

Privacy Policy

Effective date: 21 July, 2025

Here at this website (“Website”) we are committed to protecting and respecting your privacy.

This Privacy Policy applies to your use of the Website and receiving Services insofar it concerns the processing of personal data (or “**data**”). We presume that you should reasonably expect that the use of the Website or receiving Services requires processing your personal data. Should you disagree, you are free to stop using the Website Services or object to personal data processing.

Personal data is any information relating to you and that alone or in combination with other pieces of information gives the opportunity to the person that collects and processes such information to identify you as an individual. It can be your name, your identification number, your location data, or information related to your physical, physiological, genetic, mental, economic, cultural or social identity.

Processing of the information means any action with your personal data, for example, collection, recording, organization, structuring, storage, use, disclosure by any means and so on.

As a data controller, we determine the purposes and means of the processing of personal data: 'why' and 'how' the personal data should be processed.

This Privacy Policy describes what you should expect us to do with your personal data when we act as a data controller. The issues covered are:

- What data we process, on which grounds, how, and why;
- With whom we share data;
- How long we store your data;
- How we protect your data;
- Your rights;
- Children’s privacy;
- Transfer information to third countries;
- Changes to this Privacy Policy;
- Contact information.

WHAT DATA WE PROCESS, HOW WE PROCESS IT, ON WHICH GROUNDS, AND WHY

Website usage

Scope. When you come to our Website, we may track, collect, and aggregate information indicating, among other things, which pages of our Website you visited, the order in which you visited pages, when you visited them, and which hyperlinks you clicked. We also collect information from the URLs

from which you linked to our Website. Collecting such information may involve logging the IP address, operating system, and browser software used by each user of the Website. We may be able to determine from an IP address your Internet Service Provider and the geographic location of their point of connectivity. We may also use cookies when you visit our Website. For more information on our use of cookies, please refer to our Cookie Policy.

Legal ground. We have legitimate interest in ensuring high quality standards of our Services and to be more useful for our users. We may also use this information to ensure the security of our Website.

Purpose. We collect this data to ensure better provision of our Services and smooth operation of our Website.

Creating a user account

Scope. When you create your user account on our Website, we may collect, use and store your name, email, and corresponding platform ID (for example, google id or facebook id while signing up via Google or Facebook). You are free to submit further personal data in your profile. However, depending on the type of Service that you use on our Website, you might need to provide us with additional information that is mentioned in the respective Terms of Use.

Legal ground. We obtain your consent for this processing, which is indicated by your affirmative actions: filling this data in our application form.

Purpose. We collect, use and store this data for creating your user account and for its maintenance, namely for user identification when providing Services, for example submitting your feedback on our Website, tracing of your contractual obligations fulfillment, marketing purposes.

Services provision

Scope. During service provision, we can use your first and last name, email address, your picture, place of work, the name of the course you are studying. We can also include the topic name you are currently studying, the titles of tasks you are or have previously completed, learning performance statistics, a list of badges and awards, status, online/offline indicator, and make them open for other students who take learning courses simultaneously with you, for example, in the leader dashboard, profile, chat or for future students. However, at your discretion, you have the option to selectively hide details about your performance from other students.

Legal ground. When you provide us with your personal information for learning purposes, you give us your free and explicit consent on to process this information

Purpose. We will use this data for communication purposes inside the student community during your course studying.

Feedback

Scope. We use your first and last name, your photo, current work place and position provided in your user account when you give us public feedback on the Website or other third party resources. When you submit feedback about K

odree, including third party resources, the content of your feedback may consist of personal information at your sole discretion. So if you do not want this information to become public, do not include it in your feedback.

Legal ground. Providing us with publicly available feedback constitutes your consent.

Purpose. We use this data for promotion and improvement of our Services or Website.

Communication and Support

Scope. If you contact us for support or report any problem regardless of whether you created an account or not, we may collect and store your contact information, messages, and other data about you like your name, email address, messages, location, user ID, and any other data you provide or that we collect through automated means.

Legal ground. We have a legitimate interest in collecting this information to achieve the purpose of improving our services and user experience.

Purpose. Enhancing user experience and technical support.

RETENTION OF PERSONAL DATA

We keep all the personal data as long as necessary for the purposes for which it was collected. The time of processing depends on the purpose for which it was collected and the requirements of applicable laws to ensure protection of people's rights.

THIRD-PARTY PROCESSING

In order to provide you with high-quality Services, we use the following third-party services. With certain third-party services we share data collected from you on our Website but with most of such services you share your data without our interaction.

Automatic collection

When you use the Website, some third-party services can automatically receive the information from your device and send the information back to improve your interaction with the Website, to ensure its effective functioning and for marketing purposes.

Such data processing is based on your explicit consent, enabling us to collect the cookies identifiers. Please, specifically refer to our Cookies Policy for further details as to our use of cookies and similar technologies.

Payments

We use third-party payment providers for enabling you to make online payments for Services via the Website, namely Stripe. We may collect your personal data (for example, e-mail, user ID, IP address) and transfer this data to our payment providers. Instead, payment providers collect and use

this data for authorization of payments. Please, refer to their privacy policies to be familiar with how they process and protect your data.

CRM systems

We share your data from the user account from our database with Creatio while using their services. We use their services on data retention of users who apply for evaluation and for users who receive our Services. Their services help us to provide users with our customer care. Thus, we have a legitimate interest in sharing this data with Creatio as an external service. You may familiarize yourself on how this service keeps data obtained from their customers by reading their Privacy Policy, available on their website. Creatio [is compliant](#) with GDPR requirements.

Sending notifications

To perform our Services on a high level and to be as much useful for our users as we can, we may use different outside notification services to inform you about good offers, upcoming events, etc. With this aim, we may use such third-party services as [Sendgrid](#), [eSputnik](#), [OneSignal](#), [TurboSMS](#).

Feedback

We use SurveySparrow to gather feedback. You can discover their [privacy policy](#) to be familiar with how they process and protect your data.

LAW ENFORCEMENT AND REGULATORS

We do not disclose any information of our customers/users to any authorities, governmental agencies unless there are sufficient legal grounds according to applicable law or regulation.

HOW WE PROTECT YOUR DATA

Technical measures

While communicating with you through the Website, we use Hypertext Transfer Protocol Secure (HTTPS) for keeping your data secure and communication encrypted.

Technically the data we collect is stored in secure places such as cloud computing platforms.

Organizational measures

We require all our employees and contractors to enter into non-disclosure agreements and data processing agreements where it is required by law.

We also will inform users and the respective agencies of personal data breaches should there be high risks of violation of your rights as data subjects. We would also do our best to minimize any such risks.

YOUR RIGHTS

General

You have the following rights in relation to your personal data:

- to obtain confirmation that we process your personal data and request a copy of the personal data we hold about you;
- to update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
- to delete personal data that we hold about you, or restrict the way in which we use such personal data;
- to object to our processing of your personal data and withdraw the consent (if the consent is the legal ground for such processing);
- to data portability.

Right to obtain confirmation that we process your personal data and request a copy of the personal data we hold about you

This means that you can ask Kodree what personal data of yours is processed. You can also ask for clarifications on the information described above, i.e. purpose of collecting and processing, period of processing, third parties which have access to information. You have a right to request from Kodree your personal data in a structured, commonly used and machine-readable format.

Right to update or correct your personal data

This means you can require all the inaccurate or personal data concerning you being corrected. You can also correct your personal information on your user account on the Website by yourself.

Right to delete your data or to restrict the way in which we process them, and to lodge a complaint

You can request Kodree to delete personal data if its processing is no longer necessary to achieve the purposes for which it was collected as well as if there are no legal grounds for the processing. In most cases, if such events occur we will delete your personal data without your request unless otherwise provided by the applicable law.

In some cases, prescribed by law you will also be able to restrict the way of processing your data, for example, if you contest the accuracy of your personal data being processed or in case Kodree is not interested in processing of your personal data any longer but you want Kodree to do this on different grounds, for example, to bring some claim for somebody and, instead of the erasure of information, its processing will be restricted.

You also have the right to lodge a complaint with your local data protection authority if we were not able to assist you with your complaint or concern. If you are located in the European Economic Area, you can find the contact details for your appropriate data protection authority on the following

website ; if you are a resident of the United Kingdom, you can contact the Information Commissioner's Office.

Rights to object to our processing of your data and withdraw the consent (if any)

You have a right to object to processing of your personal data when the processing is related to the performance of our task carried in the public interest or in the exercise of official authority vested in us; or we process your data to pursue our or third party's legitimate interests, and you believe that such interests are overridden by your interests or fundamental rights and freedoms.

You also can withdraw your consent for the collection and processing of your personal data by Kodree at any time by contacting us, without affecting the lawfulness of processing based on consent before its withdrawal. After we receive such a withdrawal request from you, we will process it in a timely manner and we will no longer process your personal data, unless otherwise is set by the applicable law.

Rights to data portability

You have a right to obtain your data in a way that can be read and used in different IT environments by the machines and software (right to data portability).

How to exercise your rights as to your personal data?

We are committed to responding to any verified user on our Website as regards any issues arising from this Privacy Policy or applicable data protection laws. We are committed to responding within a reasonable time bearing in mind the possibility to extend the time to respond up to 30 days by virtue of complexity and number of the requests. In any event, we will inform you of any such extension. Please, be specific in your request regarding exercising any of the above-mentioned rights. You should bear in mind that we are to satisfy your request only on the condition of your successful verification.

To exercise any of your rights, or if you have any other questions about our use of your personal information, please contact us via the contracts indicated below.

CHILDREN'S PRIVACY

We do not knowingly process data of people under 16 years, unless the laws of your country set a lower age for your viable consent for the processing of your personal data. In the event we learn that you are under a settled age, we will take appropriate steps to remove your personal information as soon as possible. If you believe that we might have information from a person under a settled age, please let us know on **support@kodree.com**.

Before providing our Services to you, we will ask you to verify your age, including requesting you to upload a copy of your government ID. We may not receive your ID scan-copy on our servers or databases to be stored as you upload them on our third party partner's database.

TRANSFER INFORMATION TO THIRD COUNTRIES

We may transfer your information to third countries outside the European Economic Area, such as Ukraine. We strive to ensure secure transfer of personal data and compliance with the applicable laws in respective jurisdictions.

As means of appropriate safeguards, we use the European Commission's Standard Contractual Clauses (and relevant contractual clauses applicable in the UK where appropriate). We include these Clauses to the agreements with our contractors who process your personal data outside the European Economic Area to both facilitate provision of the Services and guarantee you the same level of information protection as you would have in your country.

CHANGES TO THIS PRIVACY POLICY

We may amend or update this Privacy Policy from time to time updating the “Last modified” date at the top of this Privacy Policy and adding the link to the previous version of the Privacy Policy. Your further use of this Privacy Policy will confirm your acceptance of this Privacy Policy. Should you disagree with this document, you have to stop using the Website.

CONTACT INFORMATION

The data controller for this website is MA Edupartners Limited, having its registered office at 7 Florinis Street, Greg Tower, 2nd Floor, 1057, Nicosia, Cyprus

If you have any questions about the Privacy Policy, please contact us.

MA EDUPARTNERS LIMITED

7 Florinis Street, Greg Tower, 2nd Floor, 1057, Nicosia, Cyprus

Contact email: **support@kodree.com**