

Privacy policy

We respect your privacy and are committed to protecting it through our compliance with this privacy policy (“Policy”). This Policy describes the types of information we may collect from you or that you may provide (“Personal Information”) on the gmaacademy.com website (“Website”), “GMA Academy Mobile” mobile application (“Mobile Application”), and any of their related products and services (collectively, “Services”), and our practices for collecting, using, maintaining, protecting, and disclosing that Personal Information. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update it.

This Policy is a legally binding agreement between you (“User”, “you” or “your”) and AU Partners International limited (doing business as “Global Masters Academy”, “we”, “us” or “our”). If you are entering into this agreement on behalf of a business or other legal entity, you represent that you have the authority to bind such entity to this agreement, in which case the terms “User”, “you” or “your” shall refer to such entity. If you do not have such authority, or if you do not agree with the terms of this agreement, you must not accept this agreement and may not access and use the Services. By accessing and using the Services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Policy. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

Automatic collection of information

When you open the Website or use the Mobile Application, our servers automatically record information that your browser or device sends. This data may include information such as your device’s IP address and location, browser and device name and version, operating system type and version, language preferences, the webpage you were visiting before you came to the Services, pages of the Services that you visit, the time spent on those pages, the information you search for on the Services, access times and dates, and other statistics.

Information collected automatically is used only to identify potential cases of abuse and establish statistical information regarding the usage and traffic of the Services. This statistical information is not otherwise

aggregated in such a way that would identify any particular User of the system.

Personal Data

While using Our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Bank account information in order to pay for products and/or services within the Service
- Usage Data
- Contact list for prospecting
- Images/files for profile
- Uploading of videos

Collection of personal information

You can access and use the Services without telling us who you are or revealing any information by which someone could identify you as a specific, identifiable individual. If, however, you wish to use some of the features offered on the Services, you may be asked to provide certain Personal Information (for example, your name and e-mail address).

We receive and store any information you knowingly provide to us when you create an account, make a purchase, or fill any forms on the Services. When required, this information may include the following:

- Account details (such as user name, unique user ID, password, etc) -
- Contact information (such as email address, phone number, etc)
- Basic personal information (such as name, country of residence, etc) -
- Proof of identity (such as a photocopy of a government ID)

- Payment information (such as credit card details, bank details, etc)
- Certain features on the mobile device (such as contacts, calendar, gallery, etc)

You can choose not to provide us with your Personal Information, but then you may not be able to take advantage of some of the features on the Services. Users who are uncertain about what information is mandatory are welcome to contact us.

Privacy of children

We do not knowingly collect any Personal Information from children under the age of 18. If you are under the age of 18, please do not submit any Personal Information through the Services. If you

have reason to believe that a child under the age of 18 has provided Personal Information to us through the Services, please contact us to request that we delete that child's Personal Information from our Services.

We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through the Services without their permission. We also ask that all parents and legal guardians overseeing the care of children take the necessary precautions to ensure that their children are instructed to never give out Personal Information when online without their permission.

Use and processing of collected information

We act as a data controller and a data processor when handling Personal Information, unless we have entered into a data processing agreement with you in which case you would be the data controller and we would be the data processor.

Our role may also differ depending on the specific situation involving Personal Information. We act in the capacity of a data controller when we ask you to submit your Personal Information that is necessary to ensure your access and use of the Services. In such instances, we are a data controller because we determine the purposes and means of the processing of Personal Information.

We act in the capacity of a data processor in situations when you submit Personal Information through the Services. We do not own, control, or

make decisions about the submitted Personal Information, and such Personal Information is processed only in accordance with your instructions. In such instances, the User providing Personal Information acts as a data controller.

In order to make the Services available to you, or to meet a legal obligation, we may need to collect and use certain Personal Information. If you do not provide the information that we request, we may not be able to provide you with the requested products or services. Any of the information we collect from you may be used for the following purposes:

- Create and manage user accounts
- Fulfill and manage orders
- Deliver products or services
- Send marketing and promotional communications - Send product and service updates

- Request user feedback
- Respond to legal requests and prevent harm - Run and operate the Services

Processing your Personal Information depends on how you interact with the Services, where you are located in the world and if one of the following applies: (i) you have given your consent for one or more specific purposes; this, however, does not apply, whenever the processing of Personal Information is subject to California Consumer Privacy Act; (ii) provision of information is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof; (iii) processing is necessary for compliance with a legal obligation to which you are subject; (iv) processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us; (v) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

Note that under some legislations we may be allowed to process information until you object to such processing by opting out, without having to rely on consent or any other of the legal bases. In any case, we will be happy to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Payment processing

In case of Services requiring payment, you may need to provide your credit card details or other payment account information, which will be used solely for processing payments. We use third- party payment processors (“Payment Processors”) to assist us in processing your payment information securely.

Payment Processors adhere to the latest security standards as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. Sensitive and private data exchange happens over a SSL secured communication channel and is encrypted and protected with digital signatures, and the Services are also in compliance with strict vulnerability standards in order to create as secure of an environment as possible for Users. We will share payment data with the Payment Processors only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries related to such payments and refunds.

Please note that the Payment Processors may collect some Personal Information from you, which allows them to process your payments (e.g., your email address, address, credit card details, and bank account number) and handle all the steps in the payment process through their systems, including data collection and data processing. Where necessary for processing future or recurring payments and subject to your prior consent, your financial information will be stored in encrypted form on secure servers of our Payment Processors. The Payment Processors’ use of your Personal Information is governed by their respective privacy policies which may or may not contain privacy protections as protective as this Policy. We suggest that you review their respective privacy policies.

We may also ask you to permit us to collect data about you from third-party providers to verify your identity, do a credit check and prevent fraud or assess risk. This helps us ensure that you are using our Services legally, that you are eligible for the Services you want to use, and to protect your data and our Services from fraudsters who may put you and your money at risk.

Managing information

You are able to delete certain Personal Information we have about you. The Personal Information you can delete may change as the Services

change. When you delete Personal Information, however, we may maintain a copy of the unrevised Personal Information in our records for the duration necessary to comply with our obligations to our affiliates and partners, and for the purposes described below. If you would like to delete your Personal Information or permanently delete your account, you can do so by contacting us.

Disclosure of information

Depending on the requested Services or as necessary to complete any transaction or provide any Service you have requested, we may share your information with our trusted subsidiaries and joint venture partners, affiliates, contracted companies, and service providers (collectively, “Service Providers”) we rely upon to assist in the operation of the Services available to you and whose privacy policies are consistent with ours or who agree to abide by our policies with respect to Personal Information. We will not share any personally identifiable information with third parties and will not share any information with unaffiliated third parties.

Service Providers are not authorized to use or disclose your information except as necessary to perform services on our behalf or comply with legal requirements. Service Providers are given the information they need only in order to perform their designated functions, and we do not authorize them to use or disclose any of the provided information for their own marketing or other purposes.

We may also disclose any Personal Information we collect, use or receive if required or permitted by law, such as to comply with a subpoena or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

Retention of information

We will retain and use your Personal Information for the period necessary to comply with our legal obligations, as long as your user account remains active, to enforce our agreements, resolve disputes, and unless a longer retention period is required or permitted by law.

We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

California privacy rights

Consumers residing in California are afforded certain additional rights with respect to their Personal Information under the California Consumer Privacy Act (“CCPA”). If you are a California resident, this section applies to you.

In addition to the rights as explained in this Policy, California residents who provide Personal Information as defined in the statute to obtain Services for personal, family, or household use are entitled to request and obtain from us, once a calendar year, information about the categories and specific pieces of Personal Information we have collected and disclosed.

Furthermore, California residents have the right to request deletion of their Personal Information or opt-out of the sale of their Personal Information which may include selling, disclosing, or transferring Personal Information to another business or a third party for monetary or other valuable consideration. To do so, simply contact us. We will not discriminate against you if you exercise your rights under the CCPA.

How to exercise your rights

Any requests to exercise your rights can be directed to us through the contact details provided in this document. Please note that we may ask you to verify your identity before responding to such requests. Your request must provide sufficient information that allows us to verify that you are the person you are claiming to be or that you are the authorized representative of such person. If we receive your request from an authorized representative, we may request evidence that you have provided such an authorized representative with power of attorney or that the authorized representative otherwise has valid written authority to submit requests on your behalf.

You must include sufficient details to allow us to properly understand the request and respond to it. We cannot respond to your request or provide you with Personal Information unless we first verify your identity or authority to make such a request and confirm that the Personal Information relates to you.

Cookies

Our Services use “cookies” to help personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. If you choose to decline cookies, you may not be able to fully experience the features of the Services.

We may use cookies to collect, store, and track information for security and personalization, to operate the Services, and for statistical purposes. Please note that you have the ability to accept or decline cookies. Most web browsers automatically accept cookies by default, but you can modify your browser settings to decline cookies if you prefer.

Data analytics

Our Services may use third-party analytics tools that use cookies, web beacons, or other similar information-gathering technologies to collect standard internet activity and usage information. The information gathered is used to compile statistical reports on User activity such as how often

Users visit our Services, what pages they visit and for how long, etc. We use the information obtained from these analytics tools to monitor the performance and improve our Services. We do not use third-party analytics tools to track or to collect any personally identifiable information of our Users and we will not associate any information gathered from the statistical reports with any individual User.

Do Not Track signals

Some browsers incorporate a Do Not Track feature that signals to websites you visit that you do not want to have your online activity tracked. Tracking is not the same as using or collecting information in connection with a website. For these purposes, tracking refers to collecting personally identifiable information from consumers who use or visit a website or online service as they move across different websites over time. How browsers communicate the Do Not Track signal is not yet uniform. As a result, the Services are not yet set up to interpret or respond to Do Not Track signals communicated by your browser. Even so, as described in more detail throughout this Policy, we limit our use and collection of your Personal Information. For a description of Do Not Track protocols for browsers and mobile devices or to learn more about the choices available to you, visit internetcookies.com

Information Collected while Using the Application

While using our Application, in order to provide features of Our Application, We may collect, with Your prior permission:

- Information from your Device's phone book (contact list)

We use this information to provide features of Our Service, to improve and customize Our Service. The information may be uploaded to the company's servers and/or a Service Provider's server or it may be simply stored on Your device. You can enable or disable access to this information at any time, through Your Device settings.

Social media features

Our Services may include social media features, such as the Facebook and Twitter buttons, Share This buttons, etc (collectively, "Social Media Features"). These Social Media Features may collect your IP address, what page you are visiting on our Services, and may set a cookie to

enable Social Media Features to function properly. Social Media Features are hosted either by their respective providers or directly on our Services. Your interactions with these Social Media Features are governed by the privacy policy of their respective providers.

Email marketing

We offer electronic newsletters to which you may voluntarily subscribe at any time. We are committed to keeping your e-mail address confidential and will not disclose your email address to any third parties except as allowed in the information use and processing section or for the purposes of utilizing a third-party provider to send such emails. We will maintain the information sent via e-mail in accordance with applicable laws and regulations.

In compliance with the CAN-SPAM Act, all e-mails sent from us will clearly state who the e-mail is from and provide clear information on how to contact the sender. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails or by contacting us. However, you will continue to receive essential transactional emails.

Affiliate links

We may engage in affiliate marketing and have affiliate links present on the Services for the purpose of being able to offer you related or additional products and services. If you click on an affiliate link, a cookie will be placed on your browser to track any sales for purposes of commissions.

Links to other resources

The Services contain links to other resources that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other resources or third parties. We encourage you to be aware when you leave the Services and to read the privacy statements of each and every resource that may collect Personal Information.

Information security

We secure information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. We maintain reasonable administrative,

technical, and physical safeguards in an effort to protect against unauthorized access, use, modification, and disclosure of Personal Information in our control and custody. However, no data transmission over the Internet or wireless network can be guaranteed.

Therefore, while we strive to protect your Personal Information, you acknowledge that (i) there are security and privacy limitations of the Internet which are beyond our control; (ii) the security, integrity, and privacy of any and all information and data exchanged between you and the Services cannot be guaranteed; and (iii) any such information and data may be viewed or tampered with in transit by a third party, despite best efforts.

As the security of Personal Information depends in part on the security of the device you use to communicate with us and the security you use to protect your credentials, please take appropriate measures to protect this information.

Data breach

In the event we become aware that the security of the Services has been compromised or Users' Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the User as a result of the breach or if notice is otherwise required by law. When we do, we will post a notice on the Services, send you an email.

Changes and amendments

We reserve the right to modify this Policy or its terms related to the Services at any time at our discretion. When we do, we will revise the

updated date at the bottom of this page, post a notification within the Services, send you an email to notify you. We may also provide notice to you in other ways at our discretion, such as through the contact information you have provided.

An updated version of this Policy will be effective immediately upon the posting of the revised Policy unless otherwise specified. Your continued use of the Services after the effective date of the revised Policy (or such other act specified at that time) will constitute your consent to those changes. However, we will not, without your consent, use your Personal Information in a manner materially different than what was stated at the time your Personal Information was collected.

Acceptance of this policy

You acknowledge that you have read this Policy and agree to all its terms and conditions. By accessing and using the Services and submitting your information you agree to be bound by this Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to access or use the Services.

Contacting us

If you have any questions regarding the information we may hold about you or if you wish to exercise your rights, you may use the following data subject request form to submit your request:

Submit a data access request

If you have any other questions, concerns, or complaints regarding this Policy, we encourage you to contact us using the details below:

info@gmaacademy.com

We will attempt to resolve complaints and disputes and make every reasonable effort to honor your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by applicable data protection laws.

This document was last updated on July 18, 2023