

Edu.com Privacy Policy

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Introduction

Edu.com and its related services, including but not limited to providing tailored learning materials and posting questions and answers (hereinafter referred to as “**Product**”, “**Services**”) are provided by Weclass Technology Pte.Ltd. (hereinafter referred to as “**we**”, “**us**”, or “**our**”). We highly value your privacy. This Privacy Policy (hereinafter referred to as “**Policy**”) describes how we collect, use, and disclose, process, and store any personal information that you provided to us or that we collect from you when you use our products and services. If you are under 16 or otherwise regarded as a minor in your jurisdiction, do not provide any personal information **without your parent’s or legal guardian’s permission**.

This Policy applies to the website of edu.com that reference or link to this Privacy Policy. It also describes your rights and available choices regarding your personal information.

Data Controller: Weclass Technology Pte.Ltd. is the controller (or similar term under applicable laws) of any information processed in connection with this Policy.

It is our policy to comply with applicable data protection laws. We reserve the right to change the provisions of this Policy from time to time. We encourage you to periodically review this page for the latest information on our privacy practices.

I. What Information We Collect

The term of “personal information” or “personal data” means information that specifically identifies an individual (such as a name, mobile number, email address, or other account number), and information about that individual’s location or activities (such as information about your use of our Services, IP addresses or mobile device identifiers) when directly linked to personally identifiable information. Personal information also includes demographic information such as date of birth, gender, geographic area and preferences when such information is linked to other personal information that identifies or may identify you.

The term of “your” means your (parents or legal guardians) and your children.

Personal information does NOT include “anonymized” information, which is data we collect about the use of our Services or about a group or category of products, services or users, or other data from which individual identities or other personal information has been removed so that the individual concerned cannot be identified directly or indirectly. Such data helps us understand trends and our users’ needs so that we can better consider new features or otherwise tailor our Services.

This Policy in no way restricts or limits our collection and use of such information.

We may collect information that you voluntarily provide to us., information that we collect automatically through your use of our Services, and certain information we obtain from third-party sources. More information about the categories and sources of information is provided below.

1. Information provided by you

- **Account Information**

For the purpose of providing you with the functionality of logging in and verifying your identity, we will collect the following information about you:

- email
- password
- nickname

For the purpose of providing you with learning materials based on your learning stage and country/region, we will collect the following information about you:

- learning stage
- country or region

- **Answer Information**

When you answer quizzes online, we collect the answers you submitted and your steps to answer questions, to analyze your mastery of the knowledge and enhance your learning outcomes.

- **Post Information**

When you post questions or answers in the section of Question & Answer, we collect the information you post (including but limited to the pictures you upload, the text you submit and the formula you input) to provide the Q&A functionality.

- **Subscribe To Learning Materials**

When you subscribe to learning materials, we collect the email and the corresponding grade with the learning content to which you subscribe, to send learning content to your mail box.

2. Information we collect automatically

- Usage Information
 - We will automatically collect your usage information (including the action of

clicking and browsing, device model, country/region, referrer, the web page visited during the usage of our Services, and action of subscribing) to conduct analytics/statistics and improve our service and user experience.

- When you start answering quizzes online, we will collect the module and knowledge point of quizzes, the corresponding grade of quizzes, the date and time of your starting answering and finishing answering, the duration of answering, and the action of finishing online quizzes, to conduct analytics/statistics and improve our service and user experience.
- When you subscribe to learning materials, we collect the action of subscribing, to conduct analytics/statistics and improve our service and user experience.

3. Information from third-party sources

Currently, we do not collect information from third-party sources.

4. Special categories of information

We do not request or intend to collect any other “special categories of information”, such as any information on health, race, religion, political opinions or philosophical beliefs, sexual preferences or orientation. **We also want to kindly remind you to be cautious when sharing this information about yourself (or others) in our Services.**

5. Cookies and Other Similar Technologies

We automatically collect certain information by Cookies. Cookies are small text files that enable us and our service providers and partners to uniquely identify your browser or device for various purposes, including those described above. Cookies normally work by assigning a unique number to your device and are stored on your browser by the websites that you visit as well as third party service providers and partners to those websites. To learn more about our use of Cookies, please see our [Cookies Notice](#). We will obtain your consent to our use of cookies where required by law. You may be able to refuse or disable Cookies by adjusting your browser settings. Since each browser is different, please consult the instructions provided by your browser. Please note that you may need to take additional steps to refuse or disable certain types of Cookies. If you choose to refuse, disable, or delete Cookies, some of the functionalities of the Service may no longer be available to you.

II. Legal Basis

We may only use your information when we have justifications (each called a "legal basis") under data protection law. To process your information as described in this Policy, we rely on the following legal bases involving contractual necessity, legitimate interests, consent, compliance with applicable laws and regulations.

1. Contractual necessity

- To offer our Services to you;
- To store, host, back up (whether for disaster recovery or otherwise) your personal information;
- To enter into and to perform our contract with you, or to perform any steps you require from us before entering into a contract with you;
- To communicate with you, including but not limited to respond to your request for any help with the Services or for exercising your rights with respect to your personal information.

2. Legitimate interests

To pursue our legitimate interests (or those of a third party) as we deem fit and necessary, where your interests and fundamental rights do not override those legitimate interests of ours (or any third party), such as:

- To understand, improve, optimize and develop the Services;
- To conduct research and monitor the quality of the Services;
- To protect our legal rights and to protect our users and third parties from harm;
- To respond to complaints, hearings, arbitrations, law suits or other governmental or regulatory proceedings.

3. Consent

If you choose to provide us with information that may be considered “special” or “sensitive” in certain jurisdictions, you’re consenting to our processing of that information in accordance with this Policy.

4. Compliance with applicable laws and regulations

- To comply with legal requirements
- Assist law enforcement

III. How We Store Your Personal Information

The personal information we collect from you may be stored on a third-party cloud storage in the United States of America.

We store your personal information in response to the requirements of laws, regulations or our commercial purposes. We will delete or anonymize your personal information after you cancel your account.

IV. How We Share Your Personal Information

We may share some of your personal information with affiliated companies and authorized

partners who cooperate with us providing products and services. We will not share your personal information with third parties for their own marketing or commercial purposes.

1. Affiliated companies: Currently, we do not share your personal information with our affiliated companies to provide certain features in our Services. In case we share your personal information with our affiliated companies, we will only share your information within our affiliated companies for legitimate and explicit purposes, and only share the information necessary to provide the Services, and are bound by the purposes stated in this Policy (which means that these companies will use your personal information in the same way as we can under this Policy, including provide part of the functions of the Product, preventing illegal use and supporting users). If the affiliated companies wish to change the purpose of processing, we will state it in the corresponding notice of the specific services.

2. Authorized partners: For the performance of certain features or to provide you with better Services and a better user experience, some of our Services will be provided by our authorized partners (including technical services providers, data storage services providers, analytics service providers etc.). We uphold the principles of minimization, necessity, and legality to carry out such sharing. Before sharing information, we will require authorized partners to take relevant confidentiality and security measures to process personal information in accordance with this Policy and applicable laws in your jurisdiction.

3. Corporate transactions: Where a merger, acquisition or bankruptcy liquidation takes place, if transfer of personal information is involved, we will request the new company or organization which obtains your personal information to be subject to this Policy, otherwise we will ask such company or organization to acquire your authorization and consent again.

4. Legal obligations and rights: We will only publicly disclose your personal information if it is mandatorily required by laws, in compliance with subpoena, legal proceedings, legal actions or compulsory request by supervisory department of government agencies. If we sincerely believe that disclosure is necessary to protect our rights, ensure your or others' safety, investigate fraud or respond to government, we may publicly disclose your personal information.

V. How We Protect Your Personal Information

1. We have taken reasonably feasible and technical measures to protect collected services-related data. However, please be attention, even if we undertake reasonable measures to protect your data, there is no website, internet transmission, computer system or wireless connection that are definitely safe.

2. We have taken safeguarding measures in accordance with industry standards to protect the personal information you provided and prevent data from unauthorized access, public disclose, use, modification, damage or loss. We take all reasonably practical measures to protect your personal information. In particular:

(1) We encrypt a lot of information. For instance, we do not store your password but only store the Hash value after your password's double layer SHA as a proof of security authentication. The HASH algorithm of SHA is irreversible. Therefore, no one can find your password according to the Hash value. We periodically review practices regarding information collection, storage and possessing (including physical security measures), to prevent various systems from unauthorized access.

(2) We use computer system that has limited access and merely allow our employees who need to know personal information in order to help us process it or authorized staff from the Services companies to access personal information. These people are required to comply with strict contractual confidentiality obligations. Failure to comply with the obligations will lead to legal liabilities or termination of contract with us.

(3) The security of your information is extremely important to us. Therefore, we endeavour to ensure the security of your personal information and implement measures such as security encryption during storage and transmission to prevent your information from unauthorized access, use, or disclosure. At the same time, no one can access the specific content of some encrypted data except the users themselves.

3. In case of personal information security incident is likely to result in high risk to the rights and freedoms of personal information subjects, we will promptly inform you of the relevant information related to the leakage by email.

VI. How long do we retain your personal information?

1. We retain your personal information for the period necessary for the purpose of the information collection described in this Privacy Policy or required by the applicable laws, the requirements of laws and regulations. We will cease to retain and delete or anonymize personal information once the purpose of collection is fulfilled, and/or after we terminate the operation of the corresponding product or service, and/or after we confirm your request for erasure.

2. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. When we no longer need to use your information, we will remove it from our systems and records and/or take steps to anonymise it promptly so that you can no longer be identified from it.

3. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

4. However, we may continue to retain certain data to the maximum extent permitted by applicable laws. If you would like to delete your data, please refer to the heading of "Your Rights" below.

VII. Your Rights

As the subject of the personal information, you are entitled to have the rights provided by the privacy laws in your jurisdiction. Your rights may include part or all of those described underneath. You can exercise your rights entitled by the privacy laws in your jurisdiction at any time by sending us relevant requests to zhengyi19@tal.com. **A Parent/Legal Guardian User can exercise your children's rights entitled by privacy laws in your jurisdiction on behalf of your children.** Your rights may include:

1. Right to be informed:

We publish this Policy to inform you of how we handle your personal information. We are committed to the transparency of the use of your information.

2. Right to access your personal information:

You have the right to access personal information we hold about you, how we use it, and who we share it with.

You may have access to your account information (including nickname, learning stage and country/region) by navigating to “My” – “Setting”-“Profile”.

You may have access to your email information by navigating to “My” – “Setting” – “Account” – “Email”.

3. Right to correct your personal information:

You have the right to correct your information where that information is not accurate. You can log in to the Product and correct your personal and security information, or contact us via the email stated in this Policy.

You may correct your account information (including nickname, learning stage and country/region) by navigating to “My” - “Setting” - “Profile”.

You may correct your email information by navigating to “My” - “Setting” - “Account” - “Email”.

4. Right to delete your personal information:

You can delete your account or remove certain personal information that we have stored about you, by contacting us via the email stated in this Policy.

However, please note that we may need to retain personal information if there are valid grounds under data protection laws for us to do so (e.g., for the defense of legal claims or freedom of expression) but we will respond to you and let you know if that is the case.

5. **Right to restrict processing:**

In limited circumstances, you have the right to request us to stop processing your personal information we hold about you other than for storage purposes in certain circumstances.

6. **Right to data portability:**

You can request a copy of certain data in a machine-readable form that can be transferred to another provider, if such right is requested by the privacy laws in your jurisdiction.

7. **Right of Refusal:**

In certain circumstances (including where data is processed on the basis of legitimate interests or for the purposes of marketing) you may object to that processing.

If you are located in the United Kingdom of Great Britain and Northern Ireland (hereinafter referred to as the “UK”) you may also object to the processing of your personal information for certain purposes:

- **To stop receiving marketing communications from us:** you may demand that we stop any direct marketing to you, at any time. You will find a link or instructions to unsubscribe in any such communications from us.

- **For other purposes:** you may object to the processing of your personal information where such processing is based on a legitimate interest as described above. Please describe the reasons relating to your particular situation to justify your request. If applicable, we will stop the processing unless we have compelling legitimate grounds.

8. **Right to Withdraw Consent:**

You may withdraw your consent for the processing of your personal information by submitting a request to us via email. We will deal with your request within a reasonable time frame from the time when the request was received, and thereafter not processing your personal information as per your request.

Please note that your withdrawal of consent could result in certain legal consequences. Depending on the extent to which you authorize us to process your personal information, it may mean that you will no longer be able to enjoy the use of our services. However, any decision on your part to withdraw your consent or authorization will not affect personal information processing previously performed with your permission.

9. **Right to Refuse Automated Decision:**

You may have rights not to be bound by automatic decisions, including user profiling, if such right is requested by the privacy laws in your jurisdiction.

To help us verify that you are the subject of the personal information and exercise your rights outlined above, we may require you to provide sufficient proof of identification. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

If you are concerned about the way in which we are managing your personal information and think we may have breached any relevant laws and obligations, please contact us via the email stated in this Policy.

We will respond and reply to you as soon as possible. Generally, we will reply to you within one (1) month upon receipt of your request (If necessary, we may extend it by an additional two (2) months as permitted by law. We will inform you the reason for the extension within the aforementioned 30 day period, such as the request is too complicated or too much in volume).

10. Right to lodge complaints to the supervisory authority:

If you feel we have not resolved your concern, you have the right to lodge a complaint with your local privacy or data protection regulator.

How We Process Children’s Personal Information

We treat anyone under 16 years old (or equivalent minimum age in relevant jurisdiction) as a child. We do not collect children’s personal information without parents’ or legal guardians’ consent.

We only collect as much information about a child as is necessary for the child to use the functionalities in our Services, and his or her participation is not conditional on the disclosure of more personal information than is reasonably necessary.

Information We Collect From Children and How We Use Children’s Information

We may collect limited information from children.

For the purpose of providing children with the functionality of logging in and verifying your children’s identity, we will collect the following information about children:

- email
- password
- nickname
- date of birth/ages

For the purpose of providing children with learning materials based on children’s learning stage and

country/region, we will collect the following information about children:

- learning stage
- country or region

When the children answer quizzes online, we collect the answers children submitted and the steps to answer questions, to analyze the children's mastery of the knowledge and enhance the children's learning outcomes.

When the children post questions or answers in the section of Question & Answer, we collect the information the children post (including but limited to the pictures the children upload, the text children submit and the formula the children input) to provide the Q&A.

When the children subscribe to learning materials, we collect the email and the corresponding grade with the learning content to which the children subscribe, to send learning content to the mail box.

When the children use our services, we will automatically collect the usage information (including the action of clicking and browsing, device model, country/region, referrer, the web page visited during the usage of our Services, and action of subscribing) to conduct analytics/statistics and improve our service and user experience.

When the children start answering quizzes online, we will collect the module and knowledge point of quizzes, the corresponding grade of quizzes, the date and time of your starting answering and finishing answering, the duration of answering, and the action of finishing online quizzes, to conduct analytics/statistics and improve our service and user experience.

When the children subscribe to learning materials, we collect the action of subscribing, to conduct analytics/statistics and improve our service and user experience.

Disclosing Children's Information

For certain functionalities provided by us, we may share or disclose a child's information, to our authorized partners. We will only share or disclose information necessary for us to provide the Services.

Accessing, Correcting and Deleting Your Children's Personal Information

You have the right to access personal information we hold about your children, how we use it, and who we share it with.

You may have access to your children's account information (including nickname, learning stage and country/region) by navigating to "My" - "Setting" - "Profile", or by sending an e-mail to

zhengyi19@tal.com to submit your request.

You may have access to your children's email information by navigating to "My" - "Setting" - "Account" - "Email", by sending an e-mail to zhengyi19@tal.com to submit your request.

You have the right to correct your children's information where that information is not accurate. You can log in to the Product and correct your children's personal and security information, or contact us via zhengyi19@tal.com to submit your request.

You may correct your children's account information (including nickname, learning stage and country/region) by navigating to "My" - "Setting" - "Profile", or by sending an e-mail to zhengyi19@tal.com to submit your request.

You may correct your children's email information by navigating to "My" - "Setting" - "Account" - "Email", by sending an e-mail to zhengyi19@tal.com to submit your request.

You may delete your children's personal information or delete your children's account by sending an e-mail to zhengyi19@tal.com to submit your request.

VIII. How Your Personal Information is Transferred Globally

For the purposes described in the Privacy Policy, your information may be transferred to other countries or regions where our server may locate in accordance with applicable law. We may also transfer your personal information to third-party service providers and business partners and your data may therefore also be transmitted to other countries or regions. However, this does not change our commitment to comply with this Privacy Policy and to protect your personal information.

If we need to transfer personal information outside of your jurisdiction, whether to our affiliates or third-party service providers, we will comply with related applicable laws. We will take corresponding protective measures according to the requirements of applicable laws to ensure data security.

If personal information collected and generated in the UK is transferred to countries outside of the UK, we will ensure that proper protective measures are taken to comply with Data Protection Act 2018 and UK General Data Protection Regulation ("UK GDPR").

For more information for protection measures of personal information in scenario of cross border data transfer, please contact us.

IX. How This Policy is Updated

We reserve the right to update or modify this Policy from time to time. For significant changes to our Privacy Policy, we will push the updated Privacy Policy to you through our device and obtain your consent again; nonetheless, we will post the notification on our website to notify you about the changes to this Policy.

X. Inconsistency

In case of any inconsistency between this Policy and other privacy policies on personal information management related to the Services, this Policy will prevail to the extent of the inconsistency.

XI. Contact Us

If you have any concerns or doubt over our Privacy Policy, please contact us via:

zhengyi19@tal.com

Mailing Address: 30 CECIL STREET, #19-08 PRUDENTIAL TOWER SINGAPORE 049712

Special Terms for the United States

If you are using the Services in the United States, the following additional terms apply. If any conflict arises between the main Privacy Policy, the following terms shall prevail:

Minimum Age. In the United States, the minimum age for users is 13. We therefore do not knowingly collect any personal information from children under the age of 13 in the United States without parental consent, unless permitted by law. If we learn that a child under the age of 13 has provided us with personal information, we will delete it in accordance with applicable law.

We provide you with a number of rights described in the section “Your Rights” above in accordance with applicable law, including the right to request to access, correct, delete, and take your data with you. We will not unlawfully discriminate against you for exercising your rights. If we refuse to take action on your request, you may appeal this refusal within a reasonable period after you have received notice of the refusal. You may file an appeal by contacting us zhengyi19@tal.com. For Users who are California residents, you have the following extra rights under the California Consumer Privacy Act, and you have the right to be free from unlawful discrimination for exercising your rights under the Act:

You have the right to request that we disclose certain information to you and explain how we have collected, used and shared your personal information over the past 12 months.

You have the right to request that we delete your personal information that we collected from you, subject to certain exceptions.

We did not sell personal information and therefore did not process requests for opt-out of sale.

California “Shine The Light” Law. For users located in California, we do not share your personal information with third parties for those third parties’ direct marketing purposes.

In addition, under California law, operators of online services are required to disclose how they respond to “do not track” signals or other similar mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information of a consumer over time and across third-party online services, to the extent the operator engages in that collection. At this time, we do not track our Users’ personal information over time and across third-party online services. This law also requires operators of online services to disclose whether third parties may collect personal information about their users’ online activities over time and across different online services when the users use the operator’s service. We do not knowingly permit third parties to collect personal information about an individual User’s online activities over time and across different online services when using the Service.

The Children's Online Privacy Protection Act of 1998 and its rules (collectively, "COPPA") require us to inform you, as parents and legal guardians (as used in this section, "parents") about our practices for collecting, using, and disclosing Personal Information from children under the age of 13 ("children"). It also requires us to obtain verifiable consent from a child's parent for certain collection, use, and disclosure of the child's Personal Information.

This section notifies parents of:

- **Information We Collect From Your Children and How We Use Your Children’s Information**

We do not collect children’s personal information without parents’ or legal guardians’ consent.

We only collect as much information about a child as is necessary for the child to use the functionalities in our Services, and his or her participation is not conditional on the disclosure of more personal information than is reasonably necessary.

You may check the detail in the abovementioned part VIII “How We Process Children’s Personal Information”.

- **Disclosing Children’s information**

We will only disclose limited children’s information to perform our Services. You may check the detail in the abovementioned part VIII “How We Process Children’s Personal Information”.

- **Accessing, Correcting and Deleting Your Children’s Personal Information**

You may check the detail of how to access, correct and delete children’s personal information in the abovementioned part VIII “How We Process Children’s Personal Information”.