

CAM-PUS PRIVACY POLICY

Data Controller:
Cam-pus
address:
baqa main street' baqa algrbia'
3010000
email:
legal@cam-pus.net

This Privacy Policy applies to your use of the Services of Cam-pus, as defined in our Terms of Service. Cam-pus offers you options concerning data we process, use and share as described in this Privacy Policy and Cookies Policy.

GENERAL

Anyone can access our Website without the necessity to register an account. Therefore, limited use of the Services is always possible without the provision of your personal details (for example, browse the Website, check how Cam-pus works, look through the list of tutors, review the variety of services, etc.). However, whenever you access the Website, we collect log information and put cookies on your device, by which we track your activity on the Website. You can always opt out of cookies except those, without which the Website cannot work.

When you are a registered User Cam-pus may collect from you and process Cookie identifiers and those data you specifically provide us with upon registration, including first name, last name, email, phone number or social network ID (if assigned through Facebook or Google+ or if accessing Google Calendar), time zone, interface language, IP address, and device type.

Specifically, if you are a tutor, we may also collect and process, besides the aforementioned information, the other data provided by you, including zip-code, gender, year of birth, city of residence, and education experience.

Registered Users may additionally provide us with added profile pictures as well as chosen currency to perform actions pursuant to our Refund and Payment Policy.

We may change this Privacy Policy from time to time, so please check this page to ensure that you're happy with any changes. We will post those changes on this page and update the Privacy Policy modification date at the top of this page. The additional notifications on any amendments will be sent to your email.

Any questions regarding this Policy and our services should be sent to legal@cam-pus.net.

1. What Is Personal Data and the Processing of Personal Data? Main Definitions

Personal data is any information relating to you and that alone or in combination with other pieces of information allows a person that collects and processes such information to identify you as an individual.

Processing of the personal data means any operation with your personal data, whether or not by automated means, as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing; means you as a user of Cam-pus.

Consent of the data subject/user is any freely given, specific, informed, and unambiguous indication of the data subject/user's wishes by which he or she, by a statement or by clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Cam-pus's Lawful Bases for Processing

Cam-pus processes your personal data only when we have lawful bases. Specifically, Cam-pus processes your personal data if:

processing is based on the consent you have given. As such our newsletters, collection, analysis, and publication of user feedback and reviews, analysis of video lessons, your participation in our events and webinars, and placement of different types of cookies, and posting of the sweepstakes winners is based on your consent;

- processing is necessary to provide our services to you according to our Terms of Service which constitute a contract between you and us as regards to information services of Cam-pus;
- processing is necessary for the purposes of our legitimate interests. Those legitimate interests are:
 - compliance with israel financial and accounting legislation;
 - the assessment of Cam-pus's business efficiency by analyzing website traffic and financial performance indicators;
 - promotion of Cam-pus through social media networks, media outlets, and affiliates, such as bloggers or influencers;
 - performance of the contracts with enterprise clients and provision of reports on their employees' performance.
 - user session control and fraud prevention, ensuring the appropriate protection of personal data;
 - tutor verification and development of high-quality learning programs with tutors.
- where necessary, compliance with applicable legislation (e.g., data subject request processing);
- in exceptional cases, to protect your vital interests or vital interests of another natural person; or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

In all cases, we will notify you about the applied legal basis for processing and other relevant details, before we start the processing of your personal data on a specific legal basis unless we are not able to do so in accordance with our obligations under any applicable legislation.

3. Data We Collect: Scope

Cam-pus collects from you only the following information and only for the stated below purposes:

(1) Account for Students

Cam-pus collects and processes personal data submitted by you upon registration and further editing of settings in your Account. For registration purposes, you submit your login credentials (username and passwords), first name, last name and email. You may also edit your Account anytime with additional information as well as sync your Google and Cam-pus Calendars. Such additional information may help you to find a suitable time slot with a tutor or to have more visibility of your schedule. At the same time, you are not required to provide additional

information, not specifically necessary for the registration, it is your choice.

(2) Account for Tutors

Cam-pus collects and processes personal data submitted by you upon registration and further editing of your Profile. For registration purposes, you submit your login credentials (username and passwords), first name, last name and email. You may also edit your Profile anytime with additional information as well as sync your Google and Cam-pus Calendars. Such additional information may help you to find a suitable time slot with a student or to have more visibility of your schedule. At the same time, you are not strictly required to provide additional information, not specifically necessary for the registration. Therefore, it is your choice whether to include additional data in your profile, or not, such as zip code, country, language skills, education, and work experience.

Some personal data, such as users' names, and location that is listed in your user profiles or derived from IP Addresses may be publicly visible to other users on the Services or to the web. We may implement a feature that permits you to choose what information is made public by changing your privacy setting in "Edit My Profile" within the Service.

(3) Posting of Information

We process personal data freely submitted to you on Cam-pus. This may be a survey you fill in on Cam-pus or feedback you provide us with. Irrespective of whether you are a registered user or not.

Cam-pus may also process information provided by you (including content and messages) that you post on/through our Website, including personally identifiable information. By so doing, you acknowledge that any information you share through the Services will be available to Cam-pus and to other users of the Services (students/tutors). You also acknowledge that parts of your content cannot be deleted from the Service as it may be connected to the Lessons created by you and used by other users (students/tutors).

From our turn and unless you **opt-out**, we retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law. We reserve the right to terminate the accounts of visitors who use these services in a manner inconsistent with the Terms of Service.

(4) Service Use, Cookies and Other Similar Technologies

When you use our Services, we monitor and analyze web traffic and keep track of your behavior while using our Services. We may receive information about your IP address, proxy server, and operating system, web browser, or your mobile carrier and location based on phone settings.

Please, specifically refer to our Cookies Policy for further details as to our use of cookies and similar technologies.

(5) Billing Information

Details of transactions you carry out through our Website (as ID, date and time of transaction).

(6) Enterprise

When you wish to share your contact details for more information regarding Cam-pus Enterprise one-on-one online language training for international teams, as name, email, company name and phone number.

(7) Sensitive Data

Unless you expressly agree, Cam-pus does not process your sensitive data.

(8) Information Required for Submitting Tax Documentation

To comply with the applicable tax and accounting legislation, we may be required to submit various tax documentation containing your personal data. For submitting tax documentation, we may process your personal data including but not limited to your full name, country of citizenship, permanent residence address, mailing address, date of birth, or foreign tax identifying number.

(9) Analysis of Speech Activity

When you give/take lessons on the Cam-pus platform, we may analyze your microphone activity and measure the volume of the sound. We do it to provide you with an overview of your speaking activity, and to let you know how active you were during the lesson. Please be assured that we do not record your voice, words, or the content of your conversations.

4. Data We Collect: Purposes

We may process the personal data you provided us voluntarily for the purposes defined below. From our perspective, we process your personal data to personalize the use of Cam-pus to the fullest extent possible and to provide you with high-quality Services under the Terms of Service.

(1) Provision of Services

Primarily, we process your personal data to authorize access to our Services and to fulfill our obligations under the Terms of Service for Services provision. Specifically, we use your personal data upon registration to help others (be it a tutor or a student) to find your account or profile, schedule, give and/or take lessons, and track your learning progress.

In order for you to use the Services, you will need to provide payment (e.g. credit card details) and billing information through our partners – third-party payment providers, which process your personal data encrypted and securely. Please see our Refund and Payment Policy for more information.

For enterprise customers, we process the personal data of their employees to create their accounts and connect with the most suitable tutors for further learning. Based on the data about lessons taken by such students, we provide the enterprise customer with statistical reports on their employees' performance.

Please note, that without the information provided by you under our Terms of Service, we will be unable to provide you with the functionality of our platform, connect you with other users, allow you to communicate with them and take/give lessons.

(2) Payment Services

We use third-party payment providers to bill you through an online account payment in lieu of directly processing your credit/debit card information. Your paid balance for one or more lessons is safe in your account as we use an integrated iframe for checkouts from our partners-payment providers, and tutors get the payment for each confirmed lesson securely through third-party payment providers. Correspondingly all transactions are secured as our partners-payment providers use SSL encryption protection. All payment information is stored encrypted and securely by a PayPal service. We do not store your payment information on our servers.

We may also use your payment card transaction data as shared by third-party service providers to confirm a specific transaction occurred and that you qualify for a promotional offer; for example, the date and amount of your purchase and the last 4 digits of your card number so

that we can verify your purchase with our records.

(3) Communications

We may contact you via email and other ways, including through publicly available notices, for Services-related purposes (welcome letter, security and legal notices, announcements, Cam-pus updates, reminders, suggestions, etc.). We may also use your data to enable you to communicate with other users through Cam-pus, including exchanging messages, conducting video calls, and/or leaving feedback about other users.

Your contact data (including email, phone number, etc.) may also be used for gathering feedback. We may contact you to participate in research to improve the user experience of our product. The research will be used for internal purposes only.

(4) Marketing and Promotion of Cam-pus

We may process your first name, last name and email on our mailing list or for the newsletter and send you messages with some commercial or promotional information about our Services. But don't worry, we will request your consent first, and you may always opt out of our marketing messages, using the mechanisms described under the respective link in each message, and through the user settings available on Cam-pus.

If you provide us with your phone number, we may also contact you with some commercial or promotional information about our Services.

(5) Tutor Verification and Program Preparation

To ensure a high quality of lessons given by tutors on Cam-pus, we collect and process tutor credentials to verify their eligibility to teach subjects claimed by them. Besides that, we cooperate with the tutors and use their information to help them develop the learning programs.

For the purposes of analytics, we additionally process tutors' registration data to automate and improve the tutor verification process.

(6) Support and Platform Supervision

In case of any disputes on Cam-pus and other Services-connected issues, we may use data (including communications) to resolve such matters, supervise user behavior on the platform, and respond to any complaints or requests.

(7) Compliance with Legal Requirements

We process certain payment information to comply with applicable legal requirements in the field of finances and/or accounting. We also may process the data collected on the platform in connection with legal requests we receive from you or any other competent person and/or body, and we may use this information to exercise, defend and/or establish our legal rights.

(8) Fraud Prevention

Certain information, such as your log information, payment information and your behavior on the platform are subject to our supervision to prevent fraudulent activities on the platform and assist you in managing your user sessions.

(9) Changes

If Cam-pus decides to change the purposes of processing specified above, we will inform you about such changes prior to the use of your personal data within the newly set purposes. The notification on such changes will be sent to your email and you will have to provide your consent for the amended purposes unless the additional purpose of processing is compatible with those listed above.

In case you do not want to provide us with the requested personal data for the purposes specified above, you may not have access to certain functions of the Services.

5. How Is Personal Data Shared?

In order to provide high-quality services, Cam-pus hires people, enters into agreements with independent contractors as well as cooperates with other services providers, companies and organizations strictly under data processing agreement. For those reasons, some of your personal data can be passed to the persons mentioned. Cam-pus uses only secure places of storage.

6. How Long Will the Personal Data Be Processed and Stored by Cam-pus?

Your personal data will be stored by Cam-pus no longer than is necessary for the purposes for which the personal data is processed.

Generally, Cam-pus retains your personal data as long as your account is active. In case your account expires or you decide to delete your account Cam-pus retains your personal data no longer than 90 days after the account is expired.

However, in case of conflict situations in progress Cam-pus may store personal data for 180 days period or more if the processing is necessary for the establishment, exercise or defense of legal claims and for compliance with a legal obligation that requires processing to which the controller is subject in case of an expired account or in case data subject requested to delete his personal data. Upon the expiry of this period or earlier, if a conflict situation is settled, all personal data gets deleted.

In case your last activity on Cam-pus, as of the last payment date, was more than 180 (one hundred eighty) days ago, your account will be considered expired and gets deleted. Along with your account or profile, all personal data processed by Cam-pus will be erased.

As you are entitled to delete your account or profile after such a request it will be permanently removed within 30 days or earlier from our active systems, servers and back-ups. By deleting your account or profile all your personal data will be removed as well within 90 days.

Personal Data collected when you registered on our mailing list or for the newsletter will be stored as long as you are interested in receiving our emails. We consider that you're interested in this until you unsubscribe from the mailing list or the newsletter by clicking the respective link contained in each of our emails.

7. Your Rights as Data Subject Regarding Your Personal Data Cam-pus Processes

(1) Right of Confirmation

You can obtain confirmation from Cam-pus as to whether personal data concerning you is being processed.

(2) Right of Access

You can access your personal data processed by Cam-pus.

(3) Right to Rectification

You can ask Cam-pus to have incomplete personal data requiring corrections completed.

(4) Right to Erasure (Right to Be Forgotten)

You can request Cam-pus to erase personal data. In most cases, Cam-pus will erase it unless

otherwise required by legislation.

To delete your personal data, you can:

- Contact us by email at support@cam-pus.net. We will respond to your request to delete your information within 30 days and notify you of the outcome.
- Delete specific items from your account (such as your payment method, etc.) by going to your account “Settings” page.
- Delete your entire account by going to your account “Settings” page and following the instructions for deleting your account.

(5) Right of Restriction of Processing

You can contest the accuracy of your personal data or in case Cam-pus is not interested in processing your personal data any longer, but you want Cam-pus to do this for different reasons, for example, to bring a claim against somebody and, instead of the erasure of information, its processing will be restricted.

(6) Right to Object to Processing of Your Personal Data by Cam-pus

You can object to our processing of your personal data when the processing is related to the performance of our task carried in the public interest or the exercise of official authority vested in us. The other case is if we process your data for the purposes of the legitimate interests pursued by us or by a third party and you believe that such interests are overridden by your interests or fundamental rights and freedoms. If you make a request with objection to processing, we will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing.

(7) Right to Withdraw Consent at any Time by Contacting Us

After we at Cam-pus receive a withdrawal request from you, we will process it in a timely manner and we will no longer process your personal data unless otherwise is set by law.

If one of the afore mentioned reasons applies, please contact us, as instructed at the end of this Privacy Policy. We shall promptly ensure that the request is complied with immediately. These requests are free of charge.

If you believe that our use of your data violates your rights, you can lodge a complaint with the competent data protection authority.

Please note that when the processing of your personal data is carried for direct marketing purposes, you have the right to object at any time to such processing without providing any justification and we will no longer process your data with such direct marketing purposes.

8. Other Privacy Commitments

(1) Time for Reply and Reaction

Cam-pus will provide information on action taken on your request related to your rights specified above within one month of receipt of the request for the longest. That period may be extended by two further months if Cam-pus is overwhelmed by the number of requests or the request at issue is complicated and requires a lot of action. Cam-pus will inform you of any such extension within one month of receipt of the request, together with the reasons for such delay.

(2) Security

Cam-pus takes technical and organizational measures to ensure the information is processed in

a manner that ensures appropriate security of information, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage. For example, Cam-pus uses verified contractors that might have access to the data with which the relevant data processing agreements are signed.

(3) Accessing Account to provide support

In exceptional circumstances, such as required customer support, our support specialists may need to access your account. When such an occasion occurs, they will be able to see the personal data submitted to your account, including your scheduled personal events, if your Google Calendar and Cam-pus Calendar are connected.

We undertake to always ask for your permission to access your account before we start troubleshooting.

Please note that if you do not want to grant your permission to access your account, it may affect the time and quality of the provision of customer support.

(4) Children's Privacy

The privacy of children is one of our concerns. Cam-pus Services are not intended for use by children under the age of 18 without the express permission of their parent or legal guardian. If you are under the age of 18 you will need to get your parent's/legal guardian's permission before submitting any personal data to Cam-pus. We may process the personal data of children under the age of 18, provided that data has been consensually provided by parents/legal guardians for the express purpose of using Cam-pus Services.

(5) Breach Notifications

If any personal data of yours would be under the breach, we would inform you and the respective data protection agencies as to the accidents without undue delay, if there are high risks of violation of your rights as the data subject. We would also do our best to minimize any such risks.

9. Legal Matters

Cam-pus considers your use of its Service to be private. However, we may disclose your personal data stored in our databases, in order to:

- (1) comply with the law or legal process served on us;
- (2) enforce and investigate potential violations of this Privacy Policy; including use of this Service to participate in, or facilitate activities that violate the law;
- (3) investigate potential fraudulent activities; or
- (4) protect the rights, property, or safety of Cam-pus, its employees, its customers or the public.

10. Governing Law

This Privacy Policy is governed by and construed with the laws of the State of Israel.

Your Cam-pus Team