

Privacy Policy

1. GENERAL

At Pro Lingua Learning, we care about your personal data, so we have prepared this Privacy Policy to explain how we collect, use and share it.

This Privacy Policy (“**Privacy Policy**”) details the personal data Pro Lingua Learning (“**Pro Lingua Learning**”, “**we**”, “**us**” or “**our**”) receives about you, how we process it and your rights and obligations in relation to your personal data. Pro Lingua Learning, LLC, a company registered at 821 Bowie Rd; Rockville, Maryland, United States of America is the data controller for the purposes of the General Data Protection Regulation (“**GDPR**”) and any relevant local legislation (“**Data Protection Laws**”).

By using or accessing the Service, you agree to the terms of this Privacy Policy. Capitalized terms not defined here have the meanings set forth in the terms and conditions (the “Terms and Conditions”) located at www.prolingualearning.com/terms. We may update our Privacy Policy to reflect changes to our information practices. If we do this and the changes are material, we will post a notice that we have made changes to this Privacy Policy on the Website for at least 7 days before the changes are made, and we will indicate the date these terms were last revised at the bottom of the Privacy Policy. Any revisions to this Privacy Policy will become effective at the end of that 7 day period.

2. INFORMATION WE COLLECT

This Privacy Policy explains how we collect, use and share your personal data.

Information you provide

Through the registration process, you will provide us with your name, e-mail address (or parent’s e-mail address), and age range or native language. You will also provide us with your payment transaction information if you choose to pay for Pro Lingua Learning services.

Activity Data

When you use the Service, you will submit information and content to your profile. We will also generate data about your use of our Services including your engagement in educational activities on the Service, or your sending of messages and otherwise transmitting information to other users (“**Activity Data**”). We also collect technical data about how you interact with our Services.

Product Research and Development

We may contact you to participate in product research activities. These may include surveys, interviews, and other types of feedback sessions. When you participate in these research activities, the information you provide will be used to test, improve, and develop our products. We will record the video, audio and text transcriptions of these sessions and will retain this data for two years.

You may opt out of being contacted for research activities at any time by emailing us at info@prolingualearning.com.

Product Updates and Promotional Information

We may occasionally email you, as a Pro Lingua Learning account holder or a Pro Lingua Learning Community subscriber, regarding product updates and related promotional information. You may opt out of receiving such emails by contacting us at info@prolingualearning.com or by clicking on "Unsubscribe" on any of our email communications.

3. COOKIES

When you enter the Website, we collect your browser type and your IP address (a unique address that identifies your computer on the Internet). When you use our mobile Application, we collect your device type, your device ID, and your IP address.

In addition, we store certain information from your browser using "cookies." A cookie is a piece of data stored on the user's computer tied to information about the user. We use session ID cookies to confirm that users are logged in. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide you certain features available on the Website (e.g., customized delivery of information).

You can find more information about cookies and how to manage them at <http://www.allaboutcookies.org>.

4. INFORMATION OBTAINED BY THIRD PARTIES

To support and enhance the Service, we may work with a variety of third party advertising networks, marketing analytics service providers and website analysis firms, such as Google (collectively, "**Third Party Advertising Service Providers**"). These Third Party Advertising Service Providers collect and use non-personally identifiable information, such as your mobile device ID, about your visits to and use of the Website and mobile Application, as well as other websites in order to serve you with advertisements and content tailored to meet your preferences and likely

interests or better understand ad effectiveness. Aggregate demographic and interest data will also be used for market research purposes.

We use Google Analytics which is a web analytics tool that helps us understand how users engage with the Website. Like many services, Google Analytics uses first-party cookies to track user interactions as in our case, where they are used to collect information about how users use our site. This information is used to compile reports and to help us improve our Website. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page: <https://tools.google.com/dlpage/gaoptout>.

You can opt-out of receiving personalized ads from advertisers and ad networks that are members of the Network Advertising Initiative (“NAI”) or who follow the DAA Self-Regulatory Principles for Online Behavioral Advertising using their respective opt-out tools. The NAI's opt-out tool can be found here <http://www.networkadvertising.org/choices/> and the DAA's opt out tool can be found here <http://www.aboutads.info/choices/>.

In addition, your mobile devices may offer settings that enable you to make choices about the collection, use, or transfer of mobile app information for online behavioral advertising (for example, Apple iOS' Advertising ID and Google Android's Advertising ID). Please note that opting out does not prevent the display of all advertisements to you.

5. USE OF INFORMATION OBTAINED BY PRO LINGUA LEARNING

Pro Lingua Learning may occasionally send you service related and product change announcements through the general operation of the Service. We may send you reminder notifications to support the Pro Lingua Learning teaching methodology by reinforcing the learning cadence and help maintain your learning streak. We process your data to help provide you with the Service and offer personalized features, to understand and improve our Service and to keep our Service safe and secure.

Pro Lingua Learning may use or share anonymous data collected through the Service, including Activity Data without limitation. As a business, it is critical that we perform our contract with you with the best service possible, and it is in our legitimate interests to perform these processing functions and to enable service e-mails by default to keep your data secure and provide our Service. You may opt out of any non-essential service e-mails at any time.

We may also use your contact information to send you notifications regarding new services, offers and promotions offered by Pro Lingua Learning if you affirmatively consent to receive such communications.

6. SHARING YOUR PERSONAL DATA WITH THIRD PARTIES

Pro Lingua Learning shares your personal data only when it is necessary to offer the Service, legally required, or permitted by you.

We may provide personal data to hosting providers such as Amazon Web Services, search engine providers such as Google, analytics providers such as Crashlytics, and support providers such as ZenDesk.

These data processors help us bring you the Service. For example, we may share your information in order to detect where or how you encountered a bug when using our mobile application. In connection with these operations, our service providers will have access to personal data for a limited time. When we utilize service providers for processing any personal data, we implement contractual protections limiting the use of that personal data to the provision of services to Pro Lingua Learning.

We will be required to access and disclose personal data in response to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. Additionally, we will access and share account or other personal data when we believe it is necessary to comply with law, to protect our interests or property, to prevent fraud or other illegal activity perpetrated through the Service or using the Pro Lingua Learning name, or to prevent imminent harm. This will include accessing and sharing personal data with other companies, lawyers, agents or government agencies.

Pro Lingua Learning will share, via the Student Tracking Portal, the complete and accurate student progress reports of its apps with such institutions, including universities, middle and high schools, language institutes, or other third parties, (collectively, "**Student Progress Report Recipients**") when you register for a course using one or more of Pro Lingua Learning' Apps. These results will include metrics of your progress and success with the Apps, your name, and your email address. We will never share these details with any party without your approval, except that anonymized examination results will be used by Pro Lingua Learning and its partners to improve our products and for research and analysis.

If the ownership of all or substantially all of the Pro Lingua Learning business, or individual business units or assets owned by Pro Lingua Learning that are related to the Service, were to change, your personal data will be transferred to the new owner. In any such transfer of information, your personal data would remain subject to this section.

Pro Lingua Learning will share aggregate or anonymous data collected through the Service, including Activity Data, for purposes such as understanding or improving the service.

7. DATA SUBJECT RIGHTS AND DATA RETENTION

You have the following rights in relation to the personal data we hold about you, unless provided otherwise by local law:

- To request access to, or erasure of, the personal data we hold about you.
- To request us to restrict the processing of the personal data we hold about you.
- To object to us processing personal data relating to you.
- Where you have given us consent to process your personal data, you have the right to withdraw that consent at any time.
- To request the exportation of the personal data you have provided to Pro Lingua Learning in a format that can be transferred electronically to a third party.
- To delete your account with Pro Lingua Learning by following the instructions available through the Service.

Pro Lingua Learning will retain your data until your account is deleted, after which point we will retain anonymous data collected through the Service, including Activity Data, which may be used by Pro Lingua Learning and shared with third parties in any manner. Information associated with the Student Tracking Portal will be collectively deleted from your Pro Lingua Learning account after five years have passed, or sooner, from the date your progress data was uploaded, but anonymized data may be kept indefinitely by Pro Lingua Learning to improve our Apps and for research and analysis.

Please note that some of these rights are not absolute. In some cases, we may refuse a request to exercise particular rights if complying with it meant that we are no longer able to meet our contractual obligation to provide you with particular products and services. We will keep you informed as to the actions that we can take when you make your request.

8. THIRD PARTY WEBSITES AND LINKS

Please note that you may have cookies placed on your computer by third party websites that refer you to our Service. Although we do not share your personal data with these third party websites unless it is reasonably necessary to offer the Service, they may be able to link certain non-personally identifiable information we transfer to them with personal data they previously collected from you. Please review the privacy policies of each website you visit to better understand their privacy practices. In addition, Pro Lingua Learning would like to inform you that anytime you click on links (including advertising banners), which take you to third party websites, you will be subject to the third parties' privacy policies.

Our Services contain links to other sites operated by third parties. Pro Lingua Learning does not control such other sites and is not responsible for their content, their privacy policies, or their use of personal data, including any personal or financial

information collected by our third party payment processor to process payments for in-app purchases. Pro Lingua Learning' inclusion of such links does not imply any endorsement of the content on such sites or of their owners or operators except as disclosed on the Services. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

9. CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 entitles residents of the State of California to request from a business, with whom that resident has an established business relationship, certain information regarding the types of personal data the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. If you would like to request a copy of this information disclosure from Pro Lingua Learning, please contact us at info@prolingualearning.com.

10. CHILDREN'S PRIVACY

The Services are not designed for and are not marketed to children under the age of 13 years. We do not knowingly collect or solicit personal information from children under the age of 13, and we do not knowingly allow such persons to use the Services. If you are a person under the age of 13, please do not attempt to use the Services or send any information about yourself to us. In the event that we learn that we have collected personal information from such a person without verified parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a person under the age of 13, please contact us at info@prolingualearning.com.

11. LINKS

The Service may contain links to other websites. We are not responsible for the privacy practices of other websites. We encourage users to be aware when they leave the Service to read the privacy statements of other websites that collect personally identifiable information. This Privacy Policy applies only to information collected by Pro Lingua Learning via the Service.

12. INFORMATION SECURITY

Pro Lingua Learning has implemented administrative and technical safeguards it believes are appropriate to protect the confidentiality, integrity and availability of your personal data, access credentials, and student progress data. However, given sufficient resources, a determined attacker could defeat those safeguards and may, as a result, gain access to the data we seek to protect.

13. DO NOT TRACK

The Service is not designed to respond to “do not track” signals sent by some browsers.

14. CONTACT US

Pro Lingua Learning’s headquarters are located within the USA at:
Pro Lingua Learning; 821 Bowie Rd; Rockville, MD 20852 USA
Phone: +1-301-424-8900

For all data privacy inquiries and any questions or concerns you have about this Privacy Policy, please contact us at info@prolingualearning.com.

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