

## Ascola Privacy Policy

Ascola Learning Technologies Ltd. ("**Ascola**", or "**us**", "**our**", "**we**") allows users to upload academic course content through an Internet based platform and provides an online forum for communication among course participants (the "**Services**"). This privacy policy explains how we make use of data and information received from our end users. If not specifically defined herein, capitalized terms have the meaning given to them in the Ascola Terms and Conditions, which is available at <http://getascola.com/terms.pdf> (the "**Terms**").

We respect the right to privacy of end users. Your ability to make informed choices about the use of your information is important to us. This privacy statement explains our policy regarding the collection, use, disclosure and protection of any information we receive.

### Information We Collect

In order to receive services and content through Ascola, end users will be required to register and provide us with certain information. It is your voluntary decision whether to provide us with any such personal information, but if you refuse to provide such information we may not be able to register you to receive our Services.

In addition, we collect data concerning the use and viewing of all content available through the Services, which may contain personal information. We may also collect certain technical information automatically, such as your IP address, mobile device or computer, operating system and browser. In addition, we collect any information you provide when you contact us for any reason. You are not required by law to provide us with any such information, but by using the Site and agreeing to the Terms you agree to provide us with such information.

We may use services such as Google Analytics or other analytics services that provides us with analysis of the use of our Site and Services

### How we Use Information

We will not share your personally identifiable Information with third parties without your explicit permission, except when required by law, regulation, subpoena or court order or as otherwise expressly set forth herein. We may use personally identifiable Information and other information internally – for example, to help diagnose problems with our servers, and to make the Site and Services more useful for you and for our other customers.

By analyzing all information we receive, we may compile statistical information across a variety of users ("**Statistical Information**"). Statistical Information helps understand trends and customer needs so that new services can be considered and so the Site and Services and associated services can be tailored to customer desires. We may share Statistical Information with our partners, pursuant to commercial terms that we determine in our sole discretion. In addition, we may provide any information to third parties, so long as we have removed any information that identifies any specific individual or user, such as a name, address or contact information.

We will only use collected information in compliance with applicable law.

### How we Protect Information

We follow generally accepted industry standards to protect the data submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of

electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your information, we cannot guarantee its absolute security.

### **Other Uses or Transfer of Your Information**

Notwithstanding anything to the contrary herein, we will fully cooperate with any law enforcement authorities or court order requesting or directing us to disclose the identity, behavior or digital content of any user suspected to have engaged in illegal or infringing behavior.

In providing the Services, we may use subcontractors that are located in countries other than your own, and send them information we receive. For example, we may send your information to any countries outside the United States or the European Economic Area. All our subcontractors will be subject to non-disclosure and non-use obligations. Nevertheless, some countries may have levels of protection of personal and other information which are not as high as in your country of residence or business.

We may disclose data and information as necessary for us to enforce our agreements and policies and to protect the rights and property of Ascola or its agents, employees and customers.

We may transfer data and information in connection with a sale of all or part of our business.

### **Cookies**

Ascola may use cookies and local browser storage to implement its services on Internet websites or to track users on its own website. A cookie is a small piece of text that is sent to a visitor's browser. The browser provides this piece of text to the device of the originating visitor when this visitor returns. A "persistent" cookie or local browser storage may be used to help save your settings and customizations across visits. Most Web browsers are initially configured to accept cookies, but you can change this setting so your browser either refuses all cookies or informs you when a cookie is being sent. Also, you are free to delete any existing cookies at any time. Please note that some features of the Ascola site may not function properly when cookies are disabled or removed.

### **Do Not Track**

Some web browsers may transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is no standard that governs what, if anything, websites should do if they receive these signals. Ascola currently does not respond to "Do Not Track" browser signals or similar mechanisms. If and when a standard is established, we may revise our policy on responding to these signals.

### **Children**

Ascola does not knowingly collect personally identifiable information from children under the age of 13.

### **Changes**

Ascola may update this Privacy Policy from time to time - we encourage you to review it periodically.

### **Comments and Questions**

If you have any comments or questions about our privacy policy, please contact us at <http://getascola.com/#contact>

*Last updated: October, 2016*