Privacy Policy

Effective on 【December 1, 2020】

iTutorGroup (hereinafter referred to as "we", "us" or "iTutorGroup") respects and protects the privacy rights of all users who use the services provided by the iTutorGroup teacher Community (hereinafter referred to as "Community"). We will collect, store, use, protect and share the user's personal data in accordance with this Privacy Policy. We are committed to protecting your data and your right to privacy.

We sincerely welcome you to apply to be a member of the Community. Before you use the Community, we hope to explain to you how we collect, store, use, transfer, process, protect and share your data through this Privacy Policy. We will endeavor to make the relevant technical terms in this Privacy Policy concise and provide explanation for your ease understanding.

By ticking the box in the "I AGREE", you agree to be bound by this Privacy Policy, and understand that agreeing to the terms will be deemed as your written consent to iTutorGroup to collect, store, use, transfer, process and share your personal data. Your consent and the contract between you and us will be the law ground for us to deal with your personal data. Please read it carefully before sharing your personal data with us.

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What data do we collect?
You may be asked to provide your personal data when you are in contact with iTutorGroup for the purposes specified in this Privacy Policy. You are not required to

provide the personal data that we request, but if you choose not to do so, we may not be able to provide you with our products or services or response to your queries. The personal data we collect is as follows:

- **Personal data**
  When you apply to be the member of Community and agree to all the Privacy Policy, your Community account will be created with your personal information in the profile of your registered account in iTutorGroup system, include but not limited to email address, password, name, gender, date of birth, nationality, current location, education information, teaching experience and teaching certificate.

- **Log records**
  When you log in the Community, we automatically receive information from your device. We may record any account's log information, such as the websites from which you entered the Community, the websites to which you head when you leave the Community, the amount of time you spend on the Community, as well as your behaviors on the Community. If you log in our system, you agree to the recording and storage of such login activities.
  We will also record the IP address of your proxy server that you use to access the Internet and your type of device. We will use the foregoing information to help improve the Community.

- **Performance records**
  For the purpose of training, preventing inappropriate language and behavior, letting staffs or senior teacher mentors who are authorized to review after classes, when you attend any online events in Community via TM+ rooms, we may record all or part of the event(s) including your voice, accent, intonation, vocalization, facial expression, body movements, languages, typing content, and other part(s) of your interaction information to review afterward. Once you participate in any online event, you agree to the recording and storage of such audio and video recordings in our system.

- **Cookies**
  When you visit the Community, we may use cookies to collect the details of your visits. A cookie is a small file containing a string of characters that is sent to your computer or mobile device when you visit a website or an application. When you visit the website or application again, the cookie allows that website or application to recognize your web browser. Most web browsers can be set to disable the use of cookies. However, if you disable the cookies, you may not be able to access functionality on the Community correctly or at all.

- **Information from partners**

In order to provide better service, we may use some software development kits ("SDKs") in the Community. These SDKs partners will collect your data, including device information and activities information on the Community. We will require such SDKs partners to have lawful rights to collect and use your data before providing us with any data.

How will we use your data?

We will process and use your data as specified below within the time period for each purpose, or within the retention period in accordance with the relevant laws and regulations.

- **Internal use**
  We may use your data to:
  - Verify data you provide us
  - Register your account
  - Update your teacher profile
  - Communicate with you
  - Promote safety and security of the Community
  - Use internally, such as data analysis, and research to improve the Community
  - Check whether your device and internet satisfy the requirements of the Community
  - Provide necessary assistance in case of any technical issues
  - Recognize you when you return to the Community

- **Sharing with members (only limited information)**
  For others' understanding and acknowledgement of the contribution and performance of Community members, we may share your following data with our members:
  - Name (part of your name will be hidden from members)
  - Join date, last online
  - Contribution stats on your community profile
  - Other data you selected to disclose to other members, include but not limited to signature, location, birthday, honor badge, self-intro.

- **Legal purpose**
  We may access, preserve, and disclose your personal data or other account information if we believe it is required or appropriate to (a) comply with law, regulation, legal process, such as a court order or subpoena, or governmental request; (b) detect, prevent or address fraud, security or technical issues; and (c) protect against harm to your, our or others' rights, property or safety, or the public as required or permitted by law.

- **Sharing with affiliates**

We may share your data with our affiliates and use it consistent with this Privacy Policy. In the event that our affiliates intend to use your data outside of this Privacy Policy, we will seek your consent again.

How do we store your data?

We store data to ensure that personal data will not be kept longer than necessary in relation to the purpose for which they are collected. Different retention periods apply to different types of personal data that we hold, depending on the data collection/usage purpose and relevant legal and operational requirements, including backup, archival, audit, or other business purposes.

International data transfers

We run a live online interactive language platform globally to enable native speakers to share their language learning skills with English learners online without boundaries. We set up computer servers and business premises in Hong Kong, Mainland China, Taiwan, Japan and other countries, which may not be the country you currently reside in. In that scenario, PLEASE NOTE:

- Your personal data will be transferred overseas to our computer servers in Hong Kong, Mainland China, Taiwan, Japan, and your relevant information as specified above will be disclosed to the community members, staffs of our platform who reside in the above territories.
- Although Hong Kong, Mainland China, Taiwan, Japan all have their own laws or regulations of personal data protection, the content and level of protection may not be consistent with the law or regulation of country you currently reside in.
- Among the territories mentioned above, the European Commission has only recognized Japan as providing adequate protection so far, and currently we DO NOT execute any Appropriate Safeguards defined by General Data Protection Regulation EU(GDPR), including binding corporate rules, standard data protection clauses, approved codes of conduct, and approved certification. Please beware of this, especially when you currently reside in territory where GDPR apply to.
- Your use of the Community or submission of any personal data will be deemed as your consent to the transfer of your personal data outside of your home country.
- Your consent will be deemed as the law ground for us to process the international transfers of your personal data in most jurisdictions.

What are your data protection rights?

You have rights to decide whether to provide personal data at your sole discretion. However, your refusal, submission of incomplete data and/or any failure to disclose your personal data to us may lead to our inability to provide you with the relevant or more suitable services. And you have the following rights to your personal data:

- **Right to withdraw consent**
  You have the right to withdraw your consent of authorizing us to collect and process your data by sending written notification to us. The withdrawal of you consent will not affect the lawfulness of the collection, storage, usage, and sharing of your data until we receive a written notice that you withdraw your consent.

- **Right to access your personal Data**
  You may submit any inquiry and request for access of your personal data.

- **Right to rectify or update your personal data**
  You have the right to rectify and update your data to ensure that your data on our system is up to date, complete and accurate. You can rectify or update your data by accessing your community account settings and/or with the assistance of our staff.

- **Right to restrict or stop the collection, process or usage of your personal data**
  You have the right to require us to restrict or stop the collection, processing or usage of the personal data under certain conditions.

- **Right to delete or erase your personal data**
  You have the right to submit any request to remove, delete, or erasure your personal data in case that it is no longer required for the purposes of which your data initially collected or processed or when you withdraw your consent or require us to stop processing your data.

We may charge you a reasonable fee for the cost incurred when you submit unfounded and/or excessive requests of the rights mentioned above. If you make a request of the above rights, we will respond to you within one (1) month.

<u>Security</u>
By submitting your personal data, you agree to the storage of the collected data in our internal systems. Your personal data will be dealt by secure sockets layer encryption, which protects your data from being intercepted or read while in transit. Please be reminded that any data you disclose on the Community may become public. You should be extra cautious when disclosing personal data to any person. We will take all measures to ensure that your data is treated securely and in accordance with this Privacy Policy. However, no transmission of data through the Internet can be guaranteed to be entirely secure, and we are not able to ensure the security of any data you provide to us.

Automated decision-making

We may use automated decision-making, if it is authorized by legislation, if you have provided an explicit consent or if it is necessary for the performance of a contract. You can always request a manual decision- making process instead, express your opinion or contest decision based solely on automated processing, including profiling, if such a decision would produce legal effects or otherwise similarly significantly affect you.

Links to other websites

The Community may contain links to third party websites. Please note that we are not responsible for the protection of your privacy on other websites. When leaving the Community, it is recommended that you should be extra cautious and carefully read the privacy policies of other websites which collect your personal information. This Privacy Policy only applies to the information collected on the Community.

If you utilize search engine function of the third-party websites, such function is only for you to access the desired information quickly. You receive such information by utilizing the search engine of third parties, which shall not mean that we have any cooperation with the operators of the third party websites. If you encounter any dispute or damage by using such websites, please contact their operators. We assume no responsibilities and liabilities.

Changes to this privacy policy

According to the actual operational requirements or the laws and regulations, we may keep this Privacy Policy under regular review and places any updates on the Community. Your continued use of the Community will mean your acceptance of such changes and that any data collected or provided after such change will be governed by the updated Privacy Policy. If we intend to apply the amendments to this Privacy Policy retroactively or to personal data already in our possession, we will provide you with the notice of the changes and seek your explicit consent for such use to the extent required with applicable law. This Privacy Policy was last updated on October 18, 2020.

How to contact us

We value your experience and invite you to share your opinion or feedback regarding the Community and our services. If you have any comments, questions or suggestions on the Community, the data we hold on you, or you would like to exercise one of your data protection right, please contact us at the email teachersupport@iTutorGroup.com with the subject: *Inquiries on Teacher Community*.

[End of Content, Last updated on Nov 30, 2020]