

PRIVACY POLICY

SUBJECT APPLICATION

1.1. This Privacy Policy ("Policy") governs the privacy practices of our website located at <https://discoveryschool.eu> ("Site") and the tools through which we provide you or you provide services to us (collectively, the "Services" or the "Platform").

1.2. The Policy is a legal document that explains how DiscoveryTime OÜ , registration number 14323907, address: 10621, Tuuliku tee 4c Tallinn Harjumaa, Estonia ("Company" or "we"), collects, stores, processes and transfers data about you that we receive when you access or use the Platform ("Personal Data").

1.3. By using any Service or providing any Service, you agree to the Policy and accept it in full.

1.4. Please read the Policy carefully to help you understand its scope and make an informed decision about providing us with your Personal Data. 2.

WHAT INFORMATION WE COLLECT

2.1. We collect several types of Personal Data for various purposes related to providing you or receiving our Services and improving their quality:

2.1.1. information you provide to us. You provide it when you fill out certain forms on the Platform, or when you communicate with us, such as by email, phone, messenger or social media. It includes information that you provide to us when you register to use the Platform. When you write or call us, we keep a record of such messages. The information you provide may include, among others, the following Submissions:

Information type	What information do we collect
Contact and personal details	Full name, date of birth, gender, language, home address (city and state/region), email address, phone number, Skype login, Facebook name
Account	Username, password, account settings and preferences
Financial	Bank account details, if we request them (for example,

information	to make a payment or refund)
Identification	copies of identity documents, such as a passport, identity card of a citizen; driver's license (for teachers; for users - only on our request); documents confirming education (for teachers); documents confirming age (if we request them); any other information that you provide to us so that we can comply with our legal obligations and you can prove your eligibility for the Services.
Additional	links to your Google account; accounts on facebook.com, google.com, learning goal; hobbies and interests; sphere of professional activity; resume (for teachers); country, city and school (for teachers and users participating in our Olympiad, quest or other events); disciplines taught by the teacher (for teachers participating in our Olympiad); the level and name of the Olympic classes in which the teacher or user participates (for teachers and users participating in our Olympiad, quest and other events); whether you open our e-mails and click on the links in them; photographs, audio and video recordings of activities in which you participate; information about participation in lessons; information about your consent to the use of a video camera and microphone during classes; recording telephone conversations with users, including users responsible for launching corporate programs in their companies; correspondence with users responsible for launching corporate programs in their companies
About a minor user (if applicable) - in addition to other information	parental consent; information about parents (full name, date of birth, gender, address (city and region / region), phone number, Skype, name in social networks, email); family members; the class and school where the user is studying; the subject of interest to him, additional courses, classes, etc. (for example, teachers).

2.1.2 Information that is collected automatically. We collect certain information automatically when you visit, use or navigate the Platform. We

need this information to maintain the security and smooth operation of the Platform, as well as for data analysis and reporting. This information may include information about your computer or mobile device and how you use it. Examples of such information are: device information, IP protocol, browser type and version, operating system, language settings, mobile network information, mobile phone operating system, mobile device browser type and version, current location, URL format links, usage information : for example, the time you entered and exited the Site, which pages you visit and what features you use, technical information listed on the Platform, such as information about cameras, microphones, headphones and Internet access speed (“Usage Data”).

2.1.3. Data we may collect from third parties. We may receive information about you from other sources, including third parties that help us update, expand and analyze the information we have; prevent or detect fraud; process payments; or analyze how you use the Services (“Third Party Data”).

2.1.4. The information we collect serves specific purposes, such as the use of the Services and/or the Company's operational goals. The Company undertakes not to use any information collected for purposes that are inconsistent with or different from the purposes for which the information was requested.

3. USE OF DATA

3.1. We use the personal information we collect through the Platform and/or any of the means described in clause 2.1.1 for the following purposes:

3.1.1. when it is necessary for our legitimate business interests; and/or

3.1.2. for the purpose of entering into a contract with you for the use of the Platform or its execution; and/or

3.1.3. for our normal financial and business activities; and/or

3.1.4. when you have consented to the processing of information; and/or

3.1.5. in order to comply with their legal obligations.

3.1.6. in order to protect their legal rights and enforce judicial and/or administrative orders, if necessary

3.2. Below you will find a description of how we use your Personal Data, on what legal basis, and what our legitimate interests are (if any):

Type of data used	Purpose and/or direction of work and legal basis
3.2.1. Provided data	(1) Organization of necessary checks; (2) enter into an agreement on the use of the Platform between you and us at your initiative; (3) the performance of such agreement, which includes: (i) the creation and maintenance of your account; (ii) establishing and maintaining a responsible commercial relationship with you; (iii) to fulfill our obligations under a contract with you and to assist you in the performance of the contract; (iv) enforce our terms, rules and policies with respect to the Services; (v) identification (data identification) of your account in our automated management systems, in particular CRM.
Provided data. Usage Data, Third Party Data	(1) verify your identity - (i) to prevent fraud, deception and other illegal activities; (ii) verify your eligibility to use the Services; (2) improve our anti-fraud practices. Our legitimate interest is to ensure that the Platform is not used for fraud and all users have the right to use it
Submitted Data, Usage Data	For our legitimate interests: communicating with you and direct marketing. If you consent, we will send you news, information about changes to the Services, special

	<p>offers, and general information about other services we offer that are similar to those you have already purchased or inquired about. The Company understands that you agree to receive this information in the absence of a request to cancel or refuse to receive this information.</p>
<p>Submitted Data, Usage Data, Third Party Data</p>	<p>For our legitimate interests: (1) collect analytical or valuable information that will allow us to evaluate the Services and improve their quality; (2) detect, prevent and resolve technical problems of the Platform; (3) manage the Platform in the context of internal activities, including troubleshooting, data analysis, testing, research, statistics and surveys; (4) ensure that we present the contents of the Platform to you in the most effective manner; (5) maintain the security and reliability of the Platform.</p>
<p>Submitted Data, Usage Data</p>	<p>To comply with our legal obligations: (1) to respond in legal, regulatory, arbitration proceedings; (2) respond to requests for information from public authorities or other third parties; (3) prevent harm as required by law. In the event that we receive a subpoena or other request from a judicial authority, we may need to check the information we have in order to determine how to respond.</p>

3.3. Please read the description of the information we use based on your consent:

User category	Personal data we process based on your consent
Users, including minors	A copy of an identity document and bank account details (on request); full name; E-mail address; phone number; links to the user's Google account; accounts on facebook.com, vk.com, ok.ru; messenger accounts: WhatsApp, Viber, Telegram, Skype; whether you open our e-mails and click on the links in them; current location; gender; Date of Birth; photos, video and audio recordings of lessons; level of English (beginner and further); The purpose of training; hobbies and interests; sphere of professional activity; information about participation in lessons; phone call records. For minors - in addition to the information listed in the current paragraph 3.3.1: information about members of the user's family; information about the school where the user is studying; the subject of interest to him (lessons of English or mathematics); additional courses, classes, etc. (for example, tutors)
Potential user (you register on the Platform, but do not take lessons).	Full name; gender; E-mail address; phone number; current location; Date of Birth; knowledge level; The purpose of training; hobbies and interests; sphere of professional activity; whether the user opens our emails and clicks on links in them; information about participation in

	lessons; language; address (city and region/region); telephone conversation records
User responsible for running the enterprise program in your company	Full name; E-mail address; phone number; current location; records of telephone conversations; correspondence
Teacher	A copy of an identity document; photo; gender; Date of Birth; photographs, video and audio recordings of classes; current location; information about education; exam certificates; summary; telephone conversation records
Contractor	A copy of an identity document; current location; photo; gender; Date of Birth; telephone conversation records
User participating in our competitions, quests or other events	Date of Birth; gender; country, city and school; current location; telephone conversation records
Teacher participating in our competitions, quests or other events	Date of Birth; gender; country, city and school; current location; telephone conversation records
Parent of a user participating in our competitions, quests or other events	Date of Birth; gender; current location; telephone conversation records
Parents of other underage users	Date of Birth; gender; current location; telephone conversation records

4. WHEN WE DISCLOSE INFORMATION TO THIRD PARTIES

4.1. We share information only in the following cases:

4.1.1. as required by law;

4.1.2. to protect your rights;

4.1.3. to fulfill business obligations (for example, if you need to engage a third party to provide you with the Services);

4.1.4. if you give us your consent.

4.2. By accepting the Policy, you agree that we may disclose information about you only:

4.2.1. as required by law. We may disclose information about you where we are required to do so by applicable law, government requests, legal proceedings, court orders or legal process. For example, we may disclose information in response to a court order, subpoena, national security or law enforcement request. We may also disclose information about you when we are investigating or cooperating in the investigation of fraud or other illegal activity in order to prevent and detect fraud or other crime;

4.2.2. in order to allow third parties to provide services. We may share your information with business partners, service providers, contractors or agents who provide services to us or on our behalf and require access to such information in order to fulfill obligations. Examples of such third party services are: payment processing, data analysis, email delivery, hosting, customer service, providing us with access to anti-fraud databases, verification. We may allow certain third parties to use tracking technology on the Platform, which will allow them to collect data about how you interact with the Platform over time. We may also share information about you with our affiliates. Affiliates include our parent companies and any subsidiaries, joint venture partners or other members of our group of companies. Our affiliates, partners and contractors will also be required to comply with our data processing and security standards;

4.2.3. when transferring business. We may disclose or transfer your information in connection with any merger, sale of company assets, financing or acquisition of all or part of our business by another company, or during negotiations for any of these. We undertake to notify you before your personal data is transferred and becomes subject to a different privacy policy;

4.2.4. if you have given your consent. We may disclose your Personal Data for the other purposes described in section 5 if you give us your consent to do so.

5. WHO WE SHARE INFORMATION WITH

5.1. Competent authorities:

5.1.1. Upon request, as well as in the cases described in clause 4.2.1.

5.1.2. To resolve any conflict or dispute arising between users and DiscoveryTime OÜ 10621, Tuuliku tee 4c Tallinn Harjumaa, Estonia 5.2. Billing and payment service providers:

5.2.1. We transfer and disclose Submitted Data, including the number and/or date of issue of an identity document, a copy of it (for example, a passport), to Billing and payment service providers. We share and disclose Submitted Data to Billing and Payment Processing Providers only if they request it. If you do not use Billing and Payment Providers on the Platform, we will not share the Submitted Data with them.

5.2.3. We do not collect or store your credit card information. You provide this information to our Billing and Payment Providers. How they use the Submitted Data to process payments is governed by their privacy policy.

5.3 Advertising Platforms and Applications: The platforms we use for advertising allow us to optimize and serve advertisements based on Platform usage data, i.e. tracking usage data and cookies.

Platform	Managed by whom	Purpose for which we use it	Who and how stores and processes data	Where to find their privacy policy	How to reject their policy
Google Ads Google	Google: 1600 Amphitheater Park	(1) tracking your activities after	Google	https://policies.google.com/privacy	according to the instructions on the page https://policies.google.com/privacy

<p>Analyt ics; Fire bas e</p>	<p>way, Mou ntain View , CA 9404 3, USA</p>	<p>you have been redir ecte d to our Platf orm by clicki ng on an adve rtisin g link on Goo gle; (2) mea surin g the perf orm ance of Goo gle ads for the purp ose of mark et rese</p>		<p>oogle e.com/te c hnologie s/ ads, in the section "How to manage advertisi ng cookies"</p>
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		arch and statistics, in particular to better understand and display ads and make			
Facebook Pixel; Facebook SDK	"Facebook": (1) Facebook Inc., 1601 Willow Road, Menlo Park, CA 94025, USA - if	(1) tracking your activities after you have been redirected to our Platform by clicking on a	Facebook. The data is anonymous to us. Facebook may link this data to your	https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect HYPERLINK "https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0"& HYPERLINK "https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0"entry=0	(1) for Facebook Pixel, through your Facebook account settings. You can do this for both Facebook Pixel and cookies; (2) for Facebook SDK - through

	<p>you live outside the EU; or (2) Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland - if you live in the EU.</p>	<p>Facebook ad; (2) measuring the performance of Facebook ads for market research and statistics purposes, in particular to better understand and serve ads and make</p>	<p>Facebook account and use it for its own advertising purposes.</p>		<p>your device settings a.</p>
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		them mor e relev ant to you			
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USE OF COOKIES

6.1. How we use cookies

6.1.1. We use cookies to distinguish you from other users of the Platform. This helps us improve your experience and the Platform itself by storing your preferences and analyzing how you use the Platform.

6.1.2. A cookie is a small piece of text that is stored in your browser when you visit the Platform. Our Site transmits cookies to your browser; your device saves them. We assign a separate cookie to each device from which you access the Platform.

The use of cookies does not give us access to any other data on your device than the data stored in the cookie. The cookies we collect do not contain your personal information such as your name or address.

6.1.3. Cookies are stored indefinitely, not just for the duration of the session. However, you can easily delete cookies in your browser settings. You can find out more about managing cookies in section 6.3.

6.1.4. By using the Platform, you agree to the use of cookies described in the Policy.

6.2. Types of cookies we use

Category	How do we use them
Mandatory cookies	They are necessary for the operation of the Platform. Some parts of the Platform would not work without the use of these cookies.
Functional	We use them to determine your preferences and

cookies	customize the Platform in accordance with them. Functionality cookies allow us to remember your settings on the Platform and store information you have already provided (such as login, username, language and other preferences) to improve your browsing experience. These features help us to make the Platform more convenient for you.
Analytical and operational cookies	(1) contain information about how you use the Platform, including which pages you visit most often; (2) allow us to see recurring use cases for the Platform; (3) help us record any errors that occur during your use of the Platform. These cookies do not identify you personally and all information is anonymous to us. We use it only to improve the operation of the Platform. We can engage third parties to monitor and analyze how you use the Platform in the manner set out in this policy.
Third party cookies	Some of our third party service providers use their own cookies on our Platform and we have no control over these cookies. Third party providers use their cookies for analysis and targeting purposes. The use of data that third party providers collect through their cookies is governed by their privacy policy. This Policy does not govern the use of cookies by third party service providers. A list of providers with whom we share information can be found in Section 5.

6.3. Cookie management

6.3.1. You can change your cookie settings at any time, delete or reject all cookies: simply activate the setting on your browser that allows you to refuse cookies.

Please note that this may result in the inability to access certain features Platforms.

6.3.2. For more information on how to manage cookies, including opting out, please refer to your browser settings: Chrome, Edge, Firefox, Internet Explorer, Opera, Safari. You can also refuse cookies used by Google, Facebook, as indicated in paragraphs 5.4.1, 5.4.2 and 5.4.3.

7. FIRST ENTRY AND/OR SOCIAL LOGIN

7.1. Our Platform enables you to register and log in using your Facebook or Google account. If you choose to log in using a social network account, that social network will provide us with your Personal Data. By logging in with a social network account, you authorize us to collect, store and use in accordance with the Policy all the data that you have authorized the social network to provide to us. Such data includes: (1) “general” Personal Data: your first and last name, gender, date of birth, location, username, email address, phone number, links to other social media accounts, list of friends; (2) sensitive data such as your photo; (3) any other data that you choose to make available. The data we receive from a social network depends on your settings and its privacy policy. We will use received data only for the purposes described in the Policy.

7.2. When you create an account to access and use the Platform, you warrant that

the information you provide is always accurate, current and complete.

7.3. Your account exists, and the use of the Services is for personal non-commercial purposes, but not for the benefit of third parties. You are solely responsible for maintaining the confidentiality of your account and password, including restricting third party access to the Application, the Site and any electronic means (for example, computer, tablet, etc.) through which you log into the Platform or the Site.

You assume all responsibility and liability for all activities that occur on your account under your user details.

7.4 You must notify the Company immediately if you become aware of or suspect any breach of security or unauthorized use of your account.

7.4. You may not, without proper authorization, use a username that is the name of or implies the name or identity of another person or entity whose use is illegal, a name or trademark in which any rights are owned by a person or entity other than you. It is forbidden to use an offensive, vulgar or obscene username. The Company reserves the right to refuse service, terminate accounts, remove or edit content at its sole discretion.

8. SHARING YOUR INFORMATION

8.1. The countries to which we or third parties we interact with transfer your data may not have the same data protection laws as your jurisdiction. Therefore, in these cases, we take reasonable security measures prescribed by applicable law to ensure that your data is adequately protected when it is transferred outside of your jurisdiction.

8.2. By accepting the Policy and providing us with your Personal Data, you consent to such transfer. If you do not agree to such data transfer, you will no longer be able to use the Platform. If you are a resident of the European Economic Area (EEA), we may transfer your data outside the EEA in order to perform a contract with you (provide the Services to you), as we provide services worldwide. When we make such a transfer, we: (1) comply with our legal and regulatory obligations; (2) take appropriate precautions, such as complying with standard data protection provisions. We will take all steps necessary to ensure that your data is treated securely and in accordance with the Policy.

8.3. The policy applies regardless of where we store or process your Personal Data

8.4. Where we have given you (or where you have chosen) a password that allows you to access the Platform, you are responsible for keeping that password confidential. Please do not share your password with anyone.

9. STORAGE OF YOUR INFORMATION

9.1. The retention period for your data depends on the category of user you belong to:

User category	Storage period
User	12 months after you completed your last lesson on the Platform
Potential user (you register on the Platform, but do not take lessons)	mandatory period established by law (if any)
User responsible for running corporate program in your company	12 months after the last user from that user's company completes the last lesson on the Platform. Exception: if we are told that such user has left or has been fired from the company; in this case, we will delete or anonymize his Personal Data within one business day after receiving the notification
Teacher	12 months after your last lesson on the Platform
Contractor processing Personal	One month after termination of the

data taking part in our competitions, quests and other events	contract with you;
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9.2. A longer retention period may be required or permitted by law.

9.3. At the end of the retention period, we:

9.3.1. delete your personal data; or

9.3.2. depersonalize them so that they are no longer attached to you. We may use such non-personal information for research or statistical purposes or to improve our Services. We may use them indefinitely without prior notice.

9.4. We must, for a mandatory period of time (if any), keep even the Personal Data that we collected when you registered an account on the Site, but did not activate it (for example, did not complete the verification) or did not pay for the Services. The current clause 9.4 only applies if a mandatory retention period is required by law or our contractual obligations

10. DATA PROTECTION

10.1. We use appropriate physical, electronic, managerial and technical safeguards to ensure the security of all Personal Data we process. However, please be aware that we cannot ensure or warrant the security of your data that you submit to the Platform. While we will do our best to protect your Personal Information, transmission of Personal Information to and from the Platform is at your own risk. Please use the Services only in a secure environment: for example, use firewalls, choose an ISP that encrypts traffic, etc. Once we receive Personal Data, we follow strict rules and use security measures to prevent unauthorized access. However, we are not responsible for any damages related to unauthorized access to Personal Data.

11. PRIVACY OF DATA OF MINORS

11.1. Our Services are intended for a general audience and may be used by minors. Minors may access certain public areas of the Site and its content without providing us with Personal Information. However, minors who wish to access all content and functionality of the Services must register. Registration involves the collection of certain Personal Data. We may ask you to provide us with information and proof of age. If you are a minor, we may require you to provide us with proof of separation from parental custody or the legal consent of your parent or legal guardian.

11.2. In addition, we use certain technologies, such as cookies, to automatically collect information from our users (including minors) when

they visit or use the Platform. We collect, process, store and disclose the data of minors in the manner prescribed by this Policy.

12. YOUR DATA PROTECTION RIGHTS

12.1. Your data protection rights:

Right	What are you entitled to do	How to exercise the right
Access to personal data	(1) obtain confirmation if we are processing your Personal Data(2) access your Personal Data and information about how we use your Personal Data	Please contact us at the address indicated in section 15
Correct inaccurate data	Request correction of any incomplete or inaccurate Personal Data about you	Please contact us at the address indicated in section 15
Object against data processing	Object to the processing of your Personal Data if we process it for our own legitimate interests (see examples of our legitimate interests in clauses 3.2.2-3.2.4), use it for direct marketing or for statistical purposes	Please contact us at the address indicated in section 15
Demand from us to make your data portable	In certain circumstances, require that we provide you with a copy of your Personal Data in a structured, commonly used and machine-readable format	Please contact us at the address indicated in section 15
Delete your data under certain circumstances	Request that we delete your Personal Data. For example, if we no	Please contact us at the address indicated in section 15

	longer need them or you withdraw your consent that was the basis for the data processing	
Revoke consent to data processing	Withdraw your consent to the processing of your Personal Data	Please contact us at the address indicated in section 15
Restrict processing	Request us to restrict or stop the collection, use, processing and/or disclosure of your Personal Data	Please contact us at the address indicated in section 15
Revoke consent to electronic marketing	Opt out of receiving promotional emails	Please contact us at the address indicated in section 15 or follow the unsubscribe link in any of our promotional emails
Be informed of the precautions we take when transferring data to a third country or international organization	Ask us about these measures	Please contact us at the address indicated in section 15
File complaints	File a complaint to a data protection authority about our collection and use of your Personal Data	Please contact your local supervisory body

12.2. Please be aware that there may be exceptions to these rights under Cypriot data protection law, which we must comply with, or under the law, which the data controller with whom we cooperate must comply. So Therefore, we have the right to refuse a claim to exercise your rights if it is permitted or required the said laws.

12.3. If we deny your claim, we will describe the reasons for the rejection in our response. In any case, you have the right to file a complaint against our refusal with the supervisory authority.

12.4. Please note that we may ask you to verify your identity before responding to a request, and in certain circumstances we may charge a fee to cover our costs. The response time is one month after the receipt of the request. If it takes longer to process your request, we will notify you. In any case, we cannot extend the response time by more than two months after the end of the first response month. The current clause 12.4 does not apply to requests referred to in clauses 12.1.8, 12.1.10.

12.5. If you unsubscribe from our marketing communications (Section 12.1.8), we will still need to send you Service-related emails necessary to administer and use your account.

12.6. We do not use automated decision making (creating user profiles based on Personal Data, etc.).

14. POLICY CHANGES

We reserve the right to change the Policy at any time. If we make material changes to the Policy, we will notify you on the Platform or by email. We will also change the revision number and publication date on the first page of the Policy. Any changes we make to the Policy will be effective on or after the date of posting. Each new edition replaces any previous edition of the Policy. We encourage you to review the Policy frequently to be aware of how we are protecting your information.

15. CONTACTS

If you have questions, comments or requests related to the Policy, please email our Data Protection Officer at: discoverytimegm@gmail.com.