AtTech Edu Privacy Policy

Effective date: July 7, 2025

AtTech Edu Limited ("us", "we", or "our") operates the <u>www.attechedu.com</u> website, the Spark Path Micro Lesson Library, and associated pre-launch websites (collectively, the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

1. Definitions

- **Personal Data:** Data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
- Usage Data: Data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **Cookies:** Small pieces of data stored on a User's device.
- Data Controller: For the purpose of this Privacy Policy, AtTech Edu Limited is the Data Controller of your data.
- Data Processor (or Service Provider): Any person (other than an employee of the Data Controller) who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.
- Data Subject: Any living individual who is the subject of Personal Data.

2. Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

2.1. Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information ("Personal Data"). This may include, but is not limited to:

- For our "Coming Soon" / Pre-launch Pages:
 - **Email address:** We collect your email address for the sole purpose of notifying you when our new services, such as the Spark Path Micro Lesson Library, are launched and to provide you with any promotional offers mentioned on that page (e.g., a launch discount).
- For the Spark Path Micro Lesson Library:
 - Email address: Used as a unique identifier for your account login.
 - **Password:** We require a password to secure your account. This is stored in a hashed format and is not visible to us.
 - **First name and last name (Optional):** We may ask for your name to personalize your experience.
 - **Phone number (Optional):** We may request a phone number for account verification or specific customer support scenarios.

Usage Data

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

3. Use of Data

AtTech Edu Limited uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service

- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

4. Data Retention and Transfer

4.1. Retention of Data

AtTech Edu Limited will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

4.2. Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside the United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

- 5. Data Disclosure and Security
- 5.1. Disclosure Of Data

Under certain circumstances, AtTech Edu Limited may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

5.2. Security Of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

6. Your Rights under UK GDPR

AtTech Edu Limited aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data. If you wish to be informed what Personal Data we hold about you or want it to be removed from our systems, please contact us.

In certain circumstances, you have the right:

- To access and receive a copy of the Personal Data we hold about you
- To rectify any Personal Data held about you that is inaccurate
- To request the deletion of Personal Data held about you
- To object to the processing of your Personal Data
- To request that we restrict the processing of your personal information
- To request a copy of your Personal Data in a commonly used electronic format (data portability)

Please note that we may ask you to verify your identity before responding to such requests.

7. Third-Party Services

7.1. Service Providers

We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

- **Google Firebase:** We use Firebase for core application functionality. This includes **Firestore** for database hosting, **Firebase Authentication** for managing user logins securely, and may include **Cloud Functions** for backend logic.
- **Google Analytics:** A web analytics service offered by Google that tracks and reports website traffic.
- **Google AdSense & AdWords:** We may use these services to show advertisements to help support our Service and to remarket our services to you.
- **Stripe / PayPal:** We use third-party services for payment processing. We do not store or collect your payment card details. That information is provided directly to our third-party payment processors.

7.2. Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

8. Children's Privacy

Our Service is intended for a general audience but may be used by children. We do not knowingly collect personally identifiable information from anyone under the age of 13 without obtaining verifiable parental consent.

If you are a parent or guardian and you are aware that your child has provided us with Personal Data without your consent, please contact us. If we become aware that we have collected Personal Data from a child under 13 without verification of parental consent, we will take steps to remove that information from our servers.

9. Changes To This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "effective date" at the top. You are advised to review this Privacy Policy periodically for any changes.

10. Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: poth.r@attechedu.com
- By visiting this page on our website: <u>https://www.attechedu.com/contact</u>

Disclaimer: This is a template based on the information you have provided. It is not a substitute for legal advice. You should have this policy reviewed by a qualified legal professional to ensure it meets all legal requirements for your specific situation.