

PRIVACY POLICY MODEL FOR EDTAP APPLICATIONS

This privacy policy governs your use of the software application (“Application”) for mobile devices that was created Edtap Software. The Application provides you with convenient access to information about your institutional domain and allows you to define categories of messages that you would like to receive from the Institution.

Who we are?

Our registered office is at Offices 8 & 9 Enterprise House, WIN Business Park, Canal Quay, Newry. BT35 6PH. We are registered on the Information Commissioner's Office Register of Data Controllers under registration number ZA667704.

What information does the Application obtain and how is it used?

User Provided Information The Application obtains the information you provide when you download and register the Application. Registration with us is optional. However, please keep in mind that you may not be able to use some of the features offered by the Application unless you register with us. When you register with us and use the Application, you generally provide (a) your name, email address, age, password and other registration information; (b) transaction-related information, such as when you make access documents or messages, from us; (c) information you provide us when you contact us for help, and; (d) information you enter into our system when using the Application, such as contact information and project management information. We may also use the information you provided us to contact you from time to time to provide you with important information and required notices.

Automatically Collected Information In addition, the Application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, the IP address of your mobile device, your mobile operating system, and information about the way you use the Application.

Does the Application collect precise real time location information of the device? This Application does not collect precise information about the location of your mobile device.

Do third parties see and/or have access to information obtained by the Application? We will not share your information with any third party, other than described below in this privacy statement. We may disclose User Provided and Automatically Collected Information: • as required by law, such as to comply with a subpoena, or similar legal process; • when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; • if Edtap Limited is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

•Notwithstanding anything else in this policy, we may work with partners who use mobile SDKs,

including the OneSignal Messaging SDK, to passively collect information (collectively, “SDK Information”), which generally helps us deliver personalized notifications. This data may also be used to identify you in a unique manner across other devices or browsers for the purposes of customizing ads or content. Depending on the permissions granted to this application, this information may include personally identifiable information (PII) including your e-mail address. This information may also include precise location (i.e. GPS-level data) or WiFi information, apps you have installed and enabled, and your mobile identifier (e.g., Android Advertising ID).

Consumer Control & Opt-Out Options

a. **Opting-out of OneSignal Push Notifications** You may in most cases opt out of receiving push notifications by going to your device “Settings” and clicking on “Notifications,” and then changing those settings for some or all of the apps on your device. (Different device configurations, or updates to devices, may affect or change how these settings work.)

b. **Opting Out of “Cross-App” Advertising on Mobile Devices** You can opt out of having your mobile advertising identifiers used for certain types of interest-based (also called “cross-app”) mobile behavioural advertising, by accessing the “settings” on your Apple or Android mobile device, as follows: By opening the Google Settings app on your device, selecting Ads, and then selecting the option to opt-out of interest-based ads. (Different device configurations, or updates to devices, may affect or change how these settings work.)

What are my opt-out rights? You can stop all collection of information by the Application easily by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network. You can also request to opt-out via email, at privacy@edtap.com.

Data Retention Policy, Managing Your Information We will retain User Provided data for as long as you use the Application and for a reasonable time thereafter. We will retain Automatically Collected information for up to 24 months and thereafter may store it in aggregate. If you’d like us to delete User Provided Data that you have provided via the Application, please contact us at privacy@edtap.com and we will respond in a reasonable time. Please note that some or all of the User Provided Data may be required in order for the Application to function properly.

Children The application is designed for use by a variety of Institutions and hence may be installed by Children with their parent’s consent. If a parent or guardian becomes aware that his or her child has installed the application and provided us with information without their consent, he or she should contact us at privacy@edtap.com. We will delete the Child’s account and any such information from our files within a reasonable time.

Security We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Application. Please be aware that, although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

Changes This Privacy Policy may be updated from time to time for any reason. We will notify

you of any changes to our Privacy Policy by posting the new Privacy Policy in the App Store and via the Edtap Website: <https://www.edtap.com/privacy.html>. You are advised to consult this Privacy Policy regularly for any changes, as continued use is deemed approval of all changes.

Your Consent By using the Application, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. "Processing," means using cookies on a computer/hand held device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information, all of which activities will take place in the UK. If you reside outside the UK your information will be transferred, processed and stored there under UK privacy standards.

Contact us If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at privacy@edtap.com.