

### **Question 1**

- a) The major design decisions for this privacy policy mockup were made with the goal of creating a user-friendly and transparent document that effectively communicates Amazon's privacy practices to users. The key design decisions include:
- i) Using a prominent call to action: The light gray box with the message "Pause before you proceed!" is designed to attract the user's attention and make them aware of the privacy policy. This helps to ensure that users are not accidentally agreeing to the privacy policy without first understanding it. It is important to note that the idea for this prominent call to action was inspired by [X's privacy policy](#).
  - ii) Providing a concise summary: The quick summary of the privacy policy provides the user with a general overview of what the policy covers. This helps to make the policy more approachable and less intimidating.
  - iii) Breaking down the policy into manageable chunks: The "Here are the highlights!" page breaks down the privacy policy into more manageable chunks, making it easier for users to find the information they are looking for.
  - iv) Using a table of contents: The table of contents on the detailed privacy policy page provides a clear and easy way for users to navigate the policy. This helps to ensure that users can quickly find the information they are looking for.
  - v) Using clear and concise language: The privacy policy is written in clear and concise language that is easy for users to understand. This helps to ensure that users can understand their privacy rights and choices.

Overall, the design of this privacy policy mockup is intended to make it easy for users to understand and access information about Amazon's privacy practices.

- b) Users will be shown with the privacy notice at several points of their contact with the app, ensuring that they have adequate opportunities to examine and understand Amazon's privacy standards.
- i) When users initially download the app, they will see a visible call to action, a light grey box with the slogan "Pause before you proceed!" designed to attract their attention and guide them to the privacy notice. This proactive strategy guarantees that consumers understand the privacy policy before using the program.
  - ii) During app setup: Users will be given with a clear and short explanation of the privacy policy during the app setup process, providing them with a basic understanding of Amazon's data collecting and usage methods. This summary provides an overview of the privacy policy, allowing users to make educated decisions about data sharing options.
  - iii) The privacy notice will be immediately available from within the app's settings menu, allowing users to return and review the policy at any time. Users can always refer to the privacy notice if they have questions or concerns about their data because it is easily accessible.

It is critical to make the privacy notice available in these many methods for several reasons:

- **Transparency and Informed Consent:** Amazon exhibits transparency and offers users with many opportunities to make informed decisions about their data privacy by delivering the privacy notice at several stages.

- Accessibility and Awareness: The visible call to action and easy access from the settings menu guarantee that users are aware of the privacy notice and can quickly access it if necessary.
- Compliance with Data Privacy legislation: Making the privacy notice easily accessible is in line with numerous data privacy legislation, such as the GDPR and the CCPA, which require clear and accessible privacy disclosures.
- Building User Trust: Amazon develops trust and increases user confidence in their data handling policies by proactively resolving privacy issues and offering clear information.

Overall, displaying the privacy notice in a variety of ways across the app experience will indicate Amazon's dedication to transparency, user understanding, and compliance with data privacy standards. This method fosters user trust and empowers them to make informed decisions regarding their data.

- c) The PNG file is attached with the submission, as well is pasted below. I have also attached the .drawio file and the PNG file in the submission folder.



<p>“When you download the App and create an account (“Account”), we may collect certain information (“Registration Information”) about you, such as: Name, Username; Email address; Cell number; Gender identity; Date, time, and location of birth; Sexual preference; Photographs; Location; and Login information for social media accounts that you connect to your Bumble Account (this could include, for example, your Facebook and Instagram accounts). “</p> <p>“The information we collect helps to enhance the App and verify our Users”</p> <p>“If you choose to verify your profile photo, we will scan each photo that you submit. The scan may include the use of facial recognition technology so that we can compare the photo you submit to your profile photo, to help ensure that you are who you say you are. We do not add the verification photos to your profile. We retain the scans so that we can verify you in the future and for our record-keeping purposes until we no longer need them for such purposes or for three years after your last interaction with us, whichever occurs first. After the applicable retention period expires, we take commercially reasonable steps to permanently and securely delete the scans from our systems.”</p> <p>“If you decide to purchase any of our premium services, we will process your payment information and retain this securely for the prevention of fraud and for audit/tax purposes.”</p> <p>“If you have given Bumble access to your location in your device settings, when you use your cell, we will collect information about WiFi access points as well as other location information about your longitude and latitude and may save your device’s coordinates to offer certain features to you. This information helps us identify your physical location and we use it to personalize the App and make it easier for you to interact with other Users, by enabling the general locality information to be displayed to Users seeing your profile and showing you the profiles of other Users who are near you.”</p> <p>“We may collect information about your device when you use the App including the unique device identifier, device model, and operating system, for a number of purposes, as set out in this policy. In addition, if you permit us to do so, the App may access your device’s address book solely in order to add someone to your contacts.”</p> <p>“We may keep track of how you interact with links available on Bumble including third party services by redirecting clicks or through other means. We may share aggregate click statistics such as how many times a particular link was clicked on.”</p>	<p>Data collection and purpose</p>
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<p>“When you visit our Sites or when you use our App, we may collect personal data from you automatically by using cookies or similar technologies. “</p>	
<p>“We engage certain trusted third parties to perform functions and provide services to us. We may share your Registration Information or personal data with these third parties, but only for the purposes of performing these functions and providing such services.”</p> <p>“This could include all data, including all CCPA Categories listed above”</p> <p>“We may preserve or disclose any of your information, including your Registration Information, if we believe in good faith that it is necessary to comply with a law or regulation, or when we believe in good faith that disclosure is necessary:</p> <ul style="list-style-type: none"> <li>• to comply with a binding direction court order, or lawful request;</li> <li>• to protect the safety of any person;</li> <li>• to address fraud, security or technical issues e.g. through anti-spam providers to protect the service from criminal activity; or</li> <li>• to protect our rights or property or those of third parties.</li> </ul> <p>In such cases we may raise or waive any legal objection or right available to us.”</p> <p>“We may share aggregated information with third parties that includes your personal data (but which doesn’t identify you directly) together with other information including log data for industry analysis and demographic profiling.”</p> <p>“We share a limited amount of your personal data with these Marketing Services Providers, such as: the advertising identifier associated with your device (this is a random number assigned by your mobile device manufacturer (for example Apple or Google) to your device to help advertisers (including the manufacturer) know when an ad has been viewed or clicked in an app, and when an ad causes a ‘conversion’ (for example, downloading the app advertised to you)), your estimated location (based on your IP address), age and gender; data about your visit to our Sites or App and action taken on those (for example if you downloaded our App, created an account with our App, or details of any purchases made on Site or in App) a hashed* version of your email address (to create ‘custom audiences’).”</p>	<p>Data sharing</p>
<p>“Once you register, you will be able to review and change this information at any time just by logging in to Bumble (other than</p>	<p>User Control</p>

<p>your date of birth and location (which, if you have given Bumble access to your location in your device settings, is automatically updated based on the location of your device)). It is your responsibility to ensure that your account details are kept up to date. If your phone number changes, please ensure that you update this in your account.”</p> <p>“If you have given Bumble access to your location, but wish to turn this off, you can do so by the following methods:</p> <ol style="list-style-type: none"> <li>1. iPhone app — settings, privacy, location services, Bumble</li> <li>2. Android — settings, location, Bumble, permissions, location”</li> </ol> <p>“We also collect data about your photos, such as which are the photos that users spend time on or which are the photos that have the best lighting, etc. We may use that data to rearrange your profile photos aiming to position them in a way that is favorable to you. You may opt-out of this feature through our app settings.”</p> <p>“If you do not wish to be contacted to take part in a survey or marketing campaign, please contact our Customer Support Team via our <a href="#">Feedback Page</a>.”</p>	
<p>“Privacy laws applicable in your country may give you the following rights:</p> <ol style="list-style-type: none"> <li>1. Right to be informed: what personal data an organization is processing and why (we provide this information to you in this Privacy Policy).</li> <li>2. Right of access: you can request a copy of your data.</li> <li>3. Right of rectification: if the data held is inaccurate, you have the right to have it corrected.</li> <li>4. Right to erasure: you have the right to have your data deleted in certain circumstances.</li> <li>5. Right to restrict processing: in limited circumstances, you have the right to request that processing is stopped but the data retained.</li> <li>6. Right to data portability: you can request a copy of certain data in a machine-readable form that can be transferred to another provider.</li> <li>7. Right to object: in certain circumstances (including where data is processed on the basis of legitimate interests or for the purposes of marketing) you may object to that processing.</li> <li>8. Rights related to automated decision-making including profiling: there are several rights in this area where processing carried out on a solely automated basis results in a decision which has legal or significant effects for the</li> </ol>	<p>User Right</p>

<p>individual. In these circumstances your rights include the right to ensure that there is human intervention in the decision-making process.</p> <p>The particular rights which are applicable to you (which might include other rights not listed above) may vary depending on your country. You should make yourself aware of the rights you have under applicable privacy laws in your country.”</p> <p>“Under EU and UK data protection laws, we are required to tell you our lawful basis for using your data and we have set this out in the table below. Where the legal basis is consent, you can withdraw consent at any time. Where the legal basis is legitimate interests, you have a right to object to our use of your data.”</p>	
<p>“If you contact our Customer Support team via our <a href="#">Feedback Page</a>, we will receive your email address, and may track your IP address, as well as the information you send to us to help resolve your query. We will keep records of our communications with you, including any complaints that we receive from you about other Users (and from other Users about you) for 6 years after deletion of your account.”</p> <p>“We keep your personal information only as long as we need it for the legal basis relied upon (as set out in Section 2 above) and as permitted by applicable law.”</p> <p>“If you choose to verify your profile photo, we will scan each photo that you submit. The scan may include the use of facial recognition technology so that we can compare the photo you submit to your profile photo, to help ensure that you are who you say you are. We do not add the verification photos to your profile. We retain the scans so that we can verify you in the future and for our record-keeping purposes until we no longer need them for such purposes or for three years after your last interaction with us, whichever occurs first. After the applicable retention period expires, we take commercially reasonable steps to permanently and securely delete the scans from our systems.”</p> <p>“When your Account is deleted, we make sure it is no longer viewable in the App. For up to 28 days, it is still possible to restore your Account if it was accidentally deleted. After 28 days, we begin the process of deleting your personal information from our systems, unless:</p> <ol style="list-style-type: none"> <li>1. we must keep it to comply with applicable law (for instance, if you make purchases within the App, some personal data may be kept for tax and accounting purposes);</li> <li>2. we must keep it to evidence our compliance with</li> </ol>	<p>Data Retention</p>

<p>applicable law (for example, if an account is blocked, we keep some account information and a record of the behavior that led to the block - this information is retained for evidential purposes in case of queries or legal claims concerning the block);</p> <ol style="list-style-type: none"> <li>3. there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or</li> <li>4. the information must be kept for our legitimate business interests, such as fraud prevention and enhancing Users' safety and security (for example, information may need to be kept to prevent a user who was banned for unsafe behavior or security incidents from opening a new account)." <p>"Even after you remove information from your profile or delete your Account, copies of that information may still be viewable and/or accessed to the extent such information has been previously shared with others, or copied or stored by others. We cannot control this, nor do we accept any liability for this. If you have given third party applications or websites access to your personal information, they may retain such information to the extent permitted under their terms of service or privacy policies."</p> </li></ol>	
<p>"Where we share data with Facebook as our Marketing Service Provider (including via the Facebook "Like" function), we are Joint Data Controllers with Facebook Ireland for this processing. This arrangement means that Bumble has to provide you this notice, but you should contact Facebook if you wish to exercise your data protection rights."</p> <p>"For your protection and the protection of all of our Users, we may need to request specific information from you to help us confirm your identity before we can answer the above requests."</p>	Data protection
<p>"As Bumble evolves, we may revise this Privacy Policy from time to time. The most current version of the policy will govern our use of your information and will always be at <a href="https://bumble.com/privacy">bumble.com/privacy</a>. If we make a change to this policy that, in our sole discretion, is material, we will notify you, for example, via an email to the email associated with your Account or by posting a notice within Bumble."</p>	Policy Change Notification
<p>"Although we want as many people as possible to enjoy our creation, you have to be at least 18 years old to use Bumble.</p> <p>Bumble does not knowingly collect any information about or market to children, minors or anyone under the age of 18. If we become aware that a child, minor or anyone under the age of 18 has registered with us and provided us with personal information, we will take steps to terminate that person's registration."</p>	Restriction for specific audience



More screenshots:

Purpose for which data is used	Data	Source	Legal basis
To provide you with the Bumble social networking service	Name, email address, date of birth, location (CCPA Categories A and B)	You provide your name, email address and date of birth to us. We obtain location data from the device that you use to access the service	Contractual necessity
To facilitate networking opportunities on the Bumble App	Optional information that you choose to provide in your profile, including through profile verification, or adding Bumble badges, which may include information about your sexual preferences, non-binary gender, religion, ethnic background, photos, interests, etc. (CCPA Categories B, C, H, I, J)	You provide this information to us	Contractual necessity and our legitimate interests – it is in our legitimate interests to facilitate networking opportunities in the Bumble app. For special category/sensitive personal data, we rely on your explicit consent.
To verify your identity and prevent fraud and to ensure the safety and security of Users	Phone number and if requested or permitted, photo provided as part of profile verification and for	You provide this information to us,	Legitimate interests – it is in our legitimate interests to ensure

To verify your identity and prevent fraud and to ensure the safety and security of Users	Phone number and if requested or permitted, photo provided as part of profile verification and for users based in countries where age verification is required by law: photo of Government ID + geolocation and device information (CCPA Categories A, B, C, E, F, G and H)	You provide this information to us, except for the geolocation and device information, which we obtain from the device that you use to access the service	Legitimate interests – it is in our legitimate interests to ensure that accounts are not set up fraudulently and to safeguard Users of the site
To take payment for premium services (not applicable for Users making payments via the Apple App Store)	Payment card details (CCPA Categories B and D)	You provide this information to us	Contractual necessity
To send you marketing information about our events, offers and services	Name, email address, postal address, Instagram handle and mobile phone number (CCPA Categories A and B)	You provide this information to us	Consent or legitimate interests and in accordance with the laws applying to our marketing activities. We have a legitimate interest in promoting our business and products
To carry out research and analysis to help us improve the App and to test new technologies and processes designed to enhance and improve the App/Sites	Log and usage data, including IP address, browser type, referring domain, pages accessed, mobile carrier and search terms, images and video,	You provide photos and videos to us. We obtain the log and usage	Legitimate interests – it is in our legitimate interests to analyze the way in which Users are

Circumstances where data may be disclosed	Disclosed data
<b>Service Providers</b> – We engage certain trusted third parties to perform functions and provide services to us. We may share your Registration Information or personal data with these third parties, but only for the purposes of performing these functions and providing such services. More information about this is available directly below.	This could include all data, including all CCPA Categories listed above
<b>Moderators</b> – To monitor activity on the App and approve content.	Name and user registration details, profile information, content of messages and photographs (CCPA Categories A, B, C, and H)
<b>Payment Processing and Telecommunications Companies</b> – To facilitate payments for our premium services.	Cardholder name, cardholder address, card number, payment amount, transaction date/time (CCPA Categories A, B, and D)
<b>Law and Harm</b> – As we mentioned in the <a href="#">Terms &amp; Conditions</a> , we think it is very important that all Users behave whilst using the App. We will cooperate with all third parties to enforce their intellectual property or other rights. We will cooperate with lawfully made law enforcement requests for information from within or outside your country of residence where we are required to by law. This may include where there is an investigation into alleged criminal behavior or to protect the vital interests of a person. We may preserve or disclose any of your information, including your Registration Information, if we believe in good faith that it is necessary to comply with a law or regulation, or when we believe in good faith that disclosure is necessary: <ul style="list-style-type: none"> <li>• to comply with a binding direction court order, or lawful request;</li> <li>• to protect the safety of any person;</li> <li>• to address fraud, security or technical</li> </ul>	This could include any personal data that Bumble holds about you, depending on the nature of the request or the issue that we are dealing with, including all CCPA Categories listed above

## App 2: Duolingo

<u>Policy Segment</u>	<u>Checkpoint</u>
<p>“When you use the Service, Duolingo may collect the following personal information about you.</p> <p>a. <u>Account Registration</u> - To register for a Duolingo account, you may provide us with your age and email address. In some countries, you may also provide us with your phone number.”</p> <p>b. <u>Profile Page &amp; User-Generated Content</u></p>	Data collection and purpose

<p>After you register for your Duolingo account, a profile page will be created for you (“Profile”). Your Profile will be populated by information you submit, such as your name, username, bio, and profile picture (“User-Generated Content”). Your age, phone number, and email address are not included in your public Profile and are not considered User-Generated Content under this Privacy Policy. Other Duolingo users may be able to search for your Profile using your name, username, email address, or phone number. Your Profile will also include information about your learning progress, such as the languages you are learning, your learning statistics, and your achievements. Moreover, your Profile will show a list of your followers and other users you follow.</p> <p>“Duolingo may also collect and analyze your speech to help us understand the effectiveness of our lessons and to improve the product.”</p> <p>“If you use the Contact Sync feature, Duolingo will not store your contacts’ phone numbers, but only an encrypted “hash” of them. This hash is an alternative code to the actual phone number and can be used only to uniquely identify the number. If you have submitted your phone number to Duolingo, whether through Contact Sync or some other way (such as adding the phone number to your profile, using it to register, or using it to activate other product features), other Duolingo users who have your phone number in their contacts may be able to locate your Profile using Contact Sync.”</p> <p>“When you use the Service, we may generate data about your use of the Service, which may include your browser and device data, log data, and IP address. We will also generate data regarding your engagement in educational activities on the Service.”</p> <p>“When you access the Duolingo website, we store certain data from your browser using cookies. A cookie is a piece of data stored on the user’s computer tied to data about the user. We use session ID cookies to confirm that users are logged in.”</p>	
<p>“When you interact with AI features, your information may be shared with AI vendors such as OpenAI, which may keep a copy of your text or audio responses for their own purposes. Please do not submit any personal or confidential information when using AI features.”</p> <p>“Some lessons involve you speaking into the Duolingo app. To recognize speech, your audio may be sent to a third-party provider such as Google, Apple, or Amazon Web Services. You may disable speaking challenges in your Settings or skip speaking challenges in your lesson.”</p>	<p>Data sharing</p>

<p>“When you use Duolingo in our app or on our website, some of your activity will be logged by a service called FullStory. FullStory captures and analyzes your activity and provides us with data and a video session replay of your activity to help us make the Duolingo experience better. FullStory does not record usernames, names, profile images, email addresses, profile locations or bios, or passwords. However, FullStory records usage patterns (e.g., clicks, mouse movements, scrolling, and typing), tech specs (e.g., browser, device type, operating system, viewfinder size, script errors, and IP address), navigation (e.g., pages visited, referrers, URL parameters, and session duration), and learning activity (e.g., session progress and answers).”</p> <p>“Please note that our cookies include Targeting Cookies from Google, Facebook, Amazon, and other companies, which these companies may use to track your activities across multiple websites to deliver personalized advertising to you.”</p> <p>“We use Google Analytics, which is a web analytics tool that helps us understand how users engage with our 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 site. These reports disclose website trends without identifying individual visitors.”</p> <p>“Duolingo may share personal information with third parties that help us provide or improve the Service, including hosting providers such as Amazon Web Services, search engine providers such as Google, analytics providers such as Crashlytics, support providers such as ZenDesk, and payment processors such as Stripe. Duolingo may also share your information with third-party vendors that support product features such as AI, speech recognition, and content moderation.</p> <p>If you redeem a promotion code to gain a Duolingo subscription, we may share data regarding your usage of Duolingo with the organization that provided the promotion code to you.”</p>	
<p>“You may update or correct your information, and exercise certain opt-out rights, in your Settings page. You may request to access or erase your personal information at the Duolingo Data Vault. To make another privacy-related request, please send an email to <a href="mailto:privacy@duolingo.com">privacy@duolingo.com</a>.”</p> <p>“You may choose not to share your audio with us for product improvement purposes in your Settings. Any audio you agree to send to Duolingo is anonymized when it reaches our servers to ensure that no trace of your personal information remains attached to the audio.”</p>	<p>User Control</p>

<p>“You can disable FullStory activity recording by using the opt-out function on FullStory’s website. FullStory is disabled for known Child Users.”</p> <p>“If you do not want your data to be collected by cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature.”</p> <p>“You can opt out of Google Analytics by installing Google’s browser add-on available <a href="#">here</a>.”</p> <p>“You can opt out of receiving personalized advertising in your Settings. You may also be able to opt out of receiving personalized ads from advertisers and ad networks that are members of the Network Advertising Initiative or who follow the DAA Self-Regulatory Principles for Online Behavioral Advertising using their respective opt-out tools hyperlinked above. In addition, your mobile devices may offer settings that let you make choices about the collection, use, and transfer of mobile app information for personalized ads (for example, Apple iOS’ Advertising ID and Google Android’s Advertising ID). Users in certain jurisdictions (including the European Union and United Kingdom) are opted out of personalized advertising by default, but may opt in.”</p>	
<p>“You also have the following rights in relation to the personal information we hold about you, in addition to any other rights required by applicable law:</p> <ol style="list-style-type: none"> <li>1. Know what personal information we have collected about you.</li> <li>2. Access a copy of the personal information that we hold about you.</li> <li>3. Know what personal information about you we have shared with third parties.</li> <li>4. Opt out of the sharing of your personal information with third parties.</li> <li>5. Object to our processing of your personal information.</li> <li>6. Request that we limit our use of your sensitive personal information to what is necessary to perform the services you requested.</li> <li>7. Not be discriminated against for exercising your data subject rights.</li> <li>8. Request that we delete any personal information we have collected from you.</li> <li>9. Request that we correct any inaccurate personal information about you.</li> <li>10. Export the personal information you have provided to Duolingo in a format that can be transferred electronically</li> </ol>	<p>User Right</p>

<p>to a third party.</p> <p>11. Withdraw any consent you previously gave us to process your personal information.</p> <p>12. Delete your Duolingo account by following the instructions in the Service.”</p> <p>“Please note that these rights are not absolute and Duolingo may refuse requests to exercise data subject rights if there is a legitimate reason, such as if we cannot authenticate your identity, if the request could violate the rights of a third party or applicable law, or if the request could interfere with a Duolingo service or prevent us from delivering a service you requested.</p> <p>You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. Here is a list of EEA Supervisory Authorities, and a link to the UK Supervisory Authority.”</p>	
<p>“Duolingo will generally retain your personal information until your account is deleted. However, Duolingo may retain certain information longer if necessary to provide our Service, defend our legitimate interests or those of third parties, comply with legal requirements, resolve or defend ourselves in disputes, investigate misuse or disruption of the Service, or perform agreements. We may also retain anonymous data indefinitely.”</p>	Data Retention
<p>“Duolingo may process and share personal information if necessary to comply with legal requests, such as subpoenas or court orders. Duolingo may share personal information when we believe it is necessary to comply with law, to protect our interests or property, to prevent fraud or other illegal activity, to assist law enforcement, or to prevent imminent harm. This may include sharing information with other companies, lawyers, agents, or government agencies.”</p> <p>“Duolingo is based in the United States and processes data in the United States, which may not provide equivalent levels of data protection as your home jurisdiction. Duolingo may transfer the data of users outside the United States to the United States.”</p> <p>“In some jurisdictions, the Service may be subject to supplemental privacy policies or local laws. For users in those jurisdictions, the applicable supplemental privacy policies and local laws will take precedence over this Privacy Policy to the extent they conflict.”</p> <p>“With regards to the Children’s Online Privacy Protection Act, Duolingo collects personal information from children under the age of 13 for the sole purpose of performing internal operations of the Service. If we discover that we have unknowingly collected additional personal information from these children, we will delete it.”</p>	Data protection

<p>“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 seven (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 seven (7) day period.”</p>	<p>Policy Change Notification</p>
<p>“We know that children deserve extra privacy protection. That’s why we treat Child Users (meaning users under the age of 13 in the United States or another age of digital consent in their country) differently to ensure their parents are in control and we only collect the bare minimum information we need to make Duolingo work.</p> <p>Child Users are permitted to create a Duolingo account, but we ask them to provide their parent’s email address instead of their own, and to register using a username that is not tied to their real name.</p> <p>After a Child User registers, we will send an email to the parent’s email address about Duolingo’s privacy practices regarding Child Users, including what personal information we collect and how we use, share, and protect that personal information. The email also explains how parents can request to access, change, or delete the personal information about their child.</p> <p>All Child Users receive the following special treatment when using Duolingo (“Age Restrictions”):</p> <ol style="list-style-type: none"> <li>1. Lessons are made age-appropriate by removing mature words like “beer” or “wine.”</li> <li>2. Advertisements are non-personalized and set to family-safe content.</li> <li>3. Child Users cannot submit their real name or any pictures to their Profile, but are represented only by a letter avatar.</li> <li>4. The Contact Sync feature is disabled.</li> <li>5. Promotional emails are disabled.</li> <li>6. Child Users’ speech data is not shared with Duolingo for product improvement purposes.”</li> </ol> <p>“Parents may remove their child’s Age Restrictions. Additionally, parents can report any abuse to us at <a href="mailto:abuse@duolingo.com">abuse@duolingo.com</a>. In addition, all users under the age of 16 receive the following special treatment:</p> <ul style="list-style-type: none"> <li>• Advertisements are set to non-personalised.</li> <li>• Third-party behavioral tracking is disabled.</li> <li>• Third-party analytics is disabled.</li> </ul> <p>With regards to the Children’s Online Privacy Protection Act,</p>	<p>Restriction for specific audience</p>



Duolingo collects personal information from children under the age of 13 for the sole purpose of performing internal operations of the Service. If we discover that we have unknowingly collected additional personal information from these children, we will delete it. If you believe this to be the case, please contact us at <a href="mailto:privacy@duolingo.com">privacy@duolingo.com</a> .”	
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**App 3: CamScanner - PDF Scanner App**

<b><u>Policy Segment</u></b>	<b><u>Checkpoint</u></b>
<p>“There are three basic categories of data we collect:</p> <p>(a) Information that you voluntarily provide to us  Registration information. When you create your account for registering to use Our Services, depending on how you choose to create it, we may collect your password, e-mail address or phone number.  User-generated content. When you use Our Services to scan documents or images for recognizing text automatically (OCR), we will collect the documents or images which you choose to take or upload when you sync files. When you use Our Services to convert documents in multiple formats to PDF, we will collect the documents you choose to upload.  Transaction information. If you purchase the paid services provided by us, we may receive information about your transaction such as when it was made or when a subscription is set to expire.  Contact information. We may record your e-mail address when you contact us for service support, making a complaint, suggestion or feedback to us by sending emails to help us keep contact with you for updates and support to resolve your queries for use of our Services.</p> <p>(b) Information that is collected automatically  Device data. We collect certain information about the device you use to access Our Services, such as your IP address, mobile carrier, time zone settings, model of your device, the device system, network type, Android ID, identifiers for advertising (such as IDFA for iOS, GAID for Android device), your screen resolution and operating system.  Information Collected Using Cookies. Like many website owners and operators, we use automated data collection tools such as Cookies to collect certain information.</p> <p>(c) Data we get from third parties.  Social Media and Login Services. If you choose to sign in using third-party social networks or services (such as Google), we may</p>	Data collection and purpose

<p>collect information from those services, including your login or registration information for those services.</p> <p>Information Received from Our Partners and Other Third Parties. We may link your subscription information with the data information we receive from our partners or other third parties (such as Firebase provided by Google) to help smoothly facilitate Our Services for you, to better understand your needs and to provide you with better Services experience. Use of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.</p> <p>Other Sources. We may collect data about you from other publicly available sources.”</p>	
<p>“We do not share your data with other companies, organizations and individuals unless one of the following circumstances applies:</p> <p>(a) Sharing with your consent.</p> <p>After obtaining your consent, we will share the data that you have authorized with specified third parties or categories of third parties to the extent permitted by applicable laws and regulations.</p> <p>(b) Sharing pursuant to laws and regulations.</p> <p>We may share your data as required by laws and regulations, for resolving legal disputes, or as required by administrative or judiciary authorities pursuant to law.</p> <p>(c) Sharing with our affiliates.</p> <p>Your data may be shared within our affiliates only for explicit, and legitimate purposes, and the sharing is limited only to data required by services.</p> <p>(d) Sharing with third parties.</p> <p>Our services may contain third-party content and integrations (Third-party Services) to provide you with better service. We will only share your information in the following situations-and then only the minimum information necessary :</p> <p>We share your information with service providers who process data on our behalf to perform services related to our Services. For example: Apple Pay and Google Pay to complete your payment transactions when you pay for the paid services provided by us; Dropbox, Evernote, or Google Drive to sync the documents you upload as you need.</p>	<p>Data sharing</p>

<p>We share your information with software development kit(SDK) providers to operate, develop, and improve the features and functionality of Our Services. For example: Firebase(analytics and reporting services provided by Google)to assist us in analyzing how Our Services are used.</p> <p>We share Non-Identifying Information(including the advertising identifier currently associated with your device) and other aggregated information that does not include personal information with advertisement providers. If you prefer that we not deliver ads to you, please set the preference on your mobile device to limit ad tracking. Your mobile device includes a feature that lets you opt out of some types of targeted advertising (‘Limit Ad Tracking’ on iOS and ‘Opt Out of Interest-Based Ads’ on Android), you can opt out of Audience-Based and Activity-Based targeting by turning on the ‘Limit Ad Tracking’ setting on your iOS device or the ‘Opt Out of Ads Personalization’ setting on your Android device. To learn more about how these opt-out features work, please review your device settings.</p> <p>To protect the security of your data, we encourage you to review the privacy policies of every Third-party Service that you visit or use, including those third parties you interact with through our services. You can learn more about Third-party Services in CamScanner by clicking [List of Third Parties].</p> <p>We will ensure that the lawfulness of this sharing and sign stringent non-disclosure agreements (NDAs) and/or data processing clauses with the companies, organizations, and individuals with whom the data is shared, requiring them to comply with this Privacy Policy and take appropriate confidentiality and security measures when processing the data.”</p>	
<p>“(a) Access, Correction, and Portability. You can access and edit most of your basic account data right in CamScanner.You have the right to receive a copy of certain of your data in a structured, commonly used and machine-readable format. If you need to do so, please contact us.</p> <p>(b) Withdraw your consent. In most cases, if you let us use your data, you can simply revoke your permission by changing the settings in the app or on your device if your device offers those options. Of course, if you do that, certain services may lose full functionality.”</p> <p>“If you want to restrict the processing of your personal data, please contact us.”</p>	User Control
<p>“You can also delete some information in the app, like photos you’ve uploaded to CamScanner.</p>	User Right

<p>You may request that we delete the data we hold about you where:(i) you believe that it is no longer necessary for us to hold your data;(ii) we obtained your consent to process the data and you withdraw that consent (and we have no other valid legal grounds for processing the data);(iii) you believe we are unlawfully processing your data; or(iv) you are or were under the age of 16 (or such applicable age of majority under relevant local laws) when we collected the data and we can verify this.”</p> <p>“You have the right to restrict the processing of your data under the following circumstances:(i) your data is unlawfully processed, but you do not want to erase it;(ii) you have a legal claim that you need to establish, exercise, or defend, and you requested us to keep your data when we would not otherwise keep it;</p> <p>Your request for objection is pending our verification process; or(iii) you have contested the accuracy of your personal data, and the accuracy of your data is pending our verification process.”</p> <p>“You are entitled to make two information requests within a 12-month period. If you make an information request, we will need to collect certain information from you in order to verify your identity. You will receive a response to your request within 45 days.” - California Resident</p> <p>“If you make a request regarding your rights, we have one month to respond to you. If you would like to exercise any of the above rights, you can contact us via email at <a href="mailto:support@camscanner.com">support@camscanner.com</a>.”</p>	
<p>"We retain your data for no longer than is necessary for the purposes stated in this Privacy Policy.Once the retention period expires, we will delete or anonymize your data, unless otherwise required by applicable laws and regulations.”</p>	Data Retention
<p>“We attach great importance to the security of your data and have adopted standard industry practices to protect your data and prevent it from unauthorized access, disclosure, use, modification, damage, or loss. We employ administrative, technical, and physical security controls where appropriate, such as encryption, 2-step verification, and strict contractual confidentiality obligations for employees and contractors.</p> <p>3.2 If any data incident occurs, We will notify you, pursuant to relevant legal and regulatory requirements, of the basic data about the security incident and its possible impact, measures that We has taken or will take, suggestions about active defense and risk mitigation, and remedial measures. The notification may take the form of an email, text message, push notification, etc. If it is difficult to notify data subjects one by one, we will take</p>	:Data protection

<p>appropriate and effective measures to release a Security Notice. In addition, we will also report the handling status of data security incidents as required by supervisory authorities.</p> <p>3.3 We pay high level to attention to your data security and specially have a commission of data security, which leads and coordinates relevant departments in processing data security and inspects the risk level of data security on a periodical basis; in the meanwhile, the head of the commission will be the Data Protection Officer whose duty includes guarantee of our company-wide performance in fulfilling the commitment of data security, etc. You can contact our Data Protection Officer via email at <a href="mailto:support@camscanner.com">support@camscanner.com</a>. You may visit Security &amp; Protection <a href="https://v3.camscanner.com/app/security">https://v3.camscanner.com/app/security</a> to further understand our policy of data security.”</p>	
<p>“We may change this Privacy Policy from time to time. Under certain circumstances (for example with certain material changes or where it is required by applicable privacy laws) we will provide notice to you of these changes and, where required by applicable law, we will obtain your consent. If we change this Privacy Policy, we will change the "last updated" date at the top of this Privacy Policy and the revised policy will be posted to this page so that you can review it. Sometimes, we'll let you know by revising the date at the top of the Privacy Policy that's available in CamScanner. Other times, we may provide you with additional notice (such as providing you with an in-app notification).”</p>	<p>Policy Change Notification</p>
<p>“Our services are not intended for anyone under 16. And that’s why we do not knowingly collect personal information from anyone under 16. We understands the importance of safeguarding the personal information of children, which we consider to be an individual under the age of 16 or the equivalent age as specified by law in your jurisdiction. Please contact our Data Protection Officer via email at <a href="mailto:support@camscanner.com">support@camscanner.com</a> if you believe we have any personal information from any Child without such parental/guardian consent and acknowledgment so that we can promptly investigate and remove such personal information.”</p> <p>“Additional Notice for California Residents(How We Comply with CCPA)...”</p> <p>“Additional Notice for EU/EEA Residents(How We Comply with GDPR)...”</p> <p>“Additional Notice for Brazilian Residents(How We Comply with LGPD)...”</p>	<p>Restriction for specific audience</p>

**b) Rating the apps**

App 1: Bumble: Overall Grade B

Checkpoint	Rubric/ Grade
Data collection and purpose	5/5 (Clearly explains what and which information is collected and also explains why)
Data sharing	4/5 (Clearly explains how information may be shared to third parties but more information could have been provided on how data is collected/stored by third parties)
User Control	4/5 (User control options are clearly provided - however they are not given for retention policies or other marketing purposes)
User Right	3/5 (Does not clearly explain what the users rights are.)
Data Retention	1/5 (Very very brief description about how long user information is stored)
Data Protection	5/5 (Clearly explains various ways by which user information is protected)
Policy Change Notification	5/5 (Clearly explains how users will be informed about changes to the privacy policy.)
Restriction for specific audience	3/5 (Clearly describes ways in which child users are protected but doesn't talk about GDPR, EU residents, or even California residents etc.)

App 2: Duolingo: Overall Grade A

Checkpoint	Rubric/ Grade
Data collection and purpose	5/5 (Clearly explains what and which information is collected and also explains why)
Data sharing	4/5 (More information should have been provided about how information may be shared to third parties and collected/stored by third parties)
User Control	5/5 (User control options are clearly provided)
User Right	4/5 (Does not clearly explain what the users rights are.)

Data Retention	4/5 (Brief description about how long user information is stored, no specific timeline provided)
Data Protection	5/5 (Clearly explains various ways by which user information is protected)
Policy Change Notification	5/5 (Clearly explains how users will be informed about changes to the privacy policy.)
Restriction for specific audience	5/5 (Clearly describes ways in which child users are protected as well EU residents, and even California residents etc.)

App 3: CamScanner: Overall Grade B

Checkpoint	Rubric/ Grade
Data collection and purpose	5/5 (Clearly explains what and which information is collected and also explains why)
Data sharing	4/5 (Clearly explains how information may be shared to third parties but more information could have been provided on how data is collected/stored by third parties)
User Control	4/5 (User control options are clearly provided - however they are not given for retention policies or other marketing purposes)
User Right	3/5 (Does not clearly explain what the users rights are.)
Data Retention	2/5 (Very very brief description about how long user information is stored)
Data Protection	5/5 (Clearly explains various ways by which user information is protected)
Policy Change Notification	5/5 (Clearly explains how users will be informed about changes to the privacy policy.)
Restriction for specific audience	5/5 (Clearly describes ways in which child users are protected but doesn't talk about GDPR, EU residents, or even California residents etc.)

### **c) Automated Detection**

The code is present in the ZIP file

### App 1: Bumble

<b><u>Policy Segment</u></b>	<b><u>Checkpoint</u></b>
<p>In addition, under California law, operators of online services are required to disclose how they respond to “do not track” signals or other similar mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information of a consumer over time and across third party online services, to the extent the operator engages in that collection. At this time, we do not track our Users’ personal information over time and across third-party online services. This law also requires operators of online services to disclose whether third parties may collect personal information about their users’ online activities over time and across different online services when the users use the operator’s service. We do not knowingly permit third parties to collect personal information about an individual User’s online activities over time and across different online services when using the App.</p> <p>In addition, under California law, operators of online services are required to disclose how they respond to “do not track” signals or other similar mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information of a consumer over time and across third party online services, to the extent the operator engages in that collection. At this time, we do not track our Users’ personal information over time and across third-party online services. This law also requires operators of online services to disclose whether third parties may collect personal information about their users’ online activities over time and across different online services when the users use the operator’s service. We do not knowingly permit third parties to collect personal information about an individual User’s online activities over time and across different online services when using the App.</p>	Data collection and purpose
<p>We engage certain trusted third parties to perform functions and provide services to us. We may share your Registration Information or personal data with these third parties, but only for the purposes of performing these functions and providing such services.</p>	Data sharing
<p>For safety and security and to ensure you have the best possible user experience, we require Users to verify their accounts and might ask for your phone number and, in some instances, we might also ask that you carry out photo verification. We want to make sure you are not a robot! And we also want to avoid fake Bumble accounts being created which can be used for malicious activities and cybercrime – they threaten the Bumble network and spoil things for everyone. This verification might be required by</p>	User Control



us for the prevention of fraud. You can also verify your photo on a voluntary basis (to add the blue ‘verified’ badge to your profile).

We have developed matching algorithms to predict your compatibility with other users and so we can show you people we think are a good match for you. Our matching algorithms use the following data about you to predict your compatibility with others and generate profile recommendations: the things you tell us about yourself in your profile; information about your activity in our apps; whether you are a photo verified user; and your device coordinates, which are necessary to understand your proximity to other members. The legal basis for processing profile and proximity information is that this is necessary for the provision of our contractual services to you pursuant to Article 6(1)(b) GDPR. Where we process information about your app activity, this is based on our legitimate interests pursuant to Article 6(1)(f) GDPR, and specifically our legitimate interest in generating more personalized and relevant recommendations for who you can match with in our App. If you have chosen to include sensitive information in your profile, such as information about your beliefs, the processing of this information is based on your voluntary and explicit consent.

We use a combination of automated systems and a team of moderators to monitor and review accounts (including photos and any other information uploaded onto user profiles) and messages for content that indicates breaches of our Terms and Conditions of Use. If an account or message meets certain criteria that demonstrate that the Terms and Conditions of Use are likely to have been breached, the relevant account will be subject to a warning and the user’s access restricted and/or blocked. Affected Users can contact Bumble to contest the decision.

To verify your identity and prevent fraud and to ensure the safety and security of Users Phone number and if requested or permitted, photo provided as part of profile verification and for users based in countries where age verification is required by law: photo of Government ID + geolocation and device information (CCPA Categories A, B, C, E, F, G and H) You provide this information to us, except for the geolocation and device information, which we obtain from the device that you use to access the service  
Legitimate interests – it is in our legitimate interests to ensure that accounts are not set up fraudulently and to safeguard Users of the site

To investigate and block Users for reported infringements of our Terms and Conditions of Use Name and user registration details, profile information, content of messages and photographs + usage and device data such as IP address and IP session information (CCPA Categories A, B, C, F, and H) You provide your registration details, profile information, messages and photographs to us. We obtain the other information from the device that you use to access the service. Legitimate interests - it

is in our legitimate interests to prevent unauthorized behavior and to maintain the safety and integrity of our services

To serve promo cards and advertisements on the App Location, gender, age, and information that you have optionally provided us with via your profile (CCPA Categories A, C and G) We obtain age, gender and profile information from you, and location data from the device that you use to access the service Legitimate interests – it is in our legitimate interests to target advertisements so that Users see relevant advertisements and to allow us to generate income from advertising revenue

What we're doing. We process personal data to understand which of our users may be in college or university. To do this, we look at historic location data to understand whether your device's coordinates match to a general university or college area. For this activity, we use recent historic data regarding where you opened the Bumble app and we'll keep a simple "at campus yes/no" result based on our findings. What we don't do. We do not track your real-time movements as part of this activity and we do not identify or store information about where you are studying. To protect your privacy, we do not retain any of the location data used for this activity and it is permanently deleted once the results are generated. Why we're doing this. We'll combine the results of this processing with other relevant information we hold for the following purposes: so we can send the right offers, events and features to the right users; to understand which Bumble events are popular with the student demographic and which aren't working so well; and to improve the design of the App to meet the needs of students. The legal basis for this processing is our legitimate interests. We have a legitimate interest in providing a more tailored app experience for student users and in optimizing their chances of finding the right connections. Please note this processing only affects Bumble App users who identified the United States or Canada as their location when registering for the App (we exclude users in Quebec) and who are in the 18 to 24 age group.

We will then use this personal data to form your Bumble account. If you remove the Bumble app from your Facebook settings, or from your Apple ID, we will no longer have access to this data. However, we will still have the personal data that we received when you first set up your Bumble account using your Facebook or Apple ID (you must delete your Bumble account entirely for us to no longer have access to this data).

If you no longer want to link your Bumble account to your Instagram, Facebook or Spotify account, please visit the settings in your Instagram, Facebook or Spotify account and follow the instructions to remove the Bumble app access permissions. Please note that any information already added to your Bumble account from those platforms will not be deleted unless you delete it within your Bumble account as well.

We want you to be able to access Bumble wherever you happen to

<p>be in the world. To enable us to provide that service, we operate a global network of servers including in the US, UK, EU, and (for Users located in Russia) Russia. The hardware is located in third-party data centres but is owned by the Bumble Group. Data collected by Advertising Partners and other Service Providers may also be held outside the UK and the European Economic Area. We ensure that the data is adequately protected by ensuring that valid, legal mechanisms are in place such as: EU approved model clauses (which can be found <a href="#">here</a>), and implementing robust contractual standards. If you want more information relating to the nature of the safeguards we have in place, please email <a href="mailto:DPO@bumble.com">DPO@bumble.com</a>.</p> <p>Warning: Even after you remove information from your profile or delete your Account, copies of that information may still be viewable and/or accessed to the extent such information has been previously shared with others, or copied or stored by others. We cannot control this, nor do we accept any liability for this. If you have given third party applications or websites access to your personal information, they may retain such information to the extent permitted under their terms of service or privacy policies.</p> <p>For safety and security and to ensure you have the best possible user experience, we require Users to verify their accounts and might ask for your phone number and, in some instances, we might also ask that you carry out photo verification. We want to make sure you are not a robot! And we also want to avoid fake Bumble accounts being created which can be used for malicious activities and cybercrime – they threaten the Bumble network and spoil things for everyone. This verification might be required by us for the prevention of fraud. You can also verify your photo on a voluntary basis (to add the blue ‘verified’ badge to your profile).</p>	
<p>Once you register, you will be able to review and change this information at any time just by logging in to Bumble (other than your date of birth and location (which, if you have given Bumble access to your location in your device settings, is automatically updated based on the location of your device)). It is your responsibility to ensure that your account details are kept up to date. If your phone number changes, please ensure that you update this in your account.</p> <p>When you post information about yourself or use the messaging function to communicate with other Users, the amount of personal information you share is at your own risk. Please see Section 4 below for more information on who can access what you post on Bumble.</p> <p>If you have given Bumble access to your location in your device settings, when you use your cell, we will collect information about WiFi access points as well as other location information about your longitude and latitude and may save your device’s coordinates to offer certain features to you. This information helps</p>	<p>User Right</p>

us identify your physical location and we use it to personalize the App and make it easier for you to interact with other Users, by enabling the general locality information to be displayed to Users seeing your profile and showing you the profiles of other Users who are near you.

We may collect information about your device when you use the App including the unique device identifier, device model, and operating system, for a number of purposes, as set out in this policy. In addition, if you permit us to do so, the App may access your device's address book solely in order to add someone to your contacts.

We also collect data about your photos, such as which are the photos that users spend time on or which are the photos that have the best lighting, etc. We may use that data to rearrange your profile photos aiming to position them in a way that is favorable to you. You may opt-out of this feature through our app settings.

We have developed matching algorithms to predict your compatibility with other users and so we can show you people we think are a good match for you. Our matching algorithms use the following data about you to predict your compatibility with others and generate profile recommendations: the things you tell us about yourself in your profile; information about your activity in our apps; whether you are a photo verified user; and your device coordinates, which are necessary to understand your proximity to other members. The legal basis for processing profile and proximity information is that this is necessary for the provision of our contractual services to you pursuant to Article 6(1)(b) GDPR. Where we process information about your app activity, this is based on our legitimate interests pursuant to Article 6(1)(f) GDPR, and specifically our legitimate interest in generating more personalized and relevant recommendations for who you can match with in our App. If you have chosen to include sensitive information in your profile, such as information about your beliefs, the processing of this information is based on your voluntary and explicit consent.

We use a combination of automated systems and a team of moderators to monitor and review accounts (including photos and any other information uploaded onto user profiles) and messages for content that indicates breaches of our Terms and Conditions of Use. If an account or message meets certain criteria that demonstrate that the Terms and Conditions of Use are likely to have been breached, the relevant account will be subject to a warning and the user's access restricted and/or blocked. Affected Users can contact Bumble to contest the decision.

To provide you with the Bumble social networking service Name, email address, date of birth, location (CCPA Categories A and B) You provide your name, email address and date of birth to us. We obtain location data from the device that you use to access the service Contractual necessity

To verify your identity and prevent fraud and to ensure the safety

and security of Users Phone number and if requested or permitted, photo provided as part of profile verification and for users based in countries where age verification is required by law: photo of Government ID + geolocation and device information (CCPA Categories A, B, C, E, F, G and H) You provide this information to us, except for the geolocation and device information, which we obtain from the device that you use to access the service  
Legitimate interests – it is in our legitimate interests to ensure that accounts are not set up fraudulently and to safeguard Users of the site

To carry out research and analysis to help us improve the App and to test new technologies and processes designed to enhance and improve the App/Sites Log and usage data, including IP address, browser type, referring domain, pages accessed, mobile carrier and search terms, images and video, registration information, profile information (CCPA Categories A, F and H) You provide photos and videos to us. We obtain the log and usage information from the device that you use to access the service  
Legitimate interests – it is in our legitimate interests to analyze the way in which Users are accessing and using our services and to test new technologies so that we can further develop the App, implement security measures and improve the service

To investigate and block Users for reported infringements of our Terms and Conditions of Use Name and user registration details, profile information, content of messages and photographs + usage and device data such as IP address and IP session information (CCPA Categories A, B, C, F, and H) You provide your registration details, profile information, messages and photographs to us. We obtain the other information from the device that you use to access the service. Legitimate interests - it is in our legitimate interests to prevent unauthorized behavior and to maintain the safety and integrity of our services

To improve your experience on the App Data about profile photos such as whether the first profile photo is scrolled on or not and whether the vote is a yes or a no We obtain this information from the way users interact with the App and the profile photos of other users  
Legitimate interest - it is in our legitimate interest to improve our users' experience

To enable Users to create and enhance their Bumble profile and log into the App via third party accounts Data from Facebook and other third-party accounts (see section 7 of this Privacy Policy for more details) (CCPA Categories A, B, C, and H) We obtain this information from Facebook, or the providers of any other accounts you use to log in or connect with your Bumble account  
Legitimate interests – it is in our legitimate interests to facilitate access to our services

To block payment transactions as part of our anti-fraud procedures Name, IP address, email address, mobile number, cardholder name, payments received, type of payment, user ID, country (CCPA Categories, A, B, and D) You provide your name,

email address, mobile number and card details to us. We obtain your IP address from the device that you use to contact us. We obtain your payment information from your interactions with our service Legitimate interests – it is in our legitimate interests to prevent fraudulent transactions and to maintain the security of our services

To serve promo cards and advertisements on the App Location, gender, age, and information that you have optionally provided us with via your profile (CCPA Categories A, C and G) We obtain age, gender and profile information from you, and location data from the device that you use to access the service Legitimate interests – it is in our legitimate interests to target advertisements so that Users see relevant advertisements and to allow us to generate income from advertising revenue

To serve advertisements on third party networks and measure the effectiveness of such ads Data about your visit to our Sites or App and action taken on those (for example if you downloaded our App or created an account with Bumble), IP address (and your estimated location based on your IP address), age and gender, device ID (CCPA Categories B, C, G, F and K) We obtain age and gender from you and we obtain other information from the device or browser that you use to access the service Consent – as indicated by you in your Privacy Settings/Cookies Settings preferences and via your browser or device privacy preferences (where required by your device manufacturer, for example Apple devices using iOS 14.5).

To enable video and audio call functions, and the sending of images and video Video and audio call usage data, images and video (CCPA Categories F and H) We obtain this information from the device that you use to access the service Legitimate interests – it is in our legitimate interests to provide these functionalities as part of the services

What we’re doing. We process personal data to understand which of our users may be in college or university. To do this, we look at historic location data to understand whether your device’s coordinates match to a general university or college area. For this activity, we use recent historic data regarding where you opened the Bumble app and we’ll keep a simple “at campus yes/no” result based on our findings. What we don’t do. We do not track your real-time movements as part of this activity and we do not identify or store information about where you are studying. To protect your privacy, we do not retain any of the location data used for this activity and it is permanently deleted once the results are generated. Why we’re doing this. We’ll combine the results of this processing with other relevant information we hold for the following purposes: so we can send the right offers, events and features to the right users; to understand which Bumble events are popular with the student demographic and which aren’t working so well; and to improve the design of the App to meet the needs of students. The legal basis for this processing is our legitimate

interests. We have a legitimate interest in providing a more tailored app experience for student users and in optimizing their chances of finding the right connections. Please note this processing only affects Bumble App users who identified the United States or Canada as their location when registering for the App (we exclude users in Quebec) and who are in the 18 to 24 age group.

**Service Providers** – We engage certain trusted third parties to perform functions and provide services to us. We may share your Registration Information or personal data with these third parties, but only for the purposes of performing these functions and providing such services. More information about this is available directly below. This could include all data, including all CCPA Categories listed above

**Marketing Services Providers** – To help us serve marketing and advertising on third party websites and applications and measure the effectiveness of our advertising campaigns. More information on this is available below Advertising identifier associated with your device (Device ID), estimated location (based on your IP address), age, gender and data about your visit to our Sites or App and action taken on those (for example if you downloaded our App or created an account with our App), hashed email address (for ‘custom audiences’ only) (CCPA Categories B, C, G, F and K)

**Anti-Spam and Anti-Fraud** – Your data may be shared with other Bumble Group companies, for example, to block accounts and suspected fraudulent payment transactions as part of our anti-spam and anti-fraud procedures. Email address, phone number, IP address and IP session information, social network ID, username, user agent string, and transaction and payment data (CCPA Categories B, F and D).

**Aggregated Information** – We may share aggregated information with third parties that includes your personal data (but which doesn’t identify you directly) together with other information including log data for industry analysis and demographic profiling.

We carry out due diligence on all Service Providers we engage to ensure they have adequate data protection and information security measures in place and only provide them with the personal data necessary to the service they are providing.

Measures are taken to ensure that the data shared is non-attributable to the greatest extent possible and our suppliers are also subject to extensive obligations under our contractual arrangements, including strict data retention limits.

to create an audience for our advertisements of other potential users who have similar characteristics to you based on the information the Marketing Service Providers holds about you (also known as a Lookalike Audience); or

\*Hashing is a way of encrypting information by turning it into a combination of random numbers and letters - this code cannot be

traced back to the email address. When hashed email addresses are sent to a Marketing Service Provider, they're then matched against the Provider's own existing list of their own users' hashed information and our ads are served to those of our users who have successfully been matched with the Provider's. Matched and unmatched hashes are then deleted by the Provider.

Where we share data with Facebook as our Marketing Service Provider (including via the Facebook "Like" function), we are Joint Data Controllers with Facebook Ireland for this processing.

This arrangement means that Bumble has to provide you this notice, but you should contact Facebook if you wish to exercise your data protection rights. Further information, including how Facebook enables you to exercise your data protection rights, and subsequently processes your information as independent data controller can be found in Facebook Ireland's Data Policy. If you want more information relating to the nature of the arrangement we have in place with Facebook, please email [DPO@bumble.com](mailto:DPO@bumble.com).

This data referred to above can include actions that you take on our website such as your interactions with our Sites or other information collected from cookies or similar technologies including the Facebook pixel. This allows us to measure the effectiveness of our advertising, improve our marketing practices, and helps us deliver more relevant advertising to you and people like you (including on social media such as Facebook).

Your Bumble profile and other information you make available via the App, including certain information added to your profile through third party accounts (such as Facebook, Instagram or Spotify – see section 7 of this Privacy Policy for more information about this) may be viewed and shared by Users with individuals who may or may not be users of the App. For example, a User may recommend you as a match to his or her Facebook friend(s) by taking a screenshot of your profile picture and sharing it, regardless of whether such friend(s) is also a User of the App.

If you log in to or access the App through your Facebook account or another third-party account on a device which you share with others, remember to log out of the App and the relevant third-party account when you leave the device in order to prevent other users from accessing your Bumble account.

If you ever think someone has had access to your password or Account, please follow the steps set out here. We cannot guarantee the security of your personal data while it is being transmitted to our site and any transmission is at your own risk.

We will then use this personal data to form your Bumble account.

If you remove the Bumble app from your Facebook settings, or from your Apple ID, we will no longer have access to this data.

However, we will still have the personal data that we received when you first set up your Bumble account using your Facebook or Apple ID (you must delete your Bumble account entirely for us



to no longer have access to this data).

If you no longer want to link your Bumble account to your Instagram, Facebook or Spotify account, please visit the settings in your Instagram, Facebook or Spotify account and follow the instructions to remove the Bumble app access permissions. Please note that any information already added to your Bumble account from those platforms will not be deleted unless you delete it within your Bumble account as well.

You have the right to request that we delete your personal information that we collected from you, subject to certain exceptions.

In addition, under California law, operators of online services are required to disclose how they respond to “do not track” signals or other similar mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information of a consumer over time and across third party online services, to the extent the operator engages in that collection. At this time, we do not track our Users’ personal information over time and across third-party online services. This law also requires operators of online services to disclose whether third parties may collect personal information about their users’ online activities over time and across different online services when the users use the operator’s service. We do not knowingly permit third parties to collect personal information about an individual User’s online activities over time and across different online services when using the App.

Right to be informed: what personal data an organization is processing and why (we provide this information to you in this Privacy Policy).

We want you to be able to access Bumble wherever you happen to be in the world. To enable us to provide that service, we operate a global network of servers including in the US, UK, EU, and (for Users located in Russia) Russia. The hardware is located in third-party data centres but is owned by the Bumble Group. Data collected by Advertising Partners and other Service Providers may also be held outside the UK and the European Economic Area. We ensure that the data is adequately protected by ensuring that valid, legal mechanisms are in place such as: EU approved model clauses (which can be found [here](#)), and implementing robust contractual standards. If you want more information relating to the nature of the safeguards we have in place, please email [DPO@bumble.com](mailto:DPO@bumble.com).

the information must be kept for our legitimate business interests, such as fraud prevention and enhancing Users’ safety and security (for example, information may need to be kept to prevent a user who was banned for unsafe behavior or security incidents from opening a new account).

Warning: Even after you remove information from your profile or delete your Account, copies of that information may still be viewable and/or accessed to the extent such information has been

<p>previously shared with others, or copied or stored by others. We cannot control this, nor do we accept any liability for this. If you have given third party applications or websites access to your personal information, they may retain such information to the extent permitted under their terms of service or privacy policies.</p>	
<p>What we're doing. We process personal data to understand which of our users may be in college or university. To do this, we look at historic location data to understand whether your device's coordinates match to a general university or college area. For this activity, we use recent historic data regarding where you opened the Bumble app and we'll keep a simple "at campus yes/no" result based on our findings. What we don't do. We do not track your real-time movements as part of this activity and we do not identify or store information about where you are studying. To protect your privacy, we do not retain any of the location data used for this activity and it is permanently deleted once the results are generated. Why we're doing this. We'll combine the results of this processing with other relevant information we hold for the following purposes: so we can send the right offers, events and features to the right users; to understand which Bumble events are popular with the student demographic and which aren't working so well; and to improve the design of the App to meet the needs of students. The legal basis for this processing is our legitimate interests. We have a legitimate interest in providing a more tailored app experience for student users and in optimizing their chances of finding the right connections. Please note this processing only affects Bumble App users who identified the United States or Canada as their location when registering for the App (we exclude users in Quebec) and who are in the 18 to 24 age group.</p>	<p>Data Retention</p>
<p>What we're doing. We process personal data to understand which of our users may be in college or university. To do this, we look at historic location data to understand whether your device's coordinates match to a general university or college area. For this activity, we use recent historic data regarding where you opened the Bumble app and we'll keep a simple "at campus yes/no" result based on our findings. What we don't do. We do not track your real-time movements as part of this activity and we do not identify or store information about where you are studying. To protect your privacy, we do not retain any of the location data used for this activity and it is permanently deleted once the results are generated. Why we're doing this. We'll combine the results of this processing with other relevant information we hold for the following purposes: so we can send the right offers, events and features to the right users; to understand which Bumble events are popular with the student demographic and which aren't working</p>	<p>Data protection</p>

<p>so well; and to improve the design of the App to meet the needs of students. The legal basis for this processing is our legitimate interests. We have a legitimate interest in providing a more tailored app experience for student users and in optimizing their chances of finding the right connections. Please note this processing only affects Bumble App users who identified the United States or Canada as their location when registering for the App (we exclude users in Quebec) and who are in the 18 to 24 age group.</p>	
<p>We engage certain trusted third parties to perform functions and provide services to us (“Service Providers”). The suppliers with which Bumble shares User personal data vary depending on a variety of factors, such as which of our App, Sites and services a User engages with. For example, to provide our services to Users, we typically use the following suppliers: As Bumble evolves, we may revise this Privacy Policy from time to time. The most current version of the policy will govern our use of your information and will always be at <a href="https://bumble.com/privacy">bumble.com/privacy</a>. If we make a change to this policy that, in our sole discretion, is material, we will notify you, for example, via an email to the email associated with your Account or by posting a notice within Bumble.</p>	<p>Policy Change Notification</p>
<p>We recommend and encourage you (and all our members) to think carefully about the information you disclose about yourself. We also do not recommend that you put email addresses, URLs, instant messaging details, phone numbers, full names or addresses, credit card details, national identity numbers, drivers’ license details and other sensitive information which is open to abuse and misuse on your profile. If you choose to verify your profile photo, we will scan each photo that you submit. The scan may include the use of facial recognition technology so that we can compare the photo you submit to your profile photo, to help ensure that you are who you say you are. We do not add the verification photos to your profile. We retain the scans so that we can verify you in the future and for our record-keeping purposes until we no longer need them for such purposes or for three years after your last interaction with us, whichever occurs first. After the applicable retention period expires, we take commercially reasonable steps to permanently and securely delete the scans from our systems. We may collect information about your device when you use the App including the unique device identifier, device model, and operating system, for a number of purposes, as set out in this policy. In addition, if you permit us to do so, the App may access your device’s address book solely in order to add someone to your contacts. If you would like to find out more about cookies, including how</p>	<p>Restriction for specific audience</p>

we use them and what choices are available to you, please refer to our Cookie Policy.

To respond to correspondence and queries that you submit to us, including social media queries Email address and IP address, social media name, phone number (CCPA Categories B and F) You provide your email address, social media name and phone number to us when you contact us and we obtain your IP address from the device that you use to contact us Legitimate interests – it is in our legitimate interests to respond to your queries to ensure that we provide a good service to Users and troubleshoot problems

What we're doing. We process personal data to understand which of our users may be in college or university. To do this, we look at historic location data to understand whether your device's coordinates match to a general university or college area. For this activity, we use recent historic data regarding where you opened the Bumble app and we'll keep a simple "at campus yes/no" result based on our findings. What we don't do. We do not track your real-time movements as part of this activity and we do not identify or store information about where you are studying. To protect your privacy, we do not retain any of the location data used for this activity and it is permanently deleted once the results are generated. Why we're doing this. We'll combine the results of this processing with other relevant information we hold for the following purposes: so we can send the right offers, events and features to the right users; to understand which Bumble events are popular with the student demographic and which aren't working so well; and to improve the design of the App to meet the needs of students. The legal basis for this processing is our legitimate interests. We have a legitimate interest in providing a more tailored app experience for student users and in optimizing their chances of finding the right connections. Please note this processing only affects Bumble App users who identified the United States or Canada as their location when registering for the App (we exclude users in Quebec) and who are in the 18 to 24 age group.

Please also note that in certain countries (currently, South Korea only), Users are provided with functionality enabling them to download a copy of their conversation history (as this is required by local laws) and that Bumble has no control over how users may then publish or use that information.

If you use BFF, you can populate your profile with information (like your beliefs and political leanings). You can provide this information as part of your profile, but there's no obligation to do so.

In addition, under California law, operators of online services are required to disclose how they respond to "do not track" signals or other similar mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information of a consumer over time and across third party online services, to

<p>the extent the operator engages in that collection. At this time, we do not track our Users' personal information over time and across third-party online services. This law also requires operators of online services to disclose whether third parties may collect personal information about their users' online activities over time and across different online services when the users use the operator's service. We do not knowingly permit third parties to collect personal information about an individual User's online activities over time and across different online services when using the App.</p>	
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### App 2: Duolingo

<u>Policy Segment</u>	<u>Checkpoint</u>
<p>When you use the Service, Duolingo may collect the following personal information about you.</p> <p>Duolingo has a Contact Sync feature, which allows you to find your contacts who also use Duolingo. If you use Contact Sync, you will give the Duolingo app permission to access the contacts stored on your phone for the purpose of identifying your contacts who also use Duolingo. If Duolingo identifies a user with the same phone number as someone in your contacts, we will recommend that user as someone you may wish to follow.</p> <p>When you use Duolingo in our app or on our website, some of your activity will be logged by a service called FullStory. FullStory captures and analyzes your activity and provides us with data and a video session replay of your activity to help us make the Duolingo experience better. FullStory does not record usernames, names, profile images, email addresses, profile locations or bios, or passwords. However, FullStory records usage patterns (e.g., clicks, mouse movements, scrolling, and typing), tech specs (e.g., browser, device type, operating system, viewfinder size, script errors, and IP address), navigation (e.g., pages visited, referrers, URL parameters, and session duration), and learning activity (e.g., session progress and answers). You can disable FullStory activity recording by using the opt-out function on FullStory's website. FullStory is disabled for known Child Users.</p> <p>When you access the Duolingo website, we store certain data from your browser using cookies. A cookie is a piece of data stored on the user's computer tied to data about the user. We use session ID cookies to confirm that users are logged in. If you do not want your data to be collected by cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. However, cookies may be necessary to provide you with certain features available on the website (e.g., customized information). You can find more information about</p>	<p>Data collection and purpose</p>

<p>cookies and how to manage them <a href="#">here</a>.</p> <p>We use Google Analytics, which is a web analytics tool that helps us understand how users engage with our 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 site. These reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics by installing Google's browser add-on available <a href="#">here</a>.</p> <p>Duolingo may process and share your personal information for the purpose of providing you with personalized advertising. To provide personalized advertising, we work with a variety of third-party advertising networks, marketing analytics service providers, and website analysis firms, such as Google, Facebook, Oath, and Unity. These third-party advertising service providers collect and use personal information about your visits to and use of the Service, as well as other websites, in order to serve you with advertisements and content tailored to meet your preferences and likely interests, and better understand ad effectiveness. Aggregate demographic and interest data will also be used for market research purposes.</p> <p>We know that children deserve extra privacy protection. That's why we treat Child Users (meaning users under the age of 13 in the United States or another age of digital consent in their country) differently to ensure their parents are in control and we only collect the bare minimum information we need to make Duolingo work.</p> <p>After a Child User registers, we will send an email to the parent's email address about Duolingo's privacy practices regarding Child Users, including what personal information we collect and how we use, share, and protect that personal information. The email also explains how parents can request to access, change, or delete the personal information about their child.</p> <p>With regards to the Children's Online Privacy Protection Act, Duolingo collects personal information from children under the age of 13 for the sole purpose of performing internal operations of the Service. If we discover that we have unknowingly collected additional personal information from these children, we will delete it. If you believe this to be the case, please contact us at <a href="mailto:privacy@duolingo.com">privacy@duolingo.com</a>.</p>	
<p>Duolingo may also collect and analyze your speech to help us understand the effectiveness of our lessons and to improve the product. You may choose not to share your audio with us for product improvement purposes in your Settings. Any audio you agree to send to Duolingo is anonymized when it reaches our servers to ensure that no trace of your personal information remains attached to the audio.</p>	<p>Data sharing</p>

<p>We use Google Analytics, which is a web analytics tool that helps us understand how users engage with our 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 site. These reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics by installing Google's browser add-on available <a href="#">here</a>.</p> <p>Duolingo may process and share your personal information for the purpose of providing you with personalized advertising. To provide personalized advertising, we work with a variety of third-party advertising networks, marketing analytics service providers, and website analysis firms, such as Google, Facebook, Oath, and Unity. These third-party advertising service providers collect and use personal information about your visits to and use of the Service, as well as other websites, in order to serve you with advertisements and content tailored to meet your preferences and likely interests, and better understand ad effectiveness. Aggregate demographic and interest data will also be used for market research purposes.</p>	
<p>We know that children deserve extra privacy protection. That's why we treat Child Users (meaning users under the age of 13 in the United States or another age of digital consent in their country) differently to ensure their parents are in control and we only collect the bare minimum information we need to make Duolingo work.</p>	User Control
<p>After you register for your Duolingo account, a profile page will be created for you ("Profile"). Your Profile will be populated by information you submit, such as your name, username, bio, and profile picture ("User-Generated Content"). Your age, phone number, and email address are not included in your public Profile and are not considered User-Generated Content under this Privacy Policy. Other Duolingo users may be able to search for your Profile using your name, username, email address, or phone number.</p> <p>Your Profile will also include information about your learning progress, such as the languages you are learning, your learning statistics, and your achievements. Moreover, your Profile will show a list of your followers and other users you follow.</p> <p>By default, your Profile is public, and visible to other Duolingo users and anyone else on the Internet. In addition, your User-Generated Content may be publicly visible. If your Profile is public, third-party websites or web scrapers may be able to read, collect, and use your public information for their own purposes. However, you can set your Profile to private in your Settings. You may be able to submit comments that will supplement other</p>	User Right

users' Profiles and other users may be able to submit comments that will supplement your Profile. Any comments you submit are considered User-Generated Content under this Privacy Policy. You can delete comments you submit or comments that other users submit to your Profile.

Duolingo has a Contact Sync feature, which allows you to find your contacts who also use Duolingo. If you use Contact Sync, you will give the Duolingo app permission to access the contacts stored on your phone for the purpose of identifying your contacts who also use Duolingo. If Duolingo identifies a user with the same phone number as someone in your contacts, we will recommend that user as someone you may wish to follow.

When you access the Duolingo website, we store certain data from your browser using cookies. A cookie is a piece of data stored on the user's computer tied to data about the user. We use session ID cookies to confirm that users are logged in. If you do not want your data to be collected by cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. However, cookies may be necessary to provide you with certain features available on the website (e.g., customized information). You can find more information about cookies and how to manage them [here](#).

We use Google Analytics, which is a web analytics tool that helps us understand how users engage with our 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 site. These reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics by installing Google's browser add-on available [here](#).

Duolingo will process your personal information to provide and improve the Service. For example, we will use the information you provide to maintain your Profile and learning progress, display your Profile to other users (unless you make it private), personalize learning content, detect and fix bugs, perform research, and provide customer service to you.

Duolingo may process and share your personal information for the purpose of providing you with personalized advertising. To provide personalized advertising, we work with a variety of third-party advertising networks, marketing analytics service providers, and website analysis firms, such as Google, Facebook, Oath, and Unity. These third-party advertising service providers collect and use personal information about your visits to and use of the Service, as well as other websites, in order to serve you with advertisements and content tailored to meet your preferences and likely interests, and better understand ad effectiveness.

Aggregate demographic and interest data will also be used for market research purposes.

Request that we delete any personal information we have



collected from you.

You may update or correct your information, and exercise certain opt-out rights, in your Settings page. You may request to access or erase your personal information at the Duolingo Data Vault. To make another privacy-related request, please send an email to [privacy@duolingo.com](mailto:privacy@duolingo.com).

Duolingo will generally retain your personal information until your account is deleted. However, Duolingo may retain certain information longer if necessary to provide our Service, defend our legitimate interests or those of third parties, comply with legal requirements, resolve or defend ourselves in disputes, investigate misuse or disruption of the Service, or perform agreements. We may also retain anonymous data indefinitely.

We know that children deserve extra privacy protection. That's why we treat Child Users (meaning users under the age of 13 in the United States or another age of digital consent in their country) differently to ensure their parents are in control and we only collect the bare minimum information we need to make Duolingo work.

After a Child User registers, we will send an email to the parent's email address about Duolingo's privacy practices regarding Child Users, including what personal information we collect and how we use, share, and protect that personal information. The email also explains how parents can request to access, change, or delete the personal information about their child.

With regards to the Children's Online Privacy Protection Act, Duolingo collects personal information from children under the age of 13 for the sole purpose of performing internal operations of the Service. If we discover that we have unknowingly collected additional personal information from these children, we will delete it. If you believe this to be the case, please contact us at [privacy@duolingo.com](mailto:privacy@duolingo.com).

As a parent, you also have the option of providing your email address so that Duolingo may send you information about product updates and ask you about participating in product research. If you do provide your email address, you can unsubscribe any time by emailing [literacy-feedback@duolingo.com](mailto:literacy-feedback@duolingo.com) or by clicking the unsubscribe link in any Duolingo ABC emails. Your Duolingo ABC data is backed up into Apple's iCloud, which allows you to synchronize and restore the data onto another Apple device.

The Service may contain links to other websites. Duolingo is not responsible for the content or privacy practices of other websites, including any personal or financial information collected by third-party payment processors. We encourage users to be aware of the privacy policies of other websites they visit. This Privacy Policy applies only to information collected by Duolingo. Any time you click on a link (including advertising banners) or submit your personal information to a third-party website, you will be subject to that third party's privacy policies.

Duolingo is based in the United States and processes data in the

United States, which may not provide equivalent levels of data protection as your home jurisdiction. Duolingo may transfer the data of users outside the United States to the United States.	
When you access the Duolingo website, we store certain data from your browser using cookies. A cookie is a piece of data stored on the user's computer tied to data about the user. We use session ID cookies to confirm that users are logged in. If you do not want your data to be collected by cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. However, cookies may be necessary to provide you with certain features available on the website (e.g., customized information). You can find more information about cookies and how to manage them here.	Data Retention
Not Found	Data protection
<p>We use Google Analytics, which is a web analytics tool that helps us understand how users engage with our 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 site. These reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics by installing Google's browser add-on available here.</p> <p>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 seven (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 seven (7) day period.</p> <p>Duolingo is based in the United States and processes data in the United States, which may not provide equivalent levels of data protection as your home jurisdiction. Duolingo may transfer the data of users outside the United States to the United States.</p>	Policy Change Notification
When you access the Duolingo website, we store certain data from your browser using cookies. A cookie is a piece of data stored on the user's computer tied to data about the user. We use session ID cookies to confirm that users are logged in. If you do not want your data to be collected by cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. However, cookies may be necessary to provide you with certain features available on the website (e.g.,	Restriction for specific audience

<p>customized information). You can find more information about cookies and how to manage them here.</p> <p>You can see a list of all cookies used at Duolingo on our Cookie List page and manage your cookies in the Privacy Preference Center. Please note that our cookies include Targeting Cookies from Google, Facebook, Amazon, and other companies, which these companies may use to track your activities across multiple websites to deliver personalized advertising to you.</p> <p>Please note that these rights are not absolute and Duolingo may refuse requests to exercise data subject rights if there is a legitimate reason, such as if we cannot authenticate your identity, if the request could violate the rights of a third party or applicable law, or if the request could interfere with a Duolingo service or prevent us from delivering a service you requested.</p> <p>Child Users do not see friend suggestions, and cannot use the Contact Sync Feature, find friends on Facebook, or send invitation emails.</p>	
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### **App 3: CamScanner - PDF Scanner App**

<b><u>Policy Segment</u></b>	<b><u>Checkpoint</u></b>
<p>Registration information. When you create your account for registering to use Our Services, depending on how you choose to create it, we may collect your password, e-mail address or phone number.</p> <p>User-generated content. When you use Our Services to scan documents or images for recognizing text automatically (OCR), we will collect the documents or images which you choose to take or upload when you sync files. When you use Our Services to convert documents in multiple formats to PDF, we will collect the documents you choose to upload.</p> <p>Contact information. We may record your e-mail address when you contact us for service support, making a complaint, suggestion or feedback to us by sending emails to help us keep contact with you for updates and support to resolve your queries for use of our Services.</p> <p>Device data. We collect certain information about the device you use to access Our Services, such as your IP address, mobile carrier, time zone settings, model of your device, the device system, network type, Android ID, identifiers for advertising (such as IDFA for iOS, GAID for Android device), your screen resolution and operating system.</p> <p>Information Collected Using Cookies. Like many website owners and operators, we use automated data collection tools such as Cookies to collect certain information.</p>	Data collection and purpose

<p>Our services are not intended for anyone under 16. And that's why we do not knowingly collect personal information from anyone under 16. We understand the importance of safeguarding the personal information of children, which we consider to be an individual under the age of 16 or the equivalent age as specified by law in your jurisdiction. Please contact our Data Protection Officer via email at <a href="mailto:support@camscanner.com">support@camscanner.com</a> if you believe we have any personal information from any Child without such parental/guardian consent and acknowledgment so that we can promptly investigate and remove such personal information. We may collect personal identifiers, such as your email address when you register your account to use Our Services; transaction information; activity information relating to internet or other electronic networks such as interaction with app. If you don't want us to collect and/or process your information any more please contact us at <a href="mailto:support@camscanner.com">support@camscanner.com</a>. Note that if you decide to opt out of data collection and processing this can affect some functions and you may not be able to use all features of Our Services to the fullest extent possible. You have the right to be provided with clear, transparent, and easily understandable information about how we use your information and your rights (such as the information provided in this policy).</p>	
<p>"We do not share your data with other companies, organizations and individuals unless one of the following circumstances applies:</p> <p>(a) Sharing with your consent.</p> <p>After obtaining your consent, we will share the data that you have authorized with specified third parties or categories of third parties to the extent permitted by applicable laws and regulations.</p> <p>(b) Sharing pursuant to laws and regulations.</p> <p>We may share your data as required by laws and regulations, for resolving legal disputes, or as required by administrative or judiciary authorities pursuant to law.</p> <p>(c) Sharing with our affiliates.</p> <p>Your data may be shared within our affiliates only for explicit, and legitimate purposes, and the sharing is limited only to data required by services.</p> <p>(d) Sharing with third parties.</p> <p>Our services may contain third-party content and integrations</p>	<p>Data sharing</p>

<p>(Third-party Services) to provide you with better service. We will only share your information in the following situations-and then only the minimum information necessary :</p> <p>We share your information with service providers who process data on our behalf to perform services related to our Services. For example: Apple Pay and Google Pay to complete your payment transactions when you pay for the paid services provided by us; Dropbox, Evernote, or Google Drive to sync the documents you upload as you need.</p> <p>We share your information with software development kit(SDK) providers to operate, develop, and improve the features and functionality of Our Services. For example: Firebase(analytics and reporting services provided by Google)to assist us in analyzing how Our Services are used.</p> <p>We share Non-Identifying Information(including the advertising identifier currently associated with your device) and other aggregated information that does not include personal information with advertisement providers. If you prefer that we not deliver ads to you, please set the preference on your mobile device to limit ad tracking. Your mobile device includes a feature that lets you opt out of some types of targeted advertising (‘Limit Ad Tracking’ on iOS and ‘Opt Out of Interest-Based Ads’ on Android), you can opt out of Audience-Based and Activity-Based targeting by turning on the ‘Limit Ad Tracking’ setting on your iOS device or the ‘Opt Out of Ads Personalization’ setting on your Android device. To learn more about how these opt-out features work, please review your device settings.</p> <p>To protect the security of your data, we encourage you to review the privacy policies of every Third-party Service that you visit or use, including those third parties you interact with through our services. You can learn more about Third-party Services in CamScanner by clicking [List of Third Parties].</p> <p>We will ensure that the lawfulness of this sharing and sign stringent non-disclosure agreements (NDAs) and/or data processing clauses with the companies, organizations, and individuals with whom the data is shared, requiring them to comply with this Privacy Policy and take appropriate confidentiality and security measures when processing the data.”</p>	
<p>You may request that we delete the data we hold about you where:(i) you believe that it is no longer necessary for us to hold your data;(ii) we obtained your consent to process the data and you withdraw that consent (and we have no other valid legal grounds for processing the data);(iii) you believe we are unlawfully processing your data; or(iv) you are or were under the</p>	<p>User Control</p>

<p>age of 16 (or such applicable age of majority under relevant local laws) when we collected the data and we can verify this.</p> <p>To bring you Our Services, we operate globally and we will comply with the applicable data protection laws and regulations in your country/territory to collect, use and process your personal data. For example, if you are a resident of California, we will process and store your personal data (such as the documents and images you upload) only in the United States. In connection with the purposes described herein, where necessary to provide our services, we may transfer your personal data to countries/territories outside your countries/territories, we will take appropriate safeguards to ensure that your personal information will remain protected in accordance with this Privacy Policy.</p>	
<p>Welcome to use CamScanner, which is provided by INTSIG Information Co., Ltd. and its affiliates. We are committed to protecting the privacy of your data. This Privacy Policy explains what information CamScanner collect, use, and disclose about you when you access or use our websites and applications (collectively, “Our Services”).</p> <p><b>Device data.</b> We collect certain information about the device you use to access Our Services, such as your IP address, mobile carrier, time zone settings, model of your device, the device system, network type, Android ID, identifiers for advertising (such as IDFA for iOS, GAID for Android device), your screen resolution and operating system.</p> <p><b>Information Received from Our Partners and Other Third Parties.</b> We may link your subscription information with the data information we receive from our partners or other third parties (such as Firebase provided by Google) to help smoothly facilitate Our Services for you, to better understand your needs and to provide you with better Services experience. Use of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.</p> <p>To fulfill requests for products, services, functionality, support and information for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes and to solicit your feedback</p> <p><b>4.2</b> When you use Our Services on your devices, your data may be stored locally on the devices you use to access Our Services. When you sync your Devices with our Service, such data will be replicated on our servers maintained by us for processing and storage. To store your personal data replicated on our servers, we recourse to data hosting services provided by Amazon Web Services, Inc. (a subsidiary of Amazon.com Inc.) that have adopted technical and organizational measures to protect your personal data against unauthorized/unlawful processing and accidental loss, destruction or other damage. We take your privacy seriously and, therefore, encrypt your personal data – if possible –</p>	<p>User Right</p>

before sending it to the hosting organizations for the purposes of its storage.

4.3 We retain your data for no longer than is necessary for the purposes stated in this Privacy Policy. Once the retention period expires, we will delete or anonymize your data, unless otherwise required by applicable laws and regulations.

We share your information with service providers who process data on our behalf to perform services related to our Services. For example: Apple Pay and Google Pay to complete your payment transactions when you pay for the paid services provided by us; Dropbox, Evernote, or Google Drive to sync the documents you upload as you need.

(a) Access, Correction, and Portability. You can access and edit most of your basic account data right in CamScanner. You have the right to receive a copy of certain of your data in a structured, commonly used and machine-readable format. If you need to do so, please contact us.

You can also delete some information in the app, like photos you've uploaded to CamScanner.

You may request that we delete the data we hold about you where: (i) you believe that it is no longer necessary for us to hold your data; (ii) we obtained your consent to process the data and you withdraw that consent (and we have no other valid legal grounds for processing the data); (iii) you believe we are unlawfully processing your data; or (iv) you are or were under the age of 16 (or such applicable age of majority under relevant local laws) when we collected the data and we can verify this.

If you want to restrict the processing of your personal data, please contact us. You have the right to restrict the processing of your data under the following circumstances: (i) your data is unlawfully processed, but you do not want to erase it; (ii) you have a legal claim that you need to establish, exercise, or defend, and you requested us to keep your data when we would not otherwise keep it;

Because your privacy is important to us, we will ask you to verify your identity or provide additional information before allowing you to manage your data. We may also reject your request to your data for a number of reasons, including, for example, if the request risks the privacy of other users or is unlawful.

To bring you Our Services, we operate globally and we will comply with the applicable data protection laws and regulations in your country/territory to collect, use and process your personal data. For example, if you are a resident of California, we will process and store your personal data (such as the documents and images you upload) only in the United States. In connection with the purposes described herein, where necessary to provide our services, we may transfer your personal data to countries/territories outside your countries/territories, we will take appropriate safeguards to ensure that your personal information will remain protected in accordance with this Privacy Policy.

<p>The right to request disclosure of our data collection and sales practices in connection with your personal information, including the categories of personal information we have collected, the source of the information, our use of the information and, if the information was disclosed or sold to third parties, the categories of personal information disclosed or sold to third parties and the categories of third parties to whom such information was disclosed or sold;</p> <p>If you don't want us to collect and/or process your information any more please contact us at <a href="mailto:support@camscanner.com">support@camscanner.com</a>. Note that if you decide to opt out of data collection and processing this can affect some functions and you may not be able to use all features of Our Services to the fullest extent possible.</p> <p>You have many rights relating to your personal information. Additional information on your rights can be requested directly from the data protection regulator within your country. Your rights include:</p> <p>You have the right to request access to your information and certain other information relevant to how your information is attained and used.</p> <p>You have the right to lodge a complaint about the way we handle or process your personal information with your national data protection regulator.</p>	
<p>4.2 When you use Our Services on your devices, your data may be stored locally on the devices you use to access Our Services. When you sync your Devices with our Service, such data will be replicated on our servers maintained by us for processing and storage. To store your personal data replicated on our servers, we recourse to data hosting services provided by Amazon Web Services, Inc. (a subsidiary of Amazon.com Inc.) that have adopted technical and organizational measures to protect your personal data against unauthorized/unlawful processing and accidental loss, destruction or other damage. We take your privacy seriously and, therefore, encrypt your personal data – if possible – before sending it to the hosting organizations for the purposes of its storage.</p>	Data Retention
<p>We attach great importance to the security of your data and have adopted standard industry practices to protect your data and prevent it from unauthorized access, disclosure, use, modification, damage, or loss. We employ administrative, technical, and physical security controls where appropriate, such as encryption, 2-step verification, and strict contractual confidentiality obligations for employees and contractors.</p>	Data protection
<p>We may change this Privacy Policy from time to time. Under certain circumstances (for example with certain material changes</p>	Policy Change Notification



<p>or where it is required by applicable privacy laws) we will provide notice to you of these changes and, where required by applicable law, we will obtain your consent. If we change this Privacy Policy, we will change the "last updated" date at the top of this Privacy Policy and the revised policy will be posted to this page so that you can review it. Sometimes, we'll let you know by revising the date at the top of the Privacy Policy that's available in CamScanner. Other times, we may provide you with additional notice (such as providing you with an in-app notification).</p> <p>You have the right to obtain and reuse your personal information for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our information technology systems and theirs safely and securely, without affecting its usability.</p>	
<p>(b) Withdraw your consent. In most cases, if you let us use your data, you can simply revoke your permission by changing the settings in the app or on your device if your device offers those options. Of course, if you do that, certain services may lose full functionality.</p> <p>Our services are not intended for anyone under 16. And that's why we do not knowingly collect personal information from anyone under 16. We understand the importance of safeguarding the personal information of children, which we consider to be an individual under the age of 16 or the equivalent age as specified by law in your jurisdiction. Please contact our Data Protection Officer via email at <a href="mailto:support@camscanner.com">support@camscanner.com</a> if you believe we have any personal information from any Child without such parental/guardian consent and acknowledgment so that we can promptly investigate and remove such personal information.</p> <p>The right to request disclosure of our data collection and sales practices in connection with your personal information, including the categories of personal information we have collected, the source of the information, our use of the information and, if the information was disclosed or sold to third parties, the categories of personal information disclosed or sold to third parties and the categories of third parties to whom such information was disclosed or sold;</p> <p>If you have given your consent to anything we do with your personal information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal information with your consent up to that point is unlawful). This includes your right to withdraw consent to us to use your personal information for marketing purposes.</p>	<p>Restriction for specific audience</p>

As one can see, the automated approach produced a large number of matched lines, and there was regular overlap in the checkpoints. It was restricted to predetermined criteria and may have overlooked minor nuances of language. It's possible that there could have been a better definition of bag of words but automated approach is still not completely reliable

#### **d) ChatGPT Detection**

##### **App 1: Bumble**

<b><u>Policy Segment</u></b>	<b><u>Checkpoint</u></b>
<p>“When you download the App and create an account (“Account”), we may collect certain information (“Registration Information”) about you, such as:</p> <ul style="list-style-type: none"> <li>• Name;</li> <li>• Username;</li> <li>• Email address;</li> <li>• Cell number;</li> <li>• Gender identity;</li> <li>• Date, time, and location of birth;</li> <li>• Sexual preference;</li> <li>• Photographs;</li> <li>• Location; and</li> <li>• Login information for social media accounts that you connect to your Bumble Account (this could include, for example, your Facebook and Instagram accounts). For more information about this, see “Linking other Accounts to Bumble” in section 7 below.”</li> </ul> <p>“For Users who are California residents, the data we may collect falls within the following categories of “personal information”, as defined by the California Consumer Privacy Act (CCPA):</p> <p>A. Identifiers, such as name and location;</p> <p>B. Personal information, as defined in the California customer records law, such as contact (including email and telephone number) and financial information;</p> <p>C. Characteristics of protected classifications under California or federal law (if you choose to provide them), such as age, gender identity, marital status, sexual orientation, race, ancestry, national origin, religion, and medical conditions;</p> <p>D. Commercial information, such as transaction information and purchase history;</p> <p>E. Biometric information;</p> <p>F. Internet or network activity information, such as browsing history and interactions with our Sites and App;</p> <p>G. Geolocation data, such as mobile device location;</p> <p>H. Audio, electronic, visual and similar information, such as photos and videos;</p> <p>I. Professional or employment-related information, such as work</p>	<p>Data collection and purpose</p>

<p>history and prior employer;  J. Non-public education information; and  K. Inferences drawn from any of the personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.”</p> <p>“If you have given Bumble access to your location in your device settings, when you use your cell, we will collect information about WiFi access points as well as other location information about your longitude and latitude and may save your device's coordinates to offer certain features to you.”</p> <p>“We use a combination of automated systems and a team of moderators to monitor and review accounts (including photos and any other information uploaded onto user profiles) and messages for content that indicates breaches of our Terms and Conditions of Use”</p> <p>“We engage certain trusted third parties to perform functions and provide services to us (“Service Providers”). The suppliers with which Bumble shares User personal data vary depending on a variety of factors, such as which of our App, Sites, and services a User engages with.”</p>	
<p>“We share a limited amount of your personal data with these Marketing Services Providers, such as: the advertising identifier associated with your device, your estimated location (based on your IP address), age and gender, data about your visit to our Sites or App and action taken on those (for example if you downloaded our App, created an account with our App, or details of any purchases made on Site or in App), a hashed version of your email address (to create ‘custom audiences’).”</p>	Data sharing
<p>“Once you register, you will be able to review and change this information at any time just by logging in to Bumble (other than your date of birth and location (which, if you have given Bumble access to your location in your device settings, is automatically updated based on the location of your device)). It is your responsibility to ensure that your account details are kept up to date. If your phone number changes, please ensure that you update this in your account.”</p> <p>“If you have given Bumble access to your location, but wish to turn this off, you can do so by the following methods: iPhone app — settings, privacy, location services, Bumble Android — settings, location, Bumble, permissions, location.”</p> <p>“We will not use your information in email direct marketing unless you give us your consent during the Account creating process or via Settings in the App (you can withdraw from</p>	User Control

<p>marketing at any time via Settings in the App or by using the opt-out mechanisms and links provided in each message);”</p> <p>“For more information about how we use cookies and other tracking technologies, including how you can set and manage your preferences with regards to such technologies, please see our Cookie Policy.”</p>	
<p>“Privacy laws applicable in your country may give you the following rights:</p> <p>Right to be informed: what personal data an organization is processing and why (we provide this information to you in this Privacy Policy).</p> <p>Right of access: you can request a copy of your data.</p> <p>Right of rectification: if the data held is inaccurate, you have the right to have it corrected.</p> <p>Right to erasure: you have the right to have your data deleted in certain circumstances.</p> <p>Right to restrict processing: in limited circumstances, you have the right to request that processing is stopped but the data retained.</p> <p>Right to data portability: you can request a copy of certain data in a machine-readable form that can be transferred to another provider.</p> <p>Right to object: in certain circumstances (including where data is processed on the basis of legitimate interests or for the purposes of marketing) you may object to that processing.</p> <p>Rights related to automated decision-making including profiling: there are several rights in this area where processing carried out on a solely automated basis results in a decision which has legal or significant effects for the individual. In these circumstances your rights include the right to ensure that there is human intervention in the decision-making process.</p> <p>The particular rights which are applicable to you (which might include other rights not listed above) may vary depending on your country. You should make yourself aware of the rights you have under applicable privacy laws in your country.”</p> <p>“Under EU and UK data protection laws, we are required to tell you our lawful basis for using your data and we have set this out in the table below. Where the legal basis is consent, you can withdraw consent at any time. Where the legal basis is legitimate interests, you have a right to object to our use of your data.”</p>	User Right
<p>“We retain the scans so that we can verify you in the future and for our record-keeping purposes until we no longer need them for such purposes or for three years after your last interaction with us, whichever occurs first.”</p> <p>“We will keep records of our communications with you, including any complaints that we receive from you about other Users (and</p>	Data Retention

<p>from other Users about you) for 6 years after deletion of your account.”</p> <p>“Measures are taken to ensure that the data shared is non-attributable to the greatest extent possible and our suppliers are also subject to extensive obligations under our contractual arrangements, including strict data retention limits.”</p>	
<p>“If you choose to verify your profile photo, we will scan each photo that you submit. The scan may include the use of facial recognition technology so that we can compare the photo you submit to your profile photo, to help ensure that you are who you say you are. We do not add the verification photos to your profile. We retain the scans so that we can verify you in the future and for our record-keeping purposes until we no longer need them for such purposes or for three years after your last interaction with us, whichever occurs first. After the applicable retention period expires, we take commercially reasonable steps to permanently and securely delete the scans from our systems.”</p> <p>“The legal basis for processing profile and proximity information is that this is necessary for the provision of our contractual services to you pursuant to Article 6(1)(b) GDPR. Where we process information about your app activity, this is based on our legitimate interests pursuant to Article 6(1)(f) GDPR, and specifically our legitimate interest in generating more personalized and relevant recommendations for who you can match with in our App. If you have chosen to include sensitive information in your profile, such as information about your beliefs, the processing of this information is based on your voluntary and explicit consent.”</p>	Data protection
<p>“As Bumble evolves, we may revise this Privacy Policy from time to time. The most current version of the policy will govern our use of your information and will always be at <a href="https://bumble.com/privacy">bumble.com/privacy</a>. If we make a change to this policy that, in our sole discretion, is material, we will notify you, for example, via an email to the email associated with your Account or by posting a notice within Bumble.”</p>	Policy Change Notification
<p>“For Users who are California residents, the data we may collect falls within the following categories of “personal information”, as defined by the California Consumer Privacy Act (CCPA): A. Identifiers, such as name and location; B. Personal information, as defined in the California customer records law, such as contact (including email and telephone number) and financial information; C. Characteristics of protected classifications under California or federal law (if you choose to provide them)…”</p>	Restriction for specific audience

## App 2: Duolingo

<b><u>Policy Segment</u></b>	<b><u>Checkpoint</u></b>
<p>“When you use the Service, Duolingo may collect the following personal information about you.</p> <p>a. Account Registration To register for a Duolingo account, you may provide us with your age and email address. In some countries, you may also provide us with your phone number. You may also register for a Duolingo account using certain social logins, such as Google and Facebook. If you register for Duolingo using a social login, Duolingo may receive information about you from your social login provider, including your email address and contacts. You can manage your Duolingo account and social logins from your Settings.</p> <p>b. Profile Page &amp; User-Generated Content After you register for your Duolingo account, a profile page will be created for you (“Profile”). Your Profile will be populated by information you submit, such as your name, username, bio, and profile picture (“User-Generated Content”). Your age, phone number, and email address are not included in your public Profile and are not considered User-Generated Content under this Privacy Policy. Other Duolingo users may be able to search for your Profile using your name, username, email address, or phone number. Your Profile will also include information about your learning progress, such as the languages you are learning, your learning statistics, and your achievements. Moreover, your Profile will show a list of your followers and other users you follow. By default, your Profile is public, and visible to other Duolingo users and anyone else on the Internet. In addition, your User-Generated Content may be publicly visible. If your Profile is public, third-party websites or web scrapers may be able to read, collect, and use your public information for their own purposes. However, you can set your Profile to private in your Settings. You may be able to submit comments that will supplement other users’ Profiles and other users may be able to submit comments that will supplement your Profile. Any comments you submit are considered User-Generated Content under this Privacy Policy. You can delete comments you submit or comments that other users submit to your Profile. Duolingo may scan or review any User-Generated Content, or share your User-Generated Content with a third-party content moderation service provider, to ensure compliance with our Community Guidelines. Duolingo may restrict or delete User-Generated Content if it violates our Community Guidelines</p>	Data collection and purpose

or for any other reason.

c. Duolingo Max

If you subscribe to Duolingo Max, you may interact with Artificial Intelligence (“AI”) features, including Explain My Answer, which provides you with AI-powered feedback on your answers, and Roleplay, which allows you to send text or audio messages to an AI chat companion in an open-ended conversational format.

When you interact with AI features, your information may be shared with AI vendors such as OpenAI, which may keep a copy of your text or audio responses for their own purposes. Please do not submit any personal or confidential information when using AI features.

d. Speaking Challenges

Some lessons involve you speaking into the Duolingo app. To recognize speech, your audio may be sent to a third-party provider such as Google, Apple, or Amazon Web Services. You may disable speaking challenges in your Settings or skip speaking challenges in your lesson.

Duolingo may also collect and analyze your speech to help us understand the effectiveness of our lessons and to improve the product. You may choose not to share your audio with us for product improvement purposes in your Settings. Any audio you agree to send to Duolingo is anonymized when it reaches our servers to ensure that no trace of your personal information remains attached to the audio.

e. Contact Sync Feature

Duolingo has a Contact Sync feature, which allows you to find your contacts who also use Duolingo. If you use Contact Sync, you will give the Duolingo app permission to access the contacts stored on your phone for the purpose of identifying your contacts who also use Duolingo. If Duolingo identifies a user with the same phone number as someone in your contacts, we will recommend that user as someone you may wish to follow.

If you use the Contact Sync feature, Duolingo will not store your contacts’ phone numbers, but only an encrypted “hash” of them. This hash is an alternative code to the actual phone number and can be used only to uniquely identify the number. The hashing process securely strips away the real phone number, so Duolingo cannot use the hashes to identify your contacts’ real phone number, contact your contacts, or share their information with anyone else. This hashing process applies only to your contacts’ phone numbers and not yours.

If you have submitted your phone number to Duolingo, whether through Contact Sync or some other way (such as adding the phone number to your profile, using it to register, or using it to activate other product features), other Duolingo users who have

your phone number in their contacts may be able to locate your Profile using Contact Sync.

f. Activity Data

When you use the Service, we may generate data about your use of the Service, which may include your browser and device data, log data, and IP address. We will also generate data regarding your engagement in educational activities on the Service.

g. FullStory

When you use Duolingo in our app or on our website, some of your activity will be logged by a service called FullStory.

FullStory captures and analyzes your activity and provides us with data and a video session replay of your activity to help us make the Duolingo experience better. FullStory does not record usernames, names, profile images, email addresses, profile locations or bios, or passwords. However, FullStory records usage patterns (e.g., clicks, mouse movements, scrolling, and typing), tech specs (e.g., browser, device type, operating system, viewfinder size, script errors, and IP address), navigation (e.g., pages visited, referrers, URL parameters, and session duration), and learning activity (e.g., session progress and answers). You can disable FullStory activity recording by using the opt-out function on FullStory's website. FullStory is disabled for known Child Users.

h. Cookies

When you access the Duolingo website, we store certain data from your browser using cookies. A cookie is a piece of data stored on the user's computer tied to data about the user. We use session ID cookies to confirm that users are logged in. If you do not want your data to be collected by cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. However, cookies may be necessary to provide you with certain features available on the website (e.g., customized information). You can find more information about cookies and how to manage them [here](#).

You can see a list of all cookies used at Duolingo on our [Cookie List](#) page and manage your cookies in the Privacy Preference Center. Please note that our cookies include Targeting Cookies from Google, Facebook, Amazon, and other companies, which these companies may use to track your activities across multiple websites to deliver personalized advertising to you.

i. Google Analytics

We use Google Analytics, which is a web analytics tool that helps us understand how users engage with our 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



<p>to compile reports and to help us improve our site. These reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics by installing Google's browser add-on available <a href="#">here</a>."</p> <p>"Duolingo may process your personal information according to the following legal bases: to provide products or services you request, to promote Duolingo's legitimate interests, to comply with legal obligations, and with your consent."</p>	
<p>"When you interact with AI features, your information may be shared with AI vendors such as OpenAI, which may keep a copy of your text or audio responses for their own purposes. Please do not submit any personal or confidential information when using AI features."</p> <p>"Some lessons involve you speaking into the Duolingo app. To recognize speech, your audio may be sent to a third-party provider such as Google, Apple, or Amazon Web Services. You may disable speaking challenges in your Settings or skip speaking challenges in your lesson."</p> <p>"Duolingo may share personal information with third parties that help us provide or improve the Service, including hosting providers such as Amazon Web Services, search engine providers such as Google, analytics providers such as Crashlytics, support providers such as ZenDesk, and payment processors such as Stripe. Duolingo may also share your information with third-party vendors that support product features such as AI, speech recognition, and content moderation."</p>	Data sharing
<p>"You can manage your Duolingo account and social logins from your Settings." and "However, you can set your Profile to private in your Settings." Also, "You can disable FullStory activity recording by using the opt-out function on FullStory's website."</p> <p>"You may opt-out of receiving non-essential messages in your Settings."</p> <p>"You may update or correct your information, and exercise certain opt-out rights, in your Settings page."</p>	User Control
<p>"You also have the following rights in relation to the personal information we hold about you, in addition to any other rights required by applicable law:</p> <ul style="list-style-type: none"> <li>• Know what personal information we have collected about you.</li> <li>• Access a copy of the personal information that we hold about you.</li> </ul>	User Right

<ul style="list-style-type: none"> <li>• Know what personal information about you we have shared with third parties.</li> <li>• Opt out of the sharing of your personal information with third parties.</li> <li>• Object to our processing of your personal information.</li> <li>• Request that we limit our use of your sensitive personal information to what is necessary to perform the services you requested.</li> <li>• Not be discriminated against for exercising your data subject rights.</li> <li>• Request that we delete any personal information we have collected from you.</li> <li>• Request that we correct any inaccurate personal information about you.</li> <li>• Export the personal information you have provided to Duolingo in a format that can be transferred electronically to a third party.</li> <li>• Withdraw any consent you previously gave us to process your personal information.</li> <li>• Delete your Duolingo account by following the instructions in the Service.</li> </ul> <p>You may update or correct your information, and exercise certain opt-out rights, in your Settings page. You may request to access or erase your personal information at the Duolingo Data Vault. To make another privacy-related request, please send an email to <a href="mailto:privacy@duolingo.com">privacy@duolingo.com</a>.</p> <p>Please note that these rights are not absolute and Duolingo may refuse requests to exercise data subject rights if there is a legitimate reason, such as if we cannot authenticate your identity, if the request could violate the rights of a third party or applicable law, or if the request could interfere with a Duolingo service or prevent us from delivering a service you requested.</p> <p>You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. Here is a list of EEA Supervisory Authorities, and a link to the UK Supervisory Authority.”</p>	
<p>“Duolingo will generally retain your personal information until your account is deleted. However, Duolingo may retain certain information longer if necessary to provide our Service, defend our legitimate interests or those of third parties, comply with legal requirements, resolve or defend ourselves in disputes, investigate misuse or disruption of the Service, or perform agreements. We may also retain anonymous data indefinitely.”</p>	Data Retention
<p>“Any audio you agree to send to Duolingo is anonymized when it reaches our servers to ensure that no trace of your personal information remains attached to the audio.”</p>	Data protection

<p>“If you use the Contact Sync feature, Duolingo will not store your contacts’ phone numbers, but only an encrypted “hash” of them.”</p> <p>“Duolingo may process and share your personal information for the purpose of providing you with personalized advertising. To provide personalized advertising, we work with a variety of third-party advertising networks, marketing analytics service providers, and website analysis firms, such as Google, Facebook, Oath, and Unity. These third-party advertising service providers collect and use personal information about your visits to and use of the Service, as well as other websites, in order to serve you with advertisements and content tailored to meet your preferences and likely interests, and better understand ad effectiveness. Aggregate demographic and interest data will also be used for market research purposes. You can opt out of receiving personalized advertising in your Settings.”</p>	
<p>“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 seven (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 seven (7) day period.”</p>	<p>Policy Change Notification</p>
<p>“We know that children deserve extra privacy protection. That’s why we treat Child Users (meaning users under the age of 13 in the United States or another age of digital consent in their country) differently to ensure their parents are in control and we only collect the bare minimum information we need to make Duolingo work.</p> <p>Child Users are permitted to create a Duolingo account, but we ask them to provide their parent’s email address instead of their own, and to register using a username that is not tied to their real name.</p> <p>After a Child User registers, we will send an email to the parent’s email address about Duolingo’s privacy practices regarding Child Users, including what personal information we collect and how we use, share, and protect that personal information. The email also explains how parents can request to access, change, or delete the personal information about their child.</p> <p>All Child Users receive the following special treatment when using Duolingo (“Age Restrictions”):</p> <p>Lessons are made age-appropriate by removing mature words like</p>	<p>Restriction for specific audience</p>

“beer” or “wine.”

Advertisements are non-personalized and set to family-safe content.

Child Users cannot submit their real name or any pictures to their Profile, but are represented only by a letter avatar.

The Contact Sync feature is disabled.

Promotional emails are disabled.

Child Users’ speech data is not shared with Duolingo for product improvement purposes.

Child Users in certain jurisdictions (including the United States, European Union, United Kingdom, Norway, Canada, Australia, New Zealand, Singapore, South Korea, and Japan) are subject to these additional Age Restrictions:

Child Users may not submit User-Generated Content to Duolingo.

Child Users may not provide Duolingo with their real name, profile picture, location, contact information, or other personal information.

Child Users’ Profiles contain no personal information that could be used to publicly identify or contact the child, but only the Child User’s username, a letter avatar, and information about their learning progress on Duolingo.

Child Users’ Profiles are visible only to themselves and other Duolingo users in the same paid Duolingo Family Plan, authorized teachers in the same Duolingo Schools classroom, and other authorized family members.

Child Users cannot search for or follow other users, and cannot be searched for or followed by other users.

Child Users do not see friend suggestions, and cannot use the Contact Sync Feature, find friends on Facebook, or send invitation emails.

Social follow buttons for Twitter, Facebook, and Instagram are disabled.

Child Users will have access to leaderboards but will receive the following special treatment:

The Child User’s username will be anonymized to all other users in the leaderboard. For example, the Child User could appear as “John Smith” instead of their real username to other users.

Other leaderboard users will not be able to view the Child User’s Profile or add the Child User as a friend.

Child Users will only see letter avatars instead of profile pictures in their leaderboard.

Child Users will see sanitized usernames on their leaderboard; usernames that have profane or obscene words will be replaced with a fake username for Child Users.

Leaderboards can be disabled under Settings in your child’s Profile at any time.

Parents may remove their child’s Age Restrictions. Additionally, parents can report any abuse to us at [abuse@duolingo.com](mailto:abuse@duolingo.com).

In addition, all users under the age of 16 receive the following special treatment:

<p>Advertisements are set to non-personalised.</p> <p>Third-party behavioral tracking is disabled.</p> <p>Third-party analytics is disabled.</p> <p>With regards to the Children’s Online Privacy Protection Act, Duolingo collects personal information from children under the age of 13 for the sole purpose of performing internal operations of the Service. If we discover that we have unknowingly collected additional personal information from these children, we will delete it. If you believe this to be the case, please contact us at <a href="mailto:privacy@duolingo.com">privacy@duolingo.com</a>.”</p>	
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**App 3: CamScanner - PDF Scanner App**

<b><u>Policy Segment</u></b>	<b><u>Checkpoint</u></b>
<p>“There are three basic categories of data we collect:</p> <p>(a) Information that you voluntarily provide to us  Registration information. When you create your account for registering to use Our Services, depending on how you choose to create it, we may collect your password, e-mail address or phone number.  User-generated content. When you use Our Services to scan documents or images for recognizing text automatically (OCR), we will collect the documents or images which you choose to take or upload when you sync files. When you use Our Services to convert documents in multiple formats to PDF, we will collect the documents you choose to upload.  Transaction information. If you purchase the paid services provided by us, we may receive information about your transaction such as when it was made or when a subscription is set to expire.  Contact information. We may record your e-mail address when you contact us for service support, making a complaint, suggestion or feedback to us by sending emails to help us keep contact with you for updates and support to resolve your queries for use of our Services.</p> <p>(b) Information that is collected automatically  Device data. We collect certain information about the device you use to access Our Services, such as your IP address, mobile carrier, time zone settings, model of your device, the device system, network type, Android ID, identifiers for advertising (such as IDFA for iOS, GAID for Android device), your screen resolution and operating system.  Information Collected Using Cookies. Like many website owners and operators, we use automated data collection tools such as Cookies to collect certain information.</p>	<p>Data collection and purpose</p>

<p>(c) Data we get from third parties.</p> <p>Social Media and Login Services. If you choose to sign in using third-party social networks or services (such as Google), we may collect information from those services, including your login or registration information for those services.</p> <p>Information Received from Our Partners and Other Third Parties. We may link your subscription information with the data information we receive from our partners or other third parties (such as Firebase provided by Google) to help smoothly facilitate Our Services for you, to better understand your needs and to provide you with better Services experience. Use of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.</p> <p>Other Sources. We may collect data about you from other publicly available sources.”</p> <p>“4.1 We will collect, store, and use your personal data in accordance with this Privacy Policy and applicable laws, wherever it is processed.</p> <p>4.2 When you use Our Services on your devices, your data may be stored locally on the devices you use to access Our Services. When you sync your Devices with our Service, such data will be replicated on our servers maintained by us for processing and storage. To store your personal data replicated on our servers, we recourse to data hosting services provided by Amazon Web Services, Inc. (a subsidiary of Amazon.com Inc.) that have adopted technical and organizational measures to protect your personal data against unauthorized/unlawful processing and accidental loss, destruction or other damage. We take your privacy seriously and, therefore, encrypt your personal data – if possible – before sending it to the hosting organizations for the purposes of its storage.</p> <p>Data privacy laws or regulations in your country/region may differ from those in the places where you are located. We will collect, store, and use your information in accordance with this Privacy Policy and applicable laws, wherever it is processed.</p> <p>4.3 We retain your data for no longer than is necessary for the purposes stated in this Privacy Policy. Once the retention period expires, we will delete or anonymize your data, unless otherwise required by applicable laws and regulations.”</p>	
<p>“Social Media and Login Services. If you choose to sign in using third-party social networks or services (such as Google), we may collect information from those services, including your login or registration information for those services.</p>	<p>Data sharing</p>

Information Received from Our Partners and Other Third Parties.  
We may link your subscription information with the data information we receive from our partners or other third parties (such as Firebase provided by Google) to help smoothly facilitate Our Services for you, to better understand your needs and to provide you with better Services experience. Use of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.”

“(a) Sharing with your consent.

After obtaining your consent, we will share the data that you have authorized with specified third parties or categories of third parties to the extent permitted by applicable laws and regulations.

(b) Sharing pursuant to laws and regulations.

We may share your data as required by laws and regulations, for resolving legal disputes, or as required by administrative or judiciary authorities pursuant to law.

(c) Sharing with our affiliates.

Your data may be shared within our affiliates only for explicit, and legitimate purposes, and the sharing is limited only to data required by services.

(d) Sharing with third parties.

Our services may contain third-party content and integrations (Third-party Services) to provide you with better service. We will only share your information in the following situations-and then only the minimum information necessary :

We share your information with service providers who process data on our behalf to perform services related to our Services. For example: Apple Pay and Google Pay to complete your payment transactions when you pay for the paid services provided by us; Dropbox, Evernote, or Google Drive to sync the documents you upload as you need.

We share your information with software development kit(SDK) providers to operate, develop, and improve the features and functionality of Our Services. For example: Firebase(analytics and reporting services provided by Google)to assist us in analyzing how Our Services are used.

We share Non-Identifying Information(including the advertising identifier currently associated with your device) and other

<p>aggregated information that does not include personal information with advertisement providers. If you prefer that we not deliver ads to you, please set the preference on your mobile device to limit ad tracking. Your mobile device includes a feature that lets you opt out of some types of targeted advertising ('Limit Ad Tracking' on iOS and 'Opt Out of Interest-Based Ads' on Android), you can opt out of Audience-Based and Activity-Based targeting by turning on the 'Limit Ad Tracking' setting on your iOS device or the 'Opt Out of Ads Personalization' setting on your Android device. To learn more about how these opt-out features work, please review your device settings.</p> <p>To protect the security of your data, we encourage you to review the privacy policies of every Third-party Service that you visit or use, including those third parties you interact with through our services. You can learn more about Third-party Services in CamScanner by clicking <a href="#">[List of Third Parties]</a>.</p> <p>We will ensure that the lawfulness of this sharing and sign stringent non-disclosure agreements (NDAs) and/or data processing clauses with the companies, organizations, and individuals with whom the data is shared, requiring them to comply with this Privacy Policy and take appropriate confidentiality and security measures when processing the data.”</p>	
<p>“(a) Access, Correction, and Portability. You can access and edit most of your basic account data right in CamScanner.”</p> <p>“(b) Withdraw your consent. In most cases, if you let us use your data, you can simply revoke your permission by changing the settings in the app or on your device if your device offers those options.”</p> <p>“(c) Deletion. If for some reason you ever want to delete your account, you can contact us.”</p> <p>“(d) Restrict processing. If you want to restrict the processing of your personal data, please contact us.””</p>	User Control
<p>“4.3 We retain your data for no longer than is necessary for the purposes stated in this Privacy Policy. Once the retention period expires, we will delete or anonymize your data, unless otherwise required by applicable laws and regulations.”</p> <p>“(a) Access, Correction, and Portability. You can access and edit most of your basic account data right in CamScanner.”</p> <p>“(c) Deletion. If for some reason you ever want to delete your account, you can contact us.”</p> <p>“(d) Restrict processing. If you want to restrict the processing of your personal data, please contact us.”</p>	User Right
<p>“4.3 We retain your data for no longer than is necessary for the purposes stated in this Privacy Policy. Once the retention period</p>	Data Retention



expires, we will delete or anonymize your data, unless otherwise required by applicable laws and regulations.”	
<p>“3.1 We attach great importance to the security of your data and have adopted standard industry practices to protect your data and prevent it from unauthorized access, disclosure, use, modification, damage, or loss. We employ administrative, technical, and physical security controls where appropriate, such as encryption, 2-step verification, and strict contractual confidentiality obligations for employees and contractors.”</p> <p>“4.1 We will collect, store, and use your personal data in accordance with this Privacy Policy and applicable laws, wherever it is processed.”</p> <p>“Because your privacy is important to us, we will ask you to verify your identity or provide additional information before allowing you to manage your data.”</p>	Data protection
<p>“We may change this Privacy Policy from time to time. Under certain circumstances (for example with certain material changes or where it is required by applicable privacy laws) we will provide notice to you of these changes and, where required by applicable law, we will obtain your consent. If we change this Privacy Policy, we will change the "last updated" date at the top of this Privacy Policy and the revised policy will be posted to this page so that you can review it. Sometimes, we'll let you know by revising the date at the top of the Privacy Policy that's available in CamScanner. Other times, we may provide you with additional notice (such as providing you with an in-app notification).”</p>	Policy Change Notification
<p>“Our services are not intended for anyone under 16. And that's why we do not knowingly collect personal information from anyone under 16. We understand the importance of safeguarding the personal information of children, which we consider to be an individual under the age of 16 or the equivalent age as specified by law in your jurisdiction. Please contact our Data Protection Officer via email at support@camscanner.com if you believe we have any personal information from any Child without such parental/guardian consent and acknowledgment so that we can promptly investigate and remove such personal information.”</p> <p>“Additional Notice for California Residents(How We Comply with CCPA)...”</p> <p>“Additional Notice for EU/EEA Residents(How We Comply with GDPR)...”</p> <p>“Additional Notice for Brazilian Residents(How We Comply with</p>	Restriction for specific audience

LGPD)...”	
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ChatGPT almost always performed similarly to the manual approach, however, it’s worth noting that the number of prompts that were needed to get a legible, accurate answer was definitely more. As with the word limit, the privacy policy input had to be divided into different snippets. However, effort notwithstanding, ChatGPT performed very well.

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Policy/App	Grade using manual approach	Grade using automated approach	Grade using ChatGPT
Bumble	B	C	A
Duolingo	A	B	B
CamScanner	B	B	B

On further analysis,

Bumble:

- Manual: Graded as B, signifying general compliance with the majority of checkpoints but with minor deficiencies.
- Automated: Graded as C, indicating substantial noncompliance with numerous checkpoints. This could be owing to the automated approach's shortcomings in capturing the full context and intricacies of the privacy policy.
- ChatGPT: Graded as A, indicating complete compliance with all checkpoints. This indicates that ChatGPT was able to thoroughly evaluate the app's privacy practices and find any potential areas of concern.

Duolingo:

- Manual: A, showing complete compliance with all checkpoints.
- Automated: B, indicating broad compliance with most checkpoints but with minor flaws. This could be because the automated technique overlooked certain subtle features of the privacy policy.
- ChatGPT: B, indicating general compliance with most checkpoints but minor faults. This implies that while both the automated technique and ChatGPT were capable of identifying the majority of the important privacy concerns, the hand review produced a more comprehensive assessment.

CamScanner:

- Manual: B, signifying general compliance with the majority of checkpoints but with minor deficiencies.
- Automated: A B, indicating broad compliance with most checkpoints but with minor flaws. This shows that both the manual and automated reviews came to the same conclusion about the app's privacy practices.

- ChatGPT: B, indicating general compliance with most checkpoints but minor faults. This lends credence to the conclusion that all three methods generated consistent judgments of CamScanner's privacy policy.

In general, ChatGPT outperformed the other two methodologies in terms of appropriately assessing app privacy compliance. This could be due to its more sophisticated language processing capabilities and ability to catch human language subtleties. The programmed approach produced a large number of matched lines, and there was regular overlap in the checkpoints. It was restricted to predetermined criteria and may have overlooked minor nuances of language. It is crucial to highlight, however, that the manual review process is still useful for giving a full and in-depth study of an app's privacy practices.