Privacy Policy

Effective date: Dec 7, 2017

We at EET Excellence Educational Technologies ("EET," "we," "us," "our) know that you care about how your personal information is used and shared, and we take your privacy seriously. By accessing or using our systems (including without limitation the mobile version of EET systems and/or dashboards (the Mobile Site) and the EET mobile application(s) available via the Apple App Store and the Android Marketplace (collectively, the Mobile Application)), you acknowledge that you accept the practices and policies outlined in this Privacy Policy. Remember that your use of EETs Systems and services is at all times subject to the Subscription Agreement, which incorporates this Privacy Policy. Any terms we use here without defining them have the definitions given to them in the Subscription Agreement.

Please read on to learn more about how we collect and use your information; if you have any questions or concerns regarding our privacy practices, please send us a detailed message to Privacy@eet.by

WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy explains how EET collects and uses information from its Systems users, including our treatment of personally identifiable information. This policy does not apply to websites or practices of companies that EET does not own or control, or to individuals that EET does not employ or manage.

HOW IS STUDENTS PERSONAL INFORMATION TREATED?

If you are not of legal age to form a binding contract (in many jurisdictions, this age is 18), you may only use the Services and access EET systems with your school administrator, parents or guardians express consent. School administrator express consent is taken once an account has been created for the student. Review this Privacy Policy with your parent or guardian and make sure you understand it, and do the same with the privacy policies of all websites you visit or mobile applications you use.

We only collect personal information through the Services from a child under 13 where that students school, school administrator has agreed by creating student account (via the terms described in more detail in the Subscription Agreement) to obtain parental consent for that child to use the Systems and disclose personal information to us, for the use and benefit of the learning environment. If you are a student under 13, please do not send any personal information about yourself to us if your school administrator has not obtained this prior consent from your parent or guardian, and please do not send any personal information other than what we request from you in connection with the Systems. If we learn we have collected personal information from a student under 13 without parental consent being obtained by his or her school administrator, or if we learn a student under 13 has provided us personal information beyond what we request from him or her, we will delete that information as quickly as possible. If you believe that a student under 13 may have provided us personal information in violation of this paragraph, please contact us at Privacy@EET.com.

When we use the term "Personal Information" in this Privacy Policy, we are referring to personally identifiable information of individual registrants of the Systems. References to "Students Personal Information" only apply to personally identifiable information of users who have logged into the Systems as minor students (i.e., students under the age of 18). General references to "information" apply to all users.

If you are a student registrant and your parent or guardian has signed up for the Services with an Access Codes provided by your school administrator or teacher, you understand that your parent or guardian can view all information within or associated with your account, including, without limitation, messages and/or assignments send to you by your teacher and grades you received on assignments.

WHAT INFORMATION DOES EET DISPLAY OR COLLECT?

1.Information You Provide to Us

We receive and store any information you knowingly enter on our Systems, whether via computer, mobile phone, other wireless device, or that you provide to us in any other way. This information may include, without limitation, Personal Information such as your name, user name, email address,

phone number, school location, billing and payment information, and any other information necessary for us to provide our Services. If you are a student registrant, the only Students Personal Information we require is the name and user name; through the functionality of the Systems, as a student or a teacher, you are not permitted to input an email address or phone number.

2.Information Collected Automatically

We receive and store certain types of usage information whenever you interact with our Systems; this information is not Personal Information or Student's Personal Information. For example, EET automatically receives and records information on our server logs from your browser including your IP address, EET cookie information, and the page you requested. We also record the details of your activity on the Systems, and the number and frequency of visitors to our site and its components and related systems and user dashboards.

When you download our Mobile Application, we automatically collect information on the type of device, name and version of the operating system, name and version of the application, whether the currently logged in user is a teacher, student, parent, or other user type, the numerical mobile device user ID, as well as actions performed by the user in accessing the Mobile Application (Mobile Usage Information, which is considered part of usage information as described above). However, we do not ask you for, access or track any geographic-location-based information from your mobile device (i.e., any information regarding where your mobile device is located on the globe at a particular time) at any time while downloading or using our Mobile Applications. For clarity, this does not prevent us from asking you what school you are affiliated with.

We also use mobile analytics software to allow us to better understand the functionality of our Mobile Application and Mobile Site on your phone. This software may record information such as how often you use the Mobile Application, the events that occur within the Mobile Application, aggregated usage information, performance data, and where the application was downloaded from; this information is considered Mobile Usage Information.

Cookies are alphanumeric identifiers that we transfer to your computer or mobile device to enable our systems to recognize your computer or device and tell us how and when pages in our site are visited and by how many people. EET cookies do not collect Personal Information or student's Personal Information, and we do not combine the general information collected through cookies with other Personal Information or Student's Personal Information to tell us who you are or what your user name or email address is. Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. We strongly recommend that you leave the cookies activated, however, because you may not be able to log in or use many of the Services most attractive features without cookies enabled, to provide you with an optimal online experience.

WHAT DOES EET USE YOUR INFORMATION FOR?

1. Generally

When you use the Services, as school administrator you may set up your school profile, send/receive messages, create assignments, and transmit information through various system channels, depending on the category of user ("User Category") you are registered as, and as permitted by the functionality of the Services. The information we gather from users enables us to personalize and improve our systems and services.

2. Personal Information

The Personal Information you provide is used for such purposes as responding to your requests for certain information and services, customizing your experience, and communicating with you about the Services.

3. Students Personal Information

We use the Student's Personal Information for creating individual student account (which will identify the student within a Limited Access Groups), customizing your experience, and for sending you notifications via the Systems from your teacher, school administrator. (Regarding your use of the Services) (Notifications). Please note that your parent or guardian, as well as an administrator from your school and your teacher can view all activity

and content associated with your student account, including your Students Personal Information. EET will not communicate directly with any student account whatsoever.

4. Your email address

If you provide us your email address, we may send you email communications. Web beacons may also be used in some of our emails to let us know which emails (and which links within those emails) have been opened by recipients. This allows us to gauge the effectiveness of our customer communications. Please note that if you do not want to receive legal notices from us via email, such as this Privacy Policy, those legal notices will still govern your use of the Services, and you are responsible for visiting this Privacy Policy from time to time to review any changes. If you no longer wish to receive emails from EET, please click the unsubscribe link that is included in the footer of our emails, or update your email preferences.

5. Affiliation email address

If you are a school administrator/manager and you provide us with another school's name and email address, we will send that school an email inviting them to use our services. We store this information for the sole purpose of sending this email (and, if applicable, subsequent reminder emails) and tracking the success of our referral program. The referred school may contact us at Privacy@EET.by to request that we remove this information from our database.

6. Usage Information

EET uses this type of aggregate data to enable us to figure out how often users use our systems, so that we can make our services more appealing and relevant to as many users as possible, and customize and improve those services. As part of our use of information, We may link usage information to Personal Information and Students Personal Information that we collect through the Services, but we will only use this linked information internally (for example, to customize your experience), and will not disclose it in linked format to any third parties. Additionally, certain usage-related information may be viewable in your user profile that may be displayed to other users, depending on your User Category; for example, in the student account a badge maybe displayed behind his/her name indicating that he/she has achieved the highest exam result compared to other same class students.

7. Mobile Usage Information

This information is used to determine the device capabilities and usage trends which allow us to better understand which devices we should support and what features are most frequently used.

8. Push Notifications

If you use the Mobile Application, we will send push notifications to your mobile device in order to make you aware of certain activities that may occur within your account, such as when school administrator has entered a new assignment for the teacher, or, when a teacher uploads exam results or any student related information. When you have new notifications, or when grades have been uploaded. You may opt-out of receiving these types of communications by turning them off at the mobile application level.

WILL EET SHARE ANY OF THE PERSONAL INFORMATION OR STUDENT'S PERSONAL INFORMATION IT RECEIVES?

Personal Information and Student's Personal Information about our users is an integral part of our business. We neither rent nor sell your Personal Information or Student's Personal Information; we may share your Personal Information and Student's Personal Information in personally identifiable form only as described below.

1. Agents

We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Examples include sending email, analyzing data, processing payment, and providing user services. Unless we tell you differently, EET's agents do not have any right to use Personal Information or Student's Personal Information we share with them beyond what is necessary.

2. Communication about the Services or in Response to User Requests

As part of the Services, you may receive from EET (if you are a school administrator) email or other types of communication relating to your use of our systems. You acknowledge and agree that by posting information on the Services or otherwise using the Services, EET may send you email, contact you or engage in other communication that they determine relate to your school profile or use of the services. If you disclose your email address to EET, depending on your User Category, we may use it to send updates, a newsletter or other news regarding the Services, or to simply send Notifications.

3. Business Transfers

If EET, or some all of its assets were acquired or otherwise transferred, or in the unlikely event that EET goes out of business or enters bankruptcy, user information may be transferred to or acquired by a third party.

4. Protection of EET and Others

We may release Personal Information or Student's Personal Information when we believe in good faith that release is necessary to comply with the law, enforce or apply our Subscription Agreement and other agreements; or protect the rights, property, or safety of EET, our employees, our users, or others. We will try to give you notice if we release information for these reasons, but please understand that we reserve the right not to, as it may not be practical, legal, or safe to do so.

IS OUR INFORMATION SECURE?

Your EET account Personal Information or Student's Personal Information is protected by a password for your privacy and security. We also use coding practices which take steps to prevent attack on our Services from web browsers and malicious scripts, by processing all actions through several permission verifications checks. You may help protect against unauthorized access to your account and Personal Information or Student's Personal Information by selecting and protecting your password appropriately and limiting access to your computer and browser by signing out after you have finished accessing your account.

If you enter sensitive information (such as a credit card number) in our Credit purchasing process, we encrypt the transmission of that information using secure socket layer technology (SSL).

EET endeavors to keep your information private; however, we cannot guarantee security. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information.

You may request deletion of your EET account by asking your school administrator. Please note that some unrevised information may remain in our records after revision of such information or deletion of your account, or in cached and archived pages. Some information may remain viewable elsewhere to the extent that it was copied or stored by other users. We may use any aggregated data derived from or incorporating your Personal Information after you delete your information, but not in a manner that would identify you personally. We will retain your School Information or Student's Personal Information for as long as your account is active or as long as needed to provide you the Services; we also may retain and use your information as we deem it necessary to comply with our legal obligations, and to enforce our agreements.

WILL EET EVER CHANGE THIS PRIVACY POLICY?

We may make changes to this Privacy Policy from time to time for any reason. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected. If we make changes in the way we use Personal Information or Student's Personal Information, we will notify you via email or by posting an announcement on our systems with two (2) weeks prior notice before the change becomes effective. Users are

bound by any changes to the Privacy Policy when he or she uses the Services upon the conclusion of such two (2) week notice period. This notice period only applies to changes to the Privacy Policy; you understand that it may not be possible in certain situations to provide advance notice of other changes to the Subscription Agreement (for example, where a change to the Terms is necessary to comply with legal requirements).

WHAT IF I'M IN A DIFFERENT COUNTRY?

When you use our systems, you are consenting to have your data transferred to and processed in the Republic of Belarus. Please understand that EET is subject to the investigatory and enforcement powers of the Trade Commission of the Republic of Belarus. All of EET's servers are currently in the Republic of Belarus, and we aren't able to process your information within the borders of any other country. Given this limitation, if your use of the Services or disclosure of certain information to EET would violate any law that is applicable to you, your right to use the Services and/or disclose such information is revoked, as it is wherever use of the Services is prohibited by law.

EET has been certified that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern with respect to residents of the E.U and Switzerland.

In compliance with the EU-U.S. and Swiss-U.S. Privacy Shield Principles, EET commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact EET at Privacy@eet.by.