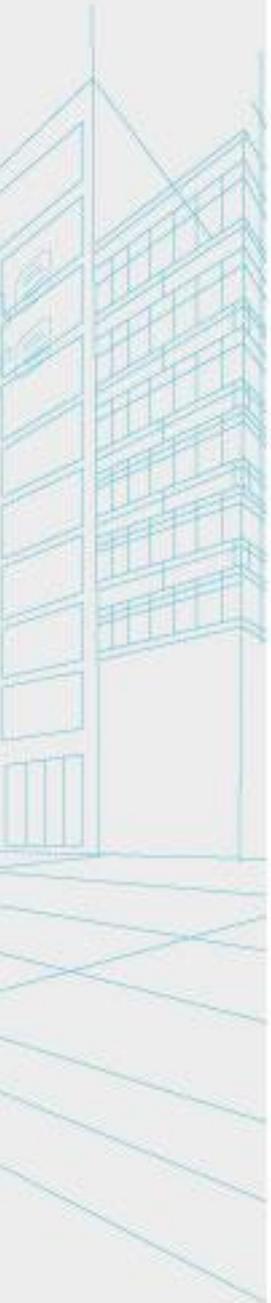




Privacy Policy



PRIVACY POLICY

1. INTRODUCTION

We are Younder (“Younder” or “us”), an EdTech that came to life to deliver new ways of teaching and learning, through the development of educational technologies and solutions. To make the experience of our users unique, the user can access the courses, the supporting materials, the file library, the handouts, the videos and other media (the "Services") both through the website www.younder.com.br (the "Web platform") and through the Younder application (the "Application", or simply "App").

Younder is committed to safeguarding your privacy and protects your Personal Data (as defined below). This is our Privacy Policy (the "Policy"), which aims at showing you how we do this, on our Web Platform and in the App (the "Younder platforms").

The acceptance of this Policy will be made when you register on the Younder Platforms. This acceptance will be given by the time you unambiguously agree to the use of your Data for each of the purposes described herein. This indicates that you are aware and in full agreement with the way we will use your information and Data. If you do not agree with this policy, please do not go on with your registration procedure and do not use our Younder Platforms. However, please let us know about your disagreement and doubts so that we can evaluate them.

In order to make your understanding easy, we divide this policy as follows:

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In this Policy, the capitalized terms have the following meanings:

“**Legal Basis**” means the legal hypotheses that allow Younder to process Personal Data. Any and all personal Data Processing is deemed legitimate only if it is grounded on a Legal Basis.

“**Personal Data**” or simply “**Data**” means any Data relating to an identified or identifiable individual, including identifying numbers, location Data, electronic identifiers, or any Data that, when combined with other information, are capable of identifying someone, making them identifiable or even individualizing them.

“**Sensitive Data**” means Personal Data regarding racial or ethnic origin, religious beliefs, political opinions, membership of a Union or an organization of religious, philosophical or political character, Data regarding health or sexual life, genetic or biometric Data, when linked to a person.

“**Privacy Policy**” or “**Policy**” means this Privacy Policy, which informs the Data Holders how Younder uses the Personal Data collected on the Younder platforms.

“**Services**” are the features that Younder offers on the Younder platforms.

“**Treatment**” or “**Processing**” means the uses that Younder makes of Personal Data, including, but not limited to, any of these activities: collection, registration, storage, organization, alteration, retrieval, consultation, use, disclosure, sharing, transmission, production, reception, classification, use, access, reproduction, distribution, processing, archiving, elimination, information evaluation or control, communication, transfer, diffusion or extraction, exclusion or destruction.

“**You**” or “**Data Holder**” means the person whom the Personal Data are related to.

3. HOW DOES YOUNDER COLLECT DATA ABOUT YOU?

In order to make this information more accessible, we listed, in the table below, some purposes for which your Data can be used, so that you can understand how Younder Platforms collect your Data. Younder may receive this Data directly from you or directly from the company which you work at, when our Services are contracted by the latter.

Purpose	Personal Data	Legal Basis
<i>Logging of navigation Data</i>	Server IP address, browser model and / or device.	Legal Obligation and / or Legitimate Interest
<i>Carry out the registration in progress</i>	Employing company, full name, email, phone, CPF and date of birth	Legitimate Interest
<i>Registration</i>	Employing company, full name, email, phone, CPF and date of birth.	Legitimate Interest
<i>Content Personalization</i>	User interests, i.e. Data referring to the User's behavior and experience on the platform, which may include some actions they perform (e.g. moments when they opened a certain activity, how much time was needed to perform an exercise, how many times they reviewed a video, among others).	Consent and/or Legitimate Interest
<i>Login by Facial Biometrics</i>	Photography and facial biometrics.	Consent and guarantee of fraud prevention, in the processes of registration identification and authentication in electronic systems.

<p><i>Track User Evolution</i></p>	<p>Data resulting from classes and courses performed on the Younder Platforms such as grades, notes, course developments and any other information related to the user's development on the Younder Platforms.</p>	<p>Consent and / or Legitimate Interest</p>
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If you need to change or remove any information that is contained in your registration, you can contact us through our service channels that are ready to address your requests. You are henceforth let known that, in the event of registration removal, your login and password may be inactivated and your access to the Younder Platforms interrupted.

4. HOW DOES YOUNDER USE YOUR DATA?

All Personal Data you provide to us through the logged area or digital environment of the Younder Platforms are confidential and will not be communicated or transmitted to third parties without your prior express permission (see item 5 below), with the exception of the contracting companies, related to the provision and execution of our services5.

According to the permissions you give us, Younder will be able to use them:

- To ensure the technical functionality and development of our Services;
- To communicate with you in response to any questions, suggestions or any contact needs;
- For the application of this Privacy Policy and any other terms with which you have agreed, as well as to protect the rights, property or security of Younder and its users;
- As specified in our Privacy Policy; and
- For synchronizing Data and records between the Application and the Web Platform, so that all Data, activities, and functionalities performed by you can be accessed and monitored from anywhere and on both platforms in a synchronic and safe way.

The collected Personal Data will be stored in a Database that will be used aiming at building up your profile. We will collect, organize, analyze, and cross information, with the objective of developing customized and modular solutions, which will contribute to your improvement and better use of the Younder Platforms.

We will not:

- Access, copy, use, sell, share or in any way disclose the images, videos, audios and other files stored on your mobile device;
- Access, use, sell, share or in any way disclose the images, videos, audios and other files stored on the Younder Platforms for any purpose other than the specific purpose of providing the services contained in these Younder Platforms and as provided in this Privacy Policy and application regulations;
- Share, sell, publish or disclose any information with third parties, except the ones provided in this policy; and
- Have access to the applications, information, Data, videos and other information stored on your mobile device, which are not strictly related to the App.

5. WHOM DOES YOUNDER SHARE YOUR DATA WITH?

To deliver our services, we can operate together with other companies. For this reason, we reserve the right to share your personal Data, including registration information and use of the Younder Platforms in the hypotheses listed below.

We do not rent or transfer your Personal Data to anyone, except for the categories of companies listed below:

- **Marketing:** We use marketing companies to disclose ads through different technologies. Therefore, you may eventually directly receive advertisements, content, and links displayed in a personalized manner, according to your interests, behaviors in our application or in other services with which you interact. To do so, Data can be shared between Younder and these other companies, mainly unique identifiers, IP addresses, cookies, behavioral Data and Data on the Platforms usage (analytics), which can be used to measure the efficiency of online advertising. You can always be opposed to this advertising by contacting us via e-mail: transparencia@younder.com.br.
- **Our Customers:** Companies can contract Younder Services in order to provide courses through the Younder Platforms for their employees. In this case, we may share your Personal Data with a given employer Customer of the respective User.
- **Our Partners:** Younder also contracts third party services for the development and / or implementation and / or achievement of its products; therefore, Younder can share your Personal Data with them so that it is possible to provide the Services of the Younder

Platforms to you. For example, we use Data hosting services to store our Database and share your information with partner establishments. Our partners are only authorized to use personal Data for the specific purposes which they have been contracted for, so they will not use your personal Data for other purposes, besides the provision of services contractually provided.

- **Artificial Intelligence ("AI"):** The Data collected by us are used so that Younder can understand, through the use of AI, the evolution and behavior of users who make use of the Younder Platforms. Third-party AI services enable us to improve the Younder Platforms and customize our services so that we can better tailor them to your interests.
- **To safeguard and protect the rights of Younder:** We reserve the right to access, read, preserve, and disclose any Data we believe are necessary to comply with a legal obligation or a court order; enforce or apply our terms and other agreements; or protect the rights, property or security of Younder, our employees, our users or others.

Whenever possible and feasible, we will submit the Data we share to an anonymization process, in order to preserve their utmost privacy.

6. WHAT ARE YOUR RIGHTS?

Below we summarize the rights you have under the General Data Protection Act ("LGPD", Law No. 13.709/18) and Brazilian sectoral laws relating to Data protection, which are:

- **Request access to your personal Data.** This right allows you to request and receive a copy of your Personal Data that we possess about you.
- **Request confirmation of the existence of a Processing of your Personal Data.** This right allows you to request and receive a confirmation of the existence of the Processing of your Personal Data by us.
- **Request for rectification of your Personal Data at Younder.** This right allows you, at any time, to request correction and / or rectification of your Personal Data if you identify that some of them are incorrect. However, to make this correction effective, we will have to check the validity of the Data you provide to us.
- **Request for deletion of your Personal Data.** This right allows you to request us to exclude your Personal Data from the Younder Platforms. All collected Data will be deleted from our servers when you request so, or when they are no longer necessary or relevant to

offer you our services unless there is any other reason for their being kept, such as any legal obligation to retain Data or the need to preserve these for the rights of Younder.

- **Right to object to some Data processing.** When we are relying on a legitimate (or third party) interest and there is something about your specific situation that makes you want to oppose to the Processing in this field. You also have the right to dispute where we are processing your Personal Data for marketing purposes, for example. In some cases, we can demonstrate that we have legitimate reasons to process your Data, which overlap your rights, since in such cases it may be essential to provide the Services.
- **Right to request anonymization, blocking or deletion.** This right allows you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) If you want us to establish the accuracy of the Data; (b) When you need the Data to be kept, even if we do not need it anymore, as necessary, to establish, exercise or defend legal claims; or (c) If you opposed to the use of your Data, but in this hypothesis we need to check if we have legitimate reasons to use it.
- **Right of portability.** We will provide to you, or to third parties you have chosen, your Personal Data in a structured and interoperable format.
- **Right to withdraw consent at any time.** You have the right to withdraw your consent; however, this will not affect the legality of any processing performed before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain Services. And if this is the case, we will warn you when this happens.
- **Right to review automated decisions.** You also have the right to request the review of decisions taken solely based on the automated processing of your Personal Data that might affect your interests.

If you have any questions about these issues and how you can exercise these rights, feel free to contact us through email: transparencia@younder.com.br.

7. SECURITY AT YOUNDER

Younder undertakes to make efforts and adopt Data Protection measures to ensure, with excellence, the security of our digital environment. For example, the Younder Platforms have mechanisms and tools for validating and monitoring the recurrence of user login and password, ensuring greater security to the logged environment.

In addition, Younder is committed to maintaining your Data stored on a secure, protected technologic platform and in accordance with the legislation, avoiding hardware redundancy, online Database replication, security backup, and access control.

Your Personal Data will be stored and processed in the protected technological system(s) and your access records to the application shall be available indefinitely if there is no objection or request for Data deletion.

We strive to protect your privacy and your Personal Data, but, unfortunately, we cannot guarantee full security. Entry or unauthorized use of the account, hardware or software failure and other factors may jeopardize the security of your Personal Data at any time, so please help us to maintain a safe environment for everyone. In addition to adopting good security practices regarding your account and your Data, if you identify or take notice of something that jeopardizes the security of your Data, please contact us.

a. PASSWORD FOR ACCESS TO THE LOGGED AREA

When you are registered for using our Services, you will receive an access password to our logged-in area. Your password will be encrypted and will protect your Personal Data, it should be exclusive because you are responsible for the confidentiality of your password. If you suspect of any unauthorized use of your password by third parties, please notify us immediately through e-mail: transparencia@younder.com.br.

Your password is personal and should not be provided for use by third parties. This protects you from intrusions and misuse of your password and personal or confidential information associated with your account. Whenever you are done navigating in the logged-in area of the Younder Platforms, make sure you have clicked the Exit button, ensuring that your access has been successfully terminated.

If you need to reset your password, you can request the change at any time through the Younder Platforms.

b. FACIAL BIOMETRICS ACCESS

Our Younder Platforms feature a facial recognition tool as a way of security and fraud prevention for access to the logged-in area through facial biometrics. In order to enable this functionality, which is not mandatory, it is necessary to allow the use of the webcam connected to

your hardware or from the front camera of your mobile device to **collect the photo**. This photo will be stored and will only be used for the comparison that the software performs, between the face viewed and the photo you saved.

We will not use your photo for any other purpose and this information shall not be shared, published, copied, sold or in any way made available to third parties, except to safeguard and protect the rights of Younder.

8. WHAT ARE YOUR RESPONSIBILITIES?

By giving your consent to this Policy, you represent and warrant that all Data and information provided by you on the Younder Platforms is legitimate, truthful and authentic.

You will be solely responsible for all information entered on the Younder Platforms, committing to use them in a lawful, fair and entirely good-faith manner, assuming all responsibility for any damage caused to Younder and / or third parties due to improper use.

Younder is not liable for the information and Data provided by you and keeps the right of verification and adoption of the necessary measures in case of suspicion or proof of fraud, legal infringement or breach of the right(s) of Younder or third parties under the law.

Also, you may not use reverse engineering, invade, hack, clone or otherwise violate the security system of the Younder Platforms in order to obtain undue advantage for yourself or for third parties, which may incur in losses of any order. Younder, from now onwards, is not liable for any damage arising from your actions or omission due to the use of the Younder Platforms.

9. HOW TO TALK TO YOUNDER ABOUT THIS POLICY

This Policy has been drawn up in a simple and accessible manner, relying on several examples of Data usage, just so that you can read and understand how we use your Data. If you have questions or need to discuss any matter related to this Policy, please contact us via email: transparencia@younder.com.br.

10. CHANGE IN THE PRIVACY POLICY

Occasionally, at our sole discretion and intending to promote improvements and adjustments, without the need for prior notice, we may make changes in this Privacy Policy. Therefore, be sure to regularly read the terms we offer on the Younder Platforms.

Whenever the changes involve the use of Data or other activities of your interest, you will be let known and new consent may be required.

I have read, understood and agree with this Privacy Policy.

Welcome to YOUNDER!

Privacy Policy updated in June 2019.

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