



Privacy Policy

This Privacy Policy (together with the Terms of Use and any other documents referred to in it and the Cookie Policy) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By downloading the App or visiting www.learnD.com.mt (the 'Website'), you are accepting and consenting to the practices described in this Privacy Policy. Unless defined in this Privacy Policy, capitalised terms have the meaning set out in the Terms.

Data Protection

We are bound by the Data Protection Act (the 'Act'), Chapter 586 of the Laws of Malta and the General Data Protection Regulation 2016/679/EU. We will protect your personal information and respect your privacy in accordance with best business practices and applicable laws.

Data Controller

For the purpose of the Act, the data controllers are the LearnD Team.

Your rights

Your privacy is very important to us. We understand you want to remain in control of your personal information and that we must earn and retain our trust. We have created this privacy statement to show our commitment to the privacy of any personal details that you provide us when using the Website. We take all reasonable measures to keep your information confidential and do not sell or rent our customers' personal information to third parties.

We will endeavour at all times to treat your personal data as private and confidential. We will only disclose your personal data to third parties as set out in this Privacy Policy or where we may become subject to a legal obligation or a public duty to disclose that data.

We comply with and are registered under the data protection laws in Malta and take all reasonable care to prevent any unauthorised access to your personal data. Under the terms of the Act you have a number of rights. If you require access to the personal data we have concerning you, please write to us at info@learnd.com.mt. You can also ask us to correct, remove, or restrict the processing of any information about you that we hold. You also have the right to ask us to transmit your personal data to another service provider of your choice. Where you have provided us with your consent to process certain personal information, such as for direct marketing purposes, you have the right to withdraw your consent at any time. Where we process your personal information on the basis of our legitimate interests, such as for fraud detection and prevention, compliance with foreign law, law enforcement, court and regulatory bodies' requirements, cyber security and product development and enhancement you also have the right to object at any time to the processing of your personal data. If you need us to do either of these things, please write to us at info@learnd.com.mt. You also have the right to lodge a complaint with the Office of the Information and Data Protection Commissioner. Further information on how to submit your complaint may be found here: <https://idpc.org.mt/en/Pages/contact/complaints.aspx>.

About this Privacy Policy

This Privacy Policy sets out our policies regarding the collection, utilisation and protection of the personal data of persons making use of the Website and Services. Personal data includes information that is attributable to a specific individual, such as name, address, telephone number, email address and credit card number. When using the Website, you are consenting to the practices set forth in this Privacy Policy.

When browsing the Website, the provision of any personal information is not required unless and until you choose to subscribe or until you sign up for one of our email newsletters or other services as described below.

Children using our Services

Safety of minors using our Services is of utmost priority to us. We take every step to ensure that children using our Services do so safely, and take every step to ensure compliance with legislation in place to safeguard personal information related to children.

Except where otherwise indicated, we do not knowingly collect or store any personal information from children under the age of 13. If you are aged 12 or under, we request that you do not provide us with information relating to you or to others. Please seek the guidance of your parent or guardian before using our services.

If you are the parent or guardian of a child who is aged under 13 and you become aware that your child has provided us with information without your consent, please contact us at info@learnd.com.mt. We will delete such information from our records as soon as possible.

Depending on the service, we may also seek to obtain the consent of your parent or guardian if you are under the age of 16. Further, we only send commercial marketing communications to individuals aged 16 or over.

If appropriate, we will take steps to determine the age of persons submitting their information to us.

Where do we get the data we hold about you?

Information you give us

In order to register for a Free Account or a Premium Account with the App, you may be required to provide us with your name, age, country, email address and any additional information required for authenticating your payment methods. You may further be asked to create a unique login name, password, and a password hint to help you to recall your password. This information is collected upon registration for various reasons including: (i) for your personal identification; (ii) to enable us and our partners to contact you for customer service purposes; (iii) to tailor the content of our site to meet your needs; (iv) to share certain information with selected partners; (v) to permit us or our partners to verify your compliance with any special conditions which might apply.

We may also ask you to provide us with information about your experience with private tuition and level of education so that we may personalise and optimise your experience. From time to time, we may invite you to participate in questionnaires to survey your experience. We shall use this information for our own purposes, for instance to improve our services, however we shall not publicise such information.

Registering with the App and providing personal data about someone other than yourself is prohibited and without prejudice to other rights reserved to us, we reserve the right to terminate any Account which we reasonably believe to be in breach of this term.

Information we collect about you

Like many other professional websites, we use cookies to improve your experience when using our Website. When you visit our Website or download our App we may automatically collect information about your computer, your IP address, geographical location, information about your visit and how you interact with our site, including which tutoring and educational offers you view. For more information on how we use cookies to improve your experience, see our [Cookie Policy](#).

From information third parties give to us

We may process additional personal data on you from our partner service provider such as advertising networks, search engine providers, analytics and social networking sites, in order to help us understand visitor behaviour patterns, so that we can improve and ensure that we are providing a fair service.

How we use your data to provide the Services

We process your personal data to help us identify you in order to administer your account and provide you with the information and services you request from us, customised to your preferences.

Information you provide may also be provided to our partners to verify your compliance with any special conditions which might apply.

Service Emails

After registering with us you agree that you will receive an initial email from us. We may also send you emails if and when there are changes to our Terms or policies or if we need to discuss your account. You cannot opt out of receiving these emails, however no further such emails will be sent to you if you close your account.

Marketing

As our customer, you may opt in at any time to occasionally receive updates from us about educational or tutoring opportunities that may be of interest to you via email, text messages, phone or post. You may opt out at any time from receiving these types of messages either through an opt out feature in the message or through your account settings. Your account settings are accessible on the home page.

If you have opted in to receive marketing messages, we will use your personal data to keep you informed on current and forthcoming products, services, offers or promotions that may be of interest to you. We utilise a third party software and storage solution to analyse the personal data

that you have provided to us in order to ensure that the marketing that you receive is as relevant and beneficial to you as possible. We retain full ownership of your personal data and ensure that it is secure at all times. If you are not happy for your personal data to be used in this way, you can send us an e-mail on info@learnd.com.mt and we shall stop processing your personal data for these purposes. If you have further queries with regards to your personal data, please feel free to contact us at info@learnd.com.mt.

Service Providers

From time to time, we may share your personal data with service providers to perform functions and process user data in ways that help us improve the App, the Website and the Services. These may include market analytics, hosting service providers, payment processors, and fraud prevention and detection tools.

Wherever we share your personal data with third parties, it is done subject to terms that are similar to this Privacy Policy and subject to security and confidentiality obligations under applicable law.

Transfers of Personal Data

Our partners are based worldwide and by agreeing to this Privacy Policy, you are consenting to the transfer of some of your personal data to our selected partners regardless of where they are based. The data that we collect from you may therefore be transferred to, and stored at, a destination outside the European Economic Area ('EEA'). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and all applicable law.

We do not trade your personal information to third parties for marketing purposes without your express consent.

For how long is your personal data retained?

We only retain your personal data for as long as is necessary for the purpose that we originally collected it for and as authorised by applicable laws.

Links to third party websites

The Website may, from time to time, contain links to and from the websites of third parties, including partner networks, advertisers and affiliates. We cannot control or be held responsible for third parties' privacy practices and content. Please read their privacy policies to find out how they collect and process your personal information.

We ask our partner platform to not send you unsolicited emails, phone calls or marketing messages. Please let us know if you experience any such problems. However, if you click through to a third party website, we cannot guarantee that you will not be contacted by those third parties.

Security

We are committed to protecting our users' information. Your password protects your user account, so you should use a unique and strong password, limit access to your computer and browser, and log out after having used the Website. While we take data protection precautions, no security measures are completely secure, and we do not guarantee the security of user information.

Compliance

From time to time, we may transfer your personal and/or financial information to other companies in order to perform or improve our services or to help our security, credit risk or fraud protection activities. As mentioned above, we may also send your personal information to our partners. By submitting your details, you are providing consent to the transfer of your information for the purposes set out in this paragraph. Any transfer of

information will take place in accordance with this Privacy Policy and as permitted by law.

We may also share your information with third parties for other limited purposes, such as to allow for a merger, acquisition, or sale of all or a portion of the assets of the LearnD Team. In connection with either of these events, our customer information may be transferred to third parties. If your personal information is transferred, use of such information would remain subject to this Privacy Policy. Your personal information will be passed on to a successor in the event of liquidation or change of administration of the LearnD Team.

You should be aware that in addition to the circumstances described above, we may disclose your financial or personal information if required to do so by law, court order, as requested by other government or law enforcement authority, or in the good faith belief that disclosure is otherwise necessary or advisable including, without limitation, to protect the rights or properties of LearnD Team or its affiliated companies or when we have reason to believe that disclosing the information is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology.

Effectiveness

This policy is effective as from 1st October, 2018. Any material changes in the way we use personal information will be described in future versions of this Privacy Policy.

Governing Law

This Privacy Policy is subject to the laws of Malta and to the exclusive jurisdiction of the Maltese courts.

Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to info@learnd.com.mt.