect About You – You have the right to know:

1. The categories of personal information we have collected about you;
2. The categories of sources from which the personal information is collected;
3. Our business or commercial purpose for collecting or selling personal information;
4. The categories of third parties with whom we share personal information, if any; and
5. The specific pieces of personal information we have collected about you.

Please note that we are not required to:

1. Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;
2. Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or
3. Provide the personal information to you more than twice in a 12-month period.

**Personal Information Sold or Used for a Business Purpose** – In connection with any personal information that we may sell or disclose to a third party for a business purpose, you have the right to know:

1. The categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and
2. The categories of personal information that we disclosed about you for a business purpose.

You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the sale of your personal information. If you exercise your right to opt-out of the sale of your personal information, we will refrain from selling your personal information, unless you subsequently provide express authorization for the sale of your personal information.

Right to Deletion – Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

1. Delete your personal information from our records; and
2. Direct any service providers to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

1. Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity;
3. Debug to identify and repair errors that impair existing intended functionality;
4. Exercise free speech, ensure the right of another consumer to exercise her or his right of free speech, or exercise another right provided for by law;
5. Comply with the California Electronic Communications Privacy Act;
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
7. Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
8. Comply with an existing legal obligation; or
9. Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

**Protection Against Discrimination** – You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:

1. Deny goods or services to you;
2. Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
3. Provide a different level or quality of goods or services to you; or
4. Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information.

### **Children’s Online Privacy Protection Act (COPPA)**

We are fully compliant with COPPA. We do not collect personal information from children under the age of sixteen. All information about individuals under the age of sixteen must be provided by a teacher or parent.

### **Student Online Personal Information Protection Act (SOPIPA)**

**We are fully compliant with SOPIPA.** We never share student data for advertising purposes or allow data collection by third-party advertisers or data brokers from students. We intentionally limit our data collection to only what we need to provide our Services to you.

We only use student personal information to provide our Services to schools and support and improve the product. Specifically, we may use and disclose the information we collect:

- To permit teachers to review students' work, monitor students' performance and progress, plan lessons, and otherwise support instruction;
- To permit parents and guardians to review their children's work and monitor their performance and progress;
- To offer students feedback and support, permit them to access information shared by their teachers, suggest other content or activities for them, help them track their own progress, maintain a history of their work; and
- To provide teachers with various types of reports, such as reports detailing the performance and progress of a particular classroom or student.

### **Accounts for Minors**

When a user creates an Eduling Account we collect their age and compare it to the local standard of child online consent depending on the country they registered. We refer to users under this age as "child users." Child users are not permitted to create a user account. Instead, we ask the parent to create a Parent account and add their child/children under their account to use our Service. With the App, we do not collect child users' names. Instead, parents can create usernames for their children.

After registration, we will send an email notifying the parent about our privacy and information practices regarding child users, including what personal data we collect and how we use, share, and protect that personal data. The email also explains how parents can request that Eduling access, change or delete the personal data about their child. Child users receive the following special treatment:

- Advertisements are set to family safe content and non-personalized;
- Child users can't change the personal information (username, email, and age) entered in their profile;
- Users choose an avatar among the given options provided by Eduling;
- Promotional emails are disabled; and
- The child's profile is made private and hidden from other users' searches.

To prevent restricted users from amending these features, the settings will be hidden or grayed out. In the future, once we are sure the user is old enough, we will automatically remove the restrictions, reset the settings to their defaults and make the settings visible for them to configure how they choose.

### **Third-Party Websites**

Our Website and App may contain links to third party websites. When you click on a link to any other website or location, you will leave our Website or App and go to another site, and another entity may collect personal information or anonymous data from you. We have no control over, do not review, and are not responsible for these outside websites or their content. Please understand that the terms of this Privacy Policy do not apply to any outside websites, content, or any collection of your personal information after you click on links to such outside websites. We encourage you to read the privacy policies of every website that you visit. The links to third

party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content, or websites.

### **Choice/Opt-Out**

We want to communicate with you only if you want to hear from us. You may choose to stop receiving marketing emails by following the unsubscribe instructions included in these emails, updating your communications preferences on our Website and App, or contacting us directly. Please note, however, that as a user of the Services, you cannot opt-out of some administrative communications that are reasonably necessary to the Services, such as billing or Account notifications.

You have the right to access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. You may request access, an updating, or the correction of inaccuracies in other personal information in our custody or control by contacting us directly.

We reserve the right to retain any personal information reasonably necessary to appropriately document our business activities and record retention purposes. We will store personal information for as long as reasonably necessary for the purposes described in this Privacy Policy. You may request deletion of your personal information by us, and we will use commercially reasonable efforts to honor your request where required by law, but please note that we may be required to keep such information and not delete it or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements. When we delete any information, it will be deleted from the active database, but it may remain in our archives. We may also retain your information for fraud or similar purposes.

### **California Residents**

If you are a California resident and have an established business relationship with us, you may request a notice disclosing the categories of personal information we have shared with third parties, for the third parties' direct marketing purposes, during the preceding calendar year. To request a notice, please contact us directly.

### **Targeted Advertising**

We may work with third parties, such as network advertisers and ad exchanges, that use tracking technologies on our Website and App in order to provide tailored advertisements on our behalf and/or on behalf of other advertisers across the Internet. We may use third-party analytics service providers to evaluate and provide us and/or third parties with information about the use of these ads on third-party websites and viewing of ads and of our content. Network advertisers are third parties that display advertisements, which may be based on your activities (including past visits to our Website and App) across the Internet and mobile media ("Targeted Advertising").

Targeted Advertising uses information collected on an individual's web browsing behavior on one website (such as the pages they have visited or the searches they have made) in order to target advertising to that individual on another website. Targeting called Cross Device Tracking



can also take place across devices such as tablets, smartphones, laptops, and smart televisions. Third parties collect this information by placing or accessing cookies or other tracking technologies in your browser when you visit this or other websites.

Collecting information enables us to target advertisements to you for services in which we believe you might be interested. If you object to receiving Targeted Advertising from us on third-party websites, you can learn more about your ability to limit them below. Our third-party ad network, exchange providers, advertisers, and/or traffic measurement services may themselves set and access their own technologies on your device and track certain behavioral usage information via a device identifier. These third-party technologies may be set to, among other things: (a) help deliver advertisements to you that you might be interested in; (b) prevent you from seeing the same advertisements; and (c) understand the usefulness of the advertisements that have been delivered to you.

Statements regarding our privacy practices do not apply to the methods for collecting information used by these third-parties or the use of the information that such third parties collect. We make no representations regarding the policies or practices of third-party advertisers, advertising networks or exchanges, or related third parties.

While websites use a variety of companies to serve advertisements, you may wish to visit [http://www.networkadvertising.org/optout\\_nonppii.asp](http://www.networkadvertising.org/optout_nonppii.asp), which provides information regarding this practice by Network Advertising Initiative (“NAI”) members and your choices regarding having this information used by these companies, including the “opt-out” procedures of NAI members. You may also opt-out of receiving Targeted Advertising on participating websites and services by visiting the Digital Advertising Alliance (“DAA”) website at <http://www.aboutads.info/choices/>.

### **Users Outside of the United States**

The Website and App are maintained in the United States of America. By using the Website or App, you freely and specifically give us your consent to export your personal information to the United States and to store and use it in the United States as specified in this Privacy Policy. You understand that data stored in the United States may be subject to lawful requests by the courts or law enforcement authorities in the United States.

### **Changes to this Privacy Policy**

We may revise this Privacy Policy from time to time, and if we make any material changes in the way we use your personal information, we will notify you by sending you an e-mail to the last e-mail address you provided to us and/or by prominently posting notice of the changes on the Services and updating the “Last Updated” date below. If we make any changes to this Privacy Policy, they will be effective upon the earlier of thirty (30) calendar days following our dispatch of an e-mail notice to you or thirty (30) calendar days following our posting of notice of the changes on the Services. Please note that at all times you are responsible for updating your personal information to provide us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice. If you do not wish to permit

changes in our use of your personal information, you must notify us prior to the effective date of the changes. Continued use of our Services following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

**How to Contact Us**

Please contact us by email if you have any questions about this privacy policy or the information that we hold about you.

Our contact details are shown below:

[info@eduling.org](mailto:info@eduling.org).