

Privacy Policy

Your privacy is key to eTutor so we've established a Privacy Policy that spells out how we collect, use, disclose, transfer, and store your personal information. In addition to this Privacy Policy, we provide data and privacy information imbedded in our products for certain features that ask to use your personal information.

Collection and Use of Personal Information

Personal information is data that can be used to identify or contact a single person.

You may be asked to provide your personal information anytime you are in contact with eTutor. Combining this information with other information eTutor may utilize it to provide and improve our products, services and content.

Here are some examples of the types of personal information eTutor may collect and how we may use it:

Personal information

When you create an eTutor user ID in order to access our various content or register for a class at an eTutor, contact us or participate in an online survey, we may collect a variety of information, including your name and phone number location information.

When you share your content with family and friends using eTutor products, or invite others to participate in eTutor platforms, eTutor may collect the information you provide about those people such as name, mailing address, email address, and phone number. eTutor will use such information to fulfill your requests, provide the relevant product or service, or for anti-fraud purposes.

Use of your personal information

We may process your personal information for the purposes described in this Privacy Policy with your consent, for compliance with a legal obligation to which eTutor is subject or when we have assessed it is necessary for the purposes of the legitimate interests pursued by eTutor or a third party to whom it may be necessary to disclose information.

The personal information we collect allows us to keep you posted on eTutor's latest product announcements, and upcoming events. If you don't want to be on our mailing list, you can opt out anytime by updating your preferences.

We may use your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For example, we may use date of birth to determine the age of eTutor ID account holders.

From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because

this information is important to your interaction with eTutor, you may not opt out of receiving these communications.

We may also use personal information for internal purposes such as auditing, data analysis, and research to improve eTutor's products, services, and customer communications.

Collection and Use of Non-Personal Information

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

We may collect information such as occupation, language, unique device identifier, referrer URL, location, and the time zone where an eTutor product is used so that we can better understand customer behavior and improve our products, services, and advertising. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.

With your explicit consent, we may collect data about how you use the platform in order to help app developers improve the app.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

Cookies and Other Technologies

eTutor's websites, online services, interactive applications, email messages, and advertisements may use "cookies" and other technologies. These technologies help us better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

eTutor and our partners also use cookies and other technologies to remember personal information when you use our website, online services, and applications. Our goal in these cases is to make your experience with eTutor more convenient and personal. For example, knowing your first name lets us welcome you the next time you visit the eTutor Online Store.

If you want to disable cookies and you're using the web browser, go to Safari preferences and then to the privacy pane to manage your preferences. On your eTutor mobile device, go to Settings, scroll down to the Privacy & Security section, and tap on "Block Cookies" to manage

your preferences. For other browsers, check with your provider to find out how to disable cookies. Please note that certain features of the eTutor website will not be available once cookies are disabled.

As is true of most internet services, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyze trends, to administer the site, to learn about user behavior on the site, to improve our product and services, and to gather demographic information about our user base as a whole.

Disclosure to Third Parties

eTutor may make certain personal information available to strategic partners that work with us to provide products and services, or that help us market to customers. For example, when you purchase and activate your iPhone, you authorize us and your carrier to exchange the information you provide during the activation process to carry out service. If you are approved for service, your account will be governed by eTutor and your carrier's respective privacy policies. Personal information will only be shared by us to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

Service Providers

eTutor shares information that's necessarily non-personal with companies who provide services such as information processing, electronic payment solution provider, fulfilling customer orders, delivering products to you, managing and enhancing customer data, providing customer service, assessing your interest in our products and services, and conducting customer research or satisfaction surveys. These companies are obligated to protect your information and may be located wherever eTutor operates.

Others

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for eTutor to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

Protection of Personal Information

eTutor takes the security of your personal information with the seriousness it deserves. All of eTutor's online services will be accessed by setting up of personal user IDs with a password not less than 8 characters.

When your personal data is stored by eTutor, we use computer systems with limited access housed in facilities using physical security measures.

When you use some eTutor products, services, or applications or post on an eTutor forum, chat room, or social networking service, the personal information and content you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to share or submit in these instances. For example, if you list your name and email address in a forum posting, that information is public. Please take care when using these features.

The existence of Automated Decision-Making, Including Profiling

We do not take any decisions involving the use of algorithms or profiling that significantly affects you.

Integrity and Retention of Personal Information

We make it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy and our service specific privacy summaries. When assessing these periods we carefully examine our need to collect personal information at all and if we establish a relevant need we only retain it for the shortest possible period to realize the purpose of collection unless a longer retention period is required by law.

Access to Personal Information

You can help ensure that your contact information and preferences are accurate, complete, and up to date by signing in to your eTutor ID account page. For other personal information we hold, we will provide you with access (including a copy) for any purpose including to request that we correct the data if it is inaccurate or delete the data if eTutor is not required to retain it by law or for legitimate business purposes.

Children & Education

We understand the importance of taking extra precautions to protect the privacy and safety of children using eTutor products and services. Children under the age of 12, or equivalent minimum age in the relevant jurisdiction, are not permitted to create their own eTutor IDs, unless their parent provided verifiable consent or as part of the child account creation process in Family

Sharing or they have obtained a Managed eTutor ID account (where available) through their school. For example, a parent must review the eTutor ID and Family Sharing Disclosure and agree to the Consent to eTutor's Collection, Use and Disclosure of Your Child's Information; and the Terms and Conditions, before they can begin the eTutor ID account creation process for their child. In addition, schools that participate in eTutor's corporate learning programme and have reviewed and consented to the Managed eTutor IDs for Students Disclosure may create Managed eTutor IDs for students.

If we learn that we have collected the personal information of a child under 13, or equivalent minimum age depending on jurisdiction, outside the above circumstances we will take steps to delete the information as soon as possible.

If at any time a parent needs to access, correct, or delete data associated with their Family Sharing account or child's eTutor ID, they may contact us through one of the options provided at the bottom of this page.

Our Companywide Commitment to Your Privacy

To make sure your personal information is secure, we communicate our privacy and security guidelines to eTutor employees and strictly enforce privacy safeguards within the company.

Privacy Questions

If you have any questions or concerns about eTutor's Privacy Policy or data processing, you would like to contact our European Data Protection Officer, or if you would like to make a complaint about a possible breach of local privacy laws, please contact us. You can always contact us by phone at the relevant eTutor Support number.

When a privacy question or question about personal information received in response to an access/download request is received we have a dedicated team which triages the contacts and seeks to address the specific concern or query which you are seeking to raise. Where your issue may be more substantive in nature, more information may be sought from you. All such substantive contacts receive a response. If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator in your jurisdiction. If you ask us, we will endeavor to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

eTutor may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

eTutor Ltd. 6 Kapililonga Flats, Casanova, Lusaka