

## **Privacy Policy**

CODECUE (“CODECUE,” “our,” “us,” or “we”) knows your privacy is important to you, and we are committed to providing a safe and secure user experience. This Privacy Policy is incorporated into the Terms of Service, and describes the personal information we collect, how we use it, and with whom we share it, including for information collected through the use of:

- CODECUE online at [www.codecue.solutions](http://www.codecue.solutions)
- CODECUE online on mobile devices, and
- Any other services that include a link to and/or copy of this Privacy Policy on the home page of the applicable website or similar location (e.g., a settings page) for any applicable mobile applications (collectively, “CODECUE”), which are owned and operated CODECUE

It describes how we collect, use, secure, and share information of our users and individuals whose payment details are used to purchase CODECUE (collectively, “you” or “your”). It also describes how to access, update, and correct your personal data and the choices available to you regarding your personal data. Under applicable law, CODECUE is the data controller of your personal data. Before you use or submit any information through or in connection with CODECUE, please carefully review this Privacy Policy. By using any part of CODECUE, you consent to the collection, use, and disclosure of your information as further outlined in this Privacy Policy.

### **1. Data That We Collect:**

We use personal data to power our services, to process your transactions, to communicate with you, for security and fraud prevention, and to comply with law and also use personal data for other purposes with your consent and also process your personal data where we believe it is in our or others’ legitimate interests, taking into consideration your interests, rights, and expectations.

We may collect and process various forms of information when you use our Site or Service:

#### **‘User-Provided’ Information**

As described in more detail below, we may collect the following categories of information about you or your use of CODECUE:

1. Identifiers (such as name and email address);
2. Commercial information (such as transaction data);
3. Financial data (such as payment information);
4. Internet or other network or device activity (such as browsing history or app usage);
5. Relocation information (e.g., general location inferred from an IP address);
6. Sensory information (such as audio or video recordings during research programs);
7. Professional or employment related data;
8. Education data;
9. Inference data about you;
10. Legally protected classifications (such as gender);
11. Medical information (such as information you voluntarily provide to us in a survey);
12. Physical characteristics or description; and
13. Other information that identifies or can be reasonably associated with you.

Examples of when this information may be provided include, but are not limited to, when you register to our site, subscribe to our services, complete surveys you have agreed to and when you have contacted us.

### **‘Automatically Collected’ Information**

We may automatically collect information about your computer, including, where available, your IP address, operating system and browser type, language, the type of device you use, operating system version, unique device identifier (“UDID”), the date and time of your visit and files you viewed on our site (e.g., HTML pages, graphics, etc.), Internet service provider, clickstream data, the pages you view and the websites you visited immediately before and after visiting CODECUE. We achieve this by using cookies and other forms of technology. All of the information that is automatically collected is statistical data about our Users browsing actions and patterns. Some of this information is stored for security purposes so we can alert you of any suspicious activity on your account.

### **Device/Usage Information**

We may automatically collect certain information about the computer or devices (including mobile devices or tablets) you use to access CODECUE. As described further below, we may collect and analyse information such as (a) IP addresses, relocation information (including general location inferred from IP addresses), unique device identifiers, IMEI and TCP/IP address, and other information about your computer or device(s), browser types, browser language, operating system, mobile device carrier information, the state or country from which you accessed CODECUE; and (b) information related to the ways in which you interact with CODECUE, such as: referring and exit web pages and URLs, platform type, the number of clicks, domain names, landing pages, pages and content viewed and the order of those pages, statistical information about the use of CODECUE, the amount of time spent on particular pages, the date and time you used CODECUE, the frequency of your use of CODECUE, error logs, and other similar information. As described further below, we may use third-party analytics providers and technologies, including cookies and similar tools, to assist in collecting this information, activity on your account.

## **2. Cookies and Other Electronic Technology**

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our Site and to deliver a better and more personalized service. By using our Site or Service, you agree to the use of cookies.

We use cookies and other web and mobile tracking technologies, like HTML5, web beacons, scripts, pixels, server logs, and tags and other tracking technologies to improve your browsing experience on our website, to show you personalized content and targeted ads, to analyse our website traffic, and to understand where our visitors are coming from.

We may use any of these and other similar technologies to capture specific data related to your use of the Websites, such as the pages you view, the items you download, the links you click, your access times, and your Internet Protocol (IP) address, domain name, and system configurations and settings. We may also use cookies that are set by CodeCue and by our third-party service providers to collect usage information that we use to improve how the Websites work.

## Information Provided by Social Networking Services and Others

We may supplement the information you provide to us with additional information gathered from other sources, such as publicly available information, or from third parties, such as marketers, partners, researchers and others. We may combine information that we collect from you with information about you that we obtain from such third parties and information derived from any other product or service we provide.

If you sign in to CODECUE using your Facebook or other third-party credentials, we will use that service to authenticate you. We may also receive other information that you have agreed may be provided by that third party, such as your username, name, e-mail address, photo, location, date of birth, gender, an ID associated with the applicable third-party platform, user files like photos and videos, your list of friends, people you follow and/or who follow you, and/or your posts or “likes.” We receive this information so that it can be used for the purposes explained in this Privacy Policy. If you do not wish to have this information shared by these third parties, do not use Facebook or another third party to access CODECUE. We may also collect other information through other social networks that you make available to us. For a description on how social networking and other third-party sites handle and share your information, please refer to their privacy policies and terms of use, which may permit you to modify your privacy settings. We may combine information that we collect from or about you with information about you that we obtain from such social media and other content platforms and information derived from any other subscription, product, or service we provide.

If you are a subject in a research project or study conducted by CODECUE in partnership with a researcher or educational institution, that project may involve the collection of different information than is described in this Section. Research participants may, for example, provide health-related information, including the existence of certain health conditions. CODECUE partners with researchers and educational institutions in conducting such studies. Such research projects are typically done on an anonymous basis, such that CODECUE acts only as a processor of anonymized or pseudonymized data. For further information on how we handle data associated with such research, please refer to the materials distributed to you as part of the study, contact the researcher leading your study, or contact us using the contact information below.

### 3. Legal Bases for Use of Your Personal Data

The laws in some jurisdictions require companies to tell you about the legal ground they rely on to use or disclose your personal data. To the extent those laws apply, our legal grounds are as follows:

To honour our contractual commitments to you: Much of our processing of personal data is to meet our contractual obligations to our users, or to take steps at users' request in anticipation of entering into a contract with them. For example, we handle personal data on this basis for our premium users.

**Consent:** You have choices when it comes to the technology you use and the data you share. When you are asked to provide personal data, you can decline. Many of our services require some personal data. If you choose not to provide data required to provide you with a service or feature, you cannot use that service or feature.

Likewise, where we need to collect personal data by law or to enter into or carry out a contract with you, and you do not provide the data, we will not be able to enter into the contract; or if this relates to an existing service you're using, we may have to suspend or cancel it. We will notify you if this is the case at the time. Where providing the data is optional, and you choose not to share personal data, features like personalization that use such data will not work for you. We may ask for additional information, such as your country of residence, email address, and phone number, to validate your request before honouring the request.

**Legitimate Interests:** In many cases, we handle personal data on the ground that it furthers our legitimate interests in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals, such as:

- Providing a safe and enjoyable user experience
- Customer service
- Marketing
- Protecting our users, personnel, and property
- Analysing and improving our business
- Processing job applications; and
- Managing legal issues

- We may also process personal data for the legitimate interests of our research partners, such as to provide cognitive training, research, and analytics for such partners

**Legal Compliance:** We need to use and disclose personal data in certain ways to comply with our legal obligations. To protect the vital interests of the individual or others: For example, we may collect or share personal data to help resolve an urgent safety situation.

## **Disclosure of Information**

We share various categories of data with software engineers, web designers working on our behalf; when required by law or to respond to legal process; to protect our clients; to protect lives; and to protect the rights and property of CodeCue and its client. We will only disclose your information to any third-parties as detailed in this Policy and under the following circumstances:

- In the event that we sell or buy any business or assets, in which case we may disclose your Personal Data to the prospective seller or buyer of such business or assets;
- If Create Internet Ltd or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets;
- To our domain name registries, in order to register domains on your behalf;
- To facilitate payment If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, to protect the rights, property, or safety of CodeCue, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;

In order for them to provide you with information about goods and services which may be of interest to you.

## **Affiliates**

We may share your information with our corporate affiliates, such as entities under common ownership or control.

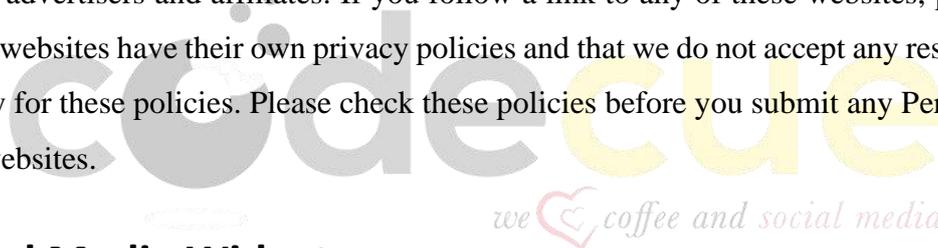
## **Business Transfers**

We may sell, transfer, or otherwise share some or all of our assets in connection with an actual or contemplated merger, reorganization, business transaction, or in the event of bankruptcy. In such scenarios, your information may be one of the assets transferred. We will post a notice or otherwise notify you and collect your consent, as may be required by law, before the information is transferred and becomes subject to a different privacy policy.

## **Online Analytics and Tailored Advertising**

If you receive email from us, we may use certain tools, such as clear GIFs to capture data such as when you open our message or click on any links or banners our email contains. This data allows us to gauge the effectiveness of our communications.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.



## **4. Social Media Widgets**

Our website may include social media features, such as Facebook and Twitter buttons. Such features may collect your IP address and information about the page you are visiting, and may set cookies to function properly. Your interactions with these features are governed by the privacy policies of the company providing them.

## **5. Maintaining Data Confidentiality**

We are entrusted with confidential information, including personal information, from our employees, faculty, customers and others and recognize our responsibility to protect and use this information with respect and care. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use, or disclosure. We do not sell your personal data. So, we do not offer an opt-out to the sale of personal data. We protect

confidential information by designating individuals within the company to be responsible for our Privacy and Information Security programmes as well as by implementing appropriate safeguards to protect confidential information from misuse, compromise, or loss. We collect, gather, process, use and store personal data strictly in accordance with legal provisions.

## 6. Retention of Personal Data

CodeCue retains personal data for as long as necessary to provide the products and fulfill the transactions you have requested. We have implemented and maintain security practices to protect against the unauthorized access, use, modification, destruction or disclosure of your personal data. If personal data is of a sensitive type, a shortened retention time would generally be adopted. We will retain data in accordance with your consent. Confidential information that we collect is retained no longer than the minimum time necessary to fulfil legitimate business purposes or comply with lawful, regulatory or other legal requirements.

We update this privacy statement when necessary to provide greater transparency or in response to:

- Feedback from customer, regulators, industry, or other stakeholders
- Changes in our services
- Changes in our data processing activities or policies

If you have any questions about security on our website, please contact us using the contact information below.

## 7. Children's Privacy

Protecting the privacy of children is particularly important in data protection. anyone under the age of 13 is not eligible to use our service. We do not knowingly collect any personal data of anyone younger than 13 unless parental consent has been obtained prior to using our service. If we become aware of any personal data that has been gathered on a child who is under the age of 13 without parental consent, we will take the appropriate action to ensure it is removed from our system.

## 8. Access to Information & Deletion of Data

As a User, you can access and change certain types of data that we hold about you. You can also request the deletion of your personal data, as permitted under applicable law. This may apply, for instance, where this information is outdated or the processing is no longer necessary or is unlawful; where you withdraw your consent to our processing based on such consent; or where we determine we should accommodate an objection you have raised to our processing. However, sometimes we may need to retain your personal data. For example, this may occur in situations in which we need to comply with our legal obligations, for the establishment, exercise, or defence of legal claims, or in some cases, to fulfill the purposes for which your information was gathered.

## **9. Changes to this Policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please note that, for existing users, unless otherwise provided by applicable law, your continued use of CODECUE following the effective date means that you agree with, and consent to be bound by, the updated Privacy Policy.

