

PRIVACY POLICY

Version: 1.1

Effective date: 01.12.2022

1. Introduction

This Privacy Policy ("the Policy") set out below will govern the protection and processing of your personal data that is collected or submitted by using the website <https://takeclass.io>, mobile application, or other online or mobile service ("Online Services") that links to or otherwise presents this Policy to you (regardless of where you visit it from).

The Online Services are owned and operated by Takeclass Holding Limited, a company registered at Griva Digeni 115, 3101, Limassol, Cyprus ("the Company").

Please read this Policy carefully. By further use of the Online Services you are deemed to have read, understood, agreed to and consented to the Policy. This Policy should be read alongside the [Terms of Service](#) found.

Any information (including personal data) submitted to the Online Services by a user, will be handled by us and transmitted to us. Please note that we need certain types of information so that we can provide services to you. If you do not provide us with such information, or ask us to delete it, you may no longer be able to access or use our services.

Our processing of personal data adheres to the provisions set forth in the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("General Data Protection Regulation", "GDPR") and all relevant local data protection laws. All definitions and concepts used in this policy have the same meaning as in the GDPR.

2. Collection of Information

We only process your personal data if this is necessary to provide the Online Services and in other cases, as provided below. The processing of personal data only takes place based on the appropriate legal basis and as permitted by law.

We also collect information that you voluntarily provide to us when you express an interest in obtaining information about us or the Online Services, when you use the Online Services or otherwise when you contact us. The information that we collect depends on the context of your interactions with us and the Online Services, the choices you make and the products and features you use.

2.1 Data You Provide to Us

Category of Personal data	Description	Legal Basis for Processing
Account Data	In order to use certain features (like accessing content), you need to create a user account, which requires us to collect and store your email address, password, and account settings. To create an instructor account, we collect and store your name, email address, password, and account settings. As you use certain features on the site, you may be prompted to submit additional information including occupation, government ID information, verification photo, date of birth, race/ethnicity, skill interests.	<ul style="list-style-type: none"> ● Performance of contract ● Legitimate interests (service provisioning, identity verification, fraud prevention and security, communication) ● Legal obligation ● Your consent
Profile Data	You can also choose to provide profile information like a photo, headline, biography, language, website link, social media profiles, country, or other data.	<ul style="list-style-type: none"> ● Performance of contract ● Legitimate interests (enhanced platform functionality, convey content source information)
Shared Content	Parts of the Services let you interact with other users or share content publicly, including by uploading educational content, posting reviews about content, asking or answering questions, sending messages to students, or posting photos or other work you upload. Such shared content may be publicly viewable by others depending on where it is posted.	<ul style="list-style-type: none"> ● Performance of contract ● Legitimate interests (service provisioning, enhanced platform functionality)
Learning Data	When you access content, we collect certain data including which courses, assignments, labs, workspaces, and quizzes you've started and completed; content and subscription purchases and credits; subscriptions; your exchanges with instructors, teaching assistants; and essays, answers to questions, and other items submitted to satisfy course and related content requirements.	<ul style="list-style-type: none"> ● Performance of contract ● Legitimate interests (service provisioning, enhanced platform functionality)

Payment Data	If you make purchases, we collect certain data about your purchase (such as your name, billing address, and ZIP code) as necessary to process your order and which may optionally be saved to process future orders. You must provide certain payment and billing data directly to our payment service providers, including your name, credit card information, billing address, and ZIP code. We may also receive limited information, like the fact that you have a new card and the last four digits of that card, from payment service providers to facilitate payments. For security we do not collect or store sensitive cardholder data, such as full credit card numbers or card authentication data.	<ul style="list-style-type: none"> • Performance of contract • Legal obligation • Legitimate interests (payment facilitation, fraud prevention and security, compliance)
Sweepstakes, Promotions, and Surveys	We may invite you to complete a survey or participate in a promotion (like a contest, sweepstakes, or challenge), either through the Services or a third-party platform. If you participate, we will collect and store the data you provide as part of participating, such as your name, email address, postal address, date of birth, or phone number. That data is subject to this Privacy Policy unless otherwise stated in the official rules of the promotion or in another privacy policy. The data collected will be used to administer the promotion or survey, including for notifying winners and distributing rewards. To receive a reward, you may be required to allow us to post some of your information publicly. Where we use a third-party platform to administer a survey or promotion, the third party's privacy policy will apply.	<ul style="list-style-type: none"> • Performance of contract • Legitimate interests (promotions administration, prize delivery, compliance)
Data Sharing outside the EU	We may share specific information with third-party partners or service providers for provision, developing, improving and maintaining the Online Services.	<ul style="list-style-type: none"> • Your consent

2.2 Data We Collect Through Automated Means

When you access the Courses we collect certain data by automated means, including:

Category of Personal data	Description	Legal Basis for Processing
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System Data	Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, browser, browser language, domain and other systems data, and platform types.	<ul style="list-style-type: none"> ● Performance of contract ● Legitimate interests (service provisioning, customer and technical support, fraud prevention and security, communication, product improvement)
Usage Data	Usage statistics about your interactions with the Online Services, including content accessed, time spent on pages or the Service, pages visited, features used, your search queries, click data, date and time, referrer, and other data regarding your use of the Online Services.	<ul style="list-style-type: none"> ● Legitimate interests (service provisioning, user experience improvement, product improvement)
Approximate Geographic Data	An approximate geographic location, including information like country, city, and geographic coordinates, calculated based on your IP address.	<ul style="list-style-type: none"> ● Legitimate interests (user experience improvement, fraud prevention and security, compliance)

3. How We Use Your Information

3.1. Principles of Personal data Processing

We are committed to protecting the privacy and security of personal data entrusted to us by you. In order to ensure transparency and compliance with applicable data protection laws and regulations, we adhere to the following principles of personal data processing:

Lawfulness, Fairness, and Transparency: we process personal data in a lawful, fair, and transparent manner. We ensure that you are aware of the purposes for which your Personal data is collected, used, and disclosed. We also inform you about rights and provide clear and easily understandable information about our data processing practices.

Purpose Limitation: we collect Personal data for specified, explicit, and legitimate purposes, and we do not process Personal data in a manner that is incompatible with those purposes. We only collect and use Personal data to the extent necessary to fulfill the stated purposes and in accordance with the consent obtained, contractual obligations, compliance with legal obligations or legitimate interests.

Data Minimization: we only collect and process Personal data that is adequate, relevant, and limited to what is necessary for the purposes for which it is processed. We strive to minimize the amount of Personal data we collect and retain, ensuring that the data is accurate, up-to-date, and necessary for the intended purposes.

Accuracy: we take reasonable steps to ensure the accuracy of Personal data and keep it up-to-date. We rely on you to provide accurate and complete information, and we provide mechanisms to update or correct their Personal data when necessary.

Storage Limitation: we retain Personal data only for as long as necessary to fulfill the purposes for which it was collected, unless a longer retention period is required or permitted by law. When Personal data is no longer needed, we securely delete or anonymize it to prevent unauthorized access or use.

Integrity and Confidentiality: we implement appropriate technical and organizational measures to protect Personal data against unauthorized access, accidental loss, alteration, or disclosure. We maintain the confidentiality, integrity, and availability of Personal data through physical, technical, and administrative safeguards.

Accountability: we take responsibility for our data processing activities and have implemented measures to ensure compliance with applicable data protection laws. We maintain records of our data processing activities, conduct regular assessments of our privacy practices, and provide training to our employees on privacy and data protection.

It is important to note that these principles guide our approach to Personal data processing, and we continuously review and update our practices to ensure ongoing compliance with evolving legal and regulatory requirements.

3.2. Information Usage

We use your information for various purposes depending on the types of information we have collected from and about you, in order to:

- complete a purchase or provide the Online Services you have requested, including invoicing and accounting;
- respond to your request for information and provide you with more effective and efficient customer service;
- provide you with updates and information about courses, classes in which you have enrolled;
- contact you by email, postal mail, or phone regarding the Company's and third-party products, services, surveys, research studies, promotions, special events and other subjects that we think may be of interest to you;
- customize the advertising and content you see on the Online Services;
- help us better understand your interests and needs, and improve the Online Services, including through research and reports, and test and create new products, features, and services;
- secure our websites and applications, and resolve app crashes and other issues being reported;
- comply with any procedures, laws, and regulations which apply to us where it is necessary for our legitimate interests or the legitimate interests of others;
- establish, exercise, or defend our legal rights where it is necessary for our legitimate interests or the legitimate interests of others.

For the purposes discussed in this Policy, we may combine the information that we collect through the Online Services with information that we receive from other sources, both online and offline, and use such combined information in accordance with this Policy.

We may aggregate and/or anonymize any information collected through the Online Services so that such information can no longer be linked to you or your device. We may use such information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors.

4. Cookies and Similar Technologies

To collect the information, we use Internet server logs, cookies, tracking pixels, and other similar tracking technologies. We use these technologies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences. Cookies are small text files that are placed on your computer or mobile device when you visit a site that enable us to:

1. recognize your computer;
2. store your preferences and settings;
3. understand the web pages of the Online Services you have visited;
4. enhance your user experience by delivering and measuring the effectiveness of content and advertising tailored to your interests;
5. perform searches and analytics; and
6. assist with security and administrative functions.

Some cookies are placed in your browser cache while those associated with flash technologies are stored with your Adobe Flash Player files. As we adopt additional technologies, we may also gather information through other methods. Please note that you can change your settings to notify you when a cookie is being set or updated or to block cookies altogether. Please consult the "Help" section of your browser for more information (e.g., Internet Explorer; Google Chrome; Mozilla Firefox; or Apple Safari). You can also manage the use of flash technologies, including flash cookies and local storage objects, with the flash management tools available at Adobe's website. Please note that by blocking, disabling, or managing any or all cookies, you may not have access to certain features or offerings of the Online Services.

Within the scope of the GDPR, the data processed by cookies for the aforementioned purposes is justified in order to perform the contract and protect our legitimate interests and those of third parties

5. Online Analytics and Advertising

We may use third-party web analytics services (such as those of Google Analytics) on our Online Services to collect and analyze usage information through cookies and similar tools; engage in auditing, research, or reporting; assist with fraud prevention; and provide certain features to you.

If you receive email from us, we may use certain analytics tools, such as clear GIFs to capture data such as when you open our message or click on any links or banners our email contains. This data allows us to gauge the effectiveness of our communications and marketing campaigns.

The Online Services may integrate third-party advertising technologies that allow for the delivery of relevant content and advertising on the Online Services, as well as on other websites you visit and other applications you use. The ads may be based on various factors such as the content of the page you are visiting, information you enter such as your age and gender, your searches, demographic data, user-generated content, and other information we collect from you. These ads may be based on your current activity or your activity over time and across other websites and online services and may be

tailored to your interests.

Third parties may also place cookies or other tracking technologies on your computer, mobile phone, or other device to collect information about you as discussed above. These third parties (e.g., ad networks and ad servers such as Google Analytics, DoubleClick and others) may also serve tailored ads to you as you use the Internet and Internet-connected applications, and access their own cookies or other tracking technologies on your computer, mobile phone, or other device you use to access the Online Services to assist in this activity.

We neither have access to, nor does this Policy govern, the use of cookies or other tracking technologies that may be placed on your device you use to access the Online Services by such non-affiliated third parties. To opt out of Google Analytics for display advertising or customize Google display network ads, visit the Google Ads Settings page. We do not control these opt-out links or whether any particular company chooses to participate in these opt-out programs. We are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

Please note that if you exercise the choices above, you will still see advertising when you use the Online Services, but it will not be tailored to you based on your online behavior over time.

6. Notice Concerning Do Not Track

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our website for third party purposes, and that is why we provide the variety of opt-out mechanisms listed above. However, we do not currently recognize or respond to browser-initiated DNT signals.

7. How We Share and Disclose Your Information

The Company will share your information in the following ways:

- **Affiliates and Subsidiaries.** We may share information we collect within the Company's group of companies to deliver products and services to you, ensure a consistent level of service, and enhance our products, services, and your customer experience.
- **Service Providers.** We provide access to or share your information with third parties who perform services on our behalf. They have access to perform these services but are prohibited from using your information for other purposes. They provide a variety of services to us, including billing, sales, marketing, product content and features, advertising, analytics, research, customer service, data storage, security, fraud prevention, payment processing, and legal services.
- **Protection of the Company and Others.** By using the Online Services, you acknowledge and agree that we may access, retain and disclose the information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably

necessary:

- (a) for any legal proceedings;
- (b) to enforce our Terms of Service, this Policy, or other contracts with you, including investigation of potential violations thereof;
- (c) to respond to claims that any content violates the rights of third parties;
- (d) to respond to your requests for customer service; and/or
- (e) to protect the rights, property or personal safety of the Company, its agents and affiliates, its users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.

- **Business Transfers.** As we continue to develop our business, we may buy, merge, or partner with other companies. In such transactions (including in contemplation of such transactions), user information may be among the transferred assets. If a portion or all of our assets are sold or transferred to a third-party, customer information (including your email address) would likely be one of the transferred business assets. If such transfer is subject to additional mandatory restrictions under applicable laws, we will comply with such restrictions.
- **Public Forums.** Certain features of our Online Services make it possible for you to share comments publicly with other users. Any information that you submit through such features is not confidential, and we may use it for any purpose (including in testimonials or other marketing materials). Any information you post openly in these ways will be available to the public at large and potentially accessible through third-party search engines. Accordingly, please take care when using these features.
- **Aggregate/Anonymous Information.** From time to time, we may share aggregate/anonymous information about use of the Online Services, such as by publishing a report on usage trends. The sharing of such data is unrestricted.

We store information about you on our servers in the EU. However, as part of our partners is outside EEA, your personal data may be processed by recipients outside of the EEA, which is not subject to an adequacy decision by the European Commission and which does not provide for the same level of data protection as in the EEA. In this event, we will ensure that the recipient of your personal data offers an adequate level of protection, for instance by entering into Standard Contractual Clauses for the transfer of data as approved by the European Commission, your explicit consent to such international data transfers or based on the performance of the contract. This way, if we transfer Personal data collected from users located within the EU to a third-party acting as a data processor, such third-party processes your personal data in a manner consistent with the GDPR.

You may obtain a copy of the documents we use to protect your personal data when it is transferred outside the EEA by contacting us via email at support@takeclass.io.

8. Retention of Your Information

We only store your information for as long as necessary to serve the purpose of the processing and we delete it or block access to it as soon as such purpose ceases to apply.

Furthermore, information may be stored if this has been provided for by the applicable law (for example for book keeping or mandatory archiving purposes). The data will also be blocked or deleted if a storage period prescribed by the applicable law expires, unless there is a need for further storage of the data for the conclusion or fulfilment of a contract.

9. How We Protect Your Information

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. Third Party Links and Features

The Online Services contain links to third-party websites such as social media sites, and also contain third-party plug-ins (such as the Facebook “like” button and Twitter “follow” button). If you choose to use these sites or features, you may disclose your information not just to those third-parties, but also to their users and the public more generally depending on how their services function. We are not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your information will be subject to the privacy policies of the third party websites or services, and not this Policy. We urge you to read the privacy and security policies of these third-parties.

11. Children's Privacy

The Online Services are for general audience and is not designed nor intended to collect personal data of persons under the age of 16 (Sixteen). Persons under the age of 16 (Sixteen) should not provide any personal data via the Online Services. We ask that parents supervise their children while online.

12. Your Legal Rights

If you would like further information in relation to your legal rights under applicable law or would like to exercise any of them, please contact us using the information in the “Contact Information” section below at any time.

You have the following rights under the applicable data protection laws:

- **Information and Access.** The right to know whether your personal data is being processed, right to get information regarding processing of personal data, right to request a copy of personal data being processed. The right to information about public and private entities with which we have shared data.
- **Rectification (correction).** The right to correct your personal data in a situation when such data available to us or disclosed to third parties is inaccurate or incomplete.
- **Erase.** The right to request deletion of your personal data from our database so that we are not able to continue processing and storing of such data, with exceptions, provided in applicable law.
- **Restrict processing.** The right to introduce the restriction regime on the processing of your personal data, including prevention the processing of your information for direct-marketing purposes (e.g. any direct marketing processing based on profiling);
- **Data portability.** The right to request for the personal data to be given in a machine-readable format so that it could be transferred to another service provider or transfer directly to a third party designated by you.
- **Object.** The right to object to processing of your personal data in a case when the corresponding processing is not performed on the basis of your consent.
- **Withdraw consent.** Right to withdraw consent to processing of your personal data by us or third parties to which we have previously disclosed your personal data.

We will consider all requests and provide our response within the time period stated by applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interests or to comply with a legal obligation. We may request you provide us with information necessary to confirm your identity before responding to your request.

You may instruct us not to use your contact information to contact you by email, postal mail, or phone regarding products, services, promotions and special events that might appeal to your interests by contacting us using the information below. In commercial email messages, you can also opt out by following the instructions located at the bottom of such emails. Please note that, regardless of your request, we may still use and share certain information as permitted by applicable law. For example, you may not opt out of certain operational emails, such as those reflecting our relationship or transactions with you, or important notifications regarding courses, classes in which you are enrolled.

You also have a right to lodge a complaint with the supervisory authority, The Office of the Commissioner for the protection of personal data, however we would appreciate the chance to deal with your concerns before you approach the supervisory authority.

The competent authority in Cyprus for the enforcement of personal data protection legislation is:

The Office of the Commissioner for the protection of personal data
Address: Iasonos 1, 1082 Nicosia Cyprus or P.O.Box 23378, 1682 Nicosia Cyprus
Telephone: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy

13.Changes to our Privacy Policy

We reserve the right to amend this Policy at any time to reflect changes in the law, our data collection and use practices, the features of our Online Services, or advances in technology. We will make the revised Policy accessible through the Online Services, so you should review the Policy periodically. You can know if the Policy has changed since the last time you reviewed it by checking the "Date of Last Revision" included at the beginning of the document. If we make a material change to the Policy, you will be provided with appropriate notice in accordance with legal requirements. By continuing to use the Online Services, you are confirming that you have read and understood the latest version of this Policy.

If this Policy or any part of it should be determined to be illegal, invalid or otherwise unenforceable under the laws of any country in which this Policy is intended to be effective, then to the extent that it is determined to be illegal, invalid or unenforceable, it shall in that country be treated as severed and deleted from this Policy and the remaining terms of this Policy shall survive and remain in full force and effect and continue to be binding and enforceable in that country.

We are not be responsible for any breach of this Policy caused by circumstances beyond its reasonable control.

14. Contact Information

Takeclass Holding Limited Address:

Trident Centre

Griva Digeni 115,

3101, Limassol, Cyprus

support@takeclass.io