



Privacy Policy

Almina Edutech - Almina Online Kids Academy collects some Personal Data from its Users.

POLICY SUMMARY

Personal Data processed for the following purposes and using the following services:

- **Advertising**
 - **Google Ad Manager, Adjust and Facebook Lookalike Audience**
Personal Data: Tracker; Usage Data
 - **Facebook Audience Network**
Personal Data: Tracker; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data
- **Analytics**
 - **Google Analytics, Hotjar Form Analysis & Conversion Funnels, Matomo, Amplitude Analytics, Facebook Ads conversion tracking (Facebook pixel), Attribution and Google Ads conversion tracking**
Personal Data: Tracker; Usage Data
 - **MixPanel**
Personal Data: Trackers; Usage Data
- **Commercial affiliation**
 - **Tapfiliate**
- **Contacting the User**
 - **Contact form and Mailing list or newsletter**
Personal Data: email address; first name; last name
- **Device permissions for Personal Data access**

- **Facebook OAuth**
Personal Data: Tracker; various types of Data
 - **Google OAuth**
Personal Data: various types of Data as specified in the privacy policy of the service
- **Remarketing and behavioral targeting**
 - **Facebook Custom Audience**
Personal Data: email address; Tracker
 - **LinkedIn Website Retargeting, Google Ad Manager Audience Extension, Google Ads Remarketing and Facebook Remarketing**
Personal Data: Tracker; Usage Data
- **SPAM protection**
 - **Akismet**
Personal Data: various types of Data as specified in the privacy policy of the service
- **Tag Management**
 - **Google Tag Manager**
Personal Data: Usage Data
- **Traffic optimization and distribution**
 - **Cloudflare**
Personal Data: Tracker; various types of Data as specified in the privacy policy of the service
- **User database management**
 - **HubSpot CRM**
Personal Data: email address; phone number; various types of Data as specified in the privacy policy of the service

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Further information about the processing of Personal Data

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- **Selling goods and services online**
The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery.
The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data

collected by Almina Edutech - Almina Online Kids Academy depends on the payment system used.

- **The Service is directed to children under the age of 13**

Almina Online Kids Academy Language Learning Platform is directed to children under the age of 13. It doesn't require the child to disclose any more information than is reasonably necessary to participate in its activity.

Parents may review the personal information about their child collected by Almina Edutech - Almina Online Kids Academy - if any - outlined in the rest of this policy, ask for its deletion and request any further collection or use to be omitted by contacting the Owner. Parents may also agree to the collection and use of their child's information, but still not allow disclosure to third parties, unless disclosure is integral to the Service.

- **CCPA: Collection of personal information about minors**

We do not knowingly collect personal information of consumers who are below the age of 16.

- **Rights for registered California Users under the age of 18**

California's "Online Eraser" law, part of California's Business and Professions Code Sections 22580-22582, requires operators of certain websites and online services targeting minors to allow registered Users who are under the age of 18 and residents of California to request removal of content they post.

If a registered User fits that description and posted content on Almina Online Kids Academy Language Learning Platform, they may request removal of such content by contacting the Owner or its privacy policy coordinator at the contact details provided in this document.

In response to this request, the Owner may make content posted by the registered User invisible to other registered Users and the public (rather than deleting it entirely), in which case the content may remain on the Owner's servers. It may also be publicly available elsewhere if a third party copied and reposted this content.

- **Equal protection of User Data**

Almina Edutech - Almina Online Kids Academy shares User Data only with third parties carefully selected to ensure that they provide the same or equal protection of User Data as stated in this privacy policy and requested by applicable data protection laws. Further information on data processing and privacy practices by third parties can be found in their respective privacy policies.

Contact information

- **Owner and Data Controller**
- Almina Edutech - Almina Online Kids Academy
Headquarters: Kingsfordweg
- 151 1043 GR, Amsterdam, NL
- **Netherlands**
- **Owner contact email:** almina.edutech@onlinekidsacademy.org

FULL POLICY

Owner and Data Controller

Almina Edutech - Almina Online Kids Academy
Headquarters: Kingsfordweg
151 1043 GR, Amsterdam, NL
Netherlands
Owner contact email: almina.edutech@onlinekidsacademy.org

Types of Data collected

Among the types of Personal Data that Almina Edutech - Almina Online Kids Academy collects, by itself or through third parties, there are: Tracker; Usage Data; first name; email address; last name; Data communicated while using the service; payment data; country; phone number; Approximate location permission (non-continuous); Microphone permission; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data; User ID.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Almina Online Kids Academy Language Learning Platform.

Unless specified otherwise, all Data requested by Almina Edutech - Almina Online Kids Academy is mandatory and failure to provide this Data may make it impossible for Almina Edutech - Almina Online Kids Academy to provide its services. In cases where Almina Edutech - Almina Online Kids Academy specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by Almina Edutech - Almina Online Kids Academy or by the owners of third-party services used by Almina Online Kids Academy Language Learning Platform serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through Almina Online Kids Academy Language Learning Platform and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Almina Edutech - Almina Online Kids Academy (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics, Tag Management, Interaction with external social networks and platforms, Interaction with live chat platforms, Interaction with support and feedback platforms, Managing support and contact requests, Traffic optimization and distribution, Handling payments, Platform services and hosting, Remarketing and behavioral targeting, Managing contacts and sending messages, Contacting the User, Hosting and backend infrastructure, SPAM protection, Advertising, Handling productivity related activity, Commercial affiliation, User database management, Device permissions for Personal Data access, Registration and authentication, Displaying content from external platforms and Managing data collection and online surveys.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Device permissions for Personal Data access

Depending on the User's specific device, Almina Edutech - Almina Online Kids Academy may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the

contact details provided in the present document.

The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of Almina Online Kids Academy Language Learning Platform.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e. accessed to, modified or removed) by Almina Edutech - Almina Online Kids Academy.

Approximate location permission (non-continuous)

Used for accessing the User's approximate device location. Almina Edutech - Almina Online Kids Academy may collect, use, and share User location Data in order to provide location-based services.

The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for Almina Edutech - Almina Online Kids Academy to derive the approximate position of the User on a continuous basis.

Microphone permission

Allows accessing and recording microphone audio from the User's device.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- **Advertising**

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Almina Online Kids Academy Language Learning Platform, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside Almina Online Kids Academy Language Learning Platform. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Google Ad Manager

Google Ad Manager is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with. In

order to opt out from being tracked by various advertising networks, Users may make use of [Youronlinechoices](#). In order to understand Google's use of data, consult [Google's partner policy](#). This service uses the “DoubleClick” Cookie, which tracks use of Almina Online Kids Academy Language Learning Platform and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: [Google Ad Settings](#).

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Adjust (Adjust GmbH)

Adjust is an advertising service provided by Adjust GmbH.

Personal Data processed: Tracker; Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: Germany – [Privacy Policy](#) – [Opt out](#).

Legal basis for data transfer: Appropriate safeguards.

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Facebook Lookalike Audience

Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of Almina Online Kids Academy Language Learning Platform or engagement with relevant content across the Facebook apps and services.

On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of Trackers for ads personalization by visiting this [opt-out page](#).

Personal Data processed: Tracker; Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Legal basis for data transfer: Standard data protection clauses.

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Facebook Audience Network

Facebook Audience Network is an advertising service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, **In order to understand Facebook's use of Data, consult [Facebook's data policy](#).**

Almina Edutech - Almina Online Kids Academy may use identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Facebook Audience Network service. One of the ways Audience Network shows ads is by using the User's ad preferences. The User can control this in the [Facebook ad settings](#).

Users may opt-out of certain Audience Network targeting through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Audience Network related sections of this privacy policy, if available.

Personal Data processed: Tracker; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Legal basis for data transfer: Standard data protection clauses.

Category of personal information collected according to CCPA: identifiers; internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google Ireland Limited)

Google Analytics is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of Almina Online Kids Academy Language Learning Platform to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Hotjar Form Analysis & Conversion Funnels (Hotjar Ltd.)

Hotjar is an analytics service provided by Hotjar Ltd.

Hotjar honors generic Do Not Track headers. This means your browser can tell its script not to collect any of your data. This is a setting that is available in all major browsers. Find Hotjar’s [opt-out information here](#).

Personal Data processed: Tracker; Usage Data.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Matomo (Almina Edutech - Almina Online Kids Academy)

Matomo is an analytics software used by Almina Edutech - Almina Online Kids Academy to analyze data directly without the help of third parties.

Personal Data processed: Tracker; Usage Data.

Category of personal information collected according to CCPA: internet information.

Amplitude Analytics (Amplitude Inc.)

Amplitude Analytics is an analytics service provided by Amplitude Inc.

Personal Data processed: Tracker; Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#).

Legal basis for data transfer: Appropriate safeguards.

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find

information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Facebook Ads conversion tracking (Facebook pixel)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that connects data from the Facebook advertising network with actions performed on Almina Online Kids Academy Language Learning Platform. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data processed: Tracker; Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Legal basis for data transfer: Standard data protection clauses.

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Attribution (Attribution, LLC)

Attribution is an analytics service provided by Attribution, LLC.

Personal Data processed: Tracker; Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#).

Legal basis for data transfer: Standard data protection clauses.

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Google Ads conversion tracking

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on Almina Online Kids Academy Language Learning Platform.

Personal Data processed: Tracker; Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Legal basis for data transfer: Standard data protection clauses.

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

MixPanel (MixPanel)

MixPanel is an analytics service provided by Mixpanel Inc.

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Commercial affiliation**

This type of service allows Almina Edutech - Almina Online Kids Academy to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with Almina Edutech - Almina Online Kids Academy.

For details of which data are collected, please refer to the privacy policy of each service.

Tapfiliate

Tapfiliate is a commercial affiliation service provided by Tapfiliate B.V.

- **Contacting the User**

Contact form (Almina Online Kids Academy Language Learning Platform.)

By filling in the contact form with their Data, the User authorizes Almina Edutech - Almina Online Kids Academy to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: email address; first name; last name.

Category of personal information collected according to CCPA: identifiers.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find

information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Mailing list or newsletter (Almina Edutech - Almina Online Kids Academy)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning Almina Online Kids Academy Language Learning Platform. Your email address might also be added to this list as a result of signing up to Almina Online Kids Academy Language Learning Platform or after making a purchase.

Personal Data processed: email address; first name; last name.

Category of personal information collected according to CCPA: identifiers.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Device permissions for Personal Data access**

Almina Edutech - Almina Online Kids Academy requests certain permissions from Users that allow it to access the User's device Data as described below.

Device permissions for Personal Data access (Almina Edutech - Almina Online Kids Academy)

Almina Edutech - Almina Online Kids Academy requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Approximate location permission (non-continuous); Microphone permission.

Category of personal information collected according to CCPA: internet information; geolocation data.

- **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of Almina Online Kids Academy Language Learning Platform and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Fonts

Google Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the

Data processing, that allows Almina Edutech - Almina Online Kids Academy to incorporate content of this kind on its pages.
Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.
Legal basis for processing: Legitimate interest.
Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).
Legal basis for data transfer: Standard data protection clauses.
Category of personal information collected according to CCPA: internet information.
This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Handling payments**

Unless otherwise specified, Almina Edutech - Almina Online Kids Academy processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. Almina Edutech - Almina Online Kids Academy isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

Apple Pay (Apple Inc.)

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.
Personal Data processed: various types of Data as specified in the privacy policy of the service.
Place of processing: United States – [Privacy Policy](#).
Category of personal information collected according to CCPA: internet information.

Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.
Personal Data processed: various types of Data as specified in the privacy policy of the service.
Place of processing: United States – [Privacy Policy](#).
Category of personal information collected according to CCPA: internet information.

PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

Google Pay (Google LLC)

Google Pay is a payment service provided by Google LLC, which allows users to make online payments using their Google credentials.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

- **Handling productivity related activity**

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question.

These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

Google Workspace

Google Workspace is an integrated suite of cloud-based productivity, collaboration and storage services provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. Gmail or other G Suite services are not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside these services for advertising purposes in any other way.

Personal Data processed: email address; first name; last name.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Category of personal information collected according to CCPA: identifiers.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable Almina Edutech - Almina Online Kids Academy to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of Almina Online Kids Academy Language Learning Platform.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#); Germany – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Google Cloud Storage (Google LLC)

Google Cloud Storage is a hosting service provided by Google LLC.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Singapore – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

WP Engine

WP Engine is a hosting and backend service provided by WP Engine, Inc.

Microsoft Azure (Microsoft Corporation)

Microsoft Azure is a hosting service provided by Microsoft Corporation.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

- **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of Almina Online Kids Academy Language Learning Platform.

The interaction and information obtained through Almina Online Kids Academy Language Learning Platform are always subject to the User's

privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to log out from the respective services in order to make sure that the processed data on Almina Online Kids Academy Language Learning Platform isn't being connected back to the User's profile.

AddToAny (AddToAny LLC)

AddToAny is a service provided by AddToAny LLC, which displays a widget that allows interaction with social networks and external platforms as well as sharing the contents of Almina Online Kids Academy Language Learning Platform.

Depending on the configuration, this service can display widgets belonging to third parties such as the managers of social networks where interactions are shared. In this case, also the third parties that provide the widget will be informed of interactions and Usage Data on the pages where this service is installed.

Data collected through the service may be used to help deliver interest-based advertising. Users can opt out of third-party interest-based advertising by visiting the [Network Advertising Initiative opt-out page](#).

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

YouTube button and social widgets (Google Ireland Limited)

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google Ireland Limited.

Personal Data processed: Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Interaction with live chat platforms**

This type of service allows Users to interact with third-party live chat platforms directly from the pages of Almina Online Kids Academy Language Learning Platform, in order to contact and be contacted by Almina Online Kids Academy Language Learning Platform's support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

- **Zendesk Chat (Zendesk, Inc.)**

Zendesk Chat is a service for interacting with the Zendesk live chat platform provided by Zendesk, Inc.

Personal Data processed: Data communicated while using the service; email address; first name; last name.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: identifiers; internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Interaction with support and feedback platforms**

This type of service allows Users to interact with third-party support and feedback platforms directly from the pages of Almina Online Kids Academy Language Learning Platform.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

- **Zendesk Widget (Zendesk, Inc.)**

The Zendesk Widget is a service for interacting with the Zendesk support and feedback platform provided by Zendesk Inc.

Personal Data processed: email address; first name; last name.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: identifiers.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

Mailchimp (The Rocket Science Group LLC)

Mailchimp is an email address management and message sending service provided by The Rocket Science Group LLC.

Personal Data processed: country; email address; first name; last name.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: identifiers.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Managing data collection and online surveys**

This type of service allows Almina Edutech - Almina Online Kids Academy to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

SurveyMonkey

SurveyMonkey is a survey builder and data collection platform provided by SurveyMonkey Inc., SurveyMonkey Brazil Internet Ltda. or by SurveyMonkey Europe UC, depending on how the Owner manages the Data processing.

Personal Data processed: Data communicated while using the service.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#); Brazil – [Privacy Policy](#); European Union – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Managing support and contact requests**

This type of service allows Almina Edutech - Almina Online Kids Academy to manage support and contact requests received via email or by other means, such as the contact form.

The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

Zendesk (Zendesk, Inc.)

Zendesk is a support and contact request management service provided by Zendesk Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Platform services and hosting**

These services have the purpose of hosting and running key components of Almina Online Kids Academy Language Learning Platform, therefore allowing the provision of Almina Edutech - Almina Online Kids Academy from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

- **Registration and authentication**

By registering or authenticating, Users allow Almina Edutech - Almina Online Kids Academy to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, Almina Edutech - Almina Online Kids Academy will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Facebook Authentication

Facebook Authentication is a registration and authentication service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: Tracker; various types of Data as specified in the privacy policy of the service.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Legal basis for data transfer: Standard data protection clauses.

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Facebook Oauth

Facebook Oauth is a registration and authentication service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: Tracker; various types of Data.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Legal basis for data transfer: Standard data protection clauses.

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Google OAuth

Google OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Google network. Personal Data processed: various types of Data as specified in the privacy policy of the service.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Legal basis for data transfer: Standard data protection clauses.

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Remarketing and behavioral targeting**

This type of service allows Almina Edutech - Almina Online Kids Academy and its partners to inform, optimize and serve advertising based on past use of Almina Online Kids Academy Language Learning Platform by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the [Network Advertising Initiative opt-out page](#).

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

Facebook Custom Audience

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that connects the activity of Almina Online Kids Academy Language Learning Platform with the Facebook advertising network.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this [opt-out page](#).

Personal Data processed: email address; Tracker.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: identifiers; internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

LinkedIn Website Retargeting (LinkedIn Corporation)

LinkedIn Website Retargeting is a remarketing and behavioral targeting service provided by LinkedIn Corporation that connects the activity of Almina Online Kids Academy Language Learning Platform with the LinkedIn advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Google Ad Manager Audience Extension

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that tracks the visitors of Almina Online Kids Academy Language Learning Platform and allows selected advertising partners to display targeted ads across the web to them.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Google Ads Remarketing

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of Almina Online Kids Academy Language Learning Platform with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Facebook Remarketing

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that connects the activity of Almina Online Kids Academy Language Learning Platform with the Facebook advertising network.

Personal Data processed: Tracker; Usage Data.

Legal basis for processing: Legitimate interest.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

Legal basis for data transfer: Standard data protection clauses.

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **SPAM protection**

This type of service analyzes the traffic of Almina Online Kids Academy Language Learning Platform, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

Akismet

Akismet is a SPAM protection service provided by Automattic Inc. or by Automattic Ireland Ltd., depending on how the Owner manages the Data processing.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

- **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on Almina Online Kids Academy Language Learning Platform in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **Traffic optimization and distribution**

This type of service allows Almina Edutech - Almina Online Kids Academy to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between Almina Online Kids Academy Language Learning Platform and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through Almina Online Kids Academy Language Learning Platform, i.e., communication between Almina Online Kids Academy Language Learning Platform and the User's browser, while also allowing analytical data from Almina Online Kids Academy Language Learning Platform to be collected.

Personal Data processed: Tracker; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

- **User database management**

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Almina Edutech - Almina Online Kids Academy, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving Almina Online Kids Academy Language Learning Platform

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Almina Online Kids Academy Language Learning Platform.

HubSpot CRM (HubSpot, Inc.)

HubSpot CRM is a User database management service provided by HubSpot, Inc.

Personal Data processed: email address; phone number; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to CCPA: identifiers; internet information.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Further information about the processing of Personal Data

- **Selling goods and services online**

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery.

The Personal Data collected to complete the payment may include the

credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by Almina Edutech - Almina Online Kids Academy depends on the payment system used.

- **The Service is directed to children under the age of 13**

Almina Online Kids Academy Language Learning Platform is directed to children under the age of 13. It doesn't require the child to disclose any more information than is reasonably necessary to participate in its activity.

Parents may review the personal information about their child collected by Almina Edutech - Almina Online Kids Academy - if any - outlined in the rest of this policy, ask for its deletion and request any further collection or use to be omitted by contacting the Owner. Parents may also agree to the collection and use of their child's information, but still not allow disclosure to third parties, unless disclosure is integral to the Service.

- **Rights for registered California Users under the age of 18**

California's "Online Eraser" law, part of California's Business and Professions Code Sections 22580-22582, requires operators of certain websites and online services targeting minors to allow registered Users who are under the age of 18 and residents of California to request removal of content they post.

If a registered User fits that description and posted content on Almina Online Kids Academy Language Learning Platform, they may request removal of such content by contacting the Owner or its privacy policy coordinator at the contact details provided in this document.

In response to this request, the Owner may make content posted by the registered User invisible to other registered Users and the public (rather than deleting it entirely), in which case the content may remain on the Owner's servers. It may also be publicly available elsewhere if a third party copied and reposted this content.

- **Equal protection of User Data**

Almina Edutech - Almina Online Kids Academy shares User Data only with third parties carefully selected to ensure that they provide the same or equal protection of User Data as stated in this privacy policy and requested by applicable data protection laws. Further information on data processing and privacy practices by third parties can be found in

their respective privacy policies.

This processing constitutes a sale based on the definition under the CCPA. In addition to the information in this clause, the User can find information regarding how to opt out of the sale in the section detailing the rights of Californian consumers.

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Cookie Policy

Almina Edutech - Almina Online Kids Academy uses Trackers. To learn more, the User may consult the [Cookie Policy](#).

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Almina Online Kids Academy Language Learning Platform or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, Almina Edutech - Almina Online Kids Academy may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, Almina Edutech - Almina Online Kids Academy and any third-party services may collect files that record interaction with Almina Online Kids Academy Language Learning Platform (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

Almina Online Kids Academy Language Learning Platform does not support “Do Not Track” requests. To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within Almina Online Kids Academy Language Learning Platform and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Information for Californian consumers

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running Almina Online Kids Academy Language Learning Platform and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The provisions contained in this section apply to all Users who are consumers residing in the state of California, United States of America, according to "The California Consumer Privacy Act of 2018" (Users are referred to below, simply as "you", "your", "yours"), and, for such consumers, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy. This part of the document uses the term "personal information" as it is defined in The California Consumer Privacy Act (CCPA).

Categories of personal information collected, disclosed or sold

In this section we summarize the categories of personal information that we've collected, disclosed or sold and the purposes thereof. **You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.**

Information we collect: the categories of personal information we collect

We have collected the following categories of personal information about you: identifiers, commercial information, internet information and geolocation data.

We will not collect additional categories of personal information without notifying you.

How we collect information: what are the sources of the personal information we collect?

We collect the above-mentioned categories of personal information, either directly or indirectly, from you when you use Almina Online Kids Academy Language Learning Platform.

For example, you directly provide your personal information when you submit requests via any forms on Almina Online Kids Academy Language Learning Platform. You also provide personal information indirectly when you navigate Almina Online Kids Academy Language Learning Platform, as personal information about you is automatically observed and collected. Finally, we may collect your personal information from third parties that work with us in connection with the Service or with the functioning of Almina Online Kids Academy Language Learning Platform and features thereof.

How we use the information we collect: sharing and disclosing of your personal information with third parties for a business purpose

We may disclose the personal information we collect about you to a third party for business purposes. In this case, we enter a written agreement with such third party that requires the recipient to both keep the personal information confidential and not use it for any purpose(s) other than those necessary for the performance of the agreement.

We may also disclose your personal information to third parties when you explicitly ask or authorize us to do so, in order to provide you with our Service.

To find out more about the purposes of processing, please refer to the relevant section of this document.

Sale of your personal information

For our purposes, the word "sale" means any "selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a

consumer's personal information by the business to **another business or a third party, for monetary or other valuable consideration**".

This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

Your right to opt out of the sale of personal information

You have the right to opt out of the sale of your personal information. This means that whenever you request us to stop selling your data, we will abide by your request.

Such requests can be made freely, at any time, without submitting any verifiable request, simply by following the instructions below.

Instructions to opt out of the sale of personal information

If you'd like to know more, or exercise your right to opt out in regard to all the sales carried out by Almina Edutech - Almina Online Kids Academy, both online and offline, you can contact us for further information using the contact details provided in this document.

What are the purposes for which we use your personal information?

We may use your personal information to allow the operational functioning of Almina Online Kids Academy Language Learning Platform and features thereof ("business purposes"). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section "Detailed information on the processing of Personal Data" within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We will not use your personal information for different, unrelated, or incompatible purposes without notifying you.

Your California privacy rights and how to exercise them

The right to know and to portability

You have the right to request that we disclose to you:

- the categories and sources of the personal information that we collect about you, the purposes for which we use your information and with whom such information is shared;
- in case of sale of personal information or disclosure for a business purpose, two separate lists where we disclose:
 - for sales, the personal information categories purchased by each category of recipient; and
 - for disclosures for a business purpose, the personal information categories obtained by each category of recipient.

The disclosure described above will be limited to the personal information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance – provided that this is technically feasible.

The right to request the deletion of your personal information

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on Almina Online Kids Academy Language Learning Platform, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and direct any of our service providers to do so.

How to exercise your rights

To exercise the rights described above, you need to submit your verifiable request to us by contacting us via the details provided in this document.

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

If you are an adult, you can make a verifiable request on behalf of a minor under your parental authority. You can submit a maximum number of 2 requests over a period of 12 months.

How and when we are expected to handle your request

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Our disclosure(s) will cover the preceding 12 month period.

Should we deny your request, we will explain you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee, or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind it.

Additional information about California privacy

CCPA: Collection of personal information about minors

We do not knowingly collect personal information of consumers who are below the age of 16.

Information for Users residing in Brazil

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running Almina Online Kids Academy Language Learning Platform and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The provisions contained in this section apply to all Users who reside in Brazil, according to the "Lei Geral de Proteção de Dados" (Users are referred to below, simply as "you", "your", "yours"). For such Users, these provisions supersede any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term "personal information" as it is defined in the Lei Geral de Proteção de Dados (LGPD).

The grounds on which we process your personal information

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

Categories of personal information processed

To find out what categories of your personal information are processed, you can read the section titled "Detailed information on the processing of Personal Data" within this document.

Why we process your personal information

To find out why we process your personal information, you can read the sections titled "Detailed information on the processing of Personal Data" and "The purposes of processing" within this document.

Your Brazilian privacy rights, how to file a request and our response to your requests

Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;

- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

How to file your request

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

How and when we will respond to your request

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist,

any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request – except in cases where such communication is proven impossible or involves disproportionate effort on our side.

Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through Almina Online Kids Academy Language Learning Platform (or third-party services employed in Almina Edutech - Almina Online Kids Academy), which can include: the IP addresses or domain names of the computers utilized by the Users who use Almina Online Kids Academy Language Learning Platform, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using Almina Online Kids Academy Language Learning Platform who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Almina Online Kids Academy Language Learning Platform. The Data Controller, unless otherwise specified, is the Owner of Almina Edutech - Almina Online Kids Academy.

Almina Edutech - Almina Online Kids Academy (Almina Online Kids Academy Language Learning Platform)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by Almina Edutech - Almina Online Kids Academy as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to Almina Edutech - Almina Online Kids Academy, if not stated otherwise within this document.

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