

PRIVACY POLICY

This privacy policy (“**Privacy Policy**”) explains how Engage2Serve PTE LTD or any of its affiliates or subsidiaries (“**We**”, “**Us**”, “**Our**”, “**e2s**”) processes personal Data collected from natural persons as specified in the section “How We Collect, Use and Share Your Personal Data” below, as a Controller (“**You**”).

e2s products caters to different type of education institutions and professional organizations, and for the benefit of the readers, the document will use “School” as a term referring to Schools, Colleges, Universities, and professional organizations. This Privacy Policy is incorporated into the e2s Terms of Use by reference. In addition to reviewing our Privacy Policy, you should also read the e2s Terms of Use. Your use of the e2s Service constitutes your agreement to the e2s Terms of Use and to this Privacy Policy.

Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms of Use. Please be sure to read this entire Privacy Policy before using or submitting information with e2s.

“Controller” means 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.

“End-User” means any person or entity with whom the User(s) interacts using the Service.

“Personal Data” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Processor” means a natural or legal person, public authority, agency, or other body which processes Personal Data on behalf of the Controller.

“Service” shall have the meaning ascribed to it in the Terms.

“Subscriber” means the natural or legal person that has subscribed to the Service by agreeing to the Terms or signing any other agreement for the subscription and use of the Service.

“Terms” means the Terms of Service at <https://www.engage2serve.com/uk/terms-and-conditions.html>.

“Website(s)” means the websites owned and operated by Us including <https://engage2serve.com>, <https://engage2serve.com.sg> and <https://e2sapp.com>

“Individual User” means a teacher or school administrator using the e2s Service. Where applicable, “You” or “Your” also means a school or school district/board or other educational institution otherwise known as an “Enterprise User” using the subscription e2s Service, with whom the User is associated either as a student, teacher, school or district/board administrator, or parent of a student or guardian of a student or alumni or external partner of subscriber and is authorized by the Enterprise User to use the Service (an “Authorized User”).

“User(s)” shall mean all users of the Service: Individual Users, Authorized Users, and Enterprise Users.

“School” means teachers, principals, school districts/boards, school administrators and any other User acting on behalf of an educational institution or professional organisations, regardless of whether the User is an Individual User or an Enterprise User.

We keep this Privacy Policy under regular review and may update this webpage at any time. This Privacy Policy may be amended at any time, and You shall be notified only if there are material changes to this Privacy Policy.

Table of Contents

HOW WE COLLECT, USE AND SHARE YOUR PERSONAL DATA _____	4
PERSONAL DATA THAT WE COLLECT NOT PROVIDED DIRECTLY BY YOU _____	7
LEGAL BASIS FOR PROCESSING _____	8
INFORMATION ABOUT STUDENTS _____	8
COOKIE POLICY _____	9
AGGREGATE DATA _____	10
HOW e2s SHARES AND USES STUDENT DATA _____	10
COMMUNICATIONS _____	10
YOUR RIGHTS _____	11
NOTICE TO CUSTOMER AND OTHER EXCLUSIONS _____	11
OUR SECURITY PRACTICES _____	12
INTERNATIONAL TRANSFER _____	12
CONTROL, ACCESS, AND DELETION OF PERSONAL DATA _____	13
CHILDREN'S PRIVACY _____	14
USAGE POLICY _____	14
CONTACT INFORMATION _____	15

HOW WE COLLECT, USE AND SHARE YOUR PERSONAL DATA

When You are a(n)	What Personal Data We Collect	How We use Your Personal Data	Whom We share Your Personal Data with
<p>User who is onboarded to use the Service on behalf of the Subscriber and may include School, parent, student, alumni, guardian and external partners of Subscriber</p>	<p>Your contact information, such as Your full name, email address, unique identifiers such as username, or password, profile picture class assignment data, classroom content.</p>	<ul style="list-style-type: none"> • Creation of a User account, verification of a User's identity and help a User log into Our Service. • To communicate with a User regarding existing products and Service availed by Subscriber including notifications of any alerts or updates. • To send the User information about Our other products or services, events, webinars, or programs which may be of interest to such User. • Student Data will be shared. between and among the School Users and parent(s) as well as with others who have been authorized to access the content for an educational purpose. Sharing within the Service will depend 	<p>Third party partners who assist Us in onboarding You and providing Our Services to You.</p> <p>Example – If You use single sign on google apps for Education to access Your e2s account, we may receive information from that third party application. We may also receive information about you if you interact with us through various social media. The data we receive is dependent upon your privacy settings with the social network.</p>

		on the settings and functionality selected by the School	
User who requests customer support	Your name, usage information or any other Personal Data You may provide Us in the course of such interaction.	<ul style="list-style-type: none"> To provide support in relation to Your use of Our Service 	Third parties who assist Us in providing these support services.
User who submits certain information to Our Services, such as filling out a survey about their user experience or feedback.	Information You have provided as part of it.	<ul style="list-style-type: none"> To improve Our Service 	Third parties who assist Us in providing these services.
Website users who enter information in the landing pages used by marketing teams	Your contact information, such as Your full name, email, phone, location, country, business name and shipping address.	<ul style="list-style-type: none"> To inform, promote and sell Our Service to You. 	Third party partners that provide Us marketing services.
Individual who registers for an event, whitepapers, newsletter, webinar or contest;	Information You have provided as part of it.	<ul style="list-style-type: none"> To ensure that the event is conducted in a secure and effective manner. To inform, promote and sell Our Services to You. 	<ul style="list-style-type: none"> Sponsors of such contests. Third party organisers that assist Us with the organisation of such events, webinars, contests.
Any individual who communicates with Us	Your name or any other Personal Data You may provide Us in the course of such interaction. Unless prohibited by law, We may record any telephonic conversation	<ul style="list-style-type: none"> To respond to Your queries or requests. To inform, promote and market Our Service to You. To send you 	Third party partners who assist Us in providing Our Service to You.

	We have with You.	information about Service updates, newsletters, whitepapers, events, webinars and promotional materials	
Individual who requests a demo.	Your contact information, such as Your full name, email, phone, business name and shipping address.	<ul style="list-style-type: none"> • To give You the demo and • To inform, promote and market Our Services to You. 	Third party partners who assist Us in providing Our Service to You.
Individual who applies for an employment opportunity with Us through Our online recruitment system.	Your contact information, such as name, email address, mailing address, phone number; any other information You volunteer, including during any interview or Your interactions with Us and contained in the resume that You submit to Us.	<ul style="list-style-type: none"> • To evaluate You for any position that You have applied for or that We may consider You at the time that You submitted Your resume or on a later date. 	<ul style="list-style-type: none"> • With external recruiters and organizations like those that do employee background checks on Our behalf and on behalf of Our group entities. • Third parties whose products We use in maintaining a record of and evaluating You for the position applied.

PERSONAL DATA THAT WE COLLECT NOT PROVIDED DIRECTLY BY YOU

When You are a(n)	What Personal Data We Collect	How We use Your Personal Data	Whom We share Your Personal Data with
Website visitor	<ul style="list-style-type: none"> Your device and Your usage of Our Websites or emails (such as Internet Protocol (IP) addresses or other identifiers As described in the section “Cookie Policy” 	<ul style="list-style-type: none"> For market analysis, and market research To protect Our data from threats, violations, and breaches if any. To inform, promote and sell Our Service to You. 	Third party partners who provide Us with services in connection with such processing
User who uses and interacts with Our Service	Your device type, and the operating system version and Your usage of Our services through log files and other technologies, some of which may qualify as Personal Data.	<ul style="list-style-type: none"> To evaluate, develop and improve Our products and Service. For market analysis, product analysis and market research. To provide support in connection with Your queries 	Third party partners who assist Us in such processing.
Individual whose information (a) third party sources share with Us without breach of any confidentiality clause; or (b) is available on public platforms.	Your contact information, such as Your full name, email address, phone number, designation and business name. We may combine this information with any Personal Data provided by You.	<ul style="list-style-type: none"> To update, expand, and analyze our records and create more tailored advertising to provide services that may be of interest to You 	Third party partners who assist Us in such processing.

If You provide Us with any Personal Data relating to other individuals, you represent that You have the authority to do so, and where required, have obtained the necessary consent, and acknowledge that it may be used in accordance with this Privacy Policy.

In addition to the details provided in the table above, we may also share Your Personal Data with

- a. Our group entities and the companies that We will acquire in the future when they are made a part of Our group entities to provide and improve Our Service.
- b. Third Parties involved in a Corporate Transaction: If We become involved in a merger, acquisition, or any form of sale of some or all its assets, then, in accordance with applicable laws, we will use reasonable efforts to notify You of any transfer of Personal Data to an unaffiliated third party.
- c. Law enforcement authorities, government authorities, courts, dispute resolution bodies, regulators, auditors, and any party appointed or requested by applicable regulators to carry out investigations or audits of Our activities.
- d. Professional advisors who advise and assist Us in enforcing Our contracts and policies, handling Our claims, effective management of Our company and in relation to any disputes We may become involved in.

LEGAL BASIS FOR PROCESSING

If You are a data subject from the European Economic Area or the United Kingdom, Our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which We collect it. We will normally collect Personal Data from You only where it needs it to perform a contract with You, where the processing is in Our legitimate interests and not overridden by Your data protection interests or fundamental rights and freedoms, or where We have Your consent. In some cases, We may also have a legal obligation to collect Personal Data from You. If We process Personal Data with reliance on Your consent, You may withdraw Your consent at any time.

If You have questions or need further information concerning the legal basis on which We collect and use Your Personal Data, please contact Us using the contact details provided below.

INFORMATION ABOUT STUDENTS

e2s provides the Service to Schools to facilitate School and parent engagement and create personalized learning portfolios. Through the provision of this Service to a School or parent, we may collect or have access to Personal Data about students (“Student Data”) that is provided by the School, parent or by the

student. The type of information we collect will depend on how the School, parent or student uses the Service, but could include the student's first and last name, email address, profile photo, class assignment data, and another classroom content. Some Schools set up the Service to permit a student to log into a student account. Only students who have been invited and authorized to use the Service by a School may register as a "student" for a e2s account and use the Service.

We consider Student Data to be highly confidential and use this data solely to provide our Services to the School and to the parent, and in limited ways, for our internal purposes in accordance with our Terms of Service or specific agreements with Schools. Our collection, use, and disclosure of Student Data is governed by our Terms of Service and/or any other agreement with the School, in the U.S. by the provisions of the Family Educational Rights and Privacy Act (FERPA) and applicable state laws, and by other applicable laws relating to the collection and use of Personal Data of students. If you have any questions about reviewing, modifying, or deleting the Personal Data of a student, please contact your educational institution directly.

See "How e2s Shares Information with Others" for more information on the limited ways in which we share School Data and Student Data. See "Children's Privacy" for more information about how we collect and use the Personal Data of children under 13.

COOKIE POLICY

Cookies are text files that are placed on Your computer to collect standard internet log information and visitor behaviour information by Us. When You visit the Website(s), We may collect Personal Data automatically from You through cookies or similar technology. We also set cookies to collect information that is used either in aggregate form to help Us understand how Our Website(s) is being used or how effective Our marketing campaigns are, to help customise the Website(s) for You or to make advertising messages more relevant to You.

Essential Cookies: We set essential cookies that enable core functionality such as security, network management, and accessibility. You may not opt-out of these cookies. However, you may disable these by changing Your browser settings, but this may affect how the Website(s) functions.

Analytics, Customisation and Advertising Cookies: We set these cookies to help Us improve Our Website(s) by collecting and reporting information on how You use it. The cookies collect information in a way that does not directly identify anyone.

When You visit the Website(s), a cookie banner will be displayed providing additional information about cookies and options to opt out of non-essential cookies as required by applicable laws.

AGGREGATE DATA

We will share information in an aggregated and/or anonymous form that does not reasonably identify you directly as an individual. For example, we may share aggregate data with other students, parents, or Schools to display statistical data related to students in a classroom, school, district/board, or geographic location. We may also use aggregate or anonymized data to study and improve our Service, user functionality, and product offerings.

HOW e2s SHARES AND USES STUDENT DATA

In addition to the actions described in this Privacy Policy, e2s may facilitate the sharing of Student Data with third parties through the Service, though only when instructed and authorized to do so on behalf of the School or parent. We will use Personal Data about Students to provide the e2s Service and permit data sharing among Users authorized to view and access the Student Data. The teacher will be able to collect, review, and edit information about all the students in the classroom. A school principal, school or district/board administrator, or other individual authorized by the School to view and access student accounts, may be able to view and access all activity and content associated with the student accounts associated with the school or district/board. Each student and his or her parent will only have access to view or submit information relative to that particular student. Neither student (nor their parents) will be able to view or otherwise access the Personal Data of other students, unless it is provided to that student account by the School (for example, a class photo and class roster containing the names and photos of other students may be added by a teacher to a student account). Except for the circumstances noted above, e2s shares student data only for purposes of providing the educational service to and at the direction of Schools and parents.

COMMUNICATIONS

When you provide an email address to invite a friend or colleague or other contact to join the Service, we will use this information to send the invitation, and we may send 1-2 reminder emails if we have not received a response. From time to time, we may also send these individuals email communications letting them know more about e2s and our Service. The recipients may unsubscribe from these emails by clicking on the “unsubscribe” button within the body of the email at any time or by contacting us at support@engage2serve.com

We use Student Data to facilitate the sending of communications via the e2s Service from the School, student, and parent. We send these communications only on behalf of, and at the direction of the School or parent. In limited circumstances, we may also send the student notifications from e2s regarding the

student's account and use of the e2s Service, but e2s will never use Student Data for advertising or marketing purposes without consent. Please note that all Users who have been authorized to have access to a student's account, which could include a parent, school administrator, teacher and/or other User, may be able to view activity and content associated with such student account, including the content of communications.

YOUR RIGHTS

You are entitled to the following rights:

You can request Us for access and correction of Your Personal Data.

If We have collected and processed Your Personal Data with Your consent, then You can withdraw your consent at any time. Withdrawing Your consent will not affect the lawfulness of any processing We have conducted prior to Your withdrawal, nor will it affect processing of Your Personal Data conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about Our collection and use of Your Personal Data. For more information, please contact Your local data protection authority.

You have the right to opt-out of marketing communications We send You at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails We send You. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please Contact Us.

If You are a resident of the EEA, UK, or Switzerland, You are also entitled to the following rights:

- a. You can request Us for deletion and erasure of Your Personal Data.
- b. You can object to the processing of Your Personal Data, ask Us to restrict processing of Your Personal Data or request portability of Your Personal Data.

If You seek to exercise Your rights under this clause, please contact Us at the details provided in clause 11. We will verify any requests before acting on the request and respond to all requests We receive from individuals wishing to exercise their data protection rights within a reasonable timeframe in accordance with applicable data protection laws.

NOTICE TO CUSTOMER AND OTHER EXCLUSIONS

Other than the Personal Data collected for the purposes set forth in this Privacy Policy (more fully contained in section ***How We Collect, Use and Share Your Personal Data***) for which We shall act as the

Controller, for any other processing of Personal Data collected from or transmitted by a Subscriber, We will only act as a Processor of Personal Data and such processing will be governed by the terms and conditions of the agreement with the Subscriber. Where the Services are made available to an End-User through a Subscriber, that enterprise is the Controller of the End-User's Personal Data. In such a case, the End-User's data privacy questions and requests should be submitted to the Subscriber in its capacity as the End-User's Controller. If the End-User is an individual who interacts with a Subscriber using Our Services, the End-User will be directed to contact Our Subscriber for assistance with any requests or questions relating to their Personal Data. We are not responsible for Subscribers' privacy or security practices which may be different from this notice. Subscribers to Our Services are solely responsible for establishing policies for and ensuring compliance with all applicable laws and regulations, as well as any and all privacy policies, agreements, or other obligations, relating to the collection of Personal Data in connection with the use of Our Services by End-Users.

Our Website(s) contain links to other websites. Our Notice applies only to our Website(s), so if You click on a link to another website, You should read their privacy notice. We encourage You to review the privacy statements of any such other websites to understand their Personal Data practices.

OUR SECURITY PRACTICES

e2s cares about the security of your Personal Data and uses commercially reasonable physical, administrative, and technological safeguards to preserve the integrity and security of all information we collect and that we share with our service providers. Our employees and contractors are bound to uphold the provisions in this Privacy Policy, and violators will be subject to disciplinary action, up to and including termination and further legal action. We maintain physical, electronic, and procedural safeguards that are designed to protect our Users' Personal Data. We use internet security best practices to transfer Personal Data. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls to buildings and files. You can help protect against unauthorized access to your account limiting access to your computer and browser by signing off after you have finished accessing your account. Access to information is limited (through user/password credentials and two factor authentication) to those employees who require it to perform their job functions. We use industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process and sign-up information.

INTERNATIONAL TRANSFER

We mainly process Personal Data in the United Kingdom, Ireland, Singapore, India and the United States("Territories"). However, We may transfer Personal Data outside the Territories for the purposes

referred to in Section. We will ensure that the recipient of Your Personal Data offers an adequate level of protection that is at least comparable to that which is provided under applicable data protection laws.

If You are a resident of the European Economic Area and when Your Personal Data is processed outside EEA, We will ensure that the recipient of Your Personal Data offers an adequate level of protection, for instance by entering into standard contractual clauses for the transfer of Personal Data as approved by the European Commission (Article 46 General Data Privacy Regulation, 2016), or We will ask You for Your prior consent to such international data transfers.

For United States Users, we store and process your Personal Data in compliance with FERPA, state laws relating to student data privacy, and other applicable U.S. law and for Users from other jurisdictions as per applicable laws.

CONTROL, ACCESS, AND DELETION OF PERSONAL DATA

You may access, update, or correct your Personal Data at any time by logging into your account. If you are a School, you may access, update, and correct the Personal Data contained in any account under your control by logging into your account. Parents may request to access, correct and update a student's Personal Data, but these requests may require the School's authorization to update or delete information contained in active School accounts.

We retain your Personal Data, including e2s content, where an ongoing legitimate business requires retention of such Personal Data.

e2s maintains this information only for the benefit of the parent and student. e2s may continue to send email communications to the parent and student until we receive an unsubscribe request or until the account has been deleted. If the account is no longer covered by a School license, e2s will delete archived accounts, including the Personal Data and Content associated with such accounts, after a period of dormancy.

In case of expiry or termination of School License, all data are retained for a period of (30) days for the schools to download. Post the (30) Day period all data would be destroyed for further use as per the deletion policy. We may maintain aggregate or de-identified data in a form that does not reasonably identify a particular individual, for our internal use or analytic purposes.

CHILDREN'S PRIVACY

e2s does not knowingly collect Personal Data through the e2s Service from a child under 13 unless and until a School has appropriate consent and authorization for a student under 13 to use the Service and for e2s to collect information from such student.

USAGE POLICY

You represent and warrant that the owners of the phone numbers you provide to e2s, to which outbound messages and broadcasts are transmitted through the Services, have consented or otherwise opted-in to the receipt of such messages and broadcasts. You agree that you will adhere to the Consumer Best Practices Guidelines promulgated by the Mobile Marketing Association. You further agree that any individual requesting "Do-Not-Call" ("DNC") status shall immediately be placed on your DNC accounts list and removed from your list of approved contacts used with the e2s Services and the e2s Sites.

You agree to familiarize yourself with and abide by all applicable local, state, national and international laws and regulations and are solely responsible for all acts or omissions that occur under your account, including without limitation the content of the messages and broadcasts transmitted through the e2s Services. Without limiting the foregoing, you agree to familiarize yourself with the legalities of any messages, calls, broadcasts, and campaigns transmitted through the e2s Services by visiting the following websites:

Federal Trade Commission <https://www.ftc.gov/> Federal Communications Commission <https://www.fcc.gov/>

Do-Not-Call Registry Info <https://www.donotcall.gov/> The Telephone Consumer Protection Act ("TCPA"), the Federal Trade Commission, the Federal Communications Commission, the DNC list registry rules (<https://www.donotcall.gov/>) and various state laws, rules, and regulations place restrictions on certain types of phone calls and text messages. e2s is in no way attempting to interpret any laws, rules, or regulations. This information is provided merely as a courtesy and is not intended to replace your responsibility to familiarize yourself with and abide by the legal requirements pertaining to your messages, broadcasts, and campaigns prior to using the e2s Sites or Services. You are ultimately responsible to make your own informed decisions regarding your messages, broadcasts, and campaigns.

You shall schedule campaigns responsibly and, in a manner, that is courteous to the recipients pursuant to local, state, national, and international calling time rules and regulations. You are solely responsible for obtaining any rights or licenses to any data, including without limitation sound files, for inclusion in any outbound messages, broadcasts, and campaigns. If you are unfamiliar or unclear on the legalities of any

message, broadcast, or campaign, you must consult with your attorney prior to your use of the e2s Sites or Services.

CONTACT INFORMATION

You may contact Our privacy officer if You have any enquiries or feedback on Our personal data protection policies and procedures, or if You wish to make any request, in the following manner:

Kind Attention: Data Protection Officer

Email Address: privacyinfo@engage2serve.com

CONFIDENTIAL