

Learnly Application  
Privacy Policy

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When you use our mobile Learnly application, and use our services, you trust us with your information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our App and our services.

This privacy policy applies to all information collected through our mobile Learnly application ("App"), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Sites").

**The App does not collect any of your Personal Data. The App may collect other information as indicated in section 1**

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11. WHAT INFORMATION MAY WE COLLECT?

Information automatically collected

In Short: Some information – browser and device characteristics – may be collected automatically when you visit our App.

We may automatically collect certain information when you visit, use or navigate the App. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our App and other technical information. This information may be primarily needed to maintain the security and operation of our App, and for our internal analytics and reporting purposes.

Information collected through our App

In Short: We may collect information regarding your mobile device, push notifications, when you use our App.

If you use our App, we may also collect the following information:

**Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's sensors, and other features. If you wish to change our access or permissions, you may do so in your device's settings.

**Mobile Device Data.** We may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information.

**Push Notifications.** We may request to send you push notifications regarding your account or the mobile application.

If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

Information collected from other sources

In Short: We may collect limited data from public databases, marketing partners, and other outside sources.

We may obtain information about you from other sources, such as public databases, joint marketing partners, as well as from other third parties. Examples of the information we receive from other sources include: social media profile information; marketing leads and search results and links, including paid listings (such as sponsored links).

## 2. HOW MAY WE USE YOUR INFORMATION?

In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use your information collected via our App for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We may use the information we collect or receive:

### **Deliver targeted advertising to you.**

We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

### **Request Feedback.**

We may use your information to request feedback and to contact you about your use of our App.

### **To enforce our terms, conditions and policies.**

To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

### **For other Business Purposes.**

We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our App, products, services, marketing and your experience.

## 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.

We may process or share data based on the following legal basis:

**Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.

**Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.

**Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

**Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or act regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations: **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the App, which will enable them to collect data about how you interact with the App over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes. **Business Partners.** We may share your information with our business partners to offer you certain products,

services or promotions. In addition, we inform you that a purpose of data collection may not be changed without your further consent unless it is explicitly permitted by law. Our App does not build a user profile based on collected data and does not identify anonymous users or reconstruct user profiles based on data collected from Apple-provided APIs or any data that user say has been collected in an “anonymized,” “aggregated,” or otherwise non-identifiable way. Especially We don’t use information from Contacts, Photos, or other APIs that access user data to build a contact database for user own use or for sale/distribution to third parties, and We don’t collect information about which other App are installed on a user’s device for the purposes of analytics or advertising/marketing.

#### 4. WHO WILL YOUR INFORMATION BE SHARED WITH?

In Short: We only share information with the following third parties: Google Firebase, Facebook Analytics, Facebook Ads, Google Ads, Smartlook, RevenueCat, AppsFlyer, MixPanel

We only share and disclose your information with the following third parties. We have categorized each party so that you may be easily understand the purpose of our data collection and processing practices. If we have processed your data based on your consent and you wish to revoke your consent, please contact us.

#### 5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 1 year.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### 6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process.

#### 7. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine the Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

#### 8. DO WE MAKE UPDATES TO THIS POLICY?

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

#### 9. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may email us at [support@learnapp.zendesk.com](mailto:support@learnapp.zendesk.com).