Privacy Policy of Shani's Tutoring

Shani's Tutoring collects some Personal Data from its Users.

Owner and Data Controller

Shani's Tutoring 323 Bury Street West London N99JW

Owner contact email: shani@shanistutoring.com

Types of Data collected

Among the types of Personal Data that Shani's Tutoring collects, by itself or through third parties, there are: Tracker; Usage Data; first name; last name; gender; date of birth; email address; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); username; device information; geographic position; language; number of Users; city; session statistics; latitude (of city); longitude (of city); browser information; answers to questions; phone number; payment info; purchase history; billing address; shipping address; referral URL; page views; crash data; number of sessions; session duration; User ID; calendar information; IP address; app information; operating systems; Data that is available across various devices; Data communicated while using the service; interests; address; contact details; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; invoicing information.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Shani's Tutoring.

Unless specified otherwise, all Data requested by Shani's Tutoring is mandatory and failure to provide this Data may make it impossible for Shani's Tutoring to provide its services. In cases where Shani's Tutoring specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by Shani's Tutoring or by the owners of third-party services used by Shani's Tutoring serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through Shani's Tutoring.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Shani's Tutoring (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Commercial affiliation, Analytics, Contacting the User, Displaying content from external platforms, Interaction with external social networks and platforms, Access to third-party accounts, Platform services and hosting, Registration and authentication, Handling productivity related activity, Advertising, Handling payments, SPAM protection, Managing contacts and sending messages, Tag Management, Managing data collection and online surveys, Advertising serving infrastructure, Hosting and backend infrastructure, Beta Testing, Infrastructure monitoring, Traffic optimization and distribution, Content commenting, Interaction with live chat platforms, Location-based interactions, Remarketing and behavioral targeting, Collection of privacy-related preferences, User database management, Building and running Shani's Tutoring and Selling goods and services online.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Facebook permissions asked by Shani's Tutoring

Shani's Tutoring may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows Shani's Tutoring to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the <u>Facebook permissions documentation</u> and to the <u>Facebook privacy policy</u>.

The permissions asked are the following:

Basic information

By default, this includes certain User's Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available.

About Me

Provides access to the 'About Me' section of the profile.

Age range

Provides access to the User's age range.

Gender

Provides access to the User's gender.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Access to third-party accounts

This type of service allows Shani's Tutoring to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.

Facebook account access (Facebook, Inc.)

This service allows Shani's Tutoring to connect with the User's account on the Facebook social network, provided by Facebook, Inc.

Permissions asked: About Me; Age range; Gender.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; personal information; biometric information.

This processing constitutes:

Twitter account access (X Corp.)

This service allows Shani's Tutoring to connect with the User's account on the Twitter social network, provided by Twitter, Inc.

Personal Data processed: username.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

• a Sale in the United States

Stripe account access (Stripe Inc)

This service allows Shani's Tutoring to connect with the User's account on Stripe, provided by Stripe, Inc.

Personal Data processed: first name; username.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

• a Sale in California

Google Drive account access (Google LLC)

This service allows Shani's Tutoring to connect with the User's account on Google Drive, provided by Google LLC.

Personal Data processed: device information; email address; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Shani's Tutoring, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside Shani's Tutoring. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Amazon Advertising

Amazon Advertising is an advertising service provided by Amazon Europe or by Amazon, depending on how the Owner manages the Data processing.

Personal Data processed: Tracker; Usage Data.

Place of processing: European Union – <u>Privacy Policy</u> – <u>Opt out</u>; United States – <u>Privacy Policy</u> – <u>Opt out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Amazon Mobile Ads (Amazon)

Amazon Mobile Ads is an advertising service provided by Amazon.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Google AdSense

Google AdSense is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. This service uses the "DoubleClick" Cookie, which tracks use of Shani's Tutoring and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

In order to understand Google's use of data, consult Google's partner policy.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Impact (Impact Tech, Inc.)

Impact is an advertising service provided by Impact Tech, Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Jetpack (Jetpack Digital LLC)

Jetpack is an advertising service provided by Jetpack Digital LLC.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Media.net (Media.net Advertising FZ-LLC)

Media.net is an advertising service provided by Media.net Advertising FZ-LLC.

Personal Data processed: Tracker; Usage Data.

Place of processing: United Arab Emirates – <u>Privacy Policy</u> – <u>Opt out.</u>

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- · a Sharing in California

Pinterest Ads (Pinterest, Inc.)

Pinterest Ads is an advertising service provided by Pinterest, Inc. that allows the Owner to run advertising campaigns on the Pinterest advertising network.

Users may opt out of behavioral advertising features through their device settings, their Pinterest personalization settings.

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Pinterest Conversion Tag (Pinterest, Inc.)

Pinterest Conversion Tag is an analytics service provided by Pinterest, Inc. that connects data from the Pinterest advertising network with actions performed on Shani's Tutoring.

Users may opt out of behavioral advertising features through their device settings, their Pinterest <u>personalization settings</u> or by visiting the <u>AdChoices opt-out page</u>.

Personal Data processed: device information; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

PubMatic (PubMatic, Inc.)

PubMatic is an advertising service provided by PubMatic, Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

AppNexus (AppNexus Inc.)

AppNexus is an advertising service provided by AppNexus Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt out.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Criteo (Criteo SA)

Criteo is an advertising service provided by Criteo SA.

Personal Data processed: Trackers; Usage Data.

Place of processing: France – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Teads (Teads SA)

Teads is an advertising service provided by Teads SA.

Personal Data processed: Trackers; Usage Data.

Place of processing: Luxembourg – <u>Privacy Policy</u> – <u>Opt out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Google Ad Manager

Google Ad Manager is an advertising service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with.

In order to understand Google's use of Data, consult Google's partner policy.

This service uses the "DoubleClick" Cookie, which tracks use of Shani's Tutoring and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: <u>Google Ad Settings</u>.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Google Ads conversion tracking (Google LLC)

Google Ads conversion tracking is an analytics service provided by Google LLC that connects data from the Google Ads advertising network with actions performed on Shani's Tutoring.

In order to understand Google's use of Data, consult their partner policy and their Business Data page.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Carbon Ads (BuySellAds.com Inc.)

Carbon Ads is an advertising service provided BuySellAds.com Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Direct Advertising (Shani's Tutoring)

Shani's Tutoring uses User Data to propose services or products provided by third parties, related or unrelated to the product or service provided by Shani's Tutoring.

Direct Advertising may involve the use of Trackers to monitor Users' behavior and serve personalized ads. Users may opt-out of ad personalization by visiting their device settings or following the instructions provided by YourOnlineChoices and AdChoices.

Besides applicable device settings, the User may also make use of the rights described under User rights in the relevant section of this privacy policy.

Personal Data processed: Trackers; Usage Data.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

eBay (advertising) (eBay Inc)

eBay (advertising) is an advertising service provided by eBay Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Google Ads Audience Expansion (Google LLC)

Google Ads Audience Expansion is an advertising service provided by Google LLC that allows the Owner to expand the available target audience by finding Users who have interests, demographics or online behaviour similar to an existing audience selected by the Owner. Users can opt out of Google's use of personalized advertising by visiting Google's <u>Ads Settings</u>.

In order to understand Google's use of Data, consult their partner policy and their Business Data page.

Personal Data processed: gender; interests; page views; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information; inferences drawn from other personal information.

Google Ads enhanced conversions (Google LLC)

Google Ads enhanced conversions is an advertising service provided by Google LLC that allows the Owner to send hashed first-party conversion Data to Google in order to improve conversion measurements.

Personal Data processed: address; contact details; email address; first name; last name; phone number; Trackers.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

LinkedIn Ads (LinkedIn Corporation)

LinkedIn Ads is an advertising service provided by LinkedIn Corporation.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Mediavine (Mediavine, Inc.)

Mediavine is an advertising service provided by Mediavine, Inc.

Mediavine Partners may also separately collect Data about Users from other sources, such as advertising IDs or pixels, and link that Data to Data collected from Mediavine publishers in order to provide interest-based advertising across Users' online experience, including devices, browsers and apps. This Data includes: Usage Data, cookie information, device information, information about interactions between Users and advertisements and websites, geolocation Data, traffic Data, and information about a visitor's referral source to a particular website. Mediavine Partners may also create unique IDs to create audience segments, which are used to provide targeted advertising.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

TikTok conversion tracking (TikTok Inc.)

TikTok conversion tracking is an analytics and behavioral targeting service provided by TikTok Inc. that connects data from the TikTok advertising network with actions performed on Shani's Tutoring. The TikTok pixel tracks conversions that can be attributed to TikTok ads and enables to target groups of Users on the base of their past use of Shani's Tutoring.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Advertising serving infrastructure

This type of service has the purpose of providing an advertising serving infrastructure that enables Shani's Tutoring to maintain its own network that serves optimized and targeted advertisements. To this end, the services listed below may allow the Owner to track unique User visits and their navigation patterns, also with the help of Cookies or other Identifiers. This tracking may occur across different sites or apps, in order to serve optimized and targeted advertisements.

AdButler (Sparklit Networks, Inc)

AdButler is an advertising server provision service provided by Sparklit Networks, Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Wordpress Stats

Wordpress Stats is an analytics service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Google Analytics (Universal Analytics)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of Shani's Tutoring, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in the United States

Google Analytics (Universal Analytics) with anonymized IP

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of Shani's Tutoring, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Google Analytics Advertising Reporting Features

Google Analytics on Shani's Tutoring has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Tracker; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Google Analytics 4

Google Analytics 4 is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of Shani's Tutoring, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting Google's official documentation.

In order to understand Google's use of Data, consult **Google's partner policy**.

Personal Data processed: browser information; city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

WooCommerce Order Attribution Tracking (Shani's Tutoring)

WooCommerce Order Attribution Tracking is an analytics feature of WooCommerce that connects data from online orders to marketing activities, channels, or campaigns in order to measure their efficacy.

Personal Data processed: page views; referral URL; Trackers; Usage Data.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

App Center - Analytics (Microsoft Corporation)

App Center - Analytics is an analytics service provided by Microsoft Corporation.

Personal Data processed: device information; number of sessions; session duration; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Google Analytics Demographics and Interests reports (Google LLC)

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for Shani's Tutoring (demographics means age and gender Data).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

Place of processing: United States – Privacy Policy – Opt Out.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Google Analytics Granular location and device data collection (Google LLC)

Google Analytics on Shani's Tutoring has granular data collection activated which collects location and device data on a perregion basis. It allows the Owner to create and analyze User reports that rely on those metrics.

Personal Data processed: browser information; city; device information; number of Users; session statistics; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Beta Testing

This type of service makes it possible to manage User access to Shani's Tutoring, or parts of it, for the purpose of testing a certain feature or the entire Application. The service provider may automatically collect data related to crashes and statistics related to the User's use of Shani's Tutoring in a personally identifiable form.

App Center - Beta Testing (Microsoft Corporation)

App Center - Beta Testing is a beta testing service provided by Microsoft Corporation. Shani's Tutoring may also send push notifications to the User.

Personal Data processed: crash data; device information; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Building and running Shani's Tutoring

Key components of Shani's Tutoring are built and run directly by the Owner by making use of the software listed below.

WordPress (self-hosted) (Shani's Tutoring)

Shani's Tutoring is built and run by the Owner via a CMS software (Content Management System) called WordPress.

Personal Data processed: date of birth; Usage Data.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Collection of privacy-related preferences

This type of service allows Shani's Tutoring to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

iubenda Consent Database (iubenda srl)

The iubenda Consent Database allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent. In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; IP address; Trackers.

Place of processing: Italy – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information, and in particular to the use of Cookies and other Trackers on Shani's Tutoring.

Personal Data processed: IP address; Trackers.

Place of processing: Italy – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Commercial affiliation

This type of service allows Shani's Tutoring to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with Shani's Tutoring.

For details of which data are collected, please refer to the privacy policy of each service.

Amazon Affiliation (Amazon)

Amazon Affiliation is a commercial affiliation service provided by Amazon.com Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

ShareAsale (ShareAsale.com Inc.)

ShareAsale is a banner commercial affiliation service provided by ShareAsale.com Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

CJ Affiliate by Conversant (Conversant LLC)

CJ Affiliate by Conversant is a commercial affiliation service provided by Conversant, Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

eBay Partner Network (eBay, Inc.)

eBay Partner Network è un servizio di affiliazione commerciale fornito da eBay, Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Contacting the User

Contact form (Shani's Tutoring)

By filling in the contact form with their Data, the User authorizes Shani's Tutoring to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: date of birth; email address; first name; gender; last name.

Category of Personal Information collected according to the CCPA: identifiers; biometric information.

This processing constitutes:

Mailing list or newsletter (Shani's Tutoring)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning Shani's Tutoring. Your email address might also be added to this list as a result of signing up to Shani's Tutoring or after making a purchase.

Personal Data processed: email address; first name.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

• a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana

Content commenting

Content commenting services allow Users to make and publish their comments on the contents of Shani's Tutoring. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments. If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

Facebook Comments (Meta Platforms, Inc.)

Facebook Comments is a content commenting service provided by Meta Platforms, Inc. enabling the User to leave comments and share them on the Facebook platform.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt out.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of Shani's Tutoring and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Fonts

Google Fonts is a typeface visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Vimeo video (Vimeo, LLC)

Vimeo is a video content visualization service provided by Vimeo, LLC that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

YouTube video widget

YouTube is a video content visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

· a Sale in California

Font Awesome (Fonticons, Inc.)

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Instagram widget

Instagram is an image visualization service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

SoundCloud widget (SoundCloud Limited)

Soundcloud is an audio content delivery service provided by SoundCloud Limited that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: Usage Data.

Place of processing: Germany – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Spotify widget (Spotify AB)

Spotify is an audio content delivery service provided by Spotify AB that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: Sweden – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

· a Sale in California

Adobe Fonts (Adobe Systems Incorporated)

Adobe Fonts is a typeface visualization service provided by Adobe Systems Incorporated that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Calendly widget (Calendly, LLC)

Calendly widget is a calendar content visualization service provided by Calendly, LLC that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: calendar information; device information; email address; Trackers.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Google Calendar widget (Google LLC)

Google Calendar widget is a calendar content visualization service provided by Google LLC that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Gravatar (Automattic Inc.)

Gravatar is an image visualization service provided by Automattic Inc. that allows Shani's Tutoring to incorporate content of this kind on its pages. Please note that if Gravatar images are used for comment forms, the commenter's email address or parts of it may be sent to Gravatar - even if the commenter has not signed up for that service.

Personal Data processed: email address; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

MyFonts (Monotype Imaging Inc.)

MyFonts is a typeface visualization service provided by Monotype Imaging Inc. that allows Shani's Tutoring to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Handling payments

Unless otherwise specified, Shani's Tutoring processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. Shani's Tutoring isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

 a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana

Apple Pay (Apple Inc.)

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; purchase history; shipping address; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information.

This processing constitutes:

Android Pay (Google LLC)

Android Pay is a payment service provided by Google LLC, which allows Users to make payments using their mobile phones.

Personal Data processed: payment info; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: commercial information; internet or other electronic network activity information.

Google Pay (Google LLC)

Google Pay is a payment service provided by Google LLC, which allows users to make online payments using their Google credentials.

Personal Data processed: email address; first name; last name; payment info; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information.

Klarna (Klarna AB)

Klarna is a payment service provided by Klarna AB.

Personal Data processed: payment info; Trackers; Usage Data.

Place of processing: Sweden – Privacy Policy.

Category of Personal Information collected according to the CCPA: commercial information; internet or other electronic network activity information.

Mastercard (Mastercard Inc.)

Mastercard is a payment service provided by Mastercard Inc. which allows Users to make online payments.

Personal Data processed: email address; payment info; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information.

Payment by bank transfer (Shani's Tutoring)

In the event that the chosen payment method is a direct bank transfer to the current account indicated by Shani's Tutoring, the Owner will collect the payment details of the User, i. e. the current account number of the sender, the SWIFT code, the bank and the name of the sender. Such data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data processed: payment info.

Category of Personal Information collected according to the CCPA: commercial information.

Payments processed via the Apple App Store (Apple Inc.)

Shani's Tutoring uses a payment service provided by Apple Inc. that allows the Owner to offer the purchase of the app itself or inapp purchases.

Personal Data processed to complete the purchases are processed by Apple, as described in the <u>privacy policy for the App Store</u>.

Personal Data processed: device information; email address; payment info; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information.

Handling productivity related activity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

Google Docs

Google Docs is an online text-editing and collaboration service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: first name; username.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

• a Sale in California

Google Workspace (Google LLC)

Google Workspace is an integrated suite of cloud-based productivity, collaboration and storage services provided by Google LLC. Gmail or other G Suite services are not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside these services for advertising purposes in any other way.

Personal Data processed: first name; gender; last name; username.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; biometric information.

This processing constitutes:

• a Sale in California

Calendar tool (Shani's Tutoring)

Calendar tool is a feature built into this Shani's Tutoring that facilitates online scheduling of appointments.

Personal Data processed: app information; browser information; calendar information; device information; email address; first name; IP address; last name; operating systems.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Google Sheets (Google LLC)

Google Sheets is an online spreadsheet and collaboration service provided by Google LLC.

Personal Data processed: Data communicated while using the service; device information; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable Shani's Tutoring to run and be distributed or to provide a ready-made infrastructure to run specific features or parts of Shani's Tutoring.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Amazon S3 (Amazon Web Services, Inc.)

Amazon S3 is a cloud storage service provided by Amazon Web Services, Inc.

Personal Data processed: Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers.

Google Cloud (Google LLC)

Google Cloud is a cloud computing platform provided by Google LLC.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers.

Google Cloud Storage (Google LLC)

Google Cloud Storage is a hosting service provided by Google LLC.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: identifiers.

Quickbooks (Intuit Limited.)

Quickbooks is an invoicing and accounting management service provided by Intuit Limited. that enables and facilitates the management of quotes, invoices and other types of accounting documents. Personal Data are shared with Quickbooks for the purpose of creating electronic invoices upon the fulfillment of a payment by the User. Quickbooks may also be used as an inventory management service.

Personal Data processed: invoicing information; Trackers; Usage Data.

Place of processing: United Kingdom – Privacy Policy.

Category of Personal Information collected according to the CCPA: commercial information; internet or other electronic network activity information.

Infrastructure monitoring

This type of service allows Shani's Tutoring to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved. Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of Shani's Tutoring.

App Center - Diagnostics (Microsoft Corporation)

App Center - Diagnostics is a monitoring service provided by Microsoft Corporation.

Personal Data processed: crash data; device information; Trackers; Usage Data; User ID.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of Shani's Tutoring.

The interaction and information obtained through Shani's Tutoring are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on Shani's Tutoring isn't being connected back to the User's profile.

LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

· a Sale in California

Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Facebook Like button and social widgets

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing,

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in the United States

PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: See the PayPal privacy policy – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

YouTube button and social widgets

The YouTube button and social widgets are services allowing interaction with the YouTube social network provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of Shani's Tutoring, in order to contact and be contacted by Shani's Tutoring's support service. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

Facebook Messenger Customer Chat (Meta Platforms, Inc.)

The Facebook Messenger Customer Chat is a service for interacting with the Messenger instant messaging app and platform provided by Meta Platforms, Inc.

Personal Data processed: Data communicated while using the service; Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt out.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Location-based interactions

Geolocation (Shani's Tutoring)

Shani's Tutoring may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by Shani's Tutoring.

Personal Data processed: geographic position.

Category of Personal Information collected according to the CCPA: geolocation data.

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

OneSignal (Lilomi, Inc.)

OneSignal is a message sending service provided by Lilomi, Inc.

OneSignal allows the Owner to send messages and notifications to Users across platforms such as Android, iOS, and the web. Messages can be sent to single devices, groups of devices, or specific topics or User segments. Depending on the permissions granted to Shani's Tutoring, the Data collected may also include precise location (i.e. GPS-level data) or WiFi information, apps installed and enabled on the User's device. Shani's Tutoring uses identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the OneSignal service.

The Data collected may be used by the service provider for interest-based advertising, analytics and market research. In order to understand OneSignal's use of Data, consult <u>OneSignal's privacy policy</u>.

Push notifications opt-out

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then changing those settings for some or all of the apps on the particular device.

Interest-based advertising opt-out

Users may opt-out of OneSignal advertising features through applicable device settings, such as the device advertising settings for mobile phones. Different device configurations, or updates to devices, may affect or change how these indicated settings work.

Personal Data processed: email address; geographic position; language; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy – Opt out.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information; geolocation data; inferences drawn from other personal information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Mailchimp (Intuit Inc.)

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Personal Data processed: email address; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Managing data collection and online surveys

This type of service allows Shani's Tutoring to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

Google Forms

Google Forms is a form builder and data collection platform provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: answers to questions; email address; first name.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; inferences drawn from other personal information.

This processing constitutes:

• a Sale in California

Platform services and hosting

These services have the purpose of hosting and running key components of Shani's Tutoring, therefore allowing the provision of Shani's Tutoring from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

WordPress.com

WordPress.com is a platform provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, that allows the Owner to build, run and host Shani's Tutoring.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

Tumblr (Tumblr Inc.)

Tumblr is a platform provided by Tumblr Inc. that allows the Owner to build, run and host Shani's Tutoring.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

CloudKit (Apple Inc.)

CloudKit is a hosting service provided by Apple Inc. that allows the Owner to manage data storage and data transfers to and from iCloud servers. Storing the User's data on iCloud gives Users the possibility to access their data across multiple devices.

Personal Data processed: Data that is available across various devices; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Hostinger (Hostinger UK Limited)

Hostinger is a hosting service provided by Hostinger UK Limited.

Personal Data processed: device information; Usage Data.

Place of processing: United Kingdom – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Registration and authentication

By registering or authenticating, Users allow Shani's Tutoring to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, Shani's Tutoring will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

WordPress.com Single Sign On

WordPress.com Single Sign On is a registration and authentication service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, and is connected to the WordPress.com network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Log In with PayPal (PayPal Inc.)

Log In with PayPal is a registration and authentication service provided by PayPal Inc. and is connected to the PayPal network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

a Sale in California

Facebook Authentication

Facebook Authentication is a registration and authentication service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Google OAuth

Google OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Google network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in the United States

YouTube OAuth

YouTube OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the YouTube network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Stripe OAuth

Stripe OAuth is a registration and authentication service provided by Stripe, Inc. and is connected to the Stripe network.

Personal Data processed: Trackers; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; European Union – <u>Privacy Policy</u>; United Kingdom – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

LinkedIn OAuth (LinkedIn Corporation)

LinkedIn Oauth is a registration and authentication service provided by LinkedIn Corporation and is connected to the LinkedIn social network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Twitch.tv Authentication (Twitch Interactive, Inc.)

Twitch.tv Authentication is a registration and authentication service provided by Twitch Interactive, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: identifiers.

Remarketing and behavioral targeting

This type of service allows Shani's Tutoring and its partners to inform, optimize and serve advertising based on past use of Shani's Tutoring by the User. This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity. Some services offer a remarketing option based on email address lists. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

Google Ad Manager Audience Extension (Google LLC)

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC that tracks the visitors of Shani's Tutoring and allows selected advertising partners to display targeted ads across the web to them.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Selling goods and services online

This type of service helps the Owner to sell goods, provide services or monetize online content. To this end, the services listed below may for instance allow the Owner to process payments, set up subscription models, track orders, and manage deliveries.

Shani's Tutoring Learning Hub

The Moodle-based LMS system used for Shani's Tutoring to deliver all educational material.

SPAM protection

This type of service analyzes the traffic of Shani's Tutoring, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

Akismet

Akismet is a SPAM protection service provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC. The use of reCAPTCHA is subject to the Google <u>privacy policy</u> and <u>terms of use</u>.

In order to understand Google's use of Data, consult their <u>partner policy</u> and their <u>Business Data page</u>.

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information; inferences drawn from other personal information.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on Shani's Tutoring in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

• a Sale in California

Traffic optimization and distribution

This type of service allows Shani's Tutoring to distribute their content using servers located across different countries and to optimize their performance. Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between Shani's Tutoring and the User's browser. Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

Bunny CDN (BunnyWay d.o.o.)

Bunny CDN is a traffic optimization and distribution service provided by Bunny Way d.o.o.

Personal Data processed: Usage Data.

Place of processing: Slovenia – Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

Cloudflare (Cloudflare, Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc. The way Cloudflare is integrated means that it filters all the traffic through Shani's Tutoring, i.e., communication between Shani's Tutoring and the User's browser, while also allowing analytical data from Shani's Tutoring to be collected.

Personal Data processed: Trackers; various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Google Cloud CDN (Google LLC)

Google Cloud CDN is a traffic optimization and distribution service provided by Google LLC.

Personal Data processed: Usage Data.

Place of processing: United States - Privacy Policy.

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Shani's Tutoring, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build

private profiles that the Owner can display and use for improving Shani's Tutoring. Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Shani's Tutoring.

Salesforce Marketing Cloud (Salesforce, Inc.)

Salesforce Marketing Cloud is a User database management service provided by salesforce.com, inc.

Personal Data processed: email address; first name; last name; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Further information about the processing of Personal Data

Push notifications

Shani's Tutoring may send push notifications to the User to achieve the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for Shani's Tutoring, some or all of the apps on the particular device. Users must be aware that disabling push notifications may negatively affect the utility of Shani's Tutoring.

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by Shani's Tutoring depends on the payment system used.

Cookie Policy

Shani's Tutoring uses Trackers. To learn more, Users may consult the Cookie Policy.

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner:
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

• Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.

• Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Further information for Users in Switzerland

This section applies to Users in Switzerland, and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy.

Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the personal data, if any, the retention period and further information about Personal Data can be found in **the section titled "Detailed information on the processing of Personal Data" within this document**.

The rights of Users according to the Swiss Federal Act on Data Protection

Users may exercise certain rights regarding their Data within the limits of law, including the following:

- right of access to Personal Data;
- right to object to the processing of their Personal Data (which also allows Users to demand that processing of Personal Data be restricted, Personal Data be deleted or destroyed, specific disclosures of Personal Data to third parties be prohibited);
- right to receive their Personal Data and have it transferred to another controller (data portability);
- right to ask for incorrect Personal Data to be corrected.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible, providing Users with the information required by law.

Further information for Users in Brazil

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running Shani's Tutoring and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

This section applies to all Users in Brazil (Users are referred to below, simply as "you", "your", "yours"), according to the "Lei Geral de Proteção de Dados" (the "LGPD"), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term "personal information" as it is defined in the **LGPD**.

The grounds on which we process your personal information

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- · credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

Categories of personal information processed

To find out what categories of your personal information are processed, you can read the section titled "Detailed information on the processing of Personal Data" within this document.

Why we process your personal information

To find out why we process your personal information, you can read the sections titled "Detailed information on the processing of Personal Data" and "The purposes of processing" within this document.

Your Brazilian privacy rights, how to file a request and our response to your requests

Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;

- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

How to file your request

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

How and when we will respond to your request

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

Further information for Users in the United States

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running Shani's Tutoring and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The information contained in this section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are residents in the following states: **California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada,**

Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).

Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.

Internet or other electronic network activity information

Personal Information collected or disclosed: Tracker, Usage Data, various types of Data as specified in the privacy policy of the service, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), Trackers, device information, email address, geographic position, language, number of Users, city, session statistics, latitude (of city), longitude (of city), browser information, first name, last name, phone number, purchase history, billing address, shipping address, referral URL, page views, crash data, number of sessions, session duration, User ID, calendar information, IP address, app information, operating systems, Data that is available across various devices, Data communicated while using the service, interests, gender, address, contact details, answers to questions, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, invoicing information, date of birth

Sensitive Personal Information collected or disclosed 1: payment info

Purposes:

- Commercial affiliation
- Analytics
- Displaying content from external platforms
- Interaction with external social networks and platforms
- Platform services and hosting
- Registration and authentication
- · Further information about Personal Data
- Advertising
- Handling payments
- SPAM protection
- Managing contacts and sending messages
- Tag Management
- Advertising serving infrastructure
- · Hosting and backend infrastructure
- Beta Testing
- Infrastructure monitoring
- Traffic optimization and distribution
- Handling activities related to productivity
- Content commenting
- Interaction with live chat platforms
- Remarketing and behavioral targeting
- Access to third-party accounts
- Collection of privacy-related preferences
- User database management
- Building and running Shani's Tutoring

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: iii: Yes

Third-parties: Amazon, Automattic Inc., Google LLC, LinkedIn Corporation, X Corp., Facebook, Inc., Amazon Europe, Stripe Inc, PayPal Inc., ShareAsale.com Inc., Conversant LLC, Vimeo, LLC, eBay, Inc., Fonticons, Inc., Impact Tech, Inc., Jetpack Digital LLC, Media.net Advertising FZ-LLC, SoundCloud Limited, Spotify AB, Tumblr Inc., Pinterest, Inc., PubMatic, Inc., AppNexus Inc., Criteo SA, Teads SA, Lilomi, Inc., Apple Inc., Shani's Tutoring, Sparklit Networks, Inc, Adobe Systems Incorporated, Amazon Web Services, Inc., Microsoft Corporation, BunnyWay d.o.o., Calendly, LLC, BuySellAds.com Inc., Cloudflare, Inc., eBay Inc, Meta Platforms, Inc., iubenda srl, Klarna AB, Intuit Inc., Mastercard Inc., Mediavine, Inc., Monotype Imaging Inc., Intuit Limited., Salesforce, Inc., TikTok Inc., Hostinger UK Limited

Service providers or contractors: Shani's Tutoring

Identifiers

Personal Information collected or disclosed: first name, last name, gender, date of birth, email address, About Me, Gender, Age range, Tracker, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), various types of Data as specified in the privacy policy of the service, Trackers, Usage Data, geographic position, language, number of Users, city, device information, session statistics, latitude (of city), longitude (of city), browser information, answers to questions, phone number, purchase history, billing address, shipping address, User ID, crash data, calendar information, IP address, app information, operating systems, page views, interests, address, contact details

Sensitive Personal Information collected or disclosed i: username, payment info

Purposes:

- Contacting the User
- Access to third-party accounts
- Analytics
- Handling productivity related activity
- Advertising
- · Managing contacts and sending messages
- Managing data collection and online surveys
- Handling payments
- Displaying content from external platforms
- · Hosting and backend infrastructure
- Infrastructure monitoring
- Traffic optimization and distribution
- User database management
- Registration and authentication
- Building and running Shani's Tutoring

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: II: Yes

Third-parties: Facebook, Inc., Google LLC, X Corp., Stripe Inc, Pinterest, Inc., Lilomi, Inc., Apple Inc., Adobe Systems Incorporated, Amazon Web Services, Inc., Microsoft Corporation, Calendly, LLC, Shani's Tutoring, Cloudflare, Inc., Automattic Inc., Intuit Inc., Mastercard Inc., Salesforce, Inc., Twitch Interactive, Inc.

Service providers or contractors: Shani's Tutoring

Biometric information

Personal Information collected or disclosed: first name, last name, gender, date of birth, email address, About Me, Gender, Age range

Sensitive Personal Information collected or disclosed : username

Purposes:

- · Contacting the User
- Access to third-party accounts
- Handling productivity related activity

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: ii: Yes

Third-parties: Facebook, Inc., Google LLC

Service providers or contractors: Shani's Tutoring

Personal information

Personal Information collected or disclosed: About Me, Gender, Age range

Purposes:

· Access to third-party accounts

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: ii: Yes

Third-parties: Facebook, Inc.

Geolocation data

Personal Information collected or disclosed: Trackers, Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), email address, geographic position, language, various types of Data as specified in the privacy policy of the service

Purposes:

- · Managing contacts and sending messages
- Location-based interactions

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: [ii]: Yes

Third-parties: Lilomi, Inc.

Service providers or contractors: Shani's Tutoring

Inferences drawn from other personal information

Personal Information collected or disclosed: Trackers, Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), email address, geographic position, language, various types of Data as specified in the privacy policy of the service, answers to questions, first name, page views, interests, gender, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events

Purposes:

- · Managing contacts and sending messages
- Managing data collection and online surveys
- Advertising
- Spam and bots protection

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: 1: Yes

Third-parties: Lilomi, Inc., Google LLC

Commercial information

Personal Information collected or disclosed: various types of Data as specified in the privacy policy of the service, Trackers, Usage Data, first name, last name, email address, phone number, purchase history, billing address, shipping address, device information, invoicing information

Sensitive Personal Information collected or disclosed ii: payment info

Purposes:

- Handling payments
- · Hosting and backend infrastructure

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: 11: Yes

Third-parties: Apple Inc., Google LLC, Klarna AB, Mastercard Inc., Intuit Limited.

Service providers or contractors: Shani's Tutoring

i You can read the definitions of these concepts inside the "Definitions and legal references section" of the privacy policy.

To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information ("Limit the Use of My Sensitive Personal Information") you can refer to the "<u>Your privacy rights under US state laws</u>" section of our privacy policy.

For more details on the collection of Personal Information, please read the section "<u>Detailed information on the processing of Personal Data</u>" of our privacy policy.

We won't process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use Shani's Tutoring.

For example, you directly provide your Personal Information when you submit requests via any forms on Shani's Tutoring. You also provide Personal Information indirectly when you navigate Shani's Tutoring, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of Shani's Tutoring and features thereof.

Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- the right to request the deletion of your Personal Information. You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity provided that this is technically feasible;
- the right to opt out from the Sale of your Personal Information; We will not discriminate against you for exercising your privacy rights.
- the right to non-discrimination.

Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- The right to opt out of the Sharing of your Personal Information for cross-context behavioral advertising;
- The right to request to limit our use or disclosure of your Sensitive Personal Information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana you have

• The right to opt out of the processing of your personal information for Targeted Advertising or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;

• The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.

Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

In Minnesota Users also have the right to obtain a list of the specific third parties to which the controller has disclosed the consumer's personal data

- * Note that in some states like Minnesota you have the following specific rights connected to profiling:
 - The right to question the results of the profiling;
 - The right to be informed of the reason that the profiling resulted in the decision; if feasible
 - The right to be informed of what actions the consumer might have taken to secure a different decision and the actions that the consumer might take to secure a different decision in the future;
 - The right to review personal data used in the profiling;
 - If inaccurate, the right to have the data corrected and the profiling decision reevaluated based on the corrected data;

Additional rights for users residing in Utah and Iowa

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah and Iowa, you have

- The right to opt out of the processing of your Personal Information for Targeted Advertising;
- The right to opt out of the processing of your Sensitive Personal Information. Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

How to exercise your privacy rights under US state laws

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on Shani's Tutoring.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("GPC"), you are free to do so and we will abide by such request in a frictionless manner.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Shani's Tutoring or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, Shani's Tutoring may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, Shani's Tutoring and any third-party services may collect files that record interaction with Shani's Tutoring (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within Shani's Tutoring and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data) / Personal Information (or Information)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Sensitive Personal Information

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

Usage Data

Information collected automatically through Shani's Tutoring (or third-party services employed in Shani's Tutoring), which can include: the IP addresses or domain names of the computers utilized by the Users who use Shani's Tutoring, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using Shani's Tutoring who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Shani's

Tutoring. The Data Controller, unless otherwise specified, is the Owner of Shani's Tutoring.

Shani's Tutoring (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by Shani's Tutoring as described in the relative terms (if available) and on this site/application.

Sale

Sale means any exchange of Personal Information by the Owner to **a third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

Sharing

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioral advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

Targeted advertising

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across nonaffiliated websites or online applications to predict such consumer's preferences or interests, as defined by the applicable privacy US state law.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to Shani's Tutoring, if not stated otherwise within this document.

Latest update: August 19, 2025