



PRIVACY POLICY

Teachy

Last Updated: March 21, 2024

We are committed to your privacy and the protection of your personal data. Therefore, we present our **Privacy Policy (Policy)**.

Through this document, we inform how we collect, use, process, and disclose your information and personal data, along with your access and use of our services.

Here, we describe the privacy and data protection practices implemented on our website and application (**Platform**).

This **Privacy Policy (Policy)** applies to any individual who accesses or registers on our **Platform**, as well as anyone who uses, in any other way, the functionalities offered by **Teachy**.

Before accessing our **Platform** and using our services, we kindly ask you to read this **Policy** carefully.

We are available to answer your questions, receive feedback or complaints through the following email: privacy@teachy.com.br

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1. IMPORTANT CONCEPTS

Below you will find some important concepts to understand this Policy.

Student. A person, whether registered with **Teachy** or not, who may have access to exercises and materials provided for the purpose of learning.

Anonymization. The process by which the collected personal data becomes files stored by the Controller in which it is impossible to identify to whom such data belongs.

Data Controller. The entity responsible for decisions regarding data processing.

Data Processor. Someone who processes data according to the Controller's instructions.

Personal Data. Information that identifies a person, such as email, ID numbers, phone number, and address.

Sensitive Personal Data. A special category of personal data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (where used for identification purposes), health, sex life, sexual orientation.

IP. The IP address is a code assigned to a terminal on a network to allow its identification, defined according to international parameters.

Platform. The web and mobile digital space provided by **Teachy**, where the **User** can access the available functionalities and services.

Teacher. A registered user who can create and edit exercises and lists and make them available to **Students**.

Data Processing. Any operation performed with personal data, such as those related to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation, or information control, modification, communication, transfer, dissemination, or extraction.

User. A person who accesses and uses the **Platform** and **Teachy** services after registration.



2. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

TEACHY EDUCATION US INC (Teachy), located at 566 ARGUELLO WAY APT 323C STANFORD, CA 94305, the owner of this Platform, is responsible for processing the personal data of Users (Data Controller).

Teachy acts as a Data Controller regarding the **Teachers'** data, except when the data is entered into the Platform by contractual obligation with the **Educational Institution**, in which case **Teachy** will be acting as a joint Data Controller.

Teachy acts as a Data Processor is the Processor of Personal Data Processing regarding Students' data whose personal data is inserted into the Platform by the **Teacher** and/or the **Educational Institution**, which are the Data Controllers in that case, as the processing activities by **Teachy** will be carried out based on the decisions of the **Teacher** and/or the **Educational Institution**.

On the other hand, if a **Student** registers their own account for independent use of the **Platform**, **Teachy** will be considered a joint Data Controller of that data and will be directly responsible for the processing of that personal information as informed in this document.

ATTENTION! Regardless of **Teachy's** control or processing position, it cannot be held responsible for the use of the **Platform** by the **Teachers** and/or the **Educational Institution**, nor for the processing of personal data they determine during the use of the **Platform**, including the improper sharing of **Students'** personal data in the forums available for their use or others.

3. HOW WE PROCESS YOUR PERSONAL DATA

How we process your data and the purposes that justify this processing.

3.1. How your data is collected on the Platform

Registration on the **Platform** is done through social login, and the **User** can choose to use Google or Facebook for this purpose. The data contained in the chosen option will be used to create the account on the **Platform**.

Teachers will need to provide information about their school activities: the school(s) where they teach, the school year, and the number of students they have.

If the **Student** registers directly on the **Platform**, personal data will be collected to create the **User** account.



3.2. Usage Data

Teachers will also need to provide indirect information about their activities, including the number of exercise lists created, which exercises are preferred by each **User**, which exercises are used in each list, and other data related to the use of the activities.

Additionally, if the **Student** accesses the **Platform** directly through their registered **User** account, information regarding their use of the **Platform** may be collected, including exercise results and other data related to performance in activities, preferences, etc.

3.3. Data Collected Indirectly

Teachy may collect data indirectly as the **Users** navigate into the **Platform**, including information about their visits and activities, the content and any ads they view and interact with, information about the browser and device they are using, their IP address, location, and the website address from which they arrived.

Some of this information is collected using our indirect data collection tools.

We may also collect data through cookies. For more information, please refer to our [Cookie Policy](#).

Access logs are also collected, which consist of information regarding the date and time of use of a specific internet application from a specific IP address, in accordance with the applicable law.

3.4. Purposes and Legal Bases for the Processing of Personal Data

The personal data processed by us may vary depending on the type of User and the relationship established with **Teachy**. For this reason, we clarify that the data collected will only be used to fulfill the following purposes:

Data	Purposes	Legal basis
Personal information such as name, email, mobile number, photo.	Perform initial registration in the Teachy application.	<ul style="list-style-type: none">Performance of a contract between the User and/or an Educational Institution and Teachy.



Name, email, phone number	Communication and advertising.	<ul style="list-style-type: none">• Legitimate interests pursued by the Controller.
Educational and platform usage data (preferences, performance, results, etc.)	Ensure the functionalities offered by the Platform.	<ul style="list-style-type: none">• Performance of a contract.• Legitimate interests, to analyze the use of the platform.
IP Address, User Session, cookies, timestamps of actions.	<p>Collect information to identify and protect the Users and comply with legal obligations.</p> <p>Session data and data collected by cookies are used to optimize the User experience on the Platform, as well as for improvements and development.</p>	<ul style="list-style-type: none">• Compliance with legal obligations.• Legitimate interests pursued by the Controller (necessary cookies only).• User consent (other cookies).

3.5. Accuracy of Data

The **User** is responsible for the accuracy or inaccuracy of their personal data provided at the time of registration or subsequently, if necessary.

Teachy is not obligated to process or treat any data provided by the **User** if there are reasons to believe that the processing may lead to a violation of any applicable law or that the **User** is using the website or application for illegal, unlawful, or contrary to the **Policy** purposes.

4. HOW WE SHARE YOUR DATA

We only share the data necessary for the provision of services offered by the **Platform**.

Teachy may share data with contracted suppliers that make the **Platform** available, which may process personal data as data processors.

As a result, the personal data of **Users** may be accessed by:

- Schools.
- Pedagogical coordinators.
- Technology and cloud storage service providers.



- Legal and accounting advisory services.
- Marketing service providers.

When applicable, payments will be made through the payment gateway **Stripe**, which will be responsible for processing payments and ensuring the security of financial transactions.

In addition to the companies and suppliers mentioned above, **Teachy** may share personal data with specific employees and/or service providers to ensure the proper performance of its services.

Once these third parties have access to the shared data, they will be responsible for processing and securing this information, and they cannot use it for any other purpose, always in compliance with applicable law.

4.1. International Data Transfers

International transfers occur when we use cloud services for data processing or storage, and they are used to enable **Teachy** to provide services effectively. In doing so, **Teachy** will take all appropriate measures to ensure that your data is processed and shared securely and in compliance with current legislation and this **Privacy Policy**.

5. LINK TO THIRD-PARTY WEBSITES

The **Platform** may, from time to time, contain links to third-party websites and/or platforms, such as business partners and advertisers. When following a link, it is important to note that these websites/platforms have their own policies and privacy statements, and We are not responsible for these policies.

We recommend reviewing these policies and statements before submitting any personal data to these third-parties.

6. HOW WE PROTECT YOUR DATA

Our company is committed to the security of all its **Users** and, therefore, implements physical, electronic, and administrative procedures that ensure the privacy and security of your data, with technical measures in line with international standards and best practices.

All your data is stored in a secure environment on cloud servers.



Whenever it is possible, your data will be processed anonymously, meaning it will not be possible to identify them within the dataset we are processing.

All technologies used and employed by **Teachy** will always comply with current legislation and the terms of this **Privacy Policy**.

7. KNOW YOUR RIGHTS AND HOW TO CLAIM THEM

Access and Confirmation of Processing. You can request access to the complete list of collected and processed data, as well as confirmation of the processing of your personal information.

Correction of Personal Data. You can request the correction/rectification of data that is incomplete, inaccurate, or outdated.

Anonymization, Blocking, or Deletion. All data collected and processed by **Teachy** are intended for the provision of services and the proper performance of the **Platform**. If you believe that any of your data is being processed unnecessarily, in excess, or not in compliance with the law, you may request anonymization, blocking, or deletion.

Information about Sharing. You can request information about our partners and suppliers with whom we share data.

Revision of Automated Decisions. You can request a review of decisions made solely on the basis of automated data processing and the criteria used in these decisions, always respecting the commercial and industrial secrets of **Teachy**.

Data Portability. You may request data portability of your personal data to another service provider.

To claim any of your rights as a **Data Subject**, please contact us via the email privacy@teachy.com.br

8. HOW LONG DO WE STORE YOUR DATA?

The data provided by the **User** on the **Platform** will be stored and processed by **Teachy** as long as the **User** maintains an active account on the **Platform**.



If the **User** wishes, they can request the deletion of their account and personal data by sending a request to privacy@teachy.com.br.

Upon the request for deletion or the termination of the processing purpose, the **User's** data will be permanently deleted, except for data whose retention is required by law or regulation, and data that may be necessary for the regular exercise of rights in a judicial, administrative, or arbitration process.

9. GENERAL CONDITIONS

We inform you that it may unilaterally modify/update this **Policy** at any time. If this happens, the **User** will be notified, and the updated version will take effect upon its publication.

The User's access or use, following the disclosure of the update, will confirm the agreement and validity of the new Privacy Policy.

If you do not agree with our policies and practices, you should not use our services. Your use of our services is at all times subject to our [Terms of Use](#), which incorporates this **Privacy Policy**.

10. CONTACT

We are available to answer your questions, receive feedback, or address complaints through the following email: privacy@teachy.com.br.