

Privacy Policy

Last Updated: June 17h, 2020

We take your privacy very seriously, and we are extremely careful with any personal information (“Personal Information”) you provide. This privacy policy explains what information is collected, how it is used, and how it is protected. Please read this agreement carefully, as it is part of the Terms and your agreement in using the Services. Unless otherwise stated or defined in this privacy policy, the terms used here have the same definitions as in our Terms of Service.

1. The Types of Information We Collect

“Personal Information” is information that can be used to identify, locate, or contact an individual. It also includes other data that may be associated with Personal Information. When you create an account with LearnLux, we may collect the following types of Personal Information: * “Personally Identifying Information,” such as: * Contact information that allows us to communicate with you, such as your name, email address(es), social media user account names, telephone numbers, or other addresses at which you receive communications from, on behalf of or through LearnLux. * Likeness content, which connects your contact information with any photographs or images that you upload to the Site. * “Non- Identifying Information,” such as: * Information that helps us to understand who you are and what types of offers you might like. This includes location information related to your state/province, city, or neighborhood; areas of interest, the types of third-party services you use, and companies you might want to receive recommendations; and demographic information (e.g., birth date, age, gender). All of this information will be aggregated and separated from any of your Identifying Information. * Transaction information about how you interact with LearnLux, such as the pages or app sections you view, how long you view them, the type of browser that you view them from, or modules you use; other information about how you use our App or other communications and applications; and how you interact with the LearnLux App generally. These are only examples of information that we may collect, not an exhaustive list.

2. How We Use the Information About You

The information that you provide to us helps LearnLux create a better experience for you and our user community. We collect Personal Information in order to customize certain modules for you, and, in some cases, to verify your identity. Additionally, we may use your Personal Information, without limitation, in the following ways: * To provide user support and communicate with you; * To deliver important administrative messages to you; * To detect or protect against any errors or fraudulent activity, as may be required by law; * To operate and improve our Services; * To recommend certain products or offers that may be of interest to you; OR * To enforce our Terms of Service or Privacy Policy. The only Personally Identifying Information we will display is what you choose to make publicly available on your profile, if any. In order to provide certain site functions through LearnLux, such as connectivity to your bank of choice, we use several third-party agents to process, route or store your information, or to communicate with you. As a requirement of using these third parties, and in full policy disclosure to you, we have posted links to their Privacy Policies

here: Plaid - Banking Data API Twilio - SMS Messaging Mandrill – Email Management Amazon Web Services - Servers and Database Parse - Push Notifications Information provided through LearnLux will be treated in accordance with these policies, in addition to our Privacy Policy here. Violations of these third-parties' policies may require us to suspend or terminate your LearnLux account immediately or based upon our investigations. For clarity, the only third-parties that may have access to your banking information will be Plaid and Amazon Web Services. LearnLux may collect, in the aggregate and without any Personally Identifying Information, Personal Information that we may provide to certain third-party companies as part of market research. We will never share any Personally Identifying Information as part of that data, nor will we share it with any other users, companies, or advertisers. All aggregate data provided to these third-party companies will contain only gender information, age ranges, and the collective activity data of those groups. We will never sell or share your Personally Identifying Information to any third parties (subject to Section 12 herein) without your prior written permission. We reserve the right to disclose any Personal Information to law enforcement or government officials or other third parties in the case where we: * Must respond to any legal process or subpoenas; * Must take action where there is a violation of our Terms of Service, Privacy Policy, or as part of any investigation into fraudulent or illegal activities may be occurring through LearnLux; * Must respond to any claim of infringement of intellectual property rights; * Where we feel we must do so to protect the safety of our Services, our users, or the general public; OR * Wherever we are required to do so by law.

3. Use of Your Email Address

Our Service mainly works on an opt-in model of communication. Once you sign up for an account with us, you are agreeing to receive electronic communications from us, through either your email address or push notifications in the App. We may use your email address to contact you in the event that we have updates to our App or other information to provide you. Such information may include, without limitation, new services offered by us or information relating to your account. Additionally, we may reach out to you from time to time in order to notify you that our Terms of Service or Privacy Policy have changed. We fully comply with the federal CAN-SPAM Act and as such all emails from us will always, among other required disclosures, have means for you to opt out of the receipt of further email correspondence, except for any emails disclosing material changes to our Terms of Service or Privacy Policy. Alert us immediately if, for any reason, you cannot access or have difficulty accessing our “unsubscribe” processes. Please note that we will never ask for any Personally Identifying Information by email. You should immediately report any emails you may receive that ask for any Personal Information, whether or not it is Personally Identifying Information, and appear as though they are coming from or promote LearnLux.

4. Information You Provide to Third Parties

LearnLux's Services allow for you to connect or sync your account with third-party sites, services, or social media platforms, which are not owned or operated by LearnLux, Inc. You are responsible for any information that you provide to those companies or any other third party that contacts you through or because of our Service. This privacy policy does not govern your interaction with those third party sites. Those sites may have their own privacy policies and practices for use of Personal Information, over which we have no control. The companies and service providers that we may work with may also have their own privacy practices, over

which we have no control. We encourage you to familiarize yourself with the privacy statements provided by these other parties prior to providing them with information or taking advantage of any offer.

5. Mobile Application

You may have the ability to download and use the LearnLux mobile App, which may ask for access to your location or other Personal Information, or for your permission to receive notifications through the application. We may also ask for access to your calendar, photos or other applications on your phone in order to provide services to you. You will have the ability to deny our access at your discretion, though denial of access may mean that you will not be able to use all of the services we provide to our users. We will never share your Personally Identifying Information through the App. All information may become part of our non-identifying, aggregate data.

6. COPPA Policy for Children Under Thirteen

LearnLux fully complies with the Children's Online Privacy Protection Act, and does not intentionally direct any services at children under thirteen (13). Since we do not at this time require any user to give us his or her specific age, it may be possible that children under 13 may access and use the Service without our knowledge. However, if we determine that any user is under the age of 13, we will immediately suspend that user's account, and it shall be that user's responsibility to provide proof of age to continue use of the Service. If you believe that we have inadvertently collected information of a child under the age of 13, please contact us immediately at info@LearnLux.com so that we can remove the information.

7. Cookies and Related Technologies

To provide a smooth and easy experience when you use LearnLux, we may use technologies such as cookies, pixel tags, server logs, and other similar technologies to automatically collect and store information. As you use our Services, your devices communicate with servers operated by us and by our service providers to coordinate the interactivity and fulfill your requests for services and information. For example, when you use our App, LearnLux may place cookies on your mobile device. Cookies allow us to recognize when you return so that we can customize and create a more pleasant user experience for you. Most of the time, the information we collect using cookies and other tools only provides us with Non-Identifying Information. It often helps us understand what our users are accessing most often and to provide better services. You may always choose not to allow cookies through your device settings, but please note that some of our Services or portions of our App may then no longer work for you. LearnLux may develop relationships with third party companies to advertise for our services on other websites, and they may perform tracking and reporting functions for our App and our advertisements. We will not and do not share Personal Information with these third party companies. This Privacy Policy does not cover the collection methods or use of the information by these third parties, and LearnLux is not responsible for cookies or other collection methods of those parties. If you arrive on the LearnLux site or access the LearnLux Services through the advertising or suggestion of a third-party, we encourage you to review the privacy policies or statements of these third party companies to learn more about their use of cookies and other technologies.

8. Account Preferences

You can choose how much information you provide to LearnLux, and you can completely customize the communications that LearnLux provides to you. Please do note, there may be a minimum amount of information required to obtain an account with LearnLux, and by limiting how much information you provide may limit the functionality of LearnLux for your purposes. You can manage your notification preferences by logging into your account and changing those preferences. You can also unsubscribe from any mailings by clicking the “unsubscribe” link at the bottom of emails you receive. You may also manage the sharing of certain Personal Information with us when you connect LearnLux to a social media platform or application. Please refer to the privacy settings of the social media website or application to determine how you may adjust our permissions and manage the interactivity between LearnLux and your social media account or your mobile device.

9. Control Over Your Personal Information

LearnLux wants to give you the best possible user experience, and current information about you helps us do just that. You can keep your information up-to-date by logging in and editing your profile, adding to your account, or interacting with our modules. If you want to close your account or have other questions or requests, please contact us at info@LearnLux.com. While we can assist you in many ways, we may not always be able to delete records of past interactions and transactions as required by applicable law. We will retain your information for as long as your account is active or as needed to provide you services and to maintain a record of your transactions to support our Services. Once your account has been deleted, we will no longer retain any of your personal information unless required by applicable law.

10. Security

LearnLux protects your information by taking reasonable steps to secure it against unauthorized access. We do this through encryption, physical administration by our staff members, and electronic measures. However, no security system or method is guaranteed to be safe from hackers or human error. We will immediately contact you if we find any breaches in our security methods.

11. Collection of Data

Our site uses technologies of third-party partners such as NextRoll to help us recognize your device and understand how you use our site(s) so that we can improve our services to reflect your interests and serve you advertisements about the products and/or services that are likely to be of more interest to you. Specifically, NextRoll/Google Analytics collect information about your activity on our site(s) to enable us to:

- measure and analyze traffic and browsing activity on our site(s);
- show advertisements for our products and/or services to you on third-party sites;

- measure and analyze the performance of our advertising campaigns;

Cross-Device

We may share data, such as hashed email derived from emails or other online identifiers collected on our site(s) with NextRoll/our advertising partners. This allows our partners to recognize and deliver you ads across devices and browsers. To read more about the technologies used by NextRoll/our partners and their cross device capabilities please refer to NextRoll's Privacy Notice.

Opting-Out

Our partners such as NextRoll may use non-cookie technologies that may not be impacted by browser settings that block cookies. Your browser may not permit you to block such technologies. For this reason you can use the following third party tools to decline the collection and use of information for the purpose of serving you interest based advertising:

- The NAI's opt-out platform: <http://www.networkadvertising.org/choices/>
- The EDAA's opt-out platform <http://www.youonlinechoices.com/>
- The DAA's opt-out platform: <http://optout.aboutads.info/?c=2&lang=EN>

12. Notice to International Users

LearnLux operates in the United States of America. Personal Information may be accessed by us or transferred to us in the United States or to our affiliates and service providers elsewhere in the world. By providing us with Personal Information, you consent to this transfer. We will protect the privacy and security of Personal Information according to our Privacy Statement, regardless of where it is processed or stored.

13. Changes in Ownership

LearnLux is a fresh, innovative and growing service. We may have the opportunity or occasion to buy, sell, merge, acquire, dissolve, or transfer assets or the ownership of the company. Depending on the requirements of such a transaction, we may share data provided by you with third parties as necessary to investigate or complete any such transaction. Such third-party assignees will take over the rights and obligations regarding the information described in this Privacy Policy. Under no circumstances will your Identifying Information be made public through any of these opportunities.

14. California Residents

California Civil Code Section 1798.83 permits LearnLux App users that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at info@LearnLux.com.

15. Modifications and Contact

From time to time, we may update this Privacy Policy to clarify our practices or to reflect new or different privacy practices, such as when we add new features to our Services. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or by means of notice through or on the Services prior to the change becoming effective. We encourage you to periodically review this page for the latest information about our privacy practices. If you have any questions about the modifications or any part of this policy, please email us at info@learnlux.com.