

Privacy Policy

Effective as of : August 01 2024

Please click [here](#) to view the previous version of our Privacy Policy.

Welcome to Cambly! This Privacy Policy details how we collect, use, and disclose information about you in connection with your use of the general-audience Cambly website located at www.cambly.com, mobile applications, as well as any other properties that link to this Privacy Policy (the “Services”). By accessing or using the Services, you agree to this Privacy Policy. If you do not agree to this Privacy Policy, please do not access or use the Services. Cambly Inc. is the data controller for your information.

For information about our child-directed Cambly Kids service made available through <https://www.cambly.com/kids/student> (the “Cambly Kids Site”), please see our Children’s Privacy Policy located [here](#) for information on how we collect, use, and disclose personal information collected from children.

We provide important information for individuals located in the European Economic Area, United Kingdom, and California [below](#).

Cambly may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information. These supplemental privacy policies will govern how we may process the information in the context of the specific product or service.

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1. The Information We Collect

We collect information about you through providing the Services. The types of information we collect depends on the features you use through the Services. Please note that we need certain types of information to provide the Services to you. If you do not provide us with such information, or if you ask us to delete that information, you may no longer be able to access or use the Services.

Information You Provide Directly to Us

We may collect information that you provide directly to us through:

- Your use of and interactions with the Services, such as when you register for an account, share your learning goals, or interact with tutors, students, and chatbots through the Services;
- Your use of and interactions with artificial intelligence (“AI”) technologies in connection with the Services;
- Your participation in surveys, provide reviews, or when you fill out our forms;
- Your requests for information, such as when inquiring about tutoring services;
- Your purchases, such as when you purchase tutoring services;
- Your subscription to newsletters;
- Your registration for contests or promotions;
- Your requests for support and/or technical assistance;
- Your transmission of user content or other information to us; and
- Any other communications you have with us.

The information you provide directly to us may concern you or others and may include, but is not limited to:

- **identifiers**, such as account and contact information, name, a username, email address, profile picture, display name, password, date of birth, address, gender, and other information you provide;
- **commercial and financial information**, such as your payment card number, expiration date, billing address, and payment account name;
- **demographic information**, such as your country of residence, time zone, and language(s) spoken;
- **audio and visual information**, such as your voice and image in recordings of your interactions with tutors, students, and chatbots;

- **location information**, such as general geolocation data inferred from an IP address; and
- **other content and information you provide**, such as your availability for tutoring sessions, your learning goals, the information you share in tutoring sessions, and the information you share when you communicate with us including via the Services or by email.

You are not required to provide us with such information, but certain features of the Services may not be accessible or available, absent the provision of the requested information.

Information from Affiliates and Non-Affiliated Third Parties

We may collect information about you or others through our affiliates or through non-affiliated third parties. For example, Cambly tutors may take notes on your conversations, based on information provided during tutoring sessions. We may combine information that we collect from you through the Services with information that we obtain from such third parties, such as if you sign in with a third party service or social media networks, and information derived from other products or services we provide.

Information We Collect Automatically: Internet or Other Network Activity

Device/Usage Information. We and our third-party service providers, which include ad networks and analytics companies such as Google Analytics, may use cookies, web beacons, and other tracking technologies to collect information about the computers or devices (including mobile devices) you use to access the Services. As described further below, we may collect and analyze information including but not limited to (a) browser type; (b) ISP or operating system; (c) domain name; (d) access time; (e) referring or exit pages; (f) page views; (g) IP address; (h) unique device identifiers (e.g. IDFA or Android ID); and (i) the type of device that you use. We may also track when and how frequently you access or use the Services, including how you engage with or navigate our website or mobile application. We use this information (including the information collected by our third-party service providers) for analytics (including to determine which portions of the Services are used most frequently and what our users like/do not like), to assist in determining relevant advertising (both on and off the Services), to evaluate the success of our advertising campaigns, and as otherwise described in this Privacy Policy. To the extent you access the Service through different platforms (e.g., the Cambly website and Cambly mobile applications) or use different devices (e.g., your mobile phone and personal computer), we may cross-reference and combine the information we collect in each instance.

Cookies and Other Electronic Technologies. We and our third-party service providers may use cookies, clear GIFs, pixel tags, flash cookies, and other technologies that help us better understand user behavior, personalize preferences, perform research and analytics, and improve the Services. These technologies, for example, may allow us to tailor the Services to your needs, save your password in password-protected areas, track the pages you visit, help us manage content, and compile statistics about usage of our Services. Some cookies may expire after a single session, but others may persist even after your session is over.

We or our third-party service providers also may use certain of these technologies in emails to our customers to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

We use cookies, pixels, and similar technologies in our websites and applications to collect and send information to Meta about actions you take on our website and applications. In particular, Meta uses this information to provide services to us and also for further processing for its own business purposes. We and Meta are joint controllers of the processing involved in collecting and sending your personal information to Meta using cookies and similar technologies as each of us has a business interest in Meta receiving this information. The services we receive from Meta that use this information are delivered to us through Meta's API. These tools allow us to target advertising to you within Meta's social media platforms by creating audiences based on your actions on our website and applications and allow Meta to improve and optimize the targeting and delivery of our advertising campaigns for us.

Most web browsers automatically accept cookies, but your browser may allow you to modify your browser settings to decline cookies if you prefer. If you disable cookies, you may be prevented from taking full advantage of the Services, because the Services may not function properly. As we adopt additional technologies, we may also gather additional information through other methods.

To learn more about our cookies or manage your cookie preferences, click [here](#).

Session-replay Technologies. We may use session-replay technologies, such as those provided by PostHog, which employs software code to record users' interactions with the Service in a manner that allows us to watch video replays of those user sessions. The replays include users' clicks, mobile app touches, mouse movements, scrolls, keystrokes and key touches during those sessions. These replays help us diagnose usability problems and identify areas for improvement. You can learn more about PostHog at <https://posthog.com/privacy>.

Artificial Intelligence. Cambly uses AI technologies to enhance our Services and the learning experience, including in connection with our chatbots and your tutoring sessions. For example, we may use AI technologies to help you practice your English, analyze your progress and usage patterns, and to personalize and provide insights about your learning journey. By using Cambly, you acknowledge and consent to the use of AI technologies as described in this agreement. We are committed to transparency in how we use AI. If you have any questions or concerns about our AI technologies or how your data is being used, please contact us [here](#).

Biometric Information. On occasion, Cambly may analyze biometric information from students, such as facial images or voiceprints, in order to prevent fraud and illegal activity. This is to help keep our users and platform safe for everyone. Cambly only collects biometric identifiers during trial lessons from students, not tutors. Cambly and its service providers do not store biometric information unless fraudulent or illegal activity has been detected, and will keep any retained biometric information for no longer than 1 year.

2. How We Use the Information We Collect

We may use your information for business and commercial purposes, such as:

- To provide you with the Services, including to register you for an account, enable tutoring sessions, and process transactions;
- To enable features such as speech recognition, language processing, and personalized experiences (such as lesson summaries, classroom content, practice activities, quizzes, and chatbots);
- To respond to your questions or inquiries, including to provide support and troubleshooting assistance;
- To communicate with you, including to communicate with you about your account, inquiries, our company, and send you related news, newsletters, or notifications;
- To send you transactional and promotional emails, surveys, requests to rate and review the Services, and opportunities to provide feedback regarding the Services;
- To manage and remember your preferences and customize the Services;
- To analyze and improve the Services or any other products and services we provide;
- To administer surveys, sweepstakes, promotions, or contests;
- To improve our advertising and marketing, such as to provide you with recommendations for products or services that may interest you;
- To verify your identity;
- To comply with our legal obligations or as permitted by law;
- To protect the safety and/or integrity of our users, employees, third parties, members of the public, and/or our Services;
- To prevent fraud and enforce our legal terms; and
- To administer and troubleshoot the Services.

We may combine information that we collect from you through the Services with information that we obtain from affiliated and nonaffiliated third parties, and information derived from any other products or services we provide.

We may aggregate and/or de-identify information collected through the Services. We may use de-identified or aggregated data for any purpose, including without limitation for research and marketing purposes and may also share such data with any third parties, including without limitation, service providers, advertisers, promotional partners, sponsors, event promoters, and/or others.

3. With Whom & Why We Disclose Your Information

We may disclose your personal information in connection with the following:

- **Affiliates and Subsidiaries:** We may disclose your information to Cambly affiliates and subsidiaries.
- **Consent/At Your Direction:** We may disclose your information to nonaffiliated third parties based on your consent to do so. Such consent includes the disclosure of your information (a) in order to connect you with tutors and students, or otherwise in connection with your tutoring sessions; (b) when we have your permission, such as if you direct us to share information about a tutoring session on a social networking site; or (c) as described in this Privacy Policy, the User Agreement, or any other legal terms governing your use of the Services.
- **Service Providers:** We provide access to or disclose your information with select Service Providers. They provide a variety of services to us, including data storage, analytics, billing, marketing, product content and features (including AI technologies), customer service, data storage, security, fraud prevention, and legal services.
- **Professional advisors:** We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.
- **Protection of Cambly and Others:** We may disclose certain information if we believe in good faith that doing so is necessary or appropriate to (i) protect or defend the rights, safety, or property of Cambly or third parties, including to defend or enforce our Privacy Policy, our User Agreement, or any other contractual arrangement; (ii) respond to your requests for customer service; and/or (iii) protect the rights, property or personal safety of Cambly, its agents and affiliates, its employees, users and/or the public.
- **Legal Requirements:** We may disclose certain information if we believe in good faith that doing so is necessary or appropriate to comply with any law enforcement, legal, or regulatory process, such as to respond to a warrant, subpoena, court order, or other applicable laws and regulations.
- **Business Transfer:** We may disclose certain information, in connection with or during a business transaction (or potential business transaction), such as any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Aggregate/Anonymous Information:** From time to time, we may disclose aggregate/anonymous information about use of the Services, such as by creating reports on usage trends. The sharing of such data is unrestricted.

While Cambly strives to protect your personal information within our platform, we cannot control whether other users share information more broadly. Cambly is not responsible for the protection or privacy of any information that other users share outside of the platform, and we disclaim any liability for their actions or conduct.

4. Online Analytics and Advertising

Analytics

We may use third-party web analytics services on the Services, such as those of Google Analytics. These service providers use the sort of technology described in the “Information we collect automatically” section above to help us analyze how users use the Services, including by noting the third-party website from which you arrive. The

information collected by the technology will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Services. We also use Google Analytics for certain purposes related to advertising, as described in the following section. To prevent Google Analytics from using your information for analytics, you may install the [Google Analytics Opt-Out Browser Add-on](#).

Advertising

We may allow other third parties (e.g., ad networks and ad servers such as Google Analytics) to access their own cookies or other tracking technologies on your computer, mobile phone, or other device you use to access the Services. We neither have access to, nor does this Privacy Policy govern, the use of cookies or other tracking technologies that may be placed on your computer, mobile phone, or other device you use to access the Services by non-affiliated, third-party ad technologies, ad servers, ad networks or any other non-affiliated third parties. Those parties that use these technologies may offer you a way to opt out of targeted advertising as described below. You may receive tailored advertising on your computer through a web browser. When we use third-party cookies and other tracking tools, we may disclose your personal information to those companies to help us analyze use of the Service, display advertisements on the Service and advertise the Service elsewhere online.

If you are interested in more information about tailored browser advertising and how you can generally control cookies from being put on your computer to deliver tailored marketing, you may visit the Network Advertising Initiative's ("NAI") [Consumer Opt-Out Link](#) and/or the Digital Advertising Alliance's ("DAA") [Consumer Opt-Out Link](#) to opt-out of receiving tailored advertising from companies that participate in those programs. To opt out of Google Analytics for Display Advertising or customize Google Display Network ads, you can visit the [Google Ads Settings page](#). Please note that to the extent advertising technology is integrated into the Services, you may still receive advertising content even if you opt out of tailored advertising. In that case, the advertising content may not be tailored to your interests. Also, we do not control any of the above opt-out links and are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms. If your browsers are configured to reject cookies when you visit this opt-out page, or you subsequently erase your cookies, use a different computer or change web browsers, your NAI or DAA opt-out may no longer be effective. Additional information is available on NAI's and DAA's websites, accessible by the above links.

5. Security of Your Information

We implement security measures to protect your information. It is important that you protect and maintain the security of your account credentials and notify us immediately of any unauthorized use of your account. Please understand that no data transmission over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us.

6. Data Retention

We keep your information until we determine it is no longer necessary for the purposes for which it is processed. The length of time for which we retain information depends on the purposes for which we collected and use it and your choices, after which time we may

delete and/or aggregate it. We may also retain and use this information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

7. Consent to Transfer

Our computer systems are currently based in the United States, so your personal information will be processed by us in the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By using the Services, you agree to this Privacy Policy and you consent to the transfer of all such information to the United States, which may not offer a level of protection equivalent to that required in the European Union, United Kingdom, or certain other countries, and to the processing of that information as described in this Privacy Policy.

8. Children's Privacy

The Cambly Kids Site contains content appropriate for children, including those under the age of 13 in the United States or 16 in all other jurisdictions ("children"), and may collect personal information directly from children. For more information about our distinct practices concerning collection, use, and disclosure of children's personal information in connection with the Cambly Kids Site, please see our [Children's Privacy Policy](#).

Our general-audience Services are not directed to children. If you become aware that your child has provided us with personal information through the Services, please contact us [here](#). We do not knowingly collect personal information from children through the Services, other than through Cambly Kids. If we become aware that a child has provided us with personal information, we will take steps to remove that information as required by applicable law and terminate the applicable account.

9. Third-Party Websites

Our Services may link to third-party websites from companies other than Cambly, such as to relevant online resources, our partners' websites, and other third-party websites. We are not responsible for the privacy practices or content of such other websites. If you have any questions about how these other websites use your information, you should review their policies and contact them directly. We are not responsible for the actions of third parties.

10. Your Choices

You have certain rights and choices with respect to your information, such as:

- **Profile Information and Accounts:** If you have an account on our Services, you can access and edit the information you provided to us through individual settings in the Services. If you want to terminate your account, please request account termination through settings in the Services or by contacting us [here](#).
- **Marketing Emails:** To opt out of marketing email communications, you may click the "unsubscribe" link in our marketing emails.

- **Cookies & Analytics:** You can opt out of certain cookie-related and analytics processing by following the instructions in this Privacy Policy.
- **Regional Privacy Disclosures and Rights:** Additional disclosures for residents of the European Economic Area, United Kingdom, Turkey, Brazil, California, Korea, and Nevada are set forth below in [Additional Regional Disclosures](#).

For information about how Cambly adheres to the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework and the Swiss-U.S. Data Privacy Framework, see the [Cambly EU-US Data Privacy Framework Statement](#).

Please note, however, that certain information may be exempt from such requests in some circumstances, which may include needing to continue processing your information to comply with a legal obligation. We may request that you provide us with information necessary to confirm your identity before responding to your request.

11. Changes to Our Privacy Policy

We may update this Policy from time to time. If we make material changes to our Policy, we will notify you and other users as required by law. By continuing to use our Services, you are agreeing to be bound by any changes or revisions made to this Privacy Policy.

12. Contacting Us

If you have any questions, comments, or concerns regarding our Privacy Policy or practices, please contact Cambly's support team [here](#) or write to us at the following address:

Cambly Inc.
440 N. Barranca Ave.#4343
Covina, CA 91723

13. Additional Regional Disclosures

European Economic Area, United Kingdom, Turkey, Korea, and Brazil

You may have the following rights, under certain circumstances. To exercise any of your rights please contact us [here](#). Your local laws may permit you to request that we:

- Provide access to and/or a copy of certain information we hold about you;
- Prevent the processing of your information for direct marketing purposes (including any direct marketing processing based on profiling);
- Update or rectify information which is out of date or incorrect;
- Delete certain information that we are holding about you;

- Oppose, cancel or restrict the way that we process and disclose certain information;
- Transfer your information to a third-party provider of services; and
- Revoke your consent for the processing of your information.

We will consider all requests and provide our response within the time period stated by applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interests or to comply with a legal obligation. We may request that you provide us with information necessary to confirm your identity before responding to your request as required or permitted by applicable law.

If you have unresolved concerns, you may lodge a complaint with your local data protection authority. However, we encourage you to contact us first, and we will do our best to resolve your concern.

The laws of some jurisdictions such as the European Union and United Kingdom require data controllers to tell you about the legal ground that they rely on for using, sharing, or disclosing your information. To the extent those laws apply, our legal grounds are as follows:

- **Contractual Commitments:** We may use, share, or disclose information to honor our contractual commitments to you (e.g., to comply with our User Agreement, which you accept by browsing or otherwise using the Services).
- **With Your Consent:** Where required by law, and in some other cases, we use, share, or disclose information on the basis of your consent.
- **Legitimate Interests:** In many cases, we use, share, or disclose information on the ground that it furthers our legitimate business interests in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals, such as customer service, certain promotional activities, analyzing and improving our business, providing security for our Services, preventing fraud, and managing legal issues.
- **Legal Compliance:** We need to use, share, and disclose information in certain ways to comply with our legal obligations.

For Turkey-specific disclosures for tutors, please click [here](#), for students, please click [here](#), and for our cookie policy, click [here](#).

For Korea-specific disclosures, please click [here](#).

Nevada

Under Nevada law, certain Nevada consumers may opt out of the sale of “personally identifiable information” for monetary consideration (as such terms are defined by Nevada law). We do not engage in such activity.

California Notice at Collection

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (“CCPA”) requires us to provide some additional information to California residents. This subsection only applies to you if you are a California resident, and it applies only to personal information we collect on or through the Services and through other means (such as information collected offline and over the telephone). It does not apply to personal information we collect from our employees and job applicants in their capacity as employees and job applicants.

Categories of Information we Collect

California law requires us to disclose information regarding the categories of personal information that we have collected about California consumers, the categories of sources from which the information was collected, the business or commercial purposes (as those terms are defined by applicable law) for which the information was collected, and the categories of parties to whom we disclose personal information. Section 1 above describes the information we collect from and about you; Section 2 describes the purposes for which we use this information; and Section 3 describes when and to whom we disclose data. The CCPA requires us to list the personal information we collect by category along with the purposes of its use and the unaffiliated parties to which it is disclosed.

Categories of Personal Information (see Section 1 above)	Purposes of Use (see Section 2 above)	Categories of Other Parties to Whom We Disclose the Information for Business and Operational Purposes (see Section 3 above)
Identifiers (e.g., name, email address, phone number, and other account information)	<ul style="list-style-type: none">● Provide the Services● Respond to questions or inquiries● Communicate with you● Manage and remember your preferences and customize the Services● Analyze and improve the Services● Administer surveys, sweepstakes, promotions, or contests● Advertising and marketing● Verify identity● Comply with legal obligations or as permitted by law● Protect safety and integrity	<ul style="list-style-type: none">● Affiliates and subsidiaries● Service providers● Ad networks and advertising partners● Entities for legal and security purposes● Professional advisors● Entities for sales or transfer of business or assets● Others with your consent, such as when you connect with students or tutors on the Services

	<ul style="list-style-type: none"> • Prevent fraud and enforce legal terms • Administer and troubleshoot the Services 	
Commercial information (e.g., transaction data regarding the transactions you've made with or through us)	<ul style="list-style-type: none"> • Provide the Services • Respond to questions or inquiries • Communicate with you • Manage and remember your preferences and customize the Services • Analyze and improve the Services • Advertising and marketing • Verify identity • Comply with legal obligations or as permitted by law • Protect safety and integrity • Prevent fraud and enforce legal terms • Administer and troubleshoot the Services 	<ul style="list-style-type: none"> • Affiliates and subsidiaries • Service Providers • Ad networks and advertising partners • Entities for legal and security purposes • Professional advisors • Entities for sales or transfer of business or assets • Others with your consent, such as when you connect with students or tutors on the Services
Financial information (e.g., payment or other financial information)	<ul style="list-style-type: none"> • Provide the Services • Verify identity • Comply with legal obligations or as permitted by law • Protect safety and integrity • Prevent fraud and enforce legal terms 	<ul style="list-style-type: none"> • Affiliates and subsidiaries • Service Providers • Entities for legal and security purposes • Professional advisors • Entities for sales or transfer of business or assets
Internet or other network or device activity (e.g., IP address, unique device identifiers, advertising and app identifiers, browsing history, or other usage data)	<ul style="list-style-type: none"> • Provide the Services • Respond to questions or inquiries • Communicate with you • Manage and remember your preferences and customize the Services • Analyze and improve the Services 	<ul style="list-style-type: none"> • Affiliates and subsidiaries • Service providers • Ad networks and advertising partners • Entities for legal and security purposes • Professional advisors • Entities for sales or transfer of business or assets

	<ul style="list-style-type: none"> • Administer surveys, sweepstakes, promotions, or contests • Advertising and marketing • Verify identity • Comply with legal obligations or as permitted by law • Protect safety and integrity • Prevent fraud and enforce legal terms • Administer and troubleshoot the Services 	<ul style="list-style-type: none"> • Others with your consent
Employment information (e.g., job positions and titles, and business contact information)	<ul style="list-style-type: none"> • Provide the Services • Respond to questions or inquiries • Communicate with you • Manage and remember your preferences and customize the Services • Analyze and improve the Services • Advertising and marketing • Verify identity • Comply with legal obligations or as permitted by law • Protect safety and integrity • Prevent fraud and enforce legal terms • Administer and troubleshoot the Services 	<ul style="list-style-type: none"> • Affiliates and subsidiaries • Service providers • Entities for legal and security purposes • Entities for sales or transfer of business or assets • Professional advisors • Others with your consent, such as when you connect with students or tutors on the Services
General location information (e.g., your general location inferred from an IP address)	<ul style="list-style-type: none"> • Provide the Services • Respond to questions or inquiries • Communicate with you • Manage and remember your preferences and customize the Services • Analyze and improve the Services • Administer surveys, sweepstakes, 	<ul style="list-style-type: none"> • Affiliates and subsidiaries • Service Providers • Ad networks and advertising partners • Entities for legal and security purposes • Professional advisors • Entities for sales or transfer of business or assets • Others with your consent, such as

	<p>promotions, or contests</p> <ul style="list-style-type: none"> • Advertising and marketing • Verify identity • Comply with legal obligations or as permitted by law • Protect safety and integrity • Prevent fraud and enforce legal terms • Administer and troubleshoot the Services 	<p>when you disclose location information to other users</p>
<p>Audio or visual information (e.g., video and audio recordings of tutoring sessions)</p>	<ul style="list-style-type: none"> • Provide the Services • Respond to questions or inquiries • Communicate with you • Analyze and improve the Services • Verify identity • Comply with legal obligations or as permitted by law • Protect safety and integrity • Prevent fraud and enforce legal terms • Administer and troubleshoot the Services 	<ul style="list-style-type: none"> • Affiliates and subsidiaries • Service providers • Entities for legal and security purposes • Professional advisors • Entities for sales or transfer of business or assets • Other users, such as when the participants of a tutoring session access recordings of the session • Others with your consent, such as when you agree to share recordings of your tutoring sessions publicly
<p>Biometric information</p>	<ul style="list-style-type: none"> • Comply with legal obligations or as permitted by law • Protect safety and integrity • Prevent fraud and enforce legal terms 	<ul style="list-style-type: none"> • Affiliates and subsidiaries • Service providers • Entities for legal and security purposes

Protected classification and demographic information (e.g., information from our users that reveals information related to protected classifications, such as ethnicity or nationality)	<ul style="list-style-type: none"> • Provide the Services • Respond to questions or inquiries • Verify identity • Comply with legal obligations or as permitted by law • Protect safety and integrity • Prevent fraud and enforce legal terms 	<ul style="list-style-type: none"> • Affiliates and subsidiaries • Service providers • Entities for legal and security purposes • Professional advisors • Entities for sales or transfer of business or assets • Others with your consent, such as when you directly or indirectly disclose such information to students or tutors
Other information (any other information you provide to us that directly or indirectly identifies you, such as information you include in emails or other communications to us)	Purposes of use will depend on the additional information you provide	Disclosure will depend on the additional information you provide

Some of the categories of personal information above may also be “sensitive personal information” under the CCPA. We may collect the following types of “sensitive personal information”: (1) account log-in and password or other credentials allowing access to your Cambly account; and (2) information you share that may reveal race/ethnic origin or other protected classifications.

We collect the categories of personal information identified above from the following sources: (1) directly from you; (2) through your use of the Services; and (3) third parties such as social media networks and analytics or attribution partners.

Additionally, if you create a tutor profile through the Service, you are directing us to share your tutor profile with prospective students. If you use the Service as a student and schedule or join a tutoring session, you are directing us to share your student profile with the other participants. Your student or tutor profile may include the following categories of personal information: (1) identifiers; (2) demographic information; (3) information related to protected classifications; (4) audio/video data; and (5) other information that identifies or can reasonably identify you.

Your CCPA Rights

If you are a California resident, you may have certain rights. California law may permit you to request that we:

- Provide you the categories of personal information we have collected or disclosed about you; the categories of sources of such information; the business or commercial purpose for collecting, “selling,” or “sharing” your personal information; the categories of third parties to whom we disclose or “sell,” or with whom we “share,” personal information; and the categories of personal information we “sell” or “share.”
- Provide access to and/or a copy of certain information we hold about you.
- Delete certain information we have about you.
- Correct inaccurate personal information we maintain about you.

You also have the right to opt out of “sales” and “sharing” of personal information, as described in the “Sales and Sharing of Personal Information” subsection below. You may have the right to receive information about the financial incentives that we offer to you, if any. You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights. Certain information may be exempt from such requests under applicable law. We need certain types of information so that we can provide the Services to you. If you ask us to delete it, you may no longer be able to access or use the Services.

If you would like to exercise any of these rights, please contact us [here](#). You will be required to verify your identity before we fulfill your request. If you have an online account with us, logging into your account will serve to verify your identity and request, although we may request additional information if we believe your account has been compromised. If you do not have an account with us, or if we have reason to suspect that the security of your account is compromised, we will request additional information from you to match with our existing records to verify your identity, depending on the nature of the request and the sensitivity of the information sought.

You can also designate an authorized agent to make a request on your behalf. To do so, you must provide us with written authorization or a power of attorney, signed by you, for the agent to act on your behalf. You will still need to verify your identity directly with us.

The CCPA also allows you to limit the use or disclosure of your “sensitive personal information” (as defined in the CCPA) if your sensitive personal information is used for certain purposes. Please note that we do not use or disclose sensitive personal information other than for purposes for which you cannot opt out under the CCPA.

Sales and sharing of personal information

We may disclose your personal information to third parties for purposes of analytics and advertising. We provide information to analytics providers to better understand how

consumers use the Services so we can improve the Services and create new products and services. We may also provide personal information to third-party advertising providers for targeted advertising purposes, so we can provide you with more relevant and tailored ads regarding our services. Under the CCPA, disclosing personal information to these third parties may be considered a “sale” of personal information or the “sharing” of personal information for purposes of “cross-context behavioral advertising.”

The following chart lists the categories of personal information we have sold or shared over the last 12 months and the categories of third parties to which we have sold or shared:

Category of personal information	Categories of “third parties” to which we have “sold” or “shared” this personal information
Identifiers	Ad networks and advertising partners; analytics providers
Device information	Ad networks and advertising partners; analytics providers
Commercial information (e.g., transactions, browsing history, or app usage)	Ad networks and advertising partners; analytics providers

To opt out of our online disclosure such as through cookie and pixel technology of your personal information for purposes that could be considered “sales” or “sharing,” please click [here](#) or [here](#).

We do not knowingly “sell” or “share” the personal information of children under 16.

Retention

Please see Section 7 [above](#) (“Data Retention”) for more information on how we retain your information.

California Do-Not Track Disclosure

Cambly does not currently recognize or respond to browser-initiated Do-Not-Track signals, as the Internet industry is currently still working on Do-Not-Track standards, implementations and solutions.

California Shine the Light Disclosure

California Civil Code Section 1798.83 permits customers of Cambly who are California residents to request certain information, once per year, regarding our disclosure of their personal information (as defined by California law) to third parties for their own direct marketing purposes, or in the alternative, that we provide a cost-free means for consumers

to opt out of any such sharing. We do not currently share personal information with third parties for their own direct marketing purposes.