jumpAgrade Privacy Policy

This privacy policy is for this website jumpAgrade ("Our Site") and served by jumpAgrade Ltd and governs the privacy of its users who choose to use it. The policy sets out the different areas where user privacy is concerned and outlines the obligations and requirements of the users, the website and website owners. Furthermore the way this website processes, stores and protects user data and information will also be detailed within this privacy policy (the "Privacy Policy").

We at jumpAgrade Ltd ("jumpAgrade," "We," "Us," "Our") know that you care about how your personal information is used and shared, and We take your privacy seriously. By accessing or using Our Services (including without limitation the mobile version of the jumpAgrade.com website (the "Mobile Site") and the jumpAgrade mobile application(s) available via the Apple App Store and the Android Marketplace (collectively, the "Mobile Application")), you acknowledge that you accept the practices and policies outlined in this Privacy Policy. Remember that your use of jumpAgrade's services is at all times subject to the Terms of Service, which incorporates this Privacy Policy. Any terms we use here without defining them have the definitions given to them in the Terms of Service.

Our Commitment

What information does jumpAgrade display or collect?

<u>Information You Provide to Us</u>

We receive and store any information you knowingly enter when using Our Services, whether via computer, mobile phone, other wireless device, or that you provide to Us in any other way. This information may include, without limitation, personal information such as your name, user name, email address, Student User name, Student User email address (if any), qualifications, phone number, school affiliation, billing and payment information, and any other information necessary for us to provide Our Services. Therefore by way of personal information of a Student User all We require is a name, school affiliation and email address. [through the functionality of the Services, you may also be permitted to input an email address or phone number.]

<u>Information Collected Automatically</u>

We receive and store certain types of information whenever a Site User interacts with Our Site ("Usage Information"); this Usage Information is not personal information. For example, jumpAgrade automatically receives and records information on Our server logs from your browser including your IP address, jumpAgrade cookie information, and the page you requested.

We also record the details of activity of Site Users on Our Platform, and the number and frequency of visitors to Our Site and its components.

When you download our Mobile Application, We automatically collect information on the type of device, name and version of the operating system, name and version of the application, whether the currently logged in user is a Tutor User or Student User, the numerical mobile device user ID, as well as actions performed by the currently logged in user in accessing the Mobile Application ("Mobile Usage Information," which is considered part of Usage Information as described above).

We also use mobile analytics software to allow Us to better understand the functionality of Our Mobile Application and Mobile Site on your phone. This software may record information such as how often you use the Mobile Application, the events that occur within the Mobile Application, aggregated usage information, performance data, and where the application was downloaded from; this information is considered Mobile Usage Information.

The Services may also contain electronic images known as web beacons (sometimes called single-pixel gifs) and are used along with cookies to compile aggregated statistics to analyze how Our Services are used.

<u>Information That We Collect</u>

As part of your use of our Services We may collect and process the following data about you:

- Information about your use of Our Site, Our Mobile Site and/or Our Mobile Application including details of your visits such as pages viewed and the resources that you access.
 Such information includes traffic data, location data and other communication data.
- Information provided voluntarily by you. For example, when you register for information or book a lesson, communicate through Our Site, Our Mobile Site and/or Our Mobile Application, or when you contact us by email or telephone.
- Technical information used to identify you, such as login information, your IP address, the device, browser or operating system used to access Our Site, Our Mobile Site and/or Our Mobile Application.
- We also work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and may receive information about you from them.
- All payment card information is handled by a third party. We do not handle any payment card information ourselves, and are not PCI compliant.

Use of Cookies

Cookies are small bits of text that are downloaded to your computer or mobile device when you visit a website. Your browser sends these cookies back to the website every time you visit the site again, so it can recognise you and can then tailor what you see on the screen.

We use cookies for two main purposes:

- 1) For Our Site, [Our Mobile Site and/or Our Mobile Application] to operate We use cookies to, for example, save login information, record when you have returned to Our Site, Our Mobile Site and/or Our Mobile Application, and during the booking and payment processes.
- 2) For analytical purposes to record visits to Our Site, Our Mobile Site and/or Our Mobile Application, to see how visitors navigate through Our Site, Our Mobile Site and/or Our Mobile Application, and to record which pages have been visited. We may use third party cookies for this purpose.

You may block cookies by activating a setting on your browser or operating system that allows you to refuse the setting of all or some cookies. By doing so, you may not be able to access all or parts of Our Site, Our Mobile Site and/or Our Mobile Application.

For more information please read the advice at AboutCookies.org.

Use of Your Information

We will use the information you give Us:

- to carry out our obligations arising from any contracts entered into between you and Us and to provide you with the information, products and/or services that you request from Us;
- to provide you with information about Us (including other products and services We offer) and to send you newsletters;
- to notify you about changes to Our Services;

- to help us communicate with you effectively should you try to contact us via Our Site, Our Mobile Site and/or Our Mobile Application, including verification of any claims you may make; and
- to ensure that content from Our Site, Our Mobile Site and/or Our Mobile Application is presented in the most effective manner for you and for your computer or mobile device.
- We may use your personal data to send you emails (or other communications) with details of our or third party products or services which may be of interest to you, including information about special offers or promotions. If you would prefer not to receive any such emails or other communications, please tell us by emailing us info@jumpagrade.com

We will use any information collected about you automatically when you visit Our Site, Our Mobile Site and/or Our Mobile Application:

- to administer Our Site, Our Mobile Site and/or Our Mobile Application and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve Our Site, Our Mobile Site and/or Our Mobile Application and to ensure that content is presented in the most effective manner for you and for your computer or mobile device;
- to allow you to participate in any interactive features of Our Service, when you choose to do so;
- as part of our efforts to keep Our Site, Our Mobile Site and/or Our Mobile Application safe and secure;
- to make suggestions and recommendations to you about other products or services that may interest you. Such additional information will only be provided where you have consented to receive such information; and
- to inform you of any changes to Our Site, Our Mobile Site and/or Our Mobile Application, Our Services or goods and products.

We may combine information We receive from other sources with information you give to Us and information We collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information received bu Us).

We retain personal data from closed accounts in order to comply with legal obligations, enforce Our Terms, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations and take other actions as permitted by law. We never give your details to third parties to use your data to enable them to provide you with information regarding unrelated goods or services.

Storing Your Personal Data

In operating Our Site, Our Mobile Site and/or Our Mobile Application it may become necessary to transfer data that we collect from you to locations outside of the European Union for processing and storing. By providing your personal data to Us, you agree to this transfer, storing and processing. We do our utmost to ensure that all reasonable steps are taken to make sure that your data is stored securely.

Unfortunately the sending of information via the internet is not totally secure and on occasion such information can be intercepted. We cannot guarantee the security of data that you choose to send Us electronically, sending such information is entirely at your own risk.

[How is personal information of minors are collected?]

[If we learn We have collected personal information of a Student User who is aged under 18 without parental consent being obtained by his or her school, district, and/or teacher, or if we learn a student under 18 has provided us personal information beyond what we request from him or her, we will delete that information as quickly as possible. If you believe that a student under 18 may have provided us personal information in violation of this paragraph, please contact us at info@jumpagrade.com]

[When we use the term "Personal Information" in this Privacy Policy, we are referring to personally identifiable information of individual, non-student registrants of the Services. References to "Children's Personal Information" only apply to personally identifiable information of users who have registered for the Services as minor students (i.e., students under the age of 18). General references to "information" apply to all users.]

Mobile Usage Information

This information is used to determine the device capabilities and usage trends which allows Us to better understand which devices We should support and what features are most frequently used.

Push Notifications

If you use the Mobile Application, We will send push notifications to your mobile device in order to make you aware of certain activities that may occur within your account, such as when new material has been entered on Our Platform. You may opt-out of receiving such communications by turning them off at the device level or emailing Us at info@jumpagrade.com

We will not disclose your personal information to any other party other than in accordance with this Privacy Policy and in the circumstances detailed below:

- In the event that We sell any or all of Our business to a buyer.
- Where We are legally required by law to disclose your personal information.
- To further fraud protection and reduce the risk of fraud.

Third Party Links

On occasion We include links to third party websites on Our Site. Where We provide a link it does not mean that We endorse or approve that third party websites policy towards visitor privacy. You should review their privacy policy before sending them any personal data.

Contacting Us

Please do not hesitate to contact Us regarding any matter relating to this Privacy Policy. We will endeavor to respond to you as soon a reasonably possible. Contact can be made via email at info@jumpagrade.com