



## **Alef Education Privacy Policy**

Alef Education Consultancy LLC (“**Alef**”) is a company registered in Abu Dhabi with commercial license CN-2209313. Alef provides this privacy policy (“**Privacy Policy**”) to help you understand how Alef collects and uses data when you use the Alef Platform and related services (the “**Alef Platform**”). “You” means an individual who downloads or uses the Alef Platform.

If you have any questions about the Privacy Policy or how we protect personal data, please contact [privacy@alefeducation.com](mailto:privacy@alefeducation.com).

This Privacy Policy only governs the collection and use of information collected through or in relation to your use of the Alef Platform. It does not apply to any other Alef Education websites, products, software or services, and it does not modify or alter other agreements you may have, or enter into later, with Alef Education. This Privacy Policy does not apply to the data collection and use practices of any third parties you may contract with using or in connection with the Alef Platform, including your mobile service provider or any third party vendor.

**BY USING OR CONTINUING TO USE THE ALEF PLATFORM YOU FULLY CONSENT TO THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY, INCLUDING THE DISCLOSURE OF YOUR INFORMATION TO LOCATIONS WHICH THE AUTHORITIES IN YOUR JURISDICTION MAY NOT RECOGNISE AS PROVIDING AN ADEQUATE LEVEL OF PROTECTION FOR PERSONAL DATA.**

In addition to this Privacy Policy, for certain features of the Alef Platform, Alef Education may present different or additional information practices and terms specific to those programmes at the time the information is collected.

### **1. What information we collect about you**

For permitted users, we will provide a unique username and password so that you can login to and use the Alef Platform. We may record information about you which you voluntarily disclose through use of the Alef Platform and when you correspond with us, such as when you report problems with the Alef Platform.

Other personal data may be collected automatically when you use the Alef Platform, such as your IP address or from our affiliates.

Alef Education also collects certain data in a form that does not directly relate to an identifiable individual, such as the location where the Alef Platform is used and information from the device you use to access the Alef Platform, such as your browser type, operating system version, and time period of use. You may stop Alef Education collecting location data at any time by turning off location services, although this may affect the provision of services which make use of location data sent from your device.

Alef Education uses ‘cookie’ technology (small computer files placed on your device’s hard drive). When you go to particular pages within the Alef Platform, the cookie identifies your browser with a unique, random number. You are always free to decline the cookies, if your browser permits, although doing so may interfere with your use of the Alef Platform. The cookies Alef Education uses do not reveal any personal information about you.

From time to time, we may ask you to update the information you have provided to us and to provide other categories of information. In some cases, it will not be possible for Alef Education to make a particular service available to you if you do not provide certain information. You do not otherwise have a legal obligation to provide any personal information to Alef Education.

## 2. **How we use your information**

We process your personal information on the basis of the consent you provide when you accept the terms of this Privacy Policy. We process your personal information:

- to enable us to provide the Alef Platform services to you;
- where necessary for compliance with a legal obligation to which we are subject; or
- where necessary for the purposes of the legitimate business interests described in this Privacy Policy.
- to enable you to participate in interactive features of the Alef Platform;
- to improve the Alef Platform and the services we provide to our clients and to notify you about changes to them;
- to administer the Alef Platform and our services, including for troubleshooting and testing purposes; and
- to detect and investigate fraud and abuse of our services.

We use the non-personal information we collect when you use the Alef Platform to better understand our users and their behaviour and to improve the user experience of the Alef Platform and Alef Education and its affiliates' services.

Unless we are required by law to retain your information, we use reasonable efforts to delete your personal information from our records when you cease using the Alef Platform services.

## 3. **When we disclose your information**

We may share your information with:

- our affiliates and suppliers (such as hosting service providers) where necessary or helpful to provide our services to you; and
- governmental authorities and law enforcement agencies when we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce our terms of use and other agreements, or to protect the rights, property, or safety of Alef Education and our users.

We may disclose information we collect when you use the Alef Platform to our affiliates (who may be interested in learning about the characteristics of users accessing the Alef Platform, such as their location) and third party analytics providers. Information disclosed in this way is anonymised and aggregated and cannot be used to identify you.

We may also disclose your personal information to third parties if:

- we sell or buy any business or sell assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets; or
- Alef Education or substantially all of its assets are acquired by a third party, in which case personal information about our users will be one of the transferred assets.

## 4. **Where your information is located**

We may store your information on servers operated by Alef Education or hosting service providers in locations worldwide which the authorities in your jurisdiction do not recognise as providing an adequate level of protection for personal data. Depending on the location of your information, it may

not be possible to effectively enforce the data privacy rights and remedies available to individuals in your jurisdiction (if any).

5. **How we keep your information secure**

Alef Education is committed to using measures to help protect the security of your information. Alef Education and the third party service providers that provide hosting services for the Alef Platform use a variety of security technologies and administrative procedures to help protect your information from unauthorised access, use or disclosure with security measures appropriate to the sensitivity of the information.

The Internet is not a secure medium and Alef Education cannot guarantee the privacy of your information. You must never share your username and password or any details about your account on the Alef Platform with any other person. If you are concerned that your username, password or account has been compromised, please contact our customer support team immediately. In particular, if you are concerned that your password has been compromised, please ensure you change your password immediately.

6. **Changes to this Privacy Policy**

We may change this Privacy Policy at any time, including when required to comply with law or the directions of governmental authorities. Any changes we may make to this Privacy Policy will be notified to you by email or prominently displayed when you access the Alef Platform and by continuing to use the Alef Platform you will be deemed to have accepted them.