

Privacy Notice

This Privacy Notice applies to the end users data that Afinidata collects and handles for the purposes of maintaining and providing Afinidata's virtual tutor services. For the purposes of this Privacy Notice, "personal data" means any information relating to an identified or identifiable individual.

Definitions

1. Afinidata: The company proprietary of the platform where the virtual tutor is in, also known as "Afinidata LLC". It is the one who processes the data and is in charge of its storage.
2. Afinidata's Partners: Entities that work on the benefit of caregivers with young children, or conduct research on early childhood development. (i.e. Harvard University, Peruvian Minister of Health) These entities have a partnership agreement with Afinidata.
3. Data Subject: any individual person who can be identified by reasonable means, directly or indirectly, by reference to an attribute or combination of attributes within the data, or combination of the data with other available information. Also called Afinidata's end user.
4. Personal Data: any information relating to an identified or identifiable individual
5. Processing: any operation or set of operations, automated or not, which is performed on Personal Data, including but not limited to collection, storage, use, transmission, disclosure or deletion.
6. Afinidata's Virtual tutor: It is a platform that provides early childhood education content for caregivers to do with their children.
7. Call for Review: A Data Subject's call to seek redress due to a reasonable belief that the Afinidata has Processed that Data Subject's Personal Data in violation of the Privacy Policy.
8. Request for Information: A Data Subject's request for information regarding a Data Subject's Personal Data Processed by Afinidata.
9. Data Privacy Officer: The individual responsible for reviewing allegations of Processing in violation of the Privacy Policy.

Information Afinidata collects

Information End User provides Afinidata

Afinidata collects any information that end users voluntarily provide to Afinidata through the platform, including name, email, phone number, the name or nickname and birthday of the child, or any other additional information the end users provide to Afinidata.

Information Afinidata Collects by Automated Means

Like many platforms, Afinidata's virtual tutor uses "interactions". This platform uses interactions to optimize functionality and give the end users the best possible experience. Afinidata obtains certain information by automated means when the end users interact with the virtual tutor, such as the ID of the device the end users use to connect with Afinidata's virtual tutor, the country where the end users are using Afinidata.

Information Afinidata Collects from Third Parties

Afinidata's virtual tutor does collect end users' information from Facebook and the app stores Afinidata's APP is downloaded from.

If the end users are using Afinidata with Facebook Messenger, Afinidata has access to the end users Facebook Usernames. By collecting this information, we learn how to best tailor the virtual tutor for the users. We collect this information through various means, including "APIs".

How does Afinidata use the personal data?

Afinidata uses the information or personal data to personalize the content Afinidata recommends to caregivers, including best content and activities to do at home improving the children's development.

Afinidata's Partners may also use personal data to monitor and improve in person or complementary services, such home visitations or follow ups with families.

Specific Purpose of Processing

The purposes of data collection on the virtual tutor are:

- To disseminate information to create a more personalized experience for the end users.
- To provide unidentifiable information to Afinidata's Partners for research purposes.

Information Afinidata Shares

Afinidata does not share identifiable data about end users, with any Afinidata's Partner.

Afinidata works with Partners that benefit a specific group of end users with the Afinidata platform. Afinidata may share unidentifiable data or information with Afinidata's Partners regarding the end user group usage of the virtual tutor and general insights.

How Afinidata Protects the Information

Afinidata maintains appropriate technical and organizational safeguards against unauthorized processing of personal data and against accidental loss, destruction or damage.

Afinidata's Partners are not authorized by Afinidata to use or disclose end users data, except as necessary to comply with the purpose of the contract such as research. Afinidata requires its partners and service providers to appropriately safeguard the privacy and security of personal data they process on their behalf.

How can end users request Afinidata for their information?

If a person, as an end user of Afinidata, wants to request for their personal information, they can write an email to tech@afinidata.com and specify the information they want to request for.

What information can an end user request for?

1. A Data Subject may request any of the following information:
 - a. Confirmation whether or not Afinidata is Processing the Data Subject's Personal Data;

- b. Information about the types of Personal Data Processed by Afinidata pertaining to that Data Subject;
- c. Information in relation to such Personal Data about:
 - i. The specific and legitimate purposes of the Processing;
 - ii. The retention period;
 - ii. Whether the Personal Data has been transferred to any Third Parties;
- d. Access to such Personal Data, either by providing, at the discretion of Afinidata, an opportunity, at the Data Subject's own expense and subject to Afinidata's approval, to prepare an encrypted file with Personal Data and send it to the Data Subject.

How to submit a call for review?

A Data Subject may submit a Call for Review whether Afinidata is Processing or has Processed the Data Subject's Personal Data in violation of Principles of the Privacy Policy.

A Data Subject may submit a Call for Review to the **Data Privacy Officer**.

Process of the Review:

- a. The Data Privacy Officer conducts the Review, determines whether a violation has taken or is taking place and determines the relief.
- b. Relief: If the Data Privacy Officer determines a violation of Principles of the Privacy Policy, the Data Privacy Officer decides on one of the following to be provided to the Data Subject:
 - i. Deletion of Personal Data Processed without legitimate purpose.
 - ii. Rectification or amendment of Personal Data Processed in violation of the data accuracy Principle of Section III, paragraph 3 of the Privacy Policy.
 - iii. Other appropriate measures at the sole discretion of the Data Privacy Officer to remedy the violation of the Principles according to Section III of the Privacy Policy.

- iv. Any relief is limited to remediating the violation in the specific case under consideration for the relevant Data Subject.

Afinidata Policy Document

Click [here](#) to view the full document.

Questions or concerns

Please contact the Data Privacy Office at profesionales@afinidata.com.