

Privacy Policy For Lulu

1. General

At Lulu Technologies co., we care about your personal data, so we have prepared this Privacy Policy to explain how we collect, use and share it.

This Privacy Policy (“Privacy Policy”) details the personal data Lulu language learning app (“Lulu”, “we”, “us” or “our”) receives about you, how we process it and your rights and obligations in relation to your personal data.

Lulu technologies co., a company registered by the Nigerian Corporate Affairs Commission , is the data controller for the purposes of the General Data Protection Regulation (“GDPR”) and any relevant local legislation (“Data Protection Laws”) By using or accessing the Service, you agree to the terms of this Privacy Policy. We may update our Privacy Policy to reflect changes to our information practices. If we do this and the changes are material, we will post a notice that we have made changes to this Privacy Policy on the Website for at least 7 days before the changes are made, and we will indicate the date these terms were last revised at the bottom of the Privacy Policy. Any revisions to this Privacy Policy will become effective at the end of that 7 day period. If you are an employee, worker or contractor of Lulu Technologies co., the information about how we handle your personal information is available in the Lulu internal knowledge base. With respect to employees based in Europe, we are committed to cooperating with European data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from Europe in the context of the employment relationship.

2. Information we collect.

This Privacy Policy explains how we collect, use and share your personal data. Information you provide Through the registration process, you will provide us with your name, e-mail address (or parent's e-mail address), and age or date of birth. You will also provide us with your payment transaction information if you choose to pay for Lulu services.

Activity data

- When you use the Service, you will submit information and content to your profile. We will also generate data about your use of our Services including your #engagement in educational activities on the Service, or your sending of messages and otherwise transmitting information to other users ("Activity Data"). We also collect technical data about how you interact with our Services; for more information, see Cookies. We only collect the data we need which means we don't record:
 - Usernames
 - Names
 - Profile Images
 - Email addresses
 - Locations or bios on the Profile page
 - Passwords
- We do record the following data:
- Usage Patterns
 - Clicks
 - Mouse
 - movements
 - Scrolling
 - Typing
- Tech Specs
 - Browser
 - Device

- type
 - Operating system
 - Viewfinder size
 - Script errors
 - IP address
- Navigation
 - Pages visited
 - Referrers
 - URL parameters
 - Session duration
- Learning Activity
 - Session progress
 - Answers
 - Speaking Challenges
- Some lessons involve you speaking into the app. To recognize speech your audio may be sent to a third party provider such as Google, Apple, or Amazon Web Services. We may ask you to allow Lulu to collect and analyze your speech data to help us understand the effectiveness of our lessons, and to improve the product. If you choose not to share your audio with us, or if we haven't asked you yet, then your audio will not be used in this way. Any audio you agree to send to Lulu is anonymized when it reaches our servers to ensure that no trace of your personal data remains attached to the audio.

Third-Party data

- We may contact you to participate in product research activities. These may include surveys, interviews, and other types of feedback sessions. When you participate in these research activities, the information you provide will be used to test, improve, and develop our products. We will record the video, audio and text transcriptions of this feedback together with any additional contact information you provide and will retain this data for two years.
Please contact us at admin@languageafrica.com to:

- Request more information about the research activities you have volunteered for.
- Opt out of being contacted for research activities.
- Request a copy of any research related data you have provided to us.

3. Cookies

When you enter the Website, we collect your browser type and your IP address (a unique address that identifies your computer on the Internet). When you use our mobile Application, we collect your device type, your device ID, and your IP address. In addition, we store certain information from your browser using "cookies."

A cookie is a piece of data stored on the user's computer tied to information about the user. We use session ID cookies to confirm that users are logged in. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide you certain features available on the Website (e.g., customized delivery of information).

You can find more information about cookies and how to manage them at <http://www.allaboutcookies.org>.

4. Information Obtained by Third-Parties

To support and enhance the Service, we work with a variety of third party advertising networks, marketing analytics service providers and website analysis firms, such as Google, Facebook, Oath, and Unity (collectively, "Third Party Advertising Service Providers"). These Third Party Advertising Service Providers collect and use personal data about your visits to and use of the Website and mobile Application, as well as other websites in order to serve you with advertisements and content tailored to meet your

preferences and likely interests or better understand ad effectiveness. Aggregate demographic and interest data will also be used for market research purposes. We use Google Analytics which is a web analytics tool that helps us understand how users engage with the Website. Like many services, Google Analytics uses first-party cookies to track user interactions as in our case, where they are used to collect information about how users use our site. This information is used to compile reports and to help us improve our Website. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page: <https://tools.google.com/dlpage/gaoptout>. You can opt-out of receiving personalized ads from advertisers and ad networks that are members of the Network Advertising Initiative (“NAI”) or who follow the DAA Self-Regulatory Principles for Online Behavioral Advertising using their respective opt-out tools.

The NAI's opt-out tool can be found here <http://www.networkadvertising.org/choices/> and the DAA's opt out tool can be found here <http://www.aboutads.info/choices/>. In addition, your mobile devices may offer settings that enable you to make choices about the collection, use, or transfer of mobile app information for online behavioral advertising (for example, Apple iOS' Advertising ID and Google Android's Advertising ID). Please note that opting out does not prevent the display of all advertisements to you.

5. Use of information obtained by Lulu technologies co.

Lulu may occasionally send you service related and product change announcements through the general operation of the Service. We will send you reminder notifications to support the Lulu teaching methodology by reinforcing the learning cadence and help maintain your translation streak. We process your data to help provide you with the Service and offer personalized features, to understand and improve our Service and to keep our Service safe and secure.

Lulu may use or share anonymous data collected through the Service, including Activity Data without limitation. As a business, it is critical that we perform our contract with you with the best service possible, and it is in our legitimate interests to perform these processing functions and to enable service e-mails by default to keep your data secure and provide our Service. You may opt out of any non-essential service e-mails at any time. We may also use your contact information to send you notifications regarding new services, offers and promotions offered by Lulu if you affirmatively consent to receive such communications. When you register with Lulu, some of your information is made public and available at various locations.

This will include the data from your Lulu Profile and Account (Name, Location, Bio, Username, User ID, Profile picture); your followers and the people you follow; and your translation progress. Your Lulu account email address is not shown publicly. Third party websites may be able to read, collect and use your public information for their own purposes. Profile information is used by Lulu to be presented back to and edited by you when you access the Service and to be presented to other users. In some cases, other users may be able to supplement your profile, including by submitting comments (which can be deleted by you).

Lulu technologies co. uses this information to provide you with support, to send you essential notifications, to enforce our terms, conditions and policies, to communicate with you, to administer the Services, and for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes. Lulu's Terms and Conditions provide the contractual lawful basis for these processing activities.

6. Sharing your personal data with third parties

Lulu technologies co. shares your personal data only when it is necessary to offer the Service, legally required, or permitted by you. We will provide personal data to hosting providers such as Amazon Web Services, search engine providers such as Google, analytics providers such as Crashlytics, and support providers such as ZenDesk.

These data processors help us bring you the Service. For example, we may share your information in order to detect where or how you encountered a bug when using our mobile application. In connection with these operations, our service providers will have access to personal data for a limited time. When we utilize service providers for processing any personal data, we implement contractual protections limiting the use of that personal data to the provision of services to Lulu. We will be required to access and disclose personal data in response to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. Additionally, we will access and share account or other personal data when we believe it is necessary to comply with law, to protect our interests or property, to prevent fraud or other illegal activity perpetrated through the Service or using the Lulu technologies co. name, or to prevent imminent harm.

This will include accessing and sharing personal data with other companies, lawyers, agents or government agencies. If the ownership of all or substantially all of the Lulu technologies co. business, or individual business units or assets owned by Lulu that are related to the Service, were to change, your personal data will be transferred to the new owner. In any such transfer of information, your personal data would remain subject to this section. Lulu will share aggregate or anonymous data collected through the Service, including Activity Data, for purposes such as understanding or improving the service.

6. Sharing your personal data with third parties

Lulu technologies co. shares your personal data only when it is necessary to offer the Service, legally required, or permitted by you. We will provide personal data to hosting providers such as Amazon Web Services, search engine providers such as Google, analytics providers such as Crashlytics, and support providers such as ZenDesk.

These data processors help us bring you the Service. For example, we may share your information in order to detect where or how you encountered a bug when using our mobile application. In connection with these operations, our service providers will have access to personal data for a limited time. When we utilize service providers for processing any personal data, we implement contractual protections limiting the use of that personal data to the provision of services to Lulu. We will be required to access and disclose personal data in response to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. Additionally, we will access and share account or other personal data when we believe it is necessary to comply with law, to protect our interests or property, to prevent fraud or other illegal activity perpetrated through the Service or using the Lulu Technologies co. name, or to prevent imminent

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7. Data subject rights and data retention

- You can manage your account settings on the Lulu website to update, amend, and correct your information.
- You also have the following rights in relation to the personal data we hold about you, unless provided otherwise by local law:
 - To request access to, or erasure of, the personal data we hold about you.
 - To request us to restrict the processing of the personal data we hold about you.
 - To object to us processing personal data relating to you.
 - Where you have given us consent to process your personal data, you have the right to withdraw that consent at any time.
 - To export the personal data you have provided to Lulu in a format that can be transferred electronically to a third party.
 - To delete your account with Lulu by following the instructions available through the Service.
- Lulu will retain your data until your account is deleted, after which point we will retain anonymous data collected through the Service, including Activity Data, which may be used by Lulu technologies co. and shared with third parties in any manner. Please note that some of these rights are not absolute. In some cases,

we may refuse a request to exercise particular rights if complying with it meant that we are no longer able to meet our contractual obligation to provide you with particular products and services. We will keep you informed as to the actions that we can take when you make your request. You may also have the right to make a GDPR complaint to the relevant Supervisory Authority.

A list of EEA Supervisory Authorities is available here:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm and the UK here: <https://ico.org.uk/global/contact-us/>.

If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law. In some cases our ability to uphold these rights for you may depend upon our obligations to process personal information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

8. Third party websites and links

Please note that you may have cookies placed on your computer by third party websites that refer you to our Service. Although we do not share your personal data with these third party websites unless it is reasonably necessary to offer the Service, they may be able to link certain non-personally identifiable information we transfer to them with personal data they previously collected from you.

Please review the privacy policies of each website you visit to better understand their privacy practices. In addition, Lulu would like to inform you that anytime you click on links (including advertising banners), which take you to third party websites, you will be subject to the third parties' privacy policies. Our Services contain links to other sites operated by third parties.

We do not control such other sites and are not responsible for their content, their privacy policies, or their use of personal data, including any personal or financial information collected by our third party payment processor to process payments for in-app purchases. Lulu's inclusion of such links does not imply any endorsement of the content on such sites or of their owners or operators except as disclosed on the Services. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

9. Third party websites and links

- Residents of California have the right to:
 - Know what personal information we collect about you and from where we collect it.
 - Access a copy of the personal information we hold about you.
 - Understand how we process your personal information and how it may be shared.
 - Opt out of having your personal information shared with certain third parties.
 - Request we delete your Lulu account and personal information.
- To make such a request, please send an email to admin@langaugeafrica.com.

10. Children under age of digital consent

We know that children deserve extra privacy protection. That's why we treat child users differently to ensure their parents are in control and we only collect the bare minimum information we need to make Lulu work. When a user creates a Lulu account we collect their age and compare it to the local standard of child online consent depending on the country they registered in. We refer to users under this age as "child users". Child users are permitted to create a user account but we ask them to provide their parent's email address instead of their own. We also prevent child users from supplying their own

name because we don't need that information. After registration we will send an email notifying the parent about Lulu's privacy and information practices regarding child users, including what personal data we collect and how we use, share, and protect that personal data. The email also explains how parents can request that Lulu technologies co. access, change or delete the personal data about their child.

- Child users receive the following special treatment:
 - Lessons are made age appropriate by removing mature words like “beer” or “wine”.
 - Advertisements are set to family safe content.
 - The Profile page is hidden, preventing the child from stating their name, location or bio.
 - Uploading an avatar photo is disabled.
 - Promotional emails are disabled.
 - Leaderboards are disabled.
 - Discussion forums are disabled.
 - The child's profile is made private and hidden from other users' searches.
 - Other users are unable to follow the child.
 - The ability to follow other users or search for other users is disabled.
 - The ability to send an invitation email is disabled.
 - Finding friends on Facebook is disabled.
 - Social logins with Facebook, Google or Apple are disabled.
 - Social follow buttons for Twitter, Facebook and Instagram are disabled.
 - In addition, all users under the age of 16 receive the following special treatment:
 - Advertisements are set to non-personalised.
 - Third party behavioral tracking is disabled.
 - Third party analytics is disabled.

To prevent restricted users from amending these features, the settings will be hidden or grayed out. In the future, once we're sure the user is old enough we will automatically

remove the restrictions, reset the settings to their defaults and make the settings visible for them to configure how they choose. With regards to the Children's Online Privacy Protection Rule ("COPPA"), Lulu only collects personal information from children under the age of 13 for the sole purpose of performing internal operations of the Service. If we discover that we have unknowingly collected additional personal information from these children we will delete it. If you believe this to be the case, please contact us at admin@languageafrica.com

11. Links

The Service may contain links to other websites. We are not responsible for the privacy practices of other websites. We encourage users to be aware when they leave the Service to read the privacy statements of other websites that collect personally identifiable information. This Privacy Policy applies only to information collected by Lulu technologies co. via the Service

12. Information Security

Lulu has implemented administrative and technical safeguards it believes are appropriate to protect the confidentiality, integrity and availability of your personal data, Testing ID, User Photo and access credentials. However, given sufficient resources, a determined attacker could defeat those safeguards and may, as a result, gain access to the data we seek to protect.

13. Do not track

The Service is not designed to respond to “do not track” signals sent by some browsers.

14. Contact us

Lulu technologies co. is registered with the Nigerian Corporate Affairs Commission with registration number: 7290121. For all data privacy inquiries and any questions or concerns you have about this Privacy Policy, please contact our Data Protection Officer at admin@languageafrica.com

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