

## **Privacy Policy Notice**

LearnAla, Inc. and its subsidiaries (“LearnAla”), respect your concerns about privacy. References in this Privacy Policy to “LearnAla”, “we”, “us”, and “our” are references to the LearnAla entity responsible for the processing of your personal information, which generally is the LearnAla entity that collects your personal information.

This privacy policy (“Privacy Policy”) describes the types of personal information we obtain, how we may use that personal information, with whom we may share it and how you may exercise your rights regarding our processing of that information. The Privacy Policy also describes the measures we take to safeguard the personal information we obtain and how you can contact us about our privacy practices.

This Privacy Policy applies to the personal information we obtain through LearnAla properties, including websites, products, services, desktop and mobile apps, and other tools offered by LearnAla that reference this Privacy Policy (the “Platforms”), offline collection, including LearnAla events, surveys, questionnaires, customer user research and evaluations (“Offline Channels”); and third-party sources, including business partners, ad networks and vendors (collectively, the “Offerings”). Additionally, This Policy applies to the all LearnAla products and/or services, including but not limited to the clients of LearnAla services, LearnAla websites and web application system and LearnAla that are offered to final users.

In connection with providing support, cloud and other services, LearnAla processes certain data maintained in environments that LearnAla may access to perform cloud, consulting and support services (“Customer Content”) on behalf of and at the direction of its customers and partners, as well as log data (e.g., regarding access and authentication requests) that we collect for analysis and security purposes across our services. Our use of such Customer Content and log data is subject to the terms of our customer agreements and terms and conditions and is not governed by this Privacy Policy. In contrast, the information we collect through our customers’ and partners’ use of our Platform (such as names, addresses, billing information and employee contact information) and through our Offline Channels interactions with customers and partners is subject to the terms of this Privacy Policy.

Platform may provide links to other third-party websites and features. Some of these third-party websites may be co-branded with a LearnAla logo even though they are not owned, controlled, operated or maintained by LearnAla. LearnAla does not share your personal information with those websites and is not responsible for their privacy practices. These websites are subject to their respective privacy policies. In some cases, we may provide the Offerings jointly with other businesses. For these co-branded offerings in which a third party is involved in your transactions, we will sometimes share or jointly collect customer data related to those transactions with that third party.

### **Personal Information We Obtain**

The data we obtain varies based on the Offerings you use in the Platform. We obtain personal information through your interaction with the Offerings, such as when you:

- create an account;
- sign up for an online program, event, seminar, promotion or sweepstakes;
- request products (including product evaluations, trials, tech preview and beta downloads), services or information;
- correspond with us or request information from us.

The types of personal information we obtain include:

- contact information (such as name email address, telephone number, postal or other physical address) for you or for others (e.g., principals in your business or billing contacts);
- information used to create your online account (such as username and password);
- business profile and practices information used to evaluate you as a partner;
- photographs, video images, voice recordings or transcripts;
- billing and financial information (such as name, billing address, payment card details and bank account information and purchase history);
- IP address and location data (such as data derived from your IP address, country and zip code);
- the precise geolocation of your mobile device;
- clickstream data and other information about your online activities (such as information about your devices, browsing actions and usage patterns), including across the Platform and third-party websites, that we obtain through the use of cookies, web beacons and similar technologies (see our description of Cookies and similar technologies below);
- time and date related access to events, offices or facilities;
- personal information contained in forums, blogs, and testimonials you provide or that we obtain from publicly available sources (such as social media channels);
- information related to participation in classroom or online training, including programs completed and certifications achieved;
- information necessary to provide support or other paid consulting services (such as contact details, chat services, support details, and event history);
- personal information contained in content you submit to us (such as through our “Contact” feature or other in-product or in-service messaging); and
- other personal information we obtain through our Offerings.

Please note that providing personal information to us is voluntary on your part. If you choose not to provide us certain information, we may not be able to offer you certain products and services, and you may not be able to access certain features of the Platform. We hereby represent that we have never collected or shall collect any data that reveals your race, nationality, political views, religious belief, philosophical views or other sensitive data defined by any applicable data protection laws.

### **How We Use Personal Information**

We use the information we obtain to:

- provide and administer our products and services (including websites and apps for which you have registered);

- process and fulfill orders in connection with our products and services and keep you informed about the status of your order;
- help you complete a transaction or order and provide customer support;
- bill you for products and services you purchased;
- provide training, support and consulting services;
- create and manage your account with LearnAla;
- operate, evaluate and improve our business (such as by administering, developing, enhancing and improving our products and services; managing our communications and customer relationships; and performing accounting, auditing, billing, reconciliation and collection activities);
- perform data analytics (such as research, trend analysis, financial analysis and customer segmentation);
- communicate with you about your account and orders (including sending emails relating to your registration, account status, order confirmations, renewal or expiration notices and other important information);
- conduct advertising, marketing and sales activities (including sending you promotional materials, generating leads, pursuing marketing prospects, performing market research, determining and managing the effectiveness of our advertising and marketing campaigns and managing our brand);
- communicate with you about, and administer your participation in, events, programs, promotions and surveys;
- connect employees with their enterprise account administrator;
- verify your identity and protect your account against unauthorized use or abuse of our services;
- protect against, identify and prevent fraud and other unlawful activity, claims and other liabilities;
- protect the health, safety and security of our employees;
- comply with and enforce relevant industry standards, contractual obligations and our policies;
- maintain and enhance the security of our Platforms, products, services, network services, information resources and employees; and
- respond to your inquiries.

Depending on the purposes for which personal information is used, and the context in which the data is obtained, we may rely on one or more of the following legal bases:

- performance of a contract with you or a relevant party;
- our legitimate business interests;
- compliance with a legal obligation, a court order, or to exercise or defend legal claims; or
- your consent to the processing, which you can revoke at any time.

We may combine data collected from you with other sources to help us improve the accuracy of our marketing and communications as well as to help expand or tailor our interactions with you. This includes combining personal information we obtain through the Platforms with information we obtain through Offline Channels with users consent. We may anonymize or aggregate personal information and use it for the purposes described above and for other purposes to the extent permitted by applicable law. We also may use personal information for additional purposes that

we specify at the time of collection. We will obtain your consent for these additional uses to the extent required by applicable law.

We will collect, use, store, disclose and protect your user information according to this Privacy Policy and corresponding product service terms in the course of providing business functions or detailed services to you; if it is necessary to collect your user information beyond the agreement made in this Privacy Policy and corresponding product service terms, we will separately describe the scope and purpose of such information collection, and collect the information as necessary to provide corresponding services after receiving your consent. Your refusal to provide the above-mentioned information will affect your use of relevant products, but without prejudice to the use of the basic functions of the Platforms products and/or service.

Where required by applicable law, we will obtain your consent for the processing of your personal information for direct marketing purposes.

### **How we use Cookies and similar technologies**

“Cookies” refer to the text-only files stored in the computers or mobile devices by the network server. Contents of the Cookies can only be retrieved or read by the server that create such Cookies. Each Cookie is unique to your web browser or mobile application. A Cookie generally includes identifiers, site name and several numbers and characters. The website can store users’ preference and other data by means of Cookies.

LearnAla uses Cookies for the same purpose as most of the Internet service providers use the Cookies for, i.e. improve user experience. When you use LearnAla products or services, we may collect and store the data related to your access to the LearnAla services by means of the Cookies or similar technologies (hereinafter referred to as the “Cookies”) to help you get more relaxed access experience. By doing this, we can understand your using habits, so that we can recognize your identity when you access or access again the LearnAla services, helping you save the steps of repeatedly entering account information, or help determine the security of your account. You have the right to select to accept or refuse the Cookies. You may refuse the Cookies by altering the browser settings. However, if you select to refuse the Cookies, you will not be able to log in or use the relevant functions of the LearnAla products and/or services relying on the Cookies. The information obtained by setting the Cookies shall apply to this Privacy Policy. LearnAla will not use the Cookies in any purposes other than those described in this Privacy Policy.

### **How We Share Your Personal Information**

We do not sell or otherwise disclose personal information about you except as described here or at the time of collection. LearnAla may share personal data in the following ways:

- if sharing your data is necessary to provide a product, service or information you have requested;
- as part of a joint sales promotion or to pass sales leads to our business partners;
- to keep you up to date on the latest product announcements, software updates, special offers or other information we think you would like to hear from our business partners;
- within LearnAla (including among affiliates and subsidiaries) for the purposes described in this Privacy Policy;
- to connect employees with their company administrator(s);

- with our customers to report and help manage issues requiring support or as part of consulting services;
- with our customers and partners to inform them about their users' use of our services (such as when a user has obtained credentials or completed a course);
- with service providers we have engaged to perform services on our behalf (such as payment processing, order fulfillment, customer support, customer relations management and data analytics). These service providers are contractually required to safeguard the information provided to them and are restricted from using or disclosing such information except as necessary to perform services on our behalf or to comply with legal requirements;
- with approved LearnAla partners, to offer and provide our products and services to you; and
- with our joint marketing and sales partners and other business partners who help us with our business operations or other aspects of our business and for the purposes described in this Privacy Policy.

We also may disclose personal information about you (1) if we are required or permitted to do so by applicable law, regulation or legal process (such as a court order or subpoena), (2) to law enforcement authorities or other government officials to comply with a legitimate legal request, (3) when we believe disclosure is necessary to prevent physical harm or financial loss to LearnAla, its users or the public as required or permitted by law, (4) to establish, exercise or defend our legal rights, and (5) in connection with an investigation of suspected or actual fraud, illegal activity, security or technical issues.

In addition, we reserve the right to transfer to relevant third parties information we have about you in the event of a potential or actual sale or transfer of all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation) or other business transaction.

We also may share the information in other ways for which we provide specific notice at the time of collection and obtain your consent to the extent required by applicable law.

### **International Data Transfers**

The information collected by LearnAla may come from various countries and regions all over the world and be processed in various countries and regions due to the business of LearnAla. The data protection laws of such countries or regions may differ. In such case, you shall agree that we transmit and store the data among regions in accordance with the following rules, otherwise you will not be able to use the existing LearnAla products and services:

- The user information collected and generated when the LearnAla products and/or services are operated within the Mexico region will be stored on the servers within US East;
- The user information collected and generated when the LearnAla products and/or services are operated within the Americas region will be stored on the servers within US East, the United States;
- The user information generated from using the LearnAla products and/or services by users

outside the above-mentioned regions will be transmitted and stored on the servers in the United States, Mexico or other third party countries. Under such circumstances, we will take relevant measures to ensure that the data we collected are processed according to this Policy and applicable laws.

## **Your Rights and Choices**

We offer you certain choices in connection with the personal information we obtain about you, such as how we use the information and how we communicate with you. To update your preferences, limit the communications you receive from us or submit a request, please contact us as specified in the “*How to Contact Us*” section of this Privacy Policy. You can also unsubscribe from our mailing lists by following the “Unsubscribe” link in our emails.

To the extent provided by the law of your jurisdiction, you may request access to the personal information we maintain about you or request that we correct, update, amend or delete your information, or that we restrict the processing of such information by contacting us as indicated below or by contacting [contact@learnala.com](mailto:contact@learnala.com) of your account. Additionally, if required by the local applicable laws, you shall have the right to control your user information in the following ways:

- You have the right to request us to tell you any user information we hold related to you.
- You have the right to request us to update, correct, supplement, delete or limit the processing of your user information if your user information is incorrect, incomplete, or processed illegally.
- You have the right to unsubscribe at any time without cost if you do not want to receive any further emails or messages sent by us.
- You have the right to object to the processing of your user information. If you object to the processing with legal reasons, we will cease the processing of your user information; however, if there are legitimate and necessary reasons more important than your interests, rights and freedom, or related to the filing and enforcement of legal proceedings, we will continue to process your user information.

If you want to execute relevant right, [contact@learnala.com](mailto:contact@learnala.com). For security purposes, you may need to make a written request in accordance with the applicable laws and shall be subject to a formal procedure.

If required by applicable laws, you also have the right to revoke your consent if LearnAla processes your user information upon your consent. However, the revocation of consent will not affect the legality and effect of our processing of your user information based on your consent prior to the revocation, nor will it affect our processing of your user information based on other appropriate justifiable reasons.

To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

Depending on your location, you may have the right to file a complaint with a government regulator if you are not satisfied with our response.

Where provided by law, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your personal information, and we will apply your preferences going forward. This will not affect the lawfulness of our use of your information based on your consent before its withdrawal.

## **How We Protect Personal Information**

We maintain administrative, technical and physical safeguards, consistent with legal requirements where the personal information was obtained, designed to protect against unlawful or unauthorized destruction, loss, alteration, use or disclosure of, or access to, the personal information provided to us through the Platforms.

## **Retention of Personal Information**

To the extent permitted by applicable law, we typically retain personal information we obtain about you for as long as it is needed (1) for the purposes for which we obtained it, in accordance with the terms of this Privacy Policy, which generally means that we will keep your personal information for the duration of our relationship or as long as you keep your account open with us; or (2) to take into account applicable statute of limitation periods and comply with applicable laws, resolve disputes and enforce our agreements. As described in the “Your Rights and Choices” section above, to the extent provided by the law of your jurisdiction, you may request that we delete your information or restrict the processing of such information by contacting us as indicated below.

## **Children’s Personal Information**

Our products and services are not aimed at minors, and we will not collect user information from minors, without the consent of their parents or guardians. If you find that your child provides user information to us without your permission, please [click here](#) to remind us. If we are reminded by you or find out that we have collected user information from minors, we will delete such information as soon as possible.

## **Changes to Our Privacy Policy**

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our information practices. We will indicate at the top of this Privacy Policy when it was most recently updated. However, if we make any material changes we will notify you by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices.

## **How to Contact Us**

If you have any questions or comments about this Privacy Policy or if you would like us to update information we have about you or your preferences, please contact us here or by email [contact@learnala.com](mailto:contact@learnala.com) or write to us at:

LearnAla, Inc.

Address: 651 N Broad St, Suite 206, in the city of Middletown, zip code 19709, Delaware