Privacy Policy

This Privacy Policy was last updated on November 11, 2024.

Thank you for joining Udemy. We at Udemy ("**Udemy**", "we", "us") respect your privacy and want you to understand how we collect, use, and share data about you. This Privacy Policy covers our data collection practices and describes your rights regarding your personal data.

Unless we link to a different policy or state otherwise, this Privacy Policy applies when you visit or use Udemy websites, mobile applications, APIs, or related services (the **"Services"**). It also applies to prospective customers of our business and enterprise products.

By using the Services, you agree to the terms of this Privacy Policy. You shouldn't use the Services if you don't agree with this Privacy Policy or any other agreement that governs your use of the Services.

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1. What Data We Get

We collect certain data from you directly, like information you enter yourself, data about your consumption of content, and data from third-party platforms you connect with Udemy. We also collect some data automatically, like information about your device and what parts of our Services you interact with or spend time using. All data listed in this section is subject to the following processing activities: collecting, recording, structuring, storing, altering, retrieving, encrypting, pseudonymizing, erasing, combining, and transmitting.

1.1 Data You Provide to Us

We may collect different data from or about you depending on how you use the Services. Below are some examples to help you better understand the data we collect.

When you create an account and use the Services, including through a third-party platform, we collect any data you provide directly, including:

Category of Personal Data	Description	Legal Basis for Processing	
Account Data	In order to use certain features (like accessing content), you need to create a user account, which requires us to collect and store your email address, password, and account settings. To create an instructor account, we collect and store your name, email address, password, and account settings. As you use certain features on the site, you may be prompted to submit additional information. For example, you may choose to provide information relevant to your learning interests, including occupation and skill interests, and if you apply to become an instructor, we may collect government ID information, verification photo, date of birth, race/ethnicity, and phone number. Upon account creation, we assign you a unique identifying number.	 Performance of contract Legitimate interests (service provisioning, identity verification, fraud prevention and security, communication) 	
Profile Data	You can also choose to provide profile information like a photo, headline, biography, language, website link, social media profiles, country, or other data. Your Profile Data will be publicly viewable by others.	 Performance of contract Legitimate interests (enhanced platform functionality, convey content source information) 	
Shared Content	Parts of the Services let you interact with other users or share content publicly, including by uploading courses and other educational content, posting reviews about content, asking or answering questions, sending messages to students or instructors, or posting photos or other work you upload. Such shared content may be publicly viewable by others depending on where it is posted.	 Performance of contract Legitimate interests (service provisioning, enhanced platform functionality) 	
Learning Data	When you access content, we collect certain data including which courses, assignments, labs, workspaces, and quizzes you've started and completed; content and subscription purchases and credits; subscriptions; completion certificates; your exchanges with instructors, teaching assistants, and other students; and essays, answers to questions, and other items submitted to satisfy course and related content requirements.	 Performance of contract Legitimate interests (service provisioning, enhanced platform functionality) 	

Student Payment Data

If you make purchases, we collect certain data about your purchase (such as your name, billing address, and ZIP code) as necessary to process your order and which may optionally be saved to process future orders. You must provide certain payment and billing data directly to our payment service providers, including your name, credit card information, billing address, and ZIP code. We may also receive limited information, like the fact that you have a new card and the last four digits of that card, from payment service providers to facilitate payments. For security, Udemy does not collect or store sensitive cardholder data, such as full credit card numbers or card authentication data.

- Performance of contract
 - Legal obligation
- Legitimate interests
 (payment
 facilitation, fraud
 prevention and
 security,
 compliance)

Instructor Payment Data

If you are an instructor, you can link your PayPal, Payoneer, or other payment account to the Services to receive payments. When you link a payment account, we collect and use certain information, including your payment account email address, account ID, physical address, or other data necessary for us to send payments to your account. In some instances, we may collect ACH or wire information to send payments to your account. In order to comply with applicable laws, we also work with trusted third parties who collect tax information as legally required. This tax information may include residency information, tax identification numbers, biographical information, and other personal information necessary for taxation purposes. For security, Udemy does not collect or store sensitive bank account information. The collection, use, and disclosure of your payment, billing, and taxation data is subject to the privacy policy and other terms of your payment account provider.

- Performance of contract
- Legal obligation
- Legitimate interests
 (service
 provisioning,
 payment
 facilitation, fraud
 prevention and
 security,
 compliance)

Data About Your Accounts on Other Services

We may obtain certain information through your social media or other online accounts if they are connected to your Udemy account. If you login to Udemy via Facebook or another third-party platform or service, those platforms and services make information available to us through their APIs. The information we receive depends on what information you (via your privacy settings) or the platform or service decide to give us and usually consists of your first and last name, user identification number, and email address.

If you access or use our Services through a third-party platform or service, or click on any third-party links, the

 Legitimate interests (identity verification, user experience improvement)

	collection, use, and sharing of your data will also be subject to the privacy policies and other agreements of that third party.		
Sweepstakes, Promotions, and Surveys	We may invite you to complete a survey or participate in a promotion (like a contest, sweepstakes, or challenge), either through the Services or a third-party platform. If you participate, we will collect and store the data you provide as part of participating, such as your name, email address, postal address, date of birth, or phone number. That data is subject to this Privacy Policy unless otherwise stated in the official rules of the promotion or in another privacy policy. The data collected will be used to administer the promotion or survey, including for notifying winners and distributing rewards. To receive a reward, you may be required to allow us to post some of your information publicly (like on a winner's page). Where we use a third-party platform to administer a survey or promotion, the third party's privacy policy will apply.	•	Performance of contract Legitimate interests (promotions administration, prize delivery, compliance)
Communications and Support	If you contact us for support or to report a problem or concern (regardless of whether you have created an account), we collect and store your contact information, messages, and other data about you like your name, email address, messages, location, Udemy user ID, refund transaction IDs, and any other data you provide or that we collect through automated means (which we cover below). We use this data to respond to you and research your question or concern, in accordance with this Privacy Policy.	•	Legitimate interests (customer and technical support)

The data listed above is stored by us and associated with your account. Udemy's use and transfer to any other app of information received from Google APIs, like instructor uploaded content, will adhere to Google API Services User Data Policy, including the Limited Use requirements.

1.2 Data We Collect through Automated Means

When you access the Services (including browsing content), we collect certain data by automated means, including:

Category of Personal Data	Description	Legal Basis for Processing
System Data	Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device	 Performance of contract Legitimate interests (service provisioning, customer and technical support, fraud

	identifiers, browser, browser language, domain and other systems data, and platform types.	prevention and security, communication, product improvement)
Usage Data	Usage statistics about your interactions with the Services, including content accessed, time spent on pages or the Service, pages visited, features used, your search queries, click data, date and time, referrer, and other data regarding your use of the Services.	 Legitimate interests (service provisioning, user experience improvement, product improvement)
Approximate Geographic Data	An approximate geographic location, including information like country, city, and geographic coordinates, calculated based on your IP address.	 Legitimate interests (user experience improvement, fraud prevention and security, compliance)

The data listed above is collected through the use of server log files and tracking technologies, as detailed in the "Cookies and Data Collection Tools" section below. It is stored by us and associated with your account.

1.3 Data From Third Parties

If you are a Udemy Business enterprise or corporate prospect, in addition to information you submit to us, we may collect certain business contact information from third-party commercial sources.

2. How We Get Data About You

We use tools like cookies, web beacons, and similar tracking technologies to gather the data listed above. Some of these tools offer you the ability to opt out of data collection.

2.1 Cookies and Data Collection Tools

We use cookies, which are small text files stored by your browser, to collect, store, and share data about your activities across websites, including on Udemy. They allow us to remember things about your visits to Udemy, like your preferred language, and to make the site easier to use. To learn more about cookies, visit https://cookiepedia.co.uk/all-about-cookies. We may also use clear pixels in emails to track deliverability and open rates.

Udemy and service providers acting on our behalf (like Google Analytics and third-party advertisers) use server log files and automated data collection tools like cookies, tags, scripts, customized links, device or browser fingerprints, and web beacons (together, "Data Collection Tools") when you access and use the Services. These Data Collection Tools automatically track and collect certain System Data and Usage Data (as detailed in Section 1) when you use the Services. In some cases, we tie data gathered through those Data Collection Tools to other data that we collect as described in this Privacy Policy.

2.2 Why We Use Data Collection Tools

Udemy uses the following types of Data Collection Tools for the purposes described:

- Strictly Necessary: These Data Collection Tools enable you to access the site, provide basic functionality (like logging in or accessing content), secure the site, protect against fraudulent logins, and detect and prevent abuse or unauthorized use of your account. These are required for the Services to work properly, so if you disable them, parts of the site will break or be unavailable.
- <u>Functional:</u> These Data Collection Tools remember data about your browser and your preferences, provide additional site functionality, customize content to be more relevant to you, and remember settings affecting the appearance and behavior of the Services (like your preferred language or volume level for video playback).
- <u>Performance:</u> These Data Collection Tools help measure and improve the Services by providing usage and performance data, visit counts, traffic sources, or where an application was downloaded from.
 These tools can help us test different versions of Udemy to see which features or content users prefer and determine which email messages are opened.
- Advertising: These Data Collection Tools are used to deliver relevant ads (on the site and/or other sites) based on things we know about you like your Usage and System Data (as detailed in Section 1), and things that the ad service providers know about you based on their tracking data. The ads can be based on your recent activity or activity over time and across other sites and services. To help deliver tailored advertising, we may provide these service providers with a hashed, anonymized version of your email address (in a non-human-readable form) and content that you share publicly on the Services.
- Social Media: These Data Collection Tools enable social media functionality, like sharing content with friends and networks. These cookies may track a user or device across other sites and build a profile of user interests for targeted advertising purposes.

You can set your web browser to alert you about attempts to place cookies on your computer, limit the types of cookies you allow, or refuse cookies altogether. If you do, you may not be able to use some or all features of the Services, and your experience may be different or less functional. To learn more about managing Data Collection Tools, refer to Section 6.1 (Your Choices About the Use of Your Data) below.

3. What We Use Your Data For

We use your data to do things like provide our Services, communicate with you, troubleshoot issues, secure against fraud and abuse, improve and update our Services, analyze how people use our Services, serve personalized advertising, and as required by law or necessary for safety and integrity. We retain your data for as long as it is needed to serve the purposes for which it was collected.

We use the data we collect through your use of the Services to:

- Provide and administer the Services, including to facilitate participation in educational content, issue completion certificates, display customized content, and facilitate communication with other users (Account Data; Shared Content; Learning Data; System Data; Usage Data; Approximate Geographic Data);
- Process payments to instructors and other third parties (Student Payment Data; Instructor Payment Data);

- Process your requests and orders for educational content, products, specific services, information, or features (Account Data; Learning Data; Student Payment Data; System Data; Communications and Support);
- Communicate with you about your account by (Account Data; Shared Content; Learning Data; Sweepstakes, Promotions, and Surveys; System Data; Communications and Support):
 - Responding to your questions and concerns;
 - Sending you administrative messages and information, including messages from instructors, students, and teaching assistants; notifications about changes to our Service; and updates to our agreements;
 - Sending you information, such as by email or text messages, about your progress in courses and related content, rewards programs, new services, new features, promotions, newsletters, and other available instructor-created content (which you can opt out of at any time);
 - Sending push notifications to your wireless device to provide updates and other relevant messages (which you can manage from the "options" or "settings" page of the mobile app);
- Manage your account and account preferences and personalize your experience (Account Data;
 Learning Data; Student Payment Data; Instructor Payment Data; System Data, Usage Data, Cookie Data);
- Facilitate the Services' technical functioning, including troubleshooting and resolving issues, securing
 the Services, and preventing fraud and abuse (Account Data; Student Payment Data; Instructor
 Payment Data; Communications and Support; System Data; Approximate Geographic Location);
- Verify the identity of instructors (Account Data; Instructor Payment Data);
- Solicit feedback from users (Account Data; Communications and Support);
- Market products, services, surveys, and promotions (Account Data; Learning Data; Sweepstakes, Promotions, and Surveys; Usage Data; Cookie Data);
- Market Subscription Plans to prospective customers (Account Data; Learning Data; Cookie Data);
- Learn more about you by linking your data with additional data through third-party data providers and/or analyzing the data with the help of analytics service providers (Account Data; Data About Your Accounts on Other Services; Usage Data; Cookie Data);
- Identify unique users across devices (Account Data; System Data; Cookie Data);
- Tailor advertisements across devices (Cookie Data);
- Improve our Services and develop new products, services, and features (all data categories), including through the use of Al consistent with the Instructor GenAl Policy (Instructor Shared Content);
- Analyze trends and traffic, track purchases, and track usage data (Account Data; Learning Data; Student Payment Data; Communications and Support; System Data; Usage Data; Approximate Geographic Data; Cookie Data);
- Advertise the Services on third-party websites and applications (Account Data; Cookie Data);
- As required or permitted by law (all data categories); or
- As we, in our sole discretion, otherwise determine to be necessary to ensure the safety or integrity of our users, employees, third parties, the public, or our Services (all data categories).

We may process your inputs into the Al Assistant chatbot or other generative artificial intelligence (GenAl) features using GenAl in order to respond to your question or request, but we do not use your personal data to train or fine tune GenAl models.

4. Who We Share Your Data With

We share certain data about you with instructors, other students, companies performing services for us, Udemy affiliates, our business partners, analytics and data enrichment providers, your social media providers, companies helping us run promotions and surveys, and advertising companies who help us promote our Services. We may also share your data as needed for security, legal compliance, or as part of a corporate restructuring. Lastly, we can share data in other ways if it is aggregated or de-identified or if we get your consent.

We may share your data with third parties under the following circumstances or as otherwise described in this Privacy Policy:

- With Your Instructors: We share data that we have about you (except your email address) with instructors or teaching assistants for educational content you access or request information about, so they can improve their content for you and other students. This data may include things like your country, browser language, operating system, device settings, the site that brought you to Udemy, and certain activities on Udemy, like enrolled courses and course review. We will not share your email address with instructors or teaching assistants. (Account Data; System Data; Usage Data; Approximate Geographic Data)
- With Other Students and Instructors: Depending on your settings, your Shared Content and profile data may be publicly viewable, including to other students and instructors. If you ask a question to an instructor or teaching assistant, your information (including your name) may also be publicly viewable. (Account Data; Profile Data; Shared Content)
- With Service Providers, Contractors, and Agents: We share your data with third-party companies who perform services on our behalf, like payment processing, fraud and abuse prevention, data analysis, marketing and advertising services (including retargeted advertising), email and hosting services, and customer services and support. These service providers may access your personal data and are required to use it solely as we direct, to provide our requested service. (All data categories)
- <u>With Udemy Affiliates:</u> We may share your data within our corporate family of companies that are related by common ownership or control to enable or support us in providing the Services. (All data categories)
- With Business Partners: We have agreements with other websites and platforms to distribute our Services and drive traffic to Udemy. Depending on your location, we may share your data with these trusted partners. (Account Data; Learning Data; Communications and Support; System Data)
- With Credit-Granting Organizations for Continuing Education: If you take a course to fulfill a continuing professional education requirement, we may share that information upon request of the organization granting the continuing education credit. (Account Data; Learning Data)
- With Analytics and Data Enrichment Services: As part of our use of third-party analytics tools like Google Analytics and data enrichment services like ZoomInfo, we share certain contact information or de-identified data. De-identified data means data where we've removed things like your name and email address and replaced it with a token ID. This allows these providers to provide analytics services or match your data with publicly-available database information (including contact and social information from other sources). We do this to communicate with you in a more effective and customized manner. (Account Data; System Data; Usage Data; Cookie Data)

- To Power Social Media Features: The social media features in the Services (like the Facebook Like button) may allow the third-party social media provider to collect things like your IP address and which page of the Services you're visiting, and to set a cookie to enable the feature. Your interactions with these features are governed by the third-party company's privacy policy. (System Data; Usage Data; Cookie Data)
- To Administer Promotions and Surveys: We may share your data as necessary to administer, market, or sponsor promotions and surveys you choose to participate in, as required by applicable law (like to provide a winners list or make required filings), or in accordance with the rules of the promotion or survey. (Account Data; Sweepstakes, Promotions, and Surveys)
- For Advertising: If we decide to use an advertising-supported revenue model in the future, we may use and share certain System Data and Usage Data with third-party advertisers and networks to show general demographic and preference information among our users. We may also allow advertisers to collect System Data through Data Collection Tools (as detailed in Section 2.1), to use this data to offer you targeted ad delivery to personalize your user experience (through behavioral advertising) and to undertake web analytics. Advertisers may also share with us the data they collect about you. To learn more or opt out from participating ad networks' behavioral advertising, see Section 6.1 (Your Choices About the Use of Your Data) below. Note that if you opt out, you'll continue to be served generic ads. (System Data)
- For Security and Legal Compliance: We may disclose your data (all data categories) to third parties if we (in our sole discretion) have a good faith belief that the disclosure is:
 - o Requested as part of a judicial, governmental, or legal inquiry, order, or proceeding;
 - Reasonably necessary as part of a valid subpoena, warrant, or other legally-valid request;
 - Reasonably necessary to enforce our Terms of Use, Privacy Policy, and other legal agreements;
 - Required to detect, prevent, or address fraud, abuse, misuse, potential violations of law (or rule or regulation), or security or technical issues;
 - Reasonably necessary in our discretion to protect against imminent harm to the rights, property, or safety of Udemy, our users, employees, members of the public, or our Services;
 - We may also disclose data about you to our auditors and legal advisors in order to assess our disclosure obligations and rights under this Privacy Policy; or
 - Required or permitted by law.
- <u>During a Change in Control:</u> If Udemy undergoes a business transaction like a merger, acquisition, corporate divestiture, or dissolution (including bankruptcy), or a sale of all or some of its assets, we may share, disclose, or transfer all of your data to the successor organization during such transition or in contemplation of a transition (including during due diligence). (All data categories)
- After Aggregation/De-identification: We may disclose or use aggregated or de-identified data for any purpose.
- <u>With Your Permission:</u> With your consent, we may share data to third parties outside the scope of this Privacy Policy. (All data categories)

If you click on any links to third-party sites, the collection, use, and disclosure of your personal data is governed by the third-party's privacy policy.

5. Security

We use appropriate security based on the type and sensitivity of data being stored. As with any internet-enabled system, there is always a risk of unauthorized access, so it's important to protect your password and to contact us if you suspect any unauthorized access to your account.

Udemy takes appropriate security measures to protect against unauthorized access, alteration, disclosure, or destruction of your personal data that we collect and store. These measures vary based on the type and sensitivity of the data. Unfortunately, however, no system can be 100% secured, so we cannot guarantee that communications between you and Udemy, the Services, or any information provided to us in connection with the data we collect through the Services will be free from unauthorized access by third parties. Your password is an important part of our security system, and it is your responsibility to protect it. You should not share your password with any third party, and if you believe your password or account has been compromised, you should change it immediately and contact our Support Team with any concerns.

6. Your Rights

You have certain rights around the use of your data, including the ability to opt out of promotional emails, cookies, and collection of your data by certain third parties. You can update or terminate your account from within our Services, and can also contact us for individual rights requests about your personal data. Parents who believe we've unintentionally collected personal data about their underage child should contact us for help deleting that information.

6.1 Your Choices About the Use of Your Data

You can choose not to provide certain data to us, but you may not be able to use certain features of the Services.

- To stop receiving promotional communications from us, you can opt out by using the unsubscribe
 mechanism in the promotional communication you receive or by changing the email preferences in your account. Note that regardless of your email preference settings, we will send you transactional and
 relationship messages regarding the Services, including administrative confirmations, order
 confirmations, important updates about the Services, and notices about our policies.
- If you're located in the European Economic Area, you may opt out of certain Data Collection Tools by clicking the "Cookie settings" link at the bottom of any page.
- The browser or device you use may allow you to control cookies and other types of local data storage. To learn more about managing cookies, visit https://cookiepedia.co.uk/how-to-manage-cookies. Your wireless device may also allow you to control whether location or other data is collected and shared.
- To get information and control cookies used for tailored advertising from participating companies, see
 the consumer opt-out pages for the Network Advertising Initiative and Digital Advertising Alliance, or if
 you're located in the European Economic Area, visit the Your Online Choices site. If you're located in
 Japan, visit the Digital Advertising Consortium. To opt out of Google's display advertising or customize
 Google Display Network ads, visit the Google Ads Settings page. To opt out of Taboola's targeted ads,
 see the Opt-out Link in their Cookie Policy.

- To opt out of allowing Google Analytics, Mixpanel, ZoomInfo, or Clearbit to use your data for analytics or enrichment, see the <u>Google Analytics Opt-out Browser Add-on</u>, <u>Mixpanel Opt-Out Cookie</u>, <u>ZoomInfo's</u> policy, and Clearbit data claiming mechanism.
- Apple iOS, Android OS, and Microsoft Windows each provide their own instructions on how to control in-app tailored advertising. For other devices and operating systems, you should review your privacy settings on that platform.

If you have any questions about your data, our use of it, or your rights, contact us at privacy@udemy.com.

6.2 Accessing, Updating, and Deleting Your Personal Data

You can access and update your personal data that Udemy collects and maintains as follows:

- To update data you provide directly, log into your account and update your account at any time.
- To terminate your account:
 - If you are a student, visit your profile settings page and follow the steps detailed here.
 - If you are an instructor, follow the steps detailed here.
 - If you have any issues terminating your account, please contact our Support Team.
 - Please note: even after your account is terminated, some or all of your data may still be visible to others, including without limitation any data that has been (a) copied, stored, or disseminated by other users (including comments on content); (b) shared or disseminated by you or others (including in your shared content); or (c) posted to a third-party platform. Even after your account is terminated, we retain your data for as long as we have a legitimate purpose to do so (and in accordance with applicable law), including to assist with legal obligations, resolve disputes, and enforce our agreements. We may retain and disclose such data pursuant to this Privacy Policy after your account has been terminated.
- To request to access, correct, or delete your personal data, please use our online form here. You can also submit these requests by emailing privacy@udemy.com or writing to us at Udemy, Attn: Privacy/Legal Team, 600 Harrison Street, 3rd floor, San Francisco CA 94107. Please allow up to 30 days for a response. For your protection, we may require that the request be sent through the email address associated with your account, and we may need to verify your identity before implementing your request. Please note that we retain certain data where we have a lawful basis to do so, including for mandatory record-keeping and to complete transactions.

6.3 Our Policy Concerning Children

We recognize the privacy interests of children and encourage parents and guardians to take an active role in their children's online activities and interests. Individuals younger than 18 years of age, but of the required age for consent to use online services where they live (for example, 13 in the US or 16 in Ireland), may not set up an account, but may have a parent or guardian open an account and help them access appropriate content. Individuals younger than the required age for consent to use online services may not use the Services. If we learn that we've collected personal data from a child under those ages, we will take reasonable steps to delete it.

Parents who believe that Udemy may have collected personal data from a child under those ages can submit a request that it be removed to privacy@udemy.com.

7. Jurisdiction-Specific Rules

If you live in California, you have certain rights related to accessing and deleting your data, as well as learning who we share your data with. If you live in Australia, you have the right to make a formal complaint with the appropriate government agency. Users outside of the United States should note that we transfer data to the US and other areas outside of the European Economic Area.

7.1 Users in California

Users who are California residents have certain rights under the California Consumer Privacy Act, ("CCPA"). If you are an eligible California user, included in these rights are:

- "Right to Know" You have the right to request to know more about the categories and specific pieces of personal information that we have collected about you and access a copy of your personal information.
- "Right to Correction" You have the right to have inaccurate personal information about you corrected.
- "Right to Deletion" You have the right to request deletion of personal information that we have collected about you.
- "Right to Non-Discrimination" If you choose to exercise any of your rights under CCPA, Udemy will treat you like all other users. In other words, there is no penalty for exercising your rights under CCPA.
- "Right to Opt-Out" You have the right to opt out of the sale or sharing of your personal information.

CCPA has a specific definition of a "sale" and "sharing" and while Udemy does not, in the traditional sense, sell your personal information or the personal information of any of our users, we do use cookies that make non-personally identifiable information available to select third-parties, including for cross-context advertising. To opt out of such a "sale" and "sharing," click on the "Do Not Sell or Share My Personal Information" link at the bottom of this page.

To exercise any of these rights under CCPA, please email privacy@udemy.com or write to us at Udemy, Attn: Privacy/Legal Team, 600 Harrison Street, 3rd floor, San Francisco CA 94107. CCPA allows you to designate an authorized agent to make these requests on your behalf. For your protection, we may require that the request be sent through the email address associated with your account, and we may need to verify you and/or your agent's identity before fulfilling your request.

Additionally, for more information about the personal information we collect and how we collect it, please see the sections above entitled "What Data We Get" and "How We Get Data About You."

To learn about the business and commercial purposes for which your personal information is collected and the categories of service providers who have access to your personal information, please see the sections above entitled "What We Use Your Data For" and "Who We Share Your Data With."

As a California resident, you also have the right to request certain details about what personal information we share with third parties for those third parties' direct marketing purposes. To submit your request, send an email to privacy@udemy.com with the phrase "California Shine the Light" and include your mailing address, state of residence, and email address.

Since there is no widely accepted standard for the browser-initiated Do Not Track signal, we do not currently recognize or respond to Do Not Track signals.

7.2 Users in Nevada

Udemy does not sell its users' personal information or personal data. Nonetheless, Nevada residents have the right to submit a request that we do not sell your covered personal information, which you can do by emailing privacy@udemy.com or writing to us at Udemy, Attn: Privacy/Legal Team, 600 Harrison Street, 3rd floor, San Francisco CA 94107.

7.3 Users in Australia

If you are an Australia resident and you have a complaint, you may refer it to the office of the Australian Information Commissioner ("OAIC"). You can contact OAIC by visiting www.oaic.gov.au; forwarding an email to enquiries@oaic.gov.au; telephoning 1300 363 992; or writing to OAIC at GPO Box 5218, Sydney NSW 2001. You may contact our privacy team at privacy@udemy.com to make a complaint about a breach of the Australian Privacy Principles which will be responded to within 30 days.

7.4 Users in the European Economic Area ("EEA") and United Kingdom ("UK")

If you are located in the EEA or UK, you have the right to request access to your data in a portable format and to request the rectification, erasure, restriction of processing, or objection to processing of your personal data. You may use the information in Section 6.2 to submit your request. Additionally, if you are located in the EEA, UK, or Switzerland, you also have the right to lodge a complaint with your supervisory authority.

Personal data is also processed outside of the UK, Switzerland, and the EEA by our Udemy group companies, or our service providers, including to process transactions, facilitate payments, and provide support services as described in Section 4. We use the Controller-to-Processor Standard Contractual Clauses adopted by the European Commission to facilitate transfers of personal data from the EEA to third countries and have entered into data processing agreements with our service providers and Udemy group companies to restrict and regulate their processing of your data. By submitting your data or using our Services, you consent to this transfer, storage, and processing by Udemy and its processors.

7.5 Data Privacy Framework (for EU/EEA, UK, and Swiss data subjects)

Udemy, Inc. complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Udemy, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Udemy, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

The Federal Trade Commission has jurisdiction over Udemy Inc.'s compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

We are committed to subject to the DPF Principles all personal data received from the European Union, UK and Gibraltar, and Switzerland. The types of personal data collected are described in Section 1 of this Privacy Policy. The purposes for which we collect and use personal data are described in Section 3 of this Privacy Policy. The type of third parties to whom we disclose personal data are described in Section 4 of this Privacy Policy. We remain responsible for any of your personal data that is shared under the Onward Transfer Principle with third parties for external processing on our behalf. Additionally, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Udemy, Inc. shall remain liable under the DPF Principles if its agent processes personal information in a manner inconsistent with the DPF Principles, unless Udemy, Inc. proves that it is not responsible for the event giving rise to the damage.

Individuals have the right to access their personal data, and instructions on doing so are provided in Section 6.2 of this Privacy Policy. Individuals may also limit the use and disclosure of their personal data as described in Section 6.1.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Udemy, Inc. commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, should first contact Udemy at privacy@udemy.com.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Udemy, Inc. commits to refer unresolved complaints concerning our handling of personal data received in reliance on EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, to the International Centre for Dispute Resolution/American Arbitration Association (ICDR-AAA), an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit https://go.adr.org/dpf_irm.html for more information or to file a complaint. The services of ICDR-AAA are provided at no cost to you. Under certain conditions, you may invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms as more particularly detailed here: https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2

7.6 Users Outside of the U.S.

In order to provide the Services to you, we must transfer your data to the United States and process it there. If you are using the Services from outside the United States, you consent to the transfer, storage, and processing of your data in and to the United States or other countries.

8. Updates & Contact Info

When we make a material change to this policy, we'll notify users via email, in-product notice, or another mechanism required by law. Changes become effective the day they're posted. Please contact

us via email or postal mail with any questions, concerns, or disputes.

8.1 Modifications to This Privacy Policy

From time to time, we may update this Privacy Policy. If we make any material change to it, we will notify you via email, through a notification posted on the Services, or as required by applicable law. We will also include a summary of the key changes. Unless stated otherwise, modifications will become effective on the day they are posted.

As permitted by applicable law, if you continue to use the Services after the effective date of any change, then your access and/or use will be deemed an acceptance of (and agreement to follow and be bound by) the revised Privacy Policy. The revised Privacy Policy supersedes all previous Privacy Policies.

8.2 Interpretation

Any capitalized terms not defined in this policy are defined as specified in Udemy's <u>Terms of Use</u>. Any version of this Privacy Policy in a language other than English is provided for convenience. If there is any conflict with a non-English version, you agree that the English language version will control.

8.3 Questions

If you have any questions, concerns, or disputes regarding our Privacy Policy, please feel free to contact our privacy team (including our Data Protection Officer) at privacy@udemy.com. You can also send postal mail to us at Udemy, Attn: Legal, 600 Harrison Street, 3rd Floor, San Francisco, CA 94107.