

# PRIVACY POLICY

*Last Updated: September 9, 2024*

This Privacy Policy outlines how Learnlink ("we," "us," or "our") collects, uses, discloses, and protects your personal data when you access or use our Platform and Services. By using our Platform, you consent to the collection and processing of your data as described in this Privacy Policy.

## 1. Introduction

Learnlink is committed to protecting the privacy and personal data of all Users, including Learners, Tutors, and Authors, who use the Platform. This Privacy Policy explains our practices regarding the collection, use, and sharing of your personal data and is intended to comply with the General Data Protection Regulation (GDPR) and other applicable data protection laws.

## 2. Data Collection

### 2.1. Information You Provide to Us

We collect personal data that you voluntarily provide when you register for an account, create or update your profile, create or update courses, participate in lessons and courses, or interact with other Users or with the Platform. This data may include:

- Full name, date of birth, ID details, phone number, email address, country, VAT-number, and contact information in messengers and social networks, time zone
- Username, password, and profile picture.
- Payment information, such as credit card details and billing address.
- Details related to your educational background, skills, and interests.
- Any content you upload, including documents, text, images, and videos.

### 2.2. Information We Collect Automatically

When you use the Platform, we automatically collect certain information, including:

- Device information, such as your location, IP address, browser type, and operating system.
- Usage data, including pages viewed, time spent on the Platform, and interactions with other Users.
- Tracking information from cookies and other technologies to enhance your experience and for analytics purposes.

### 2.3. Information Provided by Third Parties

We may receive information about you from third-party services, such as social media platforms, payment processors, and identity verification services. This information may include your profile details, transaction history, and other data relevant to your use of the Platform.

## **2.4. Recording of Lessons:**

The Platform may make video and/or audio recordings of lessons for quality assurance, training, and compliance purposes. By using the Platform, you consent to the recording of any lessons in which you participate.

## **3. Legal grounds for data collection**

By using the Platform, you have entered into the User agreement with us, and we will process your Personal Data to fulfill that Agreement (e.g., to facilitate interaction between Learners, Tutors and Authors and payments) and to enforce the terms of the User agreement. We need to obtain certain Personal Data from you to provide you with access to the Platform or certain features of the Platform in accordance with our Agreement with you. We are also required to process certain Personal Data in accordance with applicable law.

Please note that if you do not wish to provide Personal Data, we may not be able to provide you with access to the Platform or certain features and functions of the Platform.

### **3.1. Contractual Necessity**

We process your personal data to fulfill our contractual obligations to you, such as providing access to the Platform and its Services, processing payments, and ensuring you can participate in courses.

### **3.2. Legitimate Interests**

We process your data to further our legitimate interests, which include improving the functionality of the Platform, ensuring the security of our services, preventing fraud, and enhancing the user experience. We only rely on legitimate interests where your rights and freedoms are not overridden by our interests.

### **3.3. Consent**

In certain cases, we process your personal data based on your explicit consent. This may include situations where we send you promotional communications or collect certain types of sensitive data. You have the right to withdraw your consent at any time. However, if you withdraw your consent to processing or do not provide the data we need to maintain and administer the Platform, you will not be able to access and use the Platform.

### **3.4. Legal Obligations**

We may process your personal data to comply with legal obligations, such as tax laws, regulatory requirements, or responding to lawful requests from public authorities. Your personal information may also be processed if required by a law enforcement or regulatory authority, institution, or agency, or to protect or fulfill a legitimate requirement.

## **4. Use of your information**

In order to implement the User agreement between you and us and to provide you with access to and use of the Platform, we will improve, develop, and implement new features of the Platform and enhance the available functionality of the Platform. To achieve these purposes and in accordance with applicable law, we will collect, store, aggregate, systematize, retrieve, compare, use, and complete your Personal Data. We will also receive and transfer this data and the automatically processed analyses of this data to our affiliates and partners.

We use your personal data for the following purposes:

- **Account Management:** To create, manage, and maintain your personal account on the Platform.
- **Service Provision:** To facilitate teaching, learning, and course creation, promotion and sale activities, as well as to process payments.
- **Communication:** To send you updates, promotional offers, and respond to your inquiries.
- **Improvement of Services:** To analyze usage patterns and improve the functionality of the Platform.
- **Compliance:** To ensure compliance with legal obligations and to protect the rights and safety of our Users and the Platform.

## **5. Sharing Your Personal Data**

**5.1. Categories of Third Parties** We may share your personal data with the following categories of third parties:

(i) Service Providers:

We share personal data with third-party service providers who assist us in operating the Platform and providing our services, such as IT services, payment processing, customer support, content and text moderation, and User identification services (e.g., Sum and Substance Ltd, England). The legal basis for sharing personal data with these providers is our legitimate interest in obtaining the necessary services to support our business operations.

(ii) Professional Advisors:

We may share your personal data with our professional advisors, including legal counsel, bankers, auditors, accountants, consultants, and insurers. These professionals process your data as necessary to provide their services to us. The legal basis for this sharing is our legitimate interest in obtaining professional advice and services.

(iii) Group Companies:

We may share your personal data with our group companies for centralized coordination and management of our business. These group entities will process your data in accordance with this Privacy Policy and law requirements. The legal basis for this sharing is our legitimate interest in coordinating our global operations.

(iv) Affiliates and Selected Partners:

We may share your personal data with our affiliates or selected third-party partners who may use their own ad servers and advertising services to serve you relevant ads.

(v) Authorities and Regulators:

We may share your personal data with government authorities, regulators, and certain non-governmental organizations in response to legal requests or as part of our obligations to comply with laws and regulations. These recipients may use your personal data to carry out their

regulatory, law enforcement, or other functions. The legal basis for this sharing is our legal obligation to comply with the law or our legitimate interest in protecting the safety of our Users and third parties.

### **5.3. International Data Transfers**

We may transfer your personal data to our group companies and third-party service providers as outlined in this Privacy Policy. In some instances, this may involve transferring your data outside the European Economic Area (EEA). When such transfers occur, we ensure that one of the following safeguards is in place:

- (i) Adequate Protection: We transfer data to countries deemed to provide an adequate level of data protection according to the European Commission.
- (ii) Security Measures: We use appropriate security measures, such as encryption and secure data storage, to protect your data during transfer.
- (iii) Legal Compliance: We only transfer your data if permitted by applicable law. If the data protection laws of the receiving country do not meet EU standards, we implement additional safeguards, such as standard contractual clauses or data processing agreements, to ensure your data remains protected.

## **6. Data Storage and Security**

Your personal data is stored on secure servers located within the EU, using Google Cloud services. We implement industry-standard security measures, including encryption, firewalls, and secure access protocols, to protect your data from unauthorized access, alteration, or deletion. While we strive to protect your data, no security system is impenetrable, and we cannot guarantee absolute security.

### **7.1. Retention for Legal and Investigative Purposes**

We will not delete personal information if it is relevant to an investigation or dispute. It will be retained until these matters are fully resolved and/or for as long as required and/or permitted under current/actual law.

### **7.2. Retention Period**

We will retain your personal data for as long as reasonably necessary to fulfill the purposes for which it was collected, as outlined in this Privacy Policy. Typically, we will retain personal data for 6 months after your account has been deleted or deactivated. However, we may retain your data for longer periods under certain circumstances, including:

- (i) Compliance with Legal Obligations: If required by law, we will retain data for the duration of statutory record-keeping or reporting requirements, which may extend up to 7 years.
- (ii) Detecting and Preventing Illegal Activity: We may retain data to detect and report illegal activity, protect User safety, and safeguard the rights and property of our Users, ourselves, and third parties.
- (iii) Legal Proceedings: If necessary for legal proceedings, we will retain relevant data to support our defense or assert our legal rights.
- (iv) Responding to Requests from Authorities: We may retain data to respond to inquiries from law enforcement agencies, government authorities, or non-governmental organizations.

The specific data we retain and the duration of retention will vary depending on the circumstances and the nature of the data.

## **7. Your Rights**

Under GDPR, you have the following rights regarding your personal data:

- Access: To request a copy of the personal data we hold about you.
- Correction: To correct any inaccuracies in your personal data.
- Deletion: To request the deletion of your personal data, subject to certain conditions.
- Objection: To object to the processing of your data for certain purposes.
- Portability: To receive your data in a portable format and transfer it to another service provider.

### **7.1. Sensitive Data**

Please note that if you do not want us to process sensitive and special categories of data about you (including data relating to your health, racial or ethnic origin, political opinions, religious or philosophical beliefs, sex life, and your sexual orientation), you should take care not to post this information and do not provide it when interacting with the Platform. If such data is provided, we will process it only with your explicit consent and in accordance with applicable law.

### **7.2. Withdrawal of Consent**

If you withdraw your consent to the processing of your personal data or do not provide the data required for the operation and maintenance of the Platform, you may be unable to access and use the Platform.

### **7.3. Rights Related to Automated Decision Making**

You have the right not to be subject to decisions based solely on automated processing, including profiling, that produce legal or similarly significant effects on you.

### **7.4. Lodging a Complaint**

You have the right to lodge a complaint with a supervisory authority if you believe that our processing of your personal data violates applicable data protection laws.

### **7.5. Post-Mortem Data Rights**

Depending on the laws of your country of residence, you may have the right to determine instructions regarding the fate of your personal data after your death.

You also have the right to delete personal information in your Account and to make changes and corrections to your information yourself, provided that such changes and corrections contain up-to-date and accurate information.

We will need to verify your identity before we can disclose any Personal Information to you.

## **8. Technical and Organizational Measures**

We take technical, organizational, and legal measures to protect your personal data from unauthorized or accidental access, deletion, modification, blocking, copying, or dissemination. This includes encryption where necessary. Access to the Platform is secured through relevant

social network login credentials, email address, or mobile phone number, and a password. You are responsible for maintaining the confidentiality of your login information. You must not share your account data with third parties, and we encourage you to take steps to ensure the confidentiality of this information.

## **9. Cookies and Tracking Technologies**

We use cookies and similar technologies to enhance your experience on the Platform, analyze usage patterns, and provide personalized content. You can manage your cookie preferences through your browser settings.

## **10. Children's Privacy**

The Platform is accessible to users under the age of 18; however, all activities, including registration and participation, must be conducted under the supervision of a parent or legal guardian. We collect children's personal data such as name, surname, date of birth, age, and preferred language of communication, to facilitate registration, tailor educational content appropriately, and support interactions during the booking and teaching processes.

Parental or guardian consent is required for the collection and use of minor data, aligning with GDPR standards. Consent must be verifiable and can be provided through designated methods outlined on our Platform. Selected Tutors are granted limited access to necessary personal data, such as the minor's name, age and language for communication, solely for preparing and conducting lessons. This access is regulated by strict privacy policies to ensure it serves educational purposes only.

Parents or legal guardians have the right to review, request the deletion of, and refuse further collection or use of their children's personal data. We are committed to protecting the privacy and security of data collected from minors and comply rigorously with applicable laws. We take significant measures to protect the privacy and security of personal data collected from minors and ensure that it is handled in compliance with applicable laws. Should we become aware of any data collected from a child under 18 without requisite parental consent, we will take immediate steps to delete such data.

## **11. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The updated policy will be posted on this page, and we encourage you to review it regularly. If we make significant changes, we will notify you via email or through the Platform.

## **12. Contact Us**

If you have any questions or concerns about this Privacy Policy or our data protection practices, please contact us at [support@learnlink.com](mailto:support@learnlink.com).