

PRIVACY POLICY

EFFECTIVE JULY 17, 2019

1. Privacy Policy Overview

Summary – Policy Overview

This Policy explains how we may Process your information. This Policy may be amended or updated from time to time, so please check it regularly for updates.

Eduson LLC, with its affiliates (collectively, “**Eduson**”, “**us**”, “**our**” or “**we**”), owns, operates, or provides access to, several interactive websites, mobile and connected applications, and other online interactive features and services, including, but not limited to, emails, newsletters, chat areas, forums, communities and contests (collectively “**Services**”). This Privacy Policy applies to all information collected about you by Eduson, regardless of how it is collected or stored, and describes, among other things, the types of information collected about you when you interact with the Services, how your information may be used, when your information may be disclosed, how you can control the use and disclosure of your information, and how your information is protected.

Except as otherwise noted in this Privacy Policy, Eduson is a data controller (as that term is used under the **EU General Data Protection Regulation (“GDPR”)**), which means that we decide how and why the information you provide to us is processed. Please contact us using our web-site <https://www.eduson.tv>. This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of your information, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make.

This Privacy Policy covers information collected through the following websites and mobile applications: <https://www.eduson.tv> and Eduson for iOS and Android.

2. What Categories of Information We May Process

Summary – Categories of Information We May Process

We may Process: your personal details (e.g., your name); your contact details (e.g., your e-mail address); records of your consents; details of your employer (where relevant); information about your interactions with our content or advertising; and any views or opinions you provide to us.

We may also Process information about you from your use of our Services (e.g., the type of device you are using, the internet service provider, etc.), including your interactions with content and advertising on the Services.

“**Personal Information**” means information that is about any individual, or from which any individual is directly or indirectly identifiable.

“**Process**”, “**Processing**” or “**Processed**” means anything that is done with any Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We may Process the following categories of Personal Information about you:

- Personal details: your name; username or log in details; password.
- Demographic information: gender; salutation; job title, company information, education, work experience and other professional information; and language preferences.
- Contact details: email address.
- Consent records: records of any consents you may have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).

- Views and opinions: any views and opinions that you or other users choose to send to us, or publicly post about us on social media platforms or in the Services, including on forums.

We also collect other kinds of information from you or other sources, which we refer to as “**Other Information**” in this Policy, which may include but is not limited to:

- Information about your use of the Services, such as usage data and statistical information, which may be aggregated.
- Device identification (“**ID**”), which is a distinctive number associated with a smartphone or similar handheld device, but is different than a hardware serial number.
- Advertising ID, which is a unique, user-resettable identification number for advertising associated with a device (e.g., iOS uses the Identifier for Advertising (or “**IDFA**”) and Android uses Google Advertising ID).
- Internet Protocol (“**IP**”) address, which is a unique string of numbers automatically assigned to your device whenever you access the Internet.
- Internet connection means, such as internet service provider (“**ISP**”), mobile operator, WiFi connection, service set identifier (“**SSID**”), International Mobile Subscriber Identity (“**IMSI**”) and International Mobile Equipment Identity (“**IMEI**”).

3. Sensitive Personal Information

Summary – Sensitive Personal Information

We do not seek to collect or otherwise Process your Sensitive Personal Information. Where we need to Process your Sensitive Personal Information for a legitimate purpose, we do so in accordance with applicable law. The Services are not intended for use by children.

We do not collect or otherwise Process Personal Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, or any other information that may be deemed to be sensitive under GDPR (collectively, “**Sensitive Personal Information**”) in the ordinary course of our business. Where it becomes necessary to Process Sensitive Personal Information under GDPR, we would rely on one of the following legal bases:

- Compliance with applicable law: We may Process your Sensitive Personal Information where the Processing is required or permitted by applicable law;
- Detection and prevention of crime: We may Process your Sensitive Personal Information where the Processing is necessary for the detection or prevention of crime (including the prevention of fraud);
- Establishment, exercise or defense of legal rights: We may Process your Sensitive Personal Information where the Processing is necessary for the establishment, exercise or defense of legal rights; or
- Consent: We may Process your Sensitive Personal Information where we have, in accordance with applicable law, obtained your prior, express consent prior to Processing your Sensitive Personal Information.
- Children: The Services are not intended for use by children, especially those under 13, or teenagers, especially those under 18. No one under the age of 13 should provide any Personal Information.

4. How We Collect or Create Information

Summary – Collection and Creation of Information

We may collect or obtain User Information about you: directly from you (e.g., where you contact us); in the course of our relationship with you; when you visit our Services; when you register to use any part of the Services.

Collection of User Information: We may collect User Information about you from the following sources:

- Data you provide: We may obtain your Personal Information when you provide it to us across our Services (e.g., where you sign up for emails, participate in surveys; contact us via email etc.).

- Relationship data: We may collect or obtain your Personal Information in the ordinary course of our relationship with you (e.g., if you purchase a service from us or your employer buys access to the Services for you).

Creation of User Information. We may also create User Information about you, such as records of your interactions with us, for internal administrative purposes and analysis

Purposes for Which We May Process Your Information

Summary – Purposes for Which We May Process Your Information

We may Process User Information for the following purposes: providing the Services to you; communicating with you; analyzing engagement with our content; managing our IT systems; conducting surveys; ensuring the security of our systems; conducting investigations where necessary; compliance with applicable law; and improving our Services.

The purposes for which we may Process User Information, subject to applicable law, include:

- Provision of the Services to You: providing the Services to you from Eduson or its partners including (i) offering of contests, as well as chat areas, forums and communities, (ii) posting of your personal testimonial alongside other endorsements, (iii) display of your personal reviews of products or services, (iv) allowing you to search for other website members using information you may already know about that member such as username, full name or gamer profile and identify users matching that criteria, (v) management of your account, and (vi) customer support and relationship management.
- Offering and Improving the Services: operating and managing the Services for you; providing personalized content to you; communicating and interacting with you via the Services; identifying issues with the Services and planning improvements to or creating new Services; and notifying you of changes to any of our Services.
- Commerce Offerings: using cookies to track your browsing history.
- IT Administration: administration of Eduson' information technology systems; network and device administration; network and device security; implementing data security and information systems policies; compliance audits in relation to internal policies; identification and mitigation of fraudulent activity; and compliance with legal requirements.
- Legal Compliance: Subject to applicable law, we reserve the right to release information concerning any user of Services when we have grounds to believe that the user is in violation of our Terms of Use or has engaged in (or we have grounds to believe is engaging in) any illegal activity, and to release information in response to court and governmental orders, other requests from government entities, civil subpoenas, discovery requests and otherwise as required by law or regulatory obligations.

5. Direct Marketing

Summary – Direct Marketing

We may Process your User Information to contact you with information regarding services that may be of interest to you. You may unsubscribe at any time.

We may Process your User Information to contact you via e-mail,. We may send information to you regarding the Services, using the contact details that you have provided to us and always in compliance with applicable law.

You may unsubscribe from our newsletter lists at any time by following the unsubscribe instructions included in every email we send or in your account.

6. Cookies, Similar Technologies

Summary – Cookies, Similar Technologies

We may Process your User Information by placing or reading Cookies and similar technologies on the Services. Certain tracking technologies enable us to assign a unique identifier to you, and relate information about your use of the Services to Other Information about you, including your User Information for the purposes of learning more about you so we can provide you with relevant content. We also use these technologies to analyze trends; administer the Services; collect and store

information such as user settings, anonymous browser identifiers; supplement to our server logs and response measurement; and to improve our understanding of traffic on the Services.

Eduson may use cookies and other tracking technologies to administer Services, track users' movements around the Services. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on the Services.

Tracking technologies on the Services may be deployed by Eduson and/or by our service providers or partners. Certain tracking technologies enable us to assign a unique identifier to you, and relate information about your use of the Services to other information about you, including your User Information.

7. What is the Lawful Basis for Processing Personal Information

Summary – Lawful Basis for Processing User Information

We may Process your User Information where: you have given your consent; the Processing is necessary for fulfilment terms and conditions of the Contract concluded between your employer and Eduson LLC; the Processing is required by applicable law; the Processing is necessary to protect the vital interests of any individual; or where we have a valid legitimate interest in the Processing.

In Processing your User Information in connection with the purposes set out in this Policy, we may rely on one or more of the following legal bases, depending on the circumstances:

- Consent: We may Process your User Information where we have obtained your prior, express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);
- Contractual necessity: We may Process your User Information where the Processing is necessary for fulfilment terms and conditions of the Contract concluded between your employer or Eduson LLC;
- Compliance with applicable law: We may Process your User Information where the Processing is required by applicable law;
- Vital interests: We may Process your User Information where the Processing is necessary to protect the vital interests of any individual; or
- Legitimate interests: We may Process your User Information where we have a legitimate interest in carrying out the Processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

8. What Information We Disclose to Third Parties

Summary – Disclosure of User Information to Third Parties

We may disclose your User Information to: legal and regulatory authorities; our external advisors; parties who Process User Information on our behalf (“Processors”); any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; any purchaser of our business; and any third party providers of advertising, plugins or content used on the Services.

We may disclose your User Information to other entities within the Company group, for legitimate business purposes (including operating the Services, and providing services to you), in accordance with applicable law. In addition, we may disclose your User Information to:

- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- outside professional advisors (such as accountants, auditors, or lawyers), subject to binding contractual obligations of confidentiality;
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defense of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security;
- any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation);

The Services contain links to other sites or partners whose information practices may be different from ours. You should consult the privacy policy of these third parties to learn how your privacy is protected.

9. Data Security

Summary – Data Security

We implement appropriate technical and organizational security measures to protect your User Information. Please ensure that any Personal Information that you send to us is sent securely.

We have implemented appropriate technical and organizational security measures designed to protect your User Information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law. In certain instances we may use Secure Sockets Layer encryption and/or transfer certain User Information in a non-human readable format to provide protection.

10. Data Accuracy

Summary – Data Accuracy

We take every reasonable step to ensure that your User Information is kept accurate and up-to-date and are erased or rectified if we become aware of inaccuracies.

We take every reasonable step to ensure that your User Information that we Process is accurate and, where necessary, kept up to date, and any of your User Information that we Process that you inform us is inaccurate (having regard to the purposes for which they are Processed) is erased or rectified.

11. Data Minimization

Summary – Data Minimization

We take every reasonable step to limit the volume of your User Information that we Process to what is necessary.

We take every reasonable step to ensure that your User Information that we Process is limited to the User Information reasonably necessary in connection with the purposes set out in this Policy or as required to provide you services or access to the Services.

12. Data Retention

Summary – Data Retention

We take every reasonable step to ensure that your User Information is only retained for as long as they are needed.

We take every reasonable step to ensure that your User Information is only Processed for the minimum period necessary for the purposes set out in this Policy. The criteria for determining the duration for which we will keep your User Information are as follows: we will retain copies of your User Information in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Policy, unless applicable law requires a longer retention period. Unless there is a specific legal requirement for us to keep the information, we plan to retain it for no longer than is necessary to fulfill a legitimate business need. After expiry of the Contract concluded between Eduson and the Customer (e.g., your employer) your Personal Data are deleted automatically.

13. What Can I Do to Control My Information?

Summary – What Can I Do to Control My Information?

You can directly take steps to change your preferences for newsletters.

If you are an EU resident, you may have certain rights including: the right not to provide your Personal Information to us; the right of access to your Personal Information; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of Processing, of your Personal Information; the right to object to the Processing of your Personal Information; the right to have your

Personal Information transferred to another controller; the right to withdraw consent. We may require proof of or need to verify your identity before we can give effect to these rights.

You may directly take steps to change your preferences as follows:

Access to Your Personal Information. Upon request Eduson will provide you with information about whether we hold any of your personal information. You may access, correct, or request deletion of your personal information by logging into your account or contacting us through our ask@eduson.tv. We will respond to your request within a reasonable timeframe.

Your Newsletter and Email Subscriptions. You can opt out or unsubscribe to a newsletter or other email list at any time by following the instructions at the end of emails you receive or using your personal settings in your private account at Eduson' web-site. Please allow five to ten business days for changes to take effect. On some Services, member service-related communications are an integral part of such Services to which you subscribe and you may continue to receive emails as part of that particular portion of the Services unless you cancel your account, even if you opt out of the newsletters or email list. If you have provided more than one email address to us, you may continue to be contacted unless you request to unsubscribe each email address you have provided.

Push Notifications. We send you push notifications in order to update you about any news that we may be running. If you no longer wish to receive these types of communications, you may turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

14. Terms of Us

For more information concerning your use of the Services, please visit the [Eduson Terms of Use](#). The **Eduson Terms of Use** is incorporated by reference into this Privacy Policy.

We recommend that you review our Terms of Use regularly, in order to review any changes we might make from time to time.

15. Contact Details

If you have any questions about our Company's privacy policy, comments or claims on the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us via:

Email: ask@eduson.tv

Phone: +7 (499) 653-65-86

Post to following address: 115280, Moscow, Leninskaya Sloboda St., 19

16. How this Privacy Policy May Change

We may change this Privacy Policy from time to time, and all changes will be effective at the time we post them. If we believe there is a significant change to this Privacy Policy or our data collection and use practices, we will indicate on our websites that our Privacy Policy has changed prior to the change becoming effective. The then-posted version of the Privacy Policy supersedes all prior versions. Your continued access to or use of any of the Services shall be deemed your acceptance of the Privacy Policy.