

# M-Prep Inc. Privacy Policy

Last Updated 25th May, 2018.

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M-Prep Inc and its subsidiary, Eneza Education Limited, a Kenyan Ghanaian and Ivory Coast limited liability company, (“we,” “us,” “our”) know that you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. By visiting M-Prep Inc.’s website at [www.enezaeducation.com](http://www.enezaeducation.com) or any of M-Prep Inc.’s other websites, applications, domain names or other linked pages, (collectively the “Website”), or using any of our services, you acknowledge that you accept the practices and policies outlined in this Privacy Policy. By using the Website, you are consenting to have your personal data transferred to and processed in the United States and in countries where M-Prep Inc. subsidiaries are present.

You post any information (as that term is defined in M-Prep Inc.’s Terms of Service located on the Website at your own risk. Although we may allow you to set privacy options that limit access to your pages, please be aware that no security measures are perfect or impenetrable. We cannot control the actions of other users with whom you may choose to share your pages and information. Therefore, we cannot and do not guarantee that information you post on the Website will not be viewed by unauthorized persons. We are not responsible for circumvention of any privacy settings or security measures contained on the Website. You understand and acknowledge that, even after removal, copies of information may remain viewable in cached and archived pages or if other users have copied or stored your information. In the case that security is breached or compromised, affected users shall be notified within 72 hours according to the [EU GDPR](#) (General Data Protection Regulation). Capitalized terms used herein without definition shall have the meaning given to them in the Terms of Service.

Any improper collection or misuse of information accessible on the Website is a violation of M-Prep Inc.’s Terms of Service and should be reported to [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com).

## WHAT DOES THIS PRIVACY POLICY COVER?

This Privacy Policy explains how M-Prep Inc. collects and uses information from its users who access the Website and use our services, including M-Prep Inc.’s treatment of personally identifiable information (“Personal Information”). Also, this Privacy Policy covers M-Prep Inc.’s treatment of any Personal Information that M-Prep Inc.’s business partners share with M-Prep Inc., or that you provide to M-Prep Inc. through a third party website using an M-Prep Inc. application or link. This policy does not apply to websites or practices of companies that M-Prep Inc. does not own or control, or to individuals that M-Prep Inc. does not employ or manage,

including providers of third party software that may be offered on M-Prep Inc.'s Website ("Third Party Software"). This Privacy Policy also complies with the European Union GDPR.

## **HOW IS CHILDREN'S PERSONAL INFORMATION TREATED?**

If you are a minor (under the age of 18), you may only use this service and disclose Personal Information with your parent or guardian's express consent. M-Prep Inc. collects limited Personal Information from students ("Children's Personal Information"), but only where that student's school, school authority and/or teacher has contracted with M-Prep Inc. to collect Children's Personal Information from students for the use and benefit of the learning environment. All persons under the age of 18 should receive the consent of their parents or guardians before signing up to any of our platforms. If you are a student, please do not send any Children's Personal Information about yourself to us, other than what we request from you when you sign up for the Services. In the event that we learn that we have collected Children's Personal Information from a student without parental consent being obtained by his or her school, district, and/or teacher, or if we learn a student has provided us Children's Personal Information beyond what we request when he or she signs up for the Website, we will delete that information as quickly as possible. If you believe that a student may have provided us Children's Personal Information beyond what is requested when signing up for any of our e-learning platforms, or that a student's school, district, or teacher has not obtained parental consent, please contact us at [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com)

Hereinafter, references to "Personal Information" shall apply to personal information of individual Website users who are not student registrants. References to "Children's Personal Information" shall only apply to personal information of student users of the Service. General references to "information" shall apply to all users.

Notwithstanding anything to the contrary, if you are a student registrant and your parent has signed up for the Service with an access code provided by your teacher, you understand that your parent can view all information within or associated with your Website account, including without limitation messages between you and your teacher and grades you received on assignments.

## **WHAT INFORMATION DOES M-PREP INC. DISPLAY OR COLLECT?**

When you use the Service, you register with your Class, Names, Gender, School, and/or Geographic Locale. The information we gather from users enables us to personalize and improve our services, and, in some cases, to allow our users to set up a user account and profile through the Website. In most cases, we retain such information so that, for instance, you can view data from quizzes or content in which you have engaged. When you update information, we usually keep a backup copy of the prior version for a reasonable period of time to enable reversion to the prior version of that information. In addition to the foregoing, we collect the

following types of information from our users. In the case that a user wishes to have their information deleted, they should inform us at [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com)

**Information You Provide to Us:** We receive and store any information you knowingly enter for the Service, whether via computer, mobile phone, other wireless device, or that you provide to us in any other way. This information may include, without limitation, Personal Information such as your name, email address, and your school affiliation, Children's Personal Information, billing and payment information (if you choose to purchase any Credit through the Services), and any other information necessary for us to provide our services. You may choose not to provide us with certain information, but then you may not be able to take advantage of many of our features. The Personal Information you provide is used for such purposes as responding to your requests for certain information, products and services, customizing the data and content you see, and communicating with you about specials and new features. The Children's Personal Information you provide shall only be used for creating your school account or for creating a parent account. You may modify or remove your Personal Information or Children's Personal Information identified below at any time by logging into your account and accessing features to edit your users and/or account information. To seek guidance on how to remove personal information from our database contact us at [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com)

**Information Collected Automatically:** We receive and store certain types of information whenever you interact with our services. M-Prep Inc. automatically receives and records information on our server logs from your browser including your IP address, M-Prep Inc. cookie information, and the page you requested. We also record the details of your activity on the Website and any details through the mobile phone. This information is not Personal Information or Children's Personal Information.

Generally, our service automatically collects usage information, such as the numbers and frequency of visitors to our site and its components. M-Prep Inc. only uses this data in aggregate form, that is, as a statistical measure, and not in a manner that would identify you personally. This type of aggregate data enables us to figure out how often users use parts of the Website or services so that we can make the Website appealing to as many users as possible, and improve those services. As part of this use of information, we may provide aggregate information to our partners about how our users, collectively, use our site. We share this type of statistical data so that our partners also understand how often people use our partners' services and the Website to help provide you with an optimal online experience. This also helps M-Prep Inc advance its mission towards providing access to quality and affordable education.

**Email Communications:** If you provide us your email address or mobile number, we may send you communications. If you are a student, we will only use your contact information to send you Notifications. We may have your emails existing on our database, if you wish to opt out from receiving our communications you may contact us at [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com)

## **WHAT ABOUT COOKIES?**

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

## **WILL M-PREP INC. SHARE ANY OF THE PERSONAL INFORMATION OR CHILDREN'S PERSONAL INFORMATION IT RECEIVES?**

Personal Information and Children's Personal Information about our users is an integral part of our business. We neither rent nor sell your Personal Information or Children's Personal Information to anyone except for the school in which your child is registered. However, we share your Personal Information and Children's Personal Information in personally identifiable form as described below. Again, please note that references to "Personal Information" only apply to personal information of individuals who are not students.

**Businesses We Do Not Control:** In certain situations, businesses or third party websites we're affiliated with may sell items or provide services to you through the Website (either alone or jointly with us), including Third Party Software. We may, for example, sell products or provide services jointly with other businesses, or work with third party websites to enhance your online experience. These transactions or services may or may not be commercial in nature. You can recognize when such a business is associated with such a transaction or service. We will share your Personal Information or Children's Personal Information with that business only to the extent that it is related to such transaction or service. Such services may include the ability for you to automatically transmit information you input on the Website to your profile or account on a third party website, or to automatically transmit information you input on a third party website to your Website profile. We have no control over the policies and practices of third party websites (or providers of Third Party Software) as to privacy or anything else, so please review all third party websites' policies before disclosing any Personal Information or Children's Personal Information or other content on the Website or on any third party website (via the automatic transmissions discussed above or otherwise).

**To enable your participation in M-Prep Inc. partnership arrangements.**

**We use your information to enable your participation in programs or features we may offer in partnership with third parties, to the extent you wish to participate in such programs.**

For personal data subject to the European Union General Data Processing Regulations (“GDPR”), we rely on several legal bases to process the data. These legal bases include where:

- The processing is necessary to perform our contractual obligations in our Terms of Service or other contracts with you (such as to provide you the Service as described in our Terms of Service);
- You have given your prior consent, which you may withdraw at any time (such as for marketing purposes or other purposes we obtain your consent for from time to time);
- The processing is necessary to comply with a legal obligation, a court order or to exercise or defend legal claims;
- The processing is necessary for the purposes of our legitimate interests, such as in improving, personalizing, and developing the Service, marketing the Service, such as new features or products that may be of interest, and promoting safety and security as described above.

If you have any questions about or would like further information concerning the legal basis on which we collect and use your personal information, please contact us using [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com)

**Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Examples include sending email, analyzing data, processing payment, and providing user services. Unless we tell you differently, M-Prep Inc.’s agents do not have any right to use Personal Information or Children’s Personal Information we share with them beyond what is necessary to assist us.

**Communication About the Website or in Response to User Requests:** As part of the Website and our services, you may receive from M-Prep Inc. (depending on your User Category) email or other types of communication relating to your use of the Website or your user profile. You acknowledge and agree that by posting information on the Website or otherwise using the Website, M-Prep Inc. and its agents may send you email, contact you or engage in other communication that they determine in their sole discretion relate to your profile or use of the Website. If you disclose your email address to M-Prep Inc., depending on your User Category, we may use it to send updates, a newsletter or other news regarding the Website or M-Prep Inc. services, or to simply send Notifications.

**Protection of M-Prep Inc. and Others:** We may release Personal Information or Children’s Personal Information when we believe in good faith that release is necessary to comply with the law; enforce or apply our Terms of Service and other agreements; or protect the rights, property, or safety of M-Prep Inc., our employees, our users, or others. In the case that we need to release such information we will seek prior consent from the users. This includes, without

limitation, exchanging information with other companies and organizations for fraud protection. In case users realize that their information has been shared without their consent you have the right to contact us at [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com) to have us stop using your information. With Your Consent: Except for sharing as set forth above (to which you hereby consent), you will be notified when your Personal Information or Children's Personal Information may be shared with third parties, and will be given the option to prevent the sharing of this information.

## **IS INFORMATION ABOUT ME SECURE?**

Your M-Prep Inc. account Personal Information or Children's Personal Information is protected by a password for your privacy and security. You may help protect against unauthorized access to your account and Personal Information or Children's Personal Information by selecting and protecting your password appropriately and limiting access to your computer and browser by signing off after you have finished accessing your account. M-Prep Inc. endeavors to protect user information to ensure that user account information is kept private, however, M-Prep Inc. cannot guarantee the security of user account information. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. For additional information about the security measures M-Prep Inc. uses in connection with the Website, please contact us at [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com)

The Website contains links to other sites. M-Prep Inc. is not responsible for the privacy policies and/or practices on other sites. When linking to another site a user should read the privacy policy stated on that site. This Privacy Policy only governs information collected on our Website. As a measure to assure the security of your information according to the EU GDPR we will conduct periodic Data Privacy Impact Assessments.

Please be aware that whenever you voluntarily post information to public areas on the Website or any other public forums, such information can be accessed by the public.

## **WHAT INFORMATION CAN I ACCESS?**

M-Prep Inc. allows you to access the following information about you for the purpose of viewing, and in certain situations, updating that information. This list may change as the Website changes. You may currently access the following information, if your User Category allows you to input any of the following:

- a. information in your user profile,
- b. aggregate data from across the system
- c. user preferences
- d. ranking dashboards (reflecting scores on the system and not a user's personal contact information)

## **WHAT OTHER CHOICES DO I HAVE?**

As stated previously, you can always opt not to disclose information, even though it may be needed to take advantage of certain M-Prep Inc. features. You are able to add or update certain information on pages, such as those listed in the “What Information Can I Access” section above. When you update information, however, we often maintain a copy of the unrevised information in our records. Certain types of communication you send to other users cannot be removed, such as messages.

You may request deletion of your account by emailing [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com). Please note that some information may remain in our records after deletion of your account. Further, information may remain viewable elsewhere to the extent that it was copied or stored by other users. We may use any aggregated data derived from or incorporating your Personal Information after you delete your information, but not in a manner that would identify you personally.

If you do not wish to receive email or other communications or notifications from us, please email us at [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com). Please note that if you do not want to receive legal notices from us, such as this Privacy Policy, those legal notices will still govern your use of our platforms, and you are responsible for reviewing such legal notices for changes.

## **CHANGES TO THIS PRIVACY POLICY**

M-Prep Inc. may make changes to this Privacy Policy from time to time for any reason. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we use Personal Information or Children’s Personal Information, we will notify you via email or by posting an announcement on the Website. Users are bound by any changes to the Privacy Policy when he or she uses the Website after such changes have been first posted. In the case of a change in Privacy Policy, users have the right to opt in or out of the enacted policy.

## **QUESTIONS OR CONCERNS**

If you have any questions or concerns regarding privacy at M-Prep Inc. or [www.enezaeducation.com](http://www.enezaeducation.com) or any of our subsidiary domains, please send us a detailed message to [privacy@enezaeducation.com](mailto:privacy@enezaeducation.com). We will make every effort to resolve or attend to your concerns.