

ALGORITHMICS GLOBAL FZE PRIVACY POLICY

This is the privacy policy of ALGORITHMICS GLOBAL FZE.

By using our platform, websites, services, products, software ("Services"), you understand and agree to the collection and use of your and your child's information in accordance with this privacy policy. Our privacy policy applies to all visitors, users, clients, and other natural persons who access to our Services ("you" or "your") provided we execute the function of data controller (joint data controller) with respect to your and/or your child's personal data.

PLEASE READ THIS POLICY ATTENTIVELY.

1. WHO WE ARE

IN SHORT: We are a group of companies developing an interactive platform for children whose parents are interested in their children receiving after-school programming classes. Customers get access to its functionality through our (sub)franchisees. We obtain and process personal data regarding our (sub)franchisees' clients as well as limited personal data of representatives of our potential (sub)franchisee in accordance with applicable legislation.

We, at Algorithmics Global FZE, have developed an interactive platform for children whose parents are interested in their children receiving after-school programming classes ("Platform"). We do not provide services to Customers directly. We attract trusted providers to become our (sub)franchisees. We grant them access to the functionality of Platform, administer the Platform, provide (sub)franchisees with all information that they need to start and operate business, support them in the course of their business' launch, check the quality of their services, and do other things that franchisors typically do with respect to their franchise network.

We therefore mainly obtain and process two kinds of personal data of our clients or our (sub)franchisee' clients: (1) when they provide our (sub)franchisee with their personal data as well as with the personal data of their children or (2) when we receive additional data directly from our (sub)franchisee' client in certain limited cases. We also process limited personal data of representatives (agents, employees or otherwise) of our potential (sub)franchisees.

While we also process some personal data of representatives (agents, employees or otherwise) of our existing (sub)franchisees, such processing is out of scope of this policy. We request our (sub)franchisees to obtain the consent of respective data subjects for such processing and rely on it. If for whatever reason they did not receive your consent for us to process your personal data, please contact us immediately using contact details provided below.

This privacy policy explains how we collect, use, share and protect information in relation to our Services. Our Services, other than the Platform and contact forms of our websites, are not designed to target data subjects specifically. Even if any personal data processing of data subjects takes place, this happens inadvertently or incidentally.

2. HOW TO CONTACT US

IN SHORT: You can find our contacts below. Our representative in a concrete country is the (sub)franchisee with whom you entered into service agreement. If in doubt, contact us at dpo@alg.academy

You may contact Algorithmics Global FZE regarding data processing issues using the following contact details: dpo@alg.academy

3. WHAT INFORMATION WE COLLECT

IN SHORT: We collect personal data that you provide to us such as your and your child's name, age, country, contact information. We get some personal data when you and (or) your child use our services or the services of our

(sub)franchisee to the extent they enter this information into our platform. Finally, we collect some personal data automatically.

(a) What data we collect

- ***Data you disclose to us***
- ***Data we get when and (or) after you use the services provided to you by our (sub)franchisee***

When you contact with us or one of our (sub)franchisees with the purpose to discuss our after-school programming classes for children, we get access to the following personal data:

- your name
- your location (country and address)
- your contact phone number
- your contact e-mail address
- your date of birth and your age
- your passport details
- your legal basis for exercising parental rights with respect to your child
- your child's name
- your child's gender
- your child's age
- your child's contact phone number
- your child's contact e-mail address
- other information with respect to you and/or your child that we receive from you or our (sub)franchisees put into our Platform

When you enter into agreement with us or one of our (sub)franchisees, we additionally get access to the following data with respect to you and/or your child:

- your child's individual progress with the services that we or our (sub)franchisee provides to you
- your and your child's preferred (sub)franchisee
- pages you or your child viewed
- the features you or your child use
- error reports
- links you or your child click on to leave or interact with our Platform
- other applications your child use on his or her device
- other information with respect to you and/or your child that we receive from you or our (sub)franchisees put into our Platform

After you enter into agreement with us or one of our (sub)franchisees, we may get in contact with you directly in a limited number of cases and receive the following data with respect to you and/or your child:

- your and your child's feedback with respect to Platform
- your and your child's feedback with respect to services that we or our (sub)franchisee provides or have provided to you, including your impression as to the quality of these services
- your and your child's feedback as to our staff or (sub)franchisee compliance with our standards and policies

Data we get when you contact us on behalf of our potential (sub)franchisee

If you are a representative (agent, employee or otherwise) of our potential (sub)franchisee and you approach us with the purpose to discuss entering into

franchise agreement, Algorithmics Global FZE gets the following personal data with respect to you:

- your name
- your location (country)
- your position with our potential (sub)franchisee
- your contact phone number
- your contact e-mail address
- your age (if you are above 18 years old)

(a) What data we collect automatically

We also collect the following data:

- Internet Protocol (IP) address when you or your child log into the Services and respective log information and error messages
- browser type that you or your child use when you access our websites
- type of device (personal computer/notebook, mobile device), respective unique device identifiers, such as device Media Access Control (MAC) address, precise location data, device motion data, or both, if you or your child grant permission to do so in your device settings
- time of access to our websites

(b) What data we receive from cookies

We will also receive information from cookies. We have special policy for cookies and for your convenience we placed it on our web-site <https://algorithmics.id>

(c) What data we have to have

We noted above that we administer the Platform and therefore we get access to all information that our (sub)franchisee inputs in it. It is impossible to restrict us from getting access to this information. You should not enter into agreement with our (sub)franchisee if you don't want that we get access to your and your child's data.

You however may opt-out that we contact you directly albeit we don't recommend doing that because in this case we may not guarantee that you receive services satisfying all standards that we impose on our (sub)franchisees.

4. HOW WE USE YOUR INFORMATION

IN SHORT: We use your and/or your child's personal data for a variety of business purposes. Below we explain how and for which purpose we use that information.

If you are a person exercising parental rights with respect to a child – we indicate the specific legal basis of processing grounds we rely on next to each purpose listed below:

Identify you and your child. We will use information to get understanding of a person who entered into agreement with our (sub)franchisee and of a person who uses the Platform and consumes our (sub)franchisee' services. We use this information based on your consent.

Contact with you and your child. We will use information to communicate with you and your child; to request feedback regarding our Platform, our or our (sub)franchisee' services and our (sub)franchisee' compliance with our standards and policies; to answer your requests; to provide you with any support and assistance that you or your child may need if for whatever reason you cannot or don't want to contact our (sub)franchisee directly. We need this information for our legitimate business interests and based on your consent.

Provide you and your child with personalized service. We will use this information to ensure that you receive from us or our (sub)franchisee the services that you have accessed or requested or the services that are the most suitable for your child; to personalize your and his or her experience; to make statistical analysis (including with the use of special web instruments, such as Google.Analytics); to provide technical support to you and your child in case you receive services from us directly or if for whatever reason you, he or she cannot or don't want to contact our (sub)franchisee. We need this information for our legitimate business interests and based on your consent.

Keep the results of your child's individual progress with our or our (sub)franchisee' services. We will use information to ensure that our staff or our (sub)franchisee provides you and your child with regular update of the progress your child has with the services; to ensure that our staff or our (sub)franchisee takes steps to identify areas for his or her further improvement; to ensure that our staff or our (sub)franchisee provides you with a tailored feedback; to make statistical analysis (including with the use of special web instruments, such as Google.Analytics); to ensure that we or our (sub)franchisee proposes you the services that are the most suitable for your child and other customers. We need this information for our legitimate business interests and based on your consent.

Improve our Platform and the quality of our (sub)franchisee' services. We will use information to improve, test, and monitor the effectiveness of our Platform and improve the quality of the services that we or our (sub)franchisees provide to their customers; to develop new services and features that we or our (sub)franchisees may propose to you and other clients; to make statistical analysis (including with the use of special web instruments, such as Google.Analytics); to monitor metrics such as total number of visitors, traffic, and demographic patterns; to protect and improve the security and safety of our Platform, you, your child and other customers, Algorithmics Global FZE, our (sub)franchisees, other business partners, and others. We need this information for our legitimate business interests and based on your consent.

Other business reasons. We will use this information to enforce our terms, conditions and policies, to respond to legal requests and prevent harm. We may

also use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our marketing efforts. We need this information for our legitimate business interests and based on your consent.

If you are a representative of our potential (sub)franchisee - we indicate the specific legal basis of processing grounds Algorithmics Global FZE relies on next to each purpose listed below:

Identify and contact you. We will use the information to get an understanding of a person who entered into contact with Algorithmics Global FZE; to communicate with you; to request feedback regarding the Platform, our compliance with our standards and policies; to answer your requests; to provide you with any support and assistance that you may need; to maintain our business relations with respective (sub)franchisee. We need this information for our legitimate business interests and based on your consent.

Where our legitimate business interests are mentioned this includes, depending on purpose, building client-tailored Platform, ensure (sub)franchisees' compliance with our standards, develop our sub-franchise network, extend the list of client offerings, increase of the overall information security of the modern society, extend the spectrum of professions' choice available for children.

We receive your consent when you agree with our privacy policy in respective Service or enter into agreement with us or our (sub)franchisee. Please draw your attention that you may opt-out your consent in certain cases (i.e. when and to the extent our (sub)franchisees are able to service you without your consent) albeit we don't recommend doing that because in this case we may not guarantee that you receive services satisfying all standards that we maintain and we impose on our (sub)franchisees.

We may use both manual and automated systems, such as machine learning and artificial intelligence, to process your and/or your child's personal data.

Your and/or your child's personal data will not be used for any automated decision-making, including profiling. We do not sell, trade or otherwise transfer user's personal data to any third parties for commercial purposes.

5. DO WE SHARE YOUR INFORMATION WITH ANYONE

IN SHORT: Yes, but we only do this with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.

There are several situations when we can share your and/or your child's personal data, namely:

Your consent. You give us the consent to share your and/or your child's personal data with our other (sub)franchisees in your region including, inter alia, if for whatever reason you terminate purchasing services from this (sub)franchisee, terminate your other relations with such a (sub)franchisee, or if we terminate our franchise agreement with that (sub)franchisee. In all other cases (except for those outlined further in this section) we will request your consent to share your and/or your child's personal data.

Compliance. We may disclose your and/or your child's personal data where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

Vital Interests and Legal Rights. We may disclose your and/or your child's personal data where we believe it is necessary to enforce, remedy, or apply our terms of service and other agreements; for debt collection; to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the rights, property or safety of any person (including Algorithmics Global FZE, (sub)franchisee, you or your child) and illegal activities, or as evidence in litigation in which we are involved.

Third-Party Service Providers. We may share your and/or your child's personal data with third-party vendors, service providers, advertising companies, contractors, agents or other business partners who perform services for us or on our behalf and require access to such information to do that work and only to the extent they need such info to do that work. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity, arrange for joint sales, promotions, and events, enable us to operate our business or to offer you certain products, services or promotions. Some of those third-party service providers may use information about your or your child's visits to our websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

Unless described in this policy, we do not share, sell, rent or trade any of your and/or your child's personal data with third parties for their promotional purposes.

Business Transfers. We may share or transfer your and/or your child's personal data if we are involved with a merger, asset sale, financing, liquidation, bankruptcy, or the acquisition of all or part of our business to another company. In such a case we may need to share information with that company and its advisors.

Affiliates. We may share your information within Algorithmics Global FZE and with our affiliates, in which case we will require them to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

All credit/debit cards' details and personally identifiable information will NOT be stored, sold, shared, rented or leased to any third parties.

<https://algorithmics.id> will not pass any debit/credit card details to third parties.

<https://algorithmics.id> takes appropriate steps to ensure data privacy and security including through various hardware and software methodologies. However, <https://algorithmics.id> cannot guarantee the security of any information that is disclosed online.

The <https://algorithmics.id> is not responsible for the privacy policies of websites to which it links. If you provide any information to such third parties different rules regarding the collection and use of your personal information may apply. You should contact these entities directly if you have any questions about their use of the information that they collect.

6. HOW, WHERE AND FOR HOW LONG WE STORE PERSONAL DATA

IN SHORT: We keep your and your child's data to the extent we need to fulfill the purposes outlined in this policy unless the law requires otherwise. We aim to protect your and your child's data with the use of a system of organizational and technical security measures.

Algorithmics Global FZE does not retain your and/or your child's personal data any longer than it is required for attaining the purposes for which it was collected. Your and/or your child's personal data will be deleted or blocked as soon as the purpose for its storage ceases to apply, provided the deletion of the same is not in breach of any statutory storage obligations.

If you are a person exercising parental rights with respect to a child, your and/or your child's personal data will be deleted once our (sub)franchisee deletes it from the Platform. If this happens, we will also delete your and your child's respective personal data that we obtained directly within thirty ('30') calendar days.

If you are a representative of our potential (sub)franchisee, we will delete your personal data within thirty ('30') calendar days after our last contact.

Please draw your attention that the advantage of our Platform is that you can always see your child's progress with services you obtained from our (sub)franchisee irrespective of time elapsed from the completion of respective service (including in case we terminated our business relationships with that (sub)franchisee). We will therefore store your and/or your child's personal data to extent we must satisfy your potential request to see the child's progress with our or our (sub)franchisee' services.

We will also continue keeping your and/or your child's personal data to the extent necessary for either of the following purposes:

- to send you newsletter, marketing and promotional communications (this you can change at any time)
- for legal and regulatory compliance purposes
- for general Services' improvement purposes

We will permanently delete or de-identify the above information in accordance with our standard data retention practices once all the above purposes cease to be applicable.

We will also permanently delete or de-identify your and/or your child's personal data once you specifically ask us to delete it.

It may happen that we are unable to fully delete or de-identify your information due to technical or other operational reasons (for example where information has been archived and stored in backup systems). Where this is the case, we will take reasonable measures to securely isolate information from any further processing and store it until such time as we are able to delete or de-identify it.

Algorithmics Global FZE has taken appropriate technical and organizational measures by using the latest technologies to protect your and/or your child's personal data against loss or unlawful processing but there cannot be 100% guarantee that would safeguard your and/or your child's personal data a from unpermitted disclosure or leakage.

While we will do all reasonable effort to protect your and/or your child's personal data, internet itself is not a secure means of transmission. Your internet connection is at your own risk. This is your responsibility that you and your child access to Services with the use of a secure internet connection. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to e-mails between you, your (sub)franchisee and Algorithmics Group, at all times.

7. WHAT RIGHTS YOU HAVE

IN SHORT: You have certain rights with respect to your and/or your child's personal data that we collect and process.

You have a variety of rights granted to you pursuant to applicable legislation. Below we outline the main of them in brief albeit there are others that we did not list. Should you need more detailed guidance, please contact us, our representative or independent legal specialist on your rights.

Right of consent withdrawal. You have the right to withdraw from us your consent to process your and/or your child's personal data at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. For more details on this right please read applicable legislation.

Right of access. You have the right to obtain from us confirmation as to whether your and/or your child's personal data are being processed, and, where that is the case, access to that personal data, the information concerning how we process it and some other information. For more details on this right please read applicable legislation.

Right to rectification. You have the right to obtain from us the rectification of inaccurate your and/or your child's personal data. You also have the right to have incomplete personal data completed. For more details on this right please read applicable legislation.

Right to erasure ('right to be forgotten'). You have the right to obtain from us the erasure of your and/or your child's personal data, and we will erase that personal data without undue delay. For more details on this right please read applicable legislation.

Right to restriction of processing. You have the right to ask us to restrict processing your and/or your child's personal data. For more details on this right please read applicable legislation.

Right to object. You have the right to object on grounds relating to your particular situation to processing of your and/or your child's personal data and we will no longer process that personal data unless we are able to demonstrate compelling legitimate grounds for such processing. For more details on this right please read applicable legislation.

Right to data portability. You have the right to receive from us your and/or your child's personal data which you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. For more details on this right please read applicable legislation.

Right to lodge a complaint. You have the right to lodge a complaint with a supervisory authority. For more details on this right please read applicable legislation.

You can always manage the privacy of your and/or your child's personal data by updating your privacy settings, by managing marketing and promotional communications from us or changing your browser settings to opt-out of cookies in your browser settings (if you however disallow some or all of the cookies, the Services may not work).

We respond to all requests we receive from individuals in Indonesia that are using the Services directed to Indonesia wishing to exercise their data protection rights in accordance with applicable data protection laws.

To file a request or act on one of your rights, please contact us at the contact details provided above in section *How to Contact Us*.

8. DO WE PROCESS YOUR PERSONAL DATA OUTSIDE INDONESIA

IN SHORT: We store your and/or your child's personal data in Finland and process it in Indonesia and UAE. Our (sub)franchisee, who is the joint controller of your and/or your child's personal data, stores and processes the data in

Indonesia. We will ensure an adequate level of protection for your and your child's rights and freedoms.

We store your and/or your child's personal data on our servers located in Finland and Western Asia.

Since Algorithmics Global FZE is a UAE company, we will process your and/or your child's personal data in UAE. We are committed to ensuring an adequate level of protection for your rights and freedoms.

Given that certain ambiguity still exists regarding our processing status with respect to your and/or your child's personal data, we believe that we together with respective (sub)franchisee are the joint controllers of your and/or your child's personal data. Taking account of this we are entering into data transfer agreements with each of our (sub)franchisee to ensure our compliance with standard contractual clauses for data transfers.

9. HOW WE ARE CONNECTED WITH THIRD-PARTY APPLICATIONS, WEBSITES AND SERVICES

IN SHORT: We are generally not connected. If you go from your webpage to their applications, websites and services, this policy does not apply, and you are covered by their policies. Similarly, their policies do not work with our Services and you should carefully read our policy.

We are not responsible for the practices employed by any applications, websites or services linked to or from our Service, including the information or content contained within them.

You need to remember that when you use a link to go from our Service to another application, website or service, our privacy policy does not apply to those third-party applications, websites or services. Your browsing and interaction on any third-party application, website or service, including those that have a link on our Services, are subject to that third party's own rules and policies.

10. HOW DO WE SAFEGUARD CHILDREN'S PRIVACY

IN SHORT: We do not intentionally collect data directly from children under 18 years of age without the permission of a person exercising parental rights with respect to a child.

If you are a representative of our potential (sub)franchisee and you are under 18 years old, you should immediately stop using our Services.

If you are a person exercising parental rights with respect to a child, please draw your attention to the following.

Our services and services of our (sub)franchisees are primarily consumed by children and we therefore need some personal data from them even if they are under 18. We however request our (sub)franchisees to target their services to persons exercising parental rights with respect to a child and therefore we aim at receiving information regarding children under 18 from their parent or guardian or from children but with parents or guardians' consent.

We never knowingly enter in contract directly with a child and request our (sub)franchisees to never knowingly enter in contract directly with a child and to always seek for a person exercising parental rights with respect to him or her with the purpose that this person read and understand this policy and, further, contract with us or our (sub)franchisee, if they decide so.

If you are a parent or a guardian and you are aware that your child has provided us with their personal data without you having knowledge of that, please contact us. If we become aware that we or our (sub)franchisee have collected personal data from a child under age 18 without verification of parental consent, we will take steps to permanently remove that information from our servers.

11. WILL WE CHANGE THIS PRIVACY POLICY

IN SHORT: Yes, we will. We will always keep an updated version of our privacy policy on our webpage <https://algorithmics.id> so you can always read it.

We will continually review our privacy policy to ensure that it accurately reflects the applicable legislation, our processing activities and where we process the personal data for a new purpose which was not indicated in the initial policy, then we will provide a notice of policy amendment to cover this.

We reserve the right to make changes or updates at any time. We will notify you of any changes by posting the new privacy policy on <https://algorithmics.id>. We recommend that you review this privacy policy periodically. If we make material changes to the way we process your personal data, we will provide you notice and if required by applicable data protection laws seek your consent to those material changes.

Amendments to this privacy policy are effective only when they are posted on the link that we mentioned above.