

EDURAPTOR PRIVACY POLICY

EduRaptor, LLC (“**EduRaptor**”, “**we**”, “**us**”, or “**our**”) is committed to protecting your privacy. EduRaptor provides virtual educational services for students of all ages by virtue of a proprietary web conferencing platform. We have prepared this Privacy Policy (“**Privacy Policy**”) to describe our practices regarding the personal information we collect from users of our services and visitors of our website, located at <https://www.eduraptor.com/> (the “**Site**”), and the services offered by us, including interaction you may have with our website (collectively, the “**Services**”).

QUESTIONS, CONTACTING US, AND REPORTING VIOLATIONS

If you have any questions, concerns or complaints about our Privacy Policy, our data collection or processing practices, wish to have your personal information updated or removed or if you want to report any security violations to us, please contact us at userpolicy@eduraptor.com.

INFORMATION COLLECTED

Information You Provide to Us.

If you use our Site or Services we may collect a variety of information from you, including your name, mailing address, email address, zip code, credit card, and bank account information and other personal or proprietary business information, including your social media account information. In addition, we may collect information regarding your communications using our Services, including the creation of back-ups of said information, time and content of communications, and other activity when you interact with our Services. If you post any information, such as a review, we will collect that information. Information communicated through or published by our Services will be available to the party(s) to which you are communicating and may be saved or otherwise communicated by them to third parties.

When you utilize our Services, your communications may be stored on our system while being transmitted or to ensure the quality of communication sent and received via your SNS accounts. If you provide us feedback or contact us via e-mail or through the Site, we will collect your name and e-mail address, as well as any other content included in the message, including meta-data. When you utilize our services, we shall make reasonable efforts to ensure that your communications are only received by the intended recipients and we will not intentionally disclose your communications to unintended recipients except such third parties as may assist us in providing the services. However, it is possible that a third party may hack or otherwise compromise the integrity of our communication system. We cannot warrant that the information communicated over our system will not be intercepted by third parties or government entities. Once any content is published on an SNS on your behalf that published information may be copied or communicated to third parties.

When you utilize our Services to communicate with others, we may collect other information regarding the viewers of the information posted on your behalf. We may use this information to better provide the Services to you and our other customers.

Furthermore, we will collect and process payments to provide the Services. For online payments, we accept credit card payments, and use [stripe](#), a third party with no affiliation to EduRaptor, for all payment processing services. We do not process, record or maintain your credit card or bank account information. For more information on how payments are handled, or to understand the data security and privacy afforded such information, please refer to the site(s) linked above for more details.

When you post or allow us to post content (text, images, photographs, videos, messages, comments, or any other kind of content) on an SNS or any other platform, the information contained in your posting may be stored on our servers and other users of the SNS platform will be able to see content posted in a public area.

We retain information on your behalf, such as messages you send (including the content of the message and the recipient data) using your Account. We may also retain information regarding messages sent from third parties interacting with your SNS accounts.

If you participate in one of our surveys, we may collect additional information as provided during the survey.

We may collect the unique device id number of the mobile or other device which you use to access the Site including your IP address and other metadata.

If you participate in a sweepstakes, contest, or giveaway on our Services, we may ask you for your e-mail address and/or home phone number, to notify you if you win. We may also ask for first and last names, and sometimes post-office addresses to verify your identity. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and contests are voluntary.

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. We may aggregate your data, or the data of your viewers or users, and remove personally identifiable information. This aggregated non-personal information may be used by the company for any purpose, including disclosure to third parties for advertising or investment purposes.

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. If we have access to your social media account, we may receive additional information from the social media account, including data posted to such an account.

Information Collected from Social Networking Sites.

The Services may allow viewers to share information with us via social networking sites, such as Facebook, Facebook Messenger, Instagram, Pinterest, LinkedIn, or Twitter (each an “SNS”). By sharing your SNS profile, you are allowing us, to access some of your SNS information as allowed by you (such as profile information, profile photo, contact and friends lists, previous posts, and other information). We may receive that information from your SNS platforms, and that information may be imported to our servers. Our Services also allow you to share information via such SNS profiles, such as referral links, targeted posts, marketing campaigns and other content. You acknowledge and agree that you are solely responsible for content posted to an SNS and that it is your responsibility to review the terms of use and privacy policy of the third-party provider of such SNSs. We will not be responsible or liable for: (i) the availability or accuracy of such SNSs; (ii) the content, products, or services on or availability of such SNSs; or (iii) your use of any such SNSs. You can remove your SNS profile information from us, as applicable, at any time. If you terminate the Services, the SNS public profile data, content created by us and other data we have accumulated during our provision of the Services may be retained by us for our use on other projects in the sole and absolute discretion of EduRaptor.

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**”), and your browser type, operating system, Internet Protocol (IP) address, and domain name are all collected. This information is generally used to help us deliver the most relevant information to you and administer and improve the Services. In addition, in the event our Services encounter technical difficulties, we may receive information about your browser or mobile device model software version and device carrier, which allows us to identify and fix bugs and otherwise improve the performance of our Services.

Log Files.

As is true of most websites, 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 and direct our advertising.

Cookies.

Like many online services, 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 and to market the Services or other products.

Analytics Companies.

We may work with third-party analytics companies that collect information anonymously and report website 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 Services 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, including the testing of different page designs to see which performs better;

- send you administrative e-mail notifications, such as security or support and maintenance advisories;
- resolve disputes and/or troubleshoot problems; develop, improve, and deliver marketing and advertising for the Services; process and deliver orders; respond to your inquiries related to employment opportunities or other requests; and
- send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes.

We may store and process your personal information in the United States and/or in other countries.

Intra-User Communications.

In order to upkeep the quality, safety and terms of our service, communications between users on the platform may be regulated.

User Feedback.

We may post user feedback on the Services from time to time. If you make any comments on a blog, SNS wall, 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.

Creation of Anonymous Data.

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

Third Party Service Providers.

We may share your personal information with third party service providers to: provide you with the Services; conduct quality assurance testing; facilitate creation of accounts; to provide technical support; market the Services; and/or to provide other services to EduRaptor. Before sharing personal information with third parties, we will take all reasonable measures to ensure that the third parties will abide by this policy. At times, we may make certain non-personal information available to third parties too, for reasons other than providing the Services and may do so at for any purpose at our sole and absolute discretion.

Corporate Restructuring.

We may share some or all of your personal information in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the personal information collected by us and will assume the rights and obligations regarding your personal information as described in this Privacy Policy.

Other Disclosures.

Regardless of any choices you make regarding your personal information (as described below), EduRaptor may disclose personal information if it believes 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 EduRaptor; (iii) to protect or defend the rights or property of EduRaptor; and/or (iv) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or other rights of EduRaptor found in law or in contract with you or third parties.

REFERRALS

The Services may allow you to invite your friends to sign up for the Services by sharing a referral link via an SNS, email or other means. If you choose to upload your contacts to the Service, we will receive and store those contacts' information and use it to send invitations on your behalf when you choose to do so. When you refer someone via our Services, your referral may include your name, contact information, and, if shared with us, your photo.

THIRD PARTY WEBSITES

Our Site may contain links to third party websites. When you click on a link to any other website or location, you will leave our Site or Services 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 be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to 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 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.

PROTECTION OF PERSONAL INFORMATION

We take the security of your personal information seriously. Our third-party service providers protect your personal information during transit using encryption such as Secure Sockets Layer (SSL) or other forms of encryption. We restrict access to billing information to those employees, contractors, agents, and other third parties who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations. Transaction data is stored in encrypted form, including when we utilize third-party storage. All transactions are processed through a gateway provider and are not stored or processed on our servers.

We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored "personal data" (as defined in applicable state statutes on security breach notification) to you via email or conspicuous posting via the Site in the most expedient time possible and without unreasonable delay, insofar as consistent with (i) the legitimate needs of law enforcement, or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system. While we endeavor to protect the security and integrity of sensitive personal information provided to the Site, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be safe from intrusion by others. In the event of a data breach and consistent with the above, we will notify users over email or conspicuous posting via on the Site within seven (7) business days after becoming aware of a data breach unless we believe doing so would put the Services or your Personal data in increased risk of unauthorized access by malicious third parties, in which case a longer time period may be necessary to ensure the security of our system from additional intrusion.

Identity theft and the practice currently known as "phishing" are of great concern to us. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your credit card information, login information, or national identification numbers in a non-secure

or unsolicited email or telephone communication. For more information about phishing, visit the Federal Trade Commission's website.

YOUR CHOICES REGARDING INFORMATION

You have several choices regarding the use of information on our Services:

Choices.

We offer you choices regarding the collection, use, and sharing of your personal information. We may periodically send you newsletters and e-mails that directly promote the use of our Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you service-related communications, including notices of any updates to our Privacy Policy.

Cookies.

If you decide at any time that you no longer wish to accept cookies from our Services for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Consult your browser's technical information. If you do not accept cookies, however, you may not be able to use all portions of the Services or all functionality of the Services. If you have any questions about how to disable or modify cookies, please contact your web browser provider.

Changes to Personal Information.

You may change or request that we delete your personal information at any time, but please note that we may be required to keep this 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 may remain in our archives. We may also retain your information for fraud prevention or similar purposes. We may choose to only delete personally identifiable information while retaining and maintaining non-personally identifiable aggregate data. We may refuse to delete certain client information necessary to allow us to maintain complete and accurate business records.

While we and others give you the choices to control the information collected and used as described in this Privacy Policy, there are many web browser signals and other similar mechanisms that can indicate your choice to disable tracking, and we may not be aware of or honor every mechanism.

Information Disclosed to Third Parties.

This Privacy Policy addresses only our use and disclosure of information we collect from and/or about you on the Services. If you disclose information to others or authorize us to do the same under this Privacy Policy, the use and disclosure restrictions contained in this Privacy Policy may not apply to every third party. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable.

HOW WE RESPOND TO DO NOT TRACK SIGNALS

We do not currently respond to “do not track” signals or other mechanisms that might enable consumers to opt out of tracking on our Services. For more information about do not track signals you can visit <https://allaboutdnt.com>.

A NOTE ABOUT CHILDREN

Children under the age of 18 are not eligible to use our Services without the consent of a parent or guardian. We do not collect or maintain personal information from children we know are under the age of 13. If a child under 13 submits personal information to us and we learn that the personal information is the personal information of a child under 13, we will take steps to remove the personal information from our databases. If you believe that a child under 13 provided us with personal information, please contact us at the email provided above.

USERS OUTSIDE OF THE UNITED STATES

If you are a non-U.S. user of the Services, by using the Services and/or providing us with information, you acknowledge and agree that your personal information may be processed for the purposes identified in this Privacy Policy. In addition, your personal information may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of personal information may be less stringent than the laws in your country. By providing your information, you consent to such transfer. We do not currently intend to apply for the Privacy Shield Framework nor to comply with the GDPR. If you are a citizen of the EU and providing Services to you would bring us under the jurisdiction of any European country, you do not have permission to use the Services or send us personal identifiable information.

CONTACT INFORMATION

We welcome your comments or questions about this Privacy Policy. You may contact us at the email provided above. Please contact us if you would like access to your personal information that we have collected. Please contact us if you would like us to stop collecting your personal information. Please contact us if you would like us to delete your personal information. Please contact us if you would like us to stop sharing your information. Please be advised that some or all of the Services may become unavailable to you if we are no longer able to access, use, and transmit your personal information.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is subject to occasional revision, 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. Any changes to this Privacy Policy will be effective immediately upon the earlier of our dispatch of an e-mail notice to you, or our posting of notice of the changes on the Services. These changes will be effective immediately for new users of our Service. 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 dispatch of the 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.

that you wish to deactivate your Account with us. 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.

Last Updated: 19th Sep 2022