

Privacy Policy

Revision dated August 2, 2021.

The Edugram Privacy Policy ensures careful storage, confidentiality and protection of Personal Data of each user of the Edugram Platform (the “**Platform**”) and cares for the privacy of the Personal Data provided.

The term “**website**” as used in the provisions of this Privacy Policy means the website at www.edugram.com.

The term “**Services**” means the technical and marketing services provided by Tossox Holdings Limited to facilitate user interaction on the Platform.

1. List of data that may be collected by the Platform

When you interact with the Website, such as when you register your personal account on the Platform and use our Services via a browser on another electronic device, Personal Data is automatically collected:

(a) mandatorily:

- email address;
- date and time of registration, date and time of authorization on the Platform, and information about visits to our website, including access times;
- the source of access to the Platform;
- country, region, and city;
- password;
- IP address;
- records of correspondence with your requests for information, reports of problems or feedback regarding our Services.

b) additionally:

- telephone number;
- first and last name;
- experience in the field of CPA marketing;
- your social media profile.

You may also provide us with other information through your account on the Platform by updating or adding information, participating in discussions, online chats, resolving disputes, or otherwise interacting with us regarding our Services.

We also automatically collect certain information about your interactions with our Services and store it in our log files. Such information may include the following:

- IP address, cookies, browser type, Internet service provider, pages from which the user came to the website/pages from which the user left the website, operating system, date/time stamp (time in Unix format) or visitation information, device ID or unique identifier, device type, ID for advertising and unique device token.

- Location information.
- Computer and connection information such as your browsing statistics, traffic between sites, referral links (referral program links), advertising data, your IP address, your browser history, and your weblog information.

2. Cookies

We use cookies to provide you with convenient experience on our website, personalize content and advertising, analyze traffic, and improve the effectiveness of our marketing campaigns. We also share information about how you use the Edugram website with our partners, who may combine it with data we receive directly from you for their own internal purposes.

For more information about the types of cookies, the purposes for which we use them, and our partners, please see our Cookie Policy.

3. For what purposes do we use your Personal Information?

We collect and use your Personal Information with your consent to provide you with access to the Platform and our Services, communicate with you regarding your account and our Services, and detect, prevent, minimize, and investigate fraudulent or illegal activity. The personal information you provide to us may be used to manage our relationship with you, including responding to any requests you make or customizing or improving the Edugram Platform.

Specifically, among other things, we may collect your Personal Information to:

- verify your identity;
- process your registration as a user and to support and manage your registration process;
- provide you with customer service and responding to your requests, claims, or disputes;
- evaluate your account security and user operational risks, and detecting and preventing fraud and other security incidents;
- perform searches or performing statistical analysis to customize and improve the content and layout of the Platform;
- perform internal accounting, account formation, accounting purposes, and market research purposes;
- develop and market our Services in accordance with applicable law;
- provide services to you based on your location (such as advertising, search results, and other personalized content based on your general location information);
- notify of important functionality changes to the Platform (including changes to this Privacy Policy, the Cookie Policy, and/or the Edugram Affiliate Program Rules).

Subject to your prior consent, cookies or other similar technologies may be used to provide you with advertising and promotional materials by electronic means based on your visits and interests (see the Cookie Policy for more information). You may request at any time that we stop sending you advertising and promotional material, emails, or other correspondence.

We may disclose or transfer your Personal Information to our professional advisors, government agencies, and other organizations, and take such other actions as required or permitted by applicable law where disclosure and transfer of Personal Information are required by applicable law, or in our opinion, necessary to exercise or protect our legal rights, protect your legal rights and interests or those of any third parties.

The processing of Personal Data collected for the purposes specified in the Privacy Policy shall not be carried out in any way that conflicts with or violates the above-listed purposes or legal requirements. Your Personal Data shall only be used for the purposes listed above unless otherwise required by applicable law.

4. Ways to control processing and profiling (automated collection of your Personal Data)

For purposes of this Section, the following definitions will be used:

“Controlling Person” means the natural or legal person, public authority, agency, or other public body that, alone or in conjunction with other bodies, determines the purposes and means of processing Personal Data.

Your Controlling Person is Tossox Holdings Limited, a company incorporated under the laws of the Republic of Cyprus, whose address is Ellados 59, Ioannou building, office 3, 8020, Paphos, Cyprus. If you have any demands, questions, or concerns regarding the use of your Personal Data and this Privacy Policy, please contact us at DataProtection@edugram.com. Your request must include your real name and a copy of your identification document. The request may also be signed with an electronic digital signature.

The Processor is responsible for collecting, using, disclosing, storing, and protecting your Personal Information.

“Processor” means the natural or legal person, public authority, agency, or other public body that processes Personal Data on behalf of the Controlling Person.

As a Personal Data Subject, each user has the following rights:

4.1 RIGHT TO ACCESS DATA: the right to obtain information from the Controlling Person as to whether or not your Personal Data is being processed; the right to access Personal Data and information on the purposes of the processing, categories of Personal Data, recipients, or categories of recipient to whom Personal Data is or will be disclosed if necessary; the right to obtain from Tossox Holdings Limited uploads of Personal Data processed in accordance with applicable law, as well as info about the automated decision-making or data collection systems provided for on the Platform, including data profiling.

When requesting additional copies of the uploading of Personal Data undergoing processing, the Controlling Person shall be entitled to charge a reasonable fee, taking into account the administrative costs that will be incurred as a result.

4.2 RIGHT TO REMOVE: the right to request the Controlling Person to correct inaccurate Personal Data regarding the user or to supplement incomplete Personal Data based on a relevant request by the user.

4.3 **RIGHT TO REMOVE:** the right to request the Supervisory Person to delete Personal Data regarding a User. Note that the Controlling Person has an obligation to delete Personal Data if the following grounds exist:

- the Personal Data is no longer required for the purposes for which it was collected or processed;
- the user withdraws the consent on the basis of which the Personal Data was processed, and there are no legal grounds for the processing of the Personal Data;
- the user objects to the processing of the Personal Data and there are no legally binding grounds for the processing of the Personal Data;
- Personal Data has been processed unlawfully;
- The Personal Data must be deleted in order to comply with a legal obligation of the Controlling Person that applies to such person within the European Union or a Member State of the European Union.

4.4 **RIGHT TO REMINDER PROCESSING:** the right to request the Controlling Person to restrict the processing of Personal Data in the following cases:

- The User disputes the accuracy of the Personal Data;
- The Personal Data has been processed unlawfully and the User requests the restriction of the use of the Personal Data instead of its deletion;
- The Controlling Person no longer needs the Personal Data for the purposes of the processing, but the User needs the relevant Personal Data in order to file legal actions or legal complaints, to comply with legal requirements, to exercise their rights and legitimate interests;
- the User has an objection to the processing of the Personal Data, pending verification for compliance with the applicable provisions of the law.

4.5 **RIGHT TO REPRESENT:** the right to object to the processing of Personal Data for direct marketing purposes, which includes automated processing to the extent such processing is relevant to direct marketing. The Compliance Officer may not further process the Personal Data unless and until the Compliance Officer provides compelling legitimate grounds for the processing which take precedence over the User's interests, rights, and freedoms, or for legal action or legal complaints, compliance with legal requirements, rights, and legitimate interests.

4.6 **RIGHT TO COMPLAIN:** the right to complain to the supervisory authority of the Republic of Cyprus, the Office of the Commissioner for Personal Data Protection.

4.7 **RIGHT TO PORTATE PERSONAL DATA:** the right to receive Personal Data that has been provided by you to the controller in a structured, common, and machine-readable format, and the right to transmit such data to another controller without hindrance from your controller, to whom the Personal Data has been provided.

4.8 The Compliance Officer shall provide information to the User upon request within one (1) month of receiving such request. If necessary, this period may be extended by two (2) months, taking into account the complexity and number of requests. The Compliance Officer shall notify the User of the need for an extension within one (1) month of receipt of the request, stating the reasons for such delay.

4.9 The consent that the User gives us to process Personal Data is voluntary. Each user has the right to withdraw their consent at any time. Withdrawing your consent will not affect the legality of any processing that we conducted prior to the withdrawal, nor will it affect any processing of your Personal Data conducted on other legitimate grounds for processing Personal Data other than your consent. Please note that once you withdraw your consent, you will no longer be able to use our Services on the Platform, as the collection of your Personal Data is necessary to provide you with safe, quality, and lawful Services. If you decide to withdraw your consent, contact us at DataProtection@edugram.com.

4.10 Any user may contact us regarding the above rights at DataProtection@edugram.com. In accordance with the Controlling Person's obligation to use all reasonable means to verify the identity of the person making the request, Tossox Holdings Limited, as the Controlling Person, requests additional identification information, including but not limited to your passport or other identification document number, the expiration date of such document, your full name, country, and date of issue.

5. Retention Period for Personal Information

We will retain Personal Information for the term of your account or for the duration of the purposes outlined in this Privacy Policy. Regardless of the duration of the purposes or status of your account, we may retain your Personal Information as necessary to comply with our legal or professional obligations, enforce our agreements, or resolve litigation.

6. Third-Party Websites

We are not responsible for protecting your privacy on third-party websites, even if you access such websites through a link on this Website. We recommend that you carefully review each third-party website's privacy policy separately.

7. Legal basis for processing Personal Data

We collect and process Personal Data in accordance with the provisions of Cyprus Personal Data Protection Law 2018 (Law 125 (I) / 2018), Regulation (EC) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Regulation on Personal Data Protection – for European Union citizens and users using the Platform in the European Union) and other legal regulations. All employees, agents, and employees of the agents of Tossox Holdings Limited who become aware of Personal Data must ensure that the Personal Data is securely stored even after the termination of their employment.

For the purpose of processing Personal Data, Tossox Holdings Limited may engage processors and/or, at its discretion, hire other individuals to perform certain functions on behalf of Tossox Holdings Limited. In such cases, Tossox Holdings Limited shall take the necessary steps to ensure that processors process such Personal Data in accordance with Tossox Holdings Limited's instructions and applicable law. Tossox Holdings Limited shall also require that processors take appropriate measures for the security of Personal Data. In such cases, Tossox Holdings Limited

shall ensure that the individuals involved comply with the obligation of confidentiality and that such information cannot be used for any purpose other than the performance of their assigned functions.

The legal basis for processing Personal Information depends on what Personal Information is processed and the specific context within which it is collected. We only process your Personal Data in the following circumstances:

- the user has provided consent to the processing of his or her Personal Data for one or more of the purposes set forth in this Privacy Policy;
- the processing is necessary to perform a contract to which the user is a party, or to carry out actions at the request of the user prior to the conclusion of the contract;
- the processing is necessary to fulfill a legal obligation of the Controlling Person;
- the processing is necessary to protect the vital interests of the User or another natural person;
- the processing is necessary for the public interest;
- the processing is necessary for the purposes of the legitimate interests of the Controlling Person or a third party unless such interests are overridden by the legitimate interests or fundamental rights and freedoms of the user who requires the protection of the Personal Data.

8. What measures do we take to protect your Personal Data?

To protect Personal Data provided by Users against unauthorized access, disclosure, alteration, risks of loss, misuse or unlawful destruction, and any other form of unauthorized processing, the Platform uses only those technical means that meet reasonable commercial standards and implements appropriate operational security and legal protection measures.

For registered users of the Platform, the Personal Information they provide is password-protected. We recommend that your password not be disclosed to anyone. If you share your computer with other users, do not save your login information (such as your user ID and password) on that computer. Remember to log out of your account and close your browser window when your session ends.

Please note that we cannot guarantee the privacy or security of your Personal Information if you disclose it to any third parties, and we strongly encourage you to review the privacy policies of third parties before deciding to disclose your Personal Information.

9. Disclosure of Personal Information to Third Parties

We may disclose and transfer your Personal Data (within or outside the jurisdiction of Tossox Holdings Limited, the Controlling Person) to our business partners, hosting providers, and SMS providers that we engage to assist in providing the Services to you and that otherwise process Personal Data for the purposes described in this Privacy Policy or that we inform you of during the collection of Personal Data. Your Personal Information may also be disclosed to Tossox Holdings Limited employees and legal advisors to respond to your requests and inquiries.

We do not have access to the complete financial information you provide when you withdraw funds. The financial institutions you select process such data and have access to the full package of your financial information provided as a result of your withdrawal request through the Platform.

Personal Information may also be disclosed to law enforcement, regulatory or other government agencies, or other third parties, to comply with legal and regulatory obligations or national security obligations and requirements in each case of disclosure of Personal Information.

Such disclosure may involve the transfer of Personal Data to countries or regions that do not have Personal Data protection rules in the jurisdiction in which you are located.

By submitting Personal Information, you consent to disclosure in the manner and under the terms of this section.

10. Changes and amendments to this Privacy Policy

We are constantly improving and updating our Platform to maximize your convenience and improve the quality of the Services we provide to you. As such, our Privacy Policy may be amended. As soon as we implement new technology or provide new Services, our Privacy Policy is updated accordingly. We encourage you to continually refer to this page to review the most current version of our Privacy Policy and approach to processing Personal Information.

If at any time in the future we are forced to change our approach to processing Personal Information, we will post such Privacy Policy changes on this page, including the effective date of the amended version of the Privacy Policy. The most recently updated version of the Privacy Policy will be effective for you and your Personal Information as of the date we indicate in the Privacy Policy. If we make any material changes, we will notify you by posting a notice on the Platform.

12. Final provisions

We may automatically scan messages and screen for spam, viruses, phishing, and other malicious activity, illegal or prohibited content, or violations of our policies.

We may process and store your Personal Information on our servers and at any other location where our data centers are located.

This Privacy Policy is governed by the laws of the Republic of Cyprus. All disputes concerning the provisions of this Privacy Policy shall be resolved through negotiations. In the event that the matter cannot be resolved through negotiation, the dispute shall be submitted to the relevant court in the Republic of Cyprus.

You may visit this website without providing any information about yourself, however, if you wish to use the Platform Services, we will ask you to provide your Personal Information and follow established identification procedures. If you do not register on the Platform, we do not collect your Personal Information, but your Personal Information may be collected by services such as Google Analytics and Yandex Metrica.

By visiting our Platform and/or using the Platform Services, you acknowledge and confirm that you have read this Privacy Policy, understand its contents, and agree with it. When you visit this website, we encourage you to fully review the most current version of the Privacy Policy applicable to you at the time you visit this website.