# **GDPR Policy**

# **PRIVACY NOTICE**

January 6, 2025

Thank you for choosing to be part of our community at RSR GLOBAL EDUCATION LTD ("Company", "we", "us", or "our". We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our notice, or our practices with regards to your personal information, please contact us at <a href="education@rsrglobal.org">education@rsrglobal.org</a>. When you visit our website <a href="https://rsrglobaleducation.com">https://rsrglobaleducation.com</a>, Facebook application, mobile application, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Sites or Apps and our services. This privacy notice applies to all information collected through our website (such as <a href="https://rsrglobal.co">https://rsrglobal.co</a>), Facebook application, mobile application ("Apps"), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy notice as the "Services"). Please read this privacy notice carefully as it will help you make informed decisions about sharing your personal information with us.

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## 1.WHAT INFORMATION DO WE COLLECT?

In Short: We may collect information regarding your and Facebook permissions when you use our apps. If you use our Apps, we may also collect the following information: Facebook Permissions. We by default

access your Facebook basic account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other information that you choose to make public. We may also request access to other permissions related to your account, such as friends, check-ins, and likes, and you may choose to grant or deny us access to each individual permission. For more information regarding Facebook permissions, refer to the Facebook Permissions Reference page.

## 2. HOW DO WE USE YOUR INFORMATION?

In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and /or your consent. We use your information for processing education-related services, communicating with you, and complying with legal obligations. Additionally, we may use aggregated, non-identifiable data for statistical analysis and service improvement. We use personal information collected via our Services or Apps for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below. We use the information we collect or receive:

\*To facilitate account creation and logon process. If you choose to link your account with us to a thirdparty account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.

\*To send you marketing and promotional communications. We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the WHAT ARE YOUR PRIVACY RIGHTS" below).

\*To send administrative information to you. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.

\*To post testimonials. We post testimonials on our Services or Apps that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at <a href="mailto:education@rsrglobal.org">education@rsrglobal.org</a> and be sure to include your name, testimonial location, and contact information.

\*To protect our Services. We may use your information as part of our efforts to keep our Services or Apps safe and secure (for example, for fraud monitoring and prevention).

\*To enforce our terms, conditions and policies for Business Purposes, Legal Reasons and Contractual.

To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations. We may process or share data based on the following legal basis:

- \*Consent We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- \*Legitimate Interests We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- \*Performance of a Contract Where we have entered a contract with you, we may process your personal information to fulfill the terms of our contract.
- \*Legal Obligations We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- \*Vital Interests We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

\*Vendors, Consultants and Other Third-Party Service Providers. We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Services or Apps, which will enable them to collect data about how you interact with the Services or Apps over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

\*Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

\*Third-Party Advertisers. We may use third-party advertising companies to serve ads when you visit the Services or Apps. These companies may use information about your visits to our website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

\*Business Partners. We may share your information with our business partners to offer you certain products, services or promotions.

### 4.DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short – We may use cookies and similar tracking technologies to enhance your browsing experience. You can manage your cookie preferences through your browser settings. We may use cookies and other tracking technologies to collect and store your information. We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

### 5.DO WE USE GOOGLE MAPS?

In Short - Yes, we use Google Maps for the purpose of providing better service. This website, mobile application, or Facebook application uses Google Maps APIs. You may find the Google Maps APIs Terms of Service here. To better understand Google's Privacy Policy, please refer to this link. By using our Maps API Implementation, you agree to be bound by Google's Terms of Service.

#### 6.HOW LONG DO WE KEEP YOUR INFORMATION?

In Short - We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law. We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us to keep your personal information for longer than 1 year. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 7.DO WE COLLECT INFORMATION FROM MINORS?

In Short - We do not knowingly collect data from or market to children under 18 years of age. We do not knowingly solicit data from or market to children under 18 years of age. By using the Services or Apps, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services or Apps. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to

promptly delete such data from our records. If you become aware of any data, we have collected from children under age 18, please contact us at <a href="mailto:education@rsrglobal.org">education@rsrglobal.org</a>

# 8.WHAT ARE YOUR PRIVACY RIGHTS?

In Short - In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time. In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (I) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws. If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal. If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here http://ec.europa.eu/justice/data-protection/bodies/authorities/index en.htm.Cookies similar technologies Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services or Apps.

## 9.CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 10.DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short - Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information. California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below. If you are under 18 years of age, reside in California, and have a registered account with the Services or Apps, you have the right to request removal of unwanted data that you publicly post on the

Services or Apps. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services or Apps, but please be aware that the data may not be completely or comprehensively removed from our systems.

#### 11. DO WE MAKE UPDATES TO THIS POLICY?

In Short - Yes, we will update this policy as necessary to stay compliant with relevant laws. We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information. We reserve the right to update our Privacy Policy to reflect changes in our practices. We will notify you of any significant updates, and it is your responsibility to review the policy periodically.

# 12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may email us at <a href="mailto:education@rsrglobal.org">education@rsrglobal.org</a> or by post to: RSR GLOBAL EDUCATION LTD 46 Nova Road Croydon, CRO 2TL United Kingdom

# HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the laws of some countries, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request form by clicking here. We will respond to your request within 30 days.