

AcadSpace Privacy Policy

Last modified: 24/10/2023

Introduction

AcadSpace Technologies LLP ("**Company**" or "**we**") respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide to the Company's mobile application, tablet application, technology platform, and website including any content, functionality, and services offered on or through such application, website, or platform (collectively, "**AcadSpace**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On AcadSpace;
- In email, text, and other electronic messages between you and AcadSpace.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website, application, platform, etc. operated by Company or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on AcadSpace.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. This Privacy Policy is incorporated within our Terms & Conditions. By checking your acceptance of our Terms & Condition, you accept this Privacy Policy. **If you do not agree with our policies and practices, your choice is not to use AcadSpace.**

Information Covered by this Privacy Policy

This Privacy Policy only applies to personal information (as defined below). This policy excludes the following categories of information:

- Publicly available information from government records.
- Deidentified or aggregate consumer information.

Personal Information We Collect About You and How We Collect It

We collect several types of information from and about AcadSpace users, including information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). In particular, AcadSpace may collect the following categories of personal information (note: some information may overlap in multiple categories:)

CATEGORY	EXAMPLES
Identifiers	Name, email address
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, credit card number, debit card number, or any other financial information;
Protected classification characteristics under California or federal law	Age and date of birth, sex
Internet or other similar network activity	Browsing history, browser type; operating system, web pages viewed, pages clicked, frequency of visits, date and time of access; time spent per page
Education, professional or employment-related information	Name, date, and location of your past and present school, college, university, courses, employment history; current employment
Inferences drawn from other personal information	Profile reflecting a person's intelligence, abilities, and aptitudes

We collect the information detailed above:

- Directly from you when you provide it to us or with your consent e.g. when you create an account with us and answer questions pursuant to our quizzes.
- Directly from your employer, prospective employer, or recruiter.

- Automatically as you navigate through AcadSpace including traffic data, location data, and other communication data. Information collected automatically may also include usage details, details of your visit to AcadSpace, IP addresses, and information collected through cookies and other tracking technologies.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of AcadSpace. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to AcadSpace.
- **Flash Cookies.** Certain features of AcadSpace may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on AcadSpace. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons.** Pages on AcadSpace and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

By using AcadSpace, you consent to our use of automatic data collection and tracking technologies. The types of technologies we may use include cookies and Google Analytics.

In addition to our uses of cookies described above, we also use cookies to:

- track our your visits and source;
- track webpages viewed;
- store your preferences such as preferred language (if applicable);
- gather statistics on the number of users, the location of users, and usage habits or patterns;
- tailor your AcadSpace experience and advertisements; or
- analyze parts of AcadSpace in order to improve its speed, functionality, or performance.

You can choose to not accept or delete (“flush”) cookies by adjusting your browser settings or AcadSpace settings in the applicable application. However, if you do so, you may be unable to access certain parts of AcadSpace or lose some of the functionality. Unless you have set your browser not to accept cookies, AcadSpace will issue cookies when you are using AcadSpace.

Opting-Out and Managing Cookies: When you visit AcadSpace, you can change the settings in your browser or device to alter the cookie preferences, including not accepting cookies. We have provided links below to further information on how to manage cookies depending on the browser or device you use:

Google Analytics: We use Google Analytics, a web analytics service provided by Google Inc. (“Google”), which uses cookies to help analyze AcadSpace. The information generated by cookies about your use of AcadSpace will be anonymous, but may be sent to Google and stored by Google. Google will use this information to evaluate your use of AcadSpace, compile reports on activity on both, and provide us with other Internet-related services. Also, Google may transfer this information to third parties if required by law or if third parties process the information on Google’s behalf. By using AcadSpace, you consent to the processing of data about you by Google in the manner described and for the aforementioned purpose. More information about Google Analytics can be found at the following URLs:

https://marketingplatform.google.com/about/analytics/#?modal_active=none

You can also choose to opt-out of Google Analytics if you wish. To learn more about this, you may visit the following link: <https://tools.google.com/dlpage/gaoptout>.

[How We Use Your Personal Information](#)

We may use, or disclose the personal information we collect for one or more of the following purposes:

- To create your Profile so we can make assessments for your professional value and make recommendations on how to improve.
- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about AcadSpace, we will use that personal information to respond to your inquiry.
- To provide, support, personalize, and develop AcadSpace
- To process your requests, purchases, transactions, and payments and prevent transactional fraud
- To create, maintain, customize, and secure your account with us.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize the AcadSpace experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and through AcadSpace and via email or text message (with your consent, where required by law).

- To help maintain the safety, security, and integrity of AcadSpace.
- For testing, research, analysis, and product development, including to develop and improve AcadSpace.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

[Disclosure Sharing, and the \(Non\)Sale of Your Personal Information](#)

We may share your personal information by disclosing it to a third party for a business purpose.

- To your employers, prospective employers, and recruiters, where applicable
- To contractors, service providers, and other third parties we use to support our business.
- To fulfill the purpose for which you provide it. For example, if you consent to the sharing of your profile and/or analytics to a learning institution.
- For any other purpose disclosed by us when you provide the information.
- With your consent. For example, with your consent, we will share your personal information with third parties to send you promotional emails.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

We provide a brief summary of the sharing of your personal information below:

Type of Personal information	Business Purpose Disclosures to Third Parties
Identifiers	Identity verification; facilitate payment processing; data analytics; marketing purposes; share Profile (where applicable); support for AcadSpace
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Identity verification; facilitate payment processing; data analytics; marketing purposes; share Profile (where applicable) support for AcadSpace
Internet or other similar network activity	Share Profile; support for AcadSpace

Education, professional or employment-related information	Share Profile; support for AcadSpace
Inferences drawn from other personal information	Share Profile; support for AcadSpace

We do not sell personal information.

Data Security

We use measures intended to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. For example, we always use **commercially reasonable efforts** to follow industry best practices for authorization, encryption and access controls. Toward that end, all information you provide to us is stored on secure servers behind firewalls such as Google Cloud and Google Firestore. In addition, your personal information may be stored by third parties who provide services to us, which third parties will be required to maintain such information securely.

Please note that the safety and security of your information also depends on you. Because AcadSpace requires registered users to provide unique identifiers such as their username and password, **you are responsible** for keeping such username and password information confidential. You should not therefore share your username or password information with anyone.

Unfortunately, the transmission of information over the Internet is not completely secure at all times. Although we do our best to protect your personal information, **we cannot guarantee the security** of such personal information transmitted 100% of the time. Any transmission of such information is therefore at your own risk. We are **not responsible for the circumvention** of any privacy settings or security measures on AcadSpace.

Data Retention

We will retain your information for as long as your account is active with AcadSpace. If you no longer want to use AcadSpace, you may [close your account](#). However, after closing your account, we may retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our obligations and agreements.

[Deleting Your Personal Information](#)

You may also request that we delete any personal information that we have collected from/about you. We will evaluate your request and delete the information subject to applicable law. However, we need certain types of information so that we can provide our services. [If you ask us to delete it, you may no longer be able to access or use AcadSpace.](#)

Notwithstanding the above, we may [retain personal information as authorized under applicable law or regulation](#). For example, personal information will be retained (i) to comply with federal, state, or local laws, rule, or regulations; (ii) to comply with civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, local or other governmental authorities; (iii) to cooperate with law-enforcement agencies concerning conduct or activity that are reasonably and in good faith believed to violate federal, state, or local laws, rules, or regulations; (iv) to debug to identify and repair errors that impair existing intended functionality; (v) to exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided by law; or (vi) to enable solely internal uses that are reasonably aligned with the expectations of the consumer based on your relationship with us.

To exercise your deletion requests subject to applicable law, please submit your request via email to [\[email\]](#) with the subject heading "DELETION REQUEST" (or else your request may be delayed or inadvertently ignored). Please also specify your name and your state (or states) of residence within the past twelve months.

For security purposes, we may request additional information from you to verify your identity.

[FOR CALIFORNIA CITIZENS – Your Rights and Choices](#)

The California Consumer Privacy Act of 2018 ("[CCPA](#)") provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

[PLEASE NOTE THAT THE EXERCISE OF YOUR RIGHTS DEPENDS ON WHETHER WE ARE A "COVERED BUSINESS" UNDER THE CCPA. CURRENTLY WE ARE NOT A COVERED BUSINESS. WE WILL HONOR YOUR RIGHTS BELOW WHEN WE BECOME A COVERED BUSINESS.](#)

CA's Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

CA's Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your, we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Your CA Rights to Know or Delete

To exercise your rights to know or delete described above, please submit a request by:

- Emailing us at contact@acadspace.org

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. You may also make a request to know or delete on behalf of your child.

You (or your guardian acting on your behalf) may only submit a request to know twice within a 12-month period. The request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include your or your parent's legally authorized driver's license or passport.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please [[contact contact@acadspace.org](mailto:contact@acadspace.org)].

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee,

we will tell you why we made that decision and provide you with a cost estimate before completing your request.

You can review and change your personal information by logging into AcadSpace and visiting your account profile page.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of AcadSpace, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to AcadSpace. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the AcadSpace.

No Discrimination for Exercising CA Rights

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

[Changes to Our Privacy Policy](#)

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting AcadSpace and this privacy policy to check for any changes.

[Contact Information](#)

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

contact@acadspace.org.

AcadSpace GDPR Privacy Policy

EU General Data Protection Regulation Privacy Notice

Introduction

This Privacy Notice applies to AcadSpace and is intended to comply with the European Union's ("EU") General Data Protection Regulation ("GDPR"). This Privacy Notice applies to Personal Data that AcadSpace Technologies LLP ("Company" or "we") collects or processes through AcadSpace about a user ("Data Subject" or "you") while the Data Subject is located in the EU, regardless of whether the Data Subject is a citizen or permanent resident of an EU country. "Personal Data" means any information relating to an identified or identifiable Data Subject.

This Privacy Policy a contract between you and us. It is incorporated into our Terms and Conditions. By accepting our Terms and Conditions, you hereby accept this Privacy Policy. **If you do not agree with this policy, please do not accept our Terms and Conditions and cease use of AcadSpace.** Capitalized words used herein but not defined are defined in our Terms and Conditions.

Lawful Basis or Bases for Collecting and Processing Personal Data

AcadSpace is a professional tool that aims to assess and enhance a Data Subject's employment value. As such, AcadSpace collects, processes, and uses Personal Data to review and process the information provided to us to develop a Data Subject's Profile for use by the Data Subject or the Data Subject's employer, prospective employer, or recruiter.

AcadSpace's lawful basis or bases for collecting and processing Personal Data include the following:

- Processing is necessary for the legitimate interests in processing your Personal Data in order to associate your Profile and making suitable recommendations.
- Emailing you or sending notifications to your account with offers on products and services we think you may like.

If a Data Subject refuses to provide Personal Data that AcadSpace requires in connection with one of our lawful basis or bases for collecting such Personal Data, such refusal may make it impossible for us to render our services. AcadSpace's services are specifically tailored to you. **If you are uncomfortable sharing your personal data, please do not use AcadSpace.**

Types of Personal Data Collected/Processed and Purpose

AcadSpace collects and processes the following categories of Personal Data in order to enable creation of a profile to facilitate suitable course recommendations.

Personal Identifiers:

Name, email address, age, sex/gender, ethnic origin^[A1], credit card number, debit card number, or any other financial information

Inferences drawn from other personal information:

Profile reflecting a person's intelligence, abilities, and aptitudes

Internet or Other Similar Network Activity

Browsing history, browser type; operating system, web pages viewed, pages clicked, frequency of visits, date and time of access; time spent per page;

Education and Employment

Name, date, and location of your past and present school, college, university, courses, employment history; current employment

Sharing of Personal Data

The Personal Data that we collect through AcadSpace may be shared with your employers, prospective employers, or recruiters. Whether we share your personal data with such persons depends on the nature of your subscription.

- If you created an account directly with us, you control with whom such information is disclosed. **We will NOT disclose your personal data to any party without your consent.**
- If your account with us is through your employer, prospective employer, or a recruiter, **then the master account holder has access to your personal data, irrespective of your privacy settings.**

We will also share your Personal Data with our service providers acting on our behalf who have agreed to protect the confidentiality of your Personal Data.

If you have specific questions regarding the collection and use of your Personal Data, please contact us at contact@acadspace.org.

[How We Collect Your Personal and Sensitive Personal Data](#)

We receive your personal and sensitive Personal Data (i) directly from you or (ii) it is automatically collected.

[Your Individual Rights as a Data Subject under the GDPR](#)

This notice serves to **inform** you of your privacy rights pursuant to the GDPR. You as a Data Subject also have the right to...

- Request from us **access** to and **rectification** or **erasure** of your Personal Data or limit the processing of your Personal Data, the right to object to processing and the right to portability of Personal Data;
- Withdraw consent at any time, without affecting our right to process Personal Data based upon consent before its withdrawal;
- The right to file a complaint with a supervisory authority appointed by an EU member state for the purpose of receiving complaints;
- Additional notice of the existence of automated decision-making, including profiling;
- If the Personal Data is going to be further processed for a purpose other than that for which it was collected, then notice of the purpose and basis or bases for the further processing;
- If Personal Data is collected for our legitimate interests or for a task carried out in the public interest, then the Data Subject has the **right to object**, on the grounds of his or her particular situation, to the processing of Personal Data concerning him or her (including profiling);
- Where Personal Data are processed for direct marketing purposes, the right to object at any time to **processing** Personal Data concerning him or her for such marketing; and
- Not to be subject to a decision based solely on **automated processing**, including profiling; provided, however, that this right does not apply if the decision is (a) necessary for entering into, or performance of, a contract between you and us; or (b) is based upon your consent.

If you wish to exercise any of the above-mentioned rights, you may do so by contacting us at contact@acadspace.org.

[Cookies](#)

Cookies are files that many websites transfer to users' web browsers to enable the site to deliver personalized services or to provide persistent authentication. The information contained in a cookie typically includes information collected automatically by the web server and/or information provided voluntarily by the user.

We also process **automatically-gathered information** as described in our Cookies Dashboard. Cookies that are necessary to display content or perform other functions you have requested, or that are necessary for the security or basic operation of our website, are turned on by default and cannot be turned off. We request your consent for the use of other cookies as listed on our Cookies Dashboard. You can always revoke your consent by visiting the Cookies Dashboard again.

[Transfer of Personal Data Outside of the European Economic Area \(EEA\)](#)

Our main administrative offices are based in the USA and that's where we process Personal Data collected through AcadSpace. When you provide Personal Data to us, we request your consent to transfer that Personal Data to the USA. The USA does not have an adequacy decision from the European Commission, which means that the Commission has not determined that the laws of the USA provide adequate protection for Personal Data. Although the laws of the USA do not provide legal protection that is equivalent to EU data protection laws, we safeguard your Personal Data by treating it in accordance with this GDPR Privacy Notice. We take appropriate steps to protect your privacy and implement reasonable security measures to protect your Personal Data in storage. We use secure transmission methods to collect Personal Data through our website. We also enter into contracts with our data processors that require them to treat Personal Data in a manner that is consistent with this Notice.

[Retention Period for Personal Data](#)

How long we retain Personal Data varies according to how long you maintain an account with us. We delete Personal Data within a reasonable period after it is clear you are no longer active on AcadSpace or we no longer need to use it for the purpose for which it was collected (or for any subsequent purpose that is compatible with the original purpose). This does not affect your right to request that we delete your Personal Data before the end of its retention period. We

may archive Personal Data (which means storing it in inactive files) for a certain period prior to its final deletion, as part of our ordinary business continuity procedures.

[A1]In the questionnaire, demographic info is highlighted. We need to know what demographic info is collected.