

# PRIVACY POLICY

## 1. INTRODUCTION

Welcome to Explore Cultural Learning website (including all websites to which this private policy is posted, ‘the site’) which is operated by Fatherland Global Corporation and its affiliates (collectively, “**Fatherland Global**,” “**we**”, “**us**” and/or “**our**”). This Site provides, among other things, information about our people, organization and application process, tools for applicants to submit applications and go through the application process, our programs, our blog and press, and profiles of our founders, mentors, partners and companies that have participated in the Explore Cultural Learning program (collectively the “**Service**”).

We are committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with Our website and general enquiries processes. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation (“GDPR”) the Data Controller is Fatherland Global, where data is inputted directly by individual clients (parents or student); and the Data Processor is Fatherland Global, where data is uploaded by enterprise clients.

Please note: where you apply for a job opening posted by Us, this Privacy Notice provisions will apply to Our processing of your personal information.

## 2. PERSONAL INFORMATION WE COLLECT

### 2.1 Personal Information You Provide

We collect and process some or all of the following types of information from you:

- Information that you provide when you create a user account (pupil, parent or teacher), including name, email address, telephone number, post address and age. Please note, when you create an account, you confirm that you have the authority and the consent of the relevant data subjects, or their parent or guardian, to do so.
- Information that you provide when you submit an enquiry. This includes information provided through our enquiry form, via email, via phone and/or by any other method. In particular, We process personal details such as name, email address, telephone number, postal address, role, organization you work for, and business requirements or any other details in the enquiry that you provide to Us.

- If you contact Us, We may keep a record of that correspondence.
- Details of all actions that you carry out through the use of the Services.
- Details of your visits to Explore Cultural Learning Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Explore Cultural Learning Website and the resources that you access.

## **2.2 Information We Collect From Other Sources**

We have the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet – this may include sources such as government departments, local authorities, LinkedIn and other social media profiles.

## **3. HOW WE USE PERSONAL INFORMATION**

### **3.1 Lawful basis for processing**

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the fulfilment of commercial arrangements with organizations interested in engaging Our business.

### **3.2 Purposes of processing**

We use information held about you in the following ways:

- On the basis that there is a contract between Us and you. We process your data in order to fulfil this contract;
- Pupil, parent and teacher information will be used to create individual logins for each user, allowing them to access Our platform. This will enable teachers to explore content, assign tasks and review progress. It will enable parents to review progress and amend pupil and parent account details. It will enable pupils to access content, and to have their performance tracked for analysis by teachers and parents;
- To communicate with you in response to enquiries
- To enhance any information that we receive from you with information obtained from third party data providers;
- To help improve the usefulness and effectiveness of our website and marketing channels; and
- To provide you with further information on how to set up an account.

## **4. HOW WE STORE YOUR PERSONAL DATA**

### **4.1 Security**

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect your personal data, We cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

#### **4.2 Where We store your personal data**

We store your personal data in our own systems and servers, within the United States.

### **5. INTERNATIONAL TRANSFERS**

By using our Service, you understand and acknowledge that your Personal Information will be transferred from your location to our facilities and servers in the United States.

### **6. DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available upon request from our Data Representative by email:

[programs@fatherlandglobal.com](mailto:programs@fatherlandglobal.com)

## **7. CALIFORNIA PRIVACY RIGHTS**

### **7.1 California Privacy Rights**

To the extent provided for by law and subject to applicable exceptions, California residents have the following privacy rights in relation to the Personal Information we collect:

- The right to know what personal information we collect and how we have used and disclosed that personal Information;
- The right to request deletion of your Personal Information; and
- The right to be free from discrimination relating to the exercise of any of your privacy rights

**7.2 Exercising Your Rights:** California residents can exercise the right to request deletion of Personal Information by contacting us at [programs@fatherlandglobal.com](mailto:programs@fatherlandglobal.com) . California residents can exercise the right to know what Personal Information we have collected and how we have used and disclosed that Personal Information by emailing us at [programs@fatherlandglobal.com](mailto:programs@fatherlandglobal.com) .

**7.3 Verification:** In order to protect your Personal Information from unauthorised access or deletion, we may require you to verify your login credentials before you can submit a request to know or delete Personal Information. If you do not have an account with us, or if we suspect fraudulent or malicious activity, we may ask you to provide additional Personal Information and prove of residency for verification. If we cannot verify your identity, we will not provide or delete your Personal Information.

**7.4 Authorized Agents:** You may submit a request to know or a request to delete your personal Information through an authorised agent. If you do so, the agent must present signed written permission to act on your behalf and you may also be required to independently verify your identity and submit proof of your residency with us.

## **8. YOUR LEGAL RIGHTS**

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;

- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests; (direct marketing or processing for the purposes of research and statistics).

If you wish to exercise any of the rights set out above, please contact our data representative by email: [programs@fatherlandglobal.com](mailto:programs@fatherlandglobal.com) .

## **9. CHANGES TO THE PRIVACY POLICY**

The Service and Our business may change from time to time. As a result, we may change this Privacy Policy at any time. When we do, we will post an updated version on this page, unless another type of notice is required by the applicable law. By continuing to use Our services or providing us with Personal Information after we have posted an updated Privacy Policy, or notified you by other means if applicable, you consent to the revised Privacy Policy and practices described in it.

## **10. QUESTIONS ABOUT THE POLICY**

If you have any questions about our Privacy Policy or information practices or need to access this Privacy Policy in a different format, please feel free to contact the legal team at our designated request address:

[programs@fatherlandglobal.com](mailto:programs@fatherlandglobal.com)