### **Privacy Policy**

#### 1. Introduction

YOCLE complies with the Personal Data (Privacy) Ordinance of the Hong Kong Special Administrative Region (Hong Kong SAR).

Please read this Privacy Policy ("Policy") carefully before using the http://yocle.net website and/or the YOCLE app (the website and the app are together referred as the "Service") operated by YOCLE ("us", "we", or "our"). YOCLE is developed by Eireann Limited.

This Policy 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.

Our Service is for education and research purposes and is currently work in progress. You use our Service at your own risk. YOCLE is an educational network platform for supporting your development and assessment of your holistic competencies from activities you participated with your peers; these activities can be out-of-class, in-class or extra-curricular activities.

By accessing, registering or using the Service, including the website and/or the app, you acknowledge that you have read, understood, and agreed to the Policy.

### 2. Why do we collect information?

YOCLE uses the collected data for various purposes, including:

- To provide and maintain the 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 analysis or valuable information so that we can improve the Service;
- To monitor the usage of the Service; and
- To detect, prevent and address technical issues.

#### 3. What kinds of information do we collect?

### 3.1 Information you provide

While using our Service, we may ask you to provide us with "personal data" (any data (a) relating directly or indirectly to a living individual; (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (c) in a form in which access to or processing of the data is practicable).

## Sign up

When signing up for an account, you need to provide your email address, name, birthday and password. You can change your email address, name, birthday and password on your profile at any time. Your name and birthday on your profile are always visible to all other users, but not your email address and password.

### **Profile**

On your profile, you can voluntarily opt to provide your profile picture, workplace, relationship status, education, working experience, objectives, publications, awards, languages, interests or upload any materials. Your profile is always visible to all other user. If you do not want these information to be visible to other users, please do not post or upload them. Please do not upload any

personal documents (such as identity card) and financial documents to our Service. You can always access and edit your profile.

### Activities

We may collect information for education and research purposes such as generating holistic competencies scores, from the information you provide in the activities. In the activity assessments, you are voluntary to provide your reflections, report, blog and daily journal. We may also collect information from the multiple choice questions and surveys. You can request for resubmission and edit the content you submitted before in the assessment.

#### Educational network

You are voluntary to use our educational network service, including "What's up", blog, private and group messages. We may collect information when you post to, send to, upload to, receive from and engage in our educational network service. You can always delete the content or information you posted. Please be aware that users you shared with could download, store and re-share the content or information you provided.

### 3.2 Information other users provide about you

We may collect information other users provide about you through our Service, such as when someone assesses, rates or comments on your activity assessment, when someone comments on your blog or "What's up" posts, and when someone sends messages to you.

### 3.3 Usage Data

We do not collect usage data including user habits or network properties (such as your computer's IP address). If we do collect usage data, we will update this Policy and notify you.

#### 3.4 Device information

We do not collect information from the devices you use to access our Service (such as the operating system, device settings, mobile phone number, GPS and Wi-Fi). If we do collect devise data, we will update this Policy and notify you.

#### 4. How do we use Cookies?

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device.

We use Cookies and Google Recaptcha to keep your account logged in.

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 keep your account logged in.

#### 5. How is information shared?

Your profile, activities participated and holistic competencies scores can be accessible by all users, even if they are not your peers. Where we have made settings available, you can decide the visibility of your information.

In the activities, the information you provide, such as reflection, are shared with all participants, coordinators and assessors who participated in the activities.

You can choose the audience of your "What'up" posts. Blog posts are accessible by your peers. When you comment on a public post, all other users can see it.

Please be aware that users you shared with could download, store and re-share the content or information you provided.

# 6. Is information transferred to any third parties?

We do not transfer your information or personal data to any third parties. If we do so, we will notify you and obtain your consent.

## 7. Is information used for direct marketing?

As we provide our Service for education and research purposes, we do not use your information or personal data for direct marketing. If we do so, we will notify you and obtain your consent or indication of no objection.

## 8. Rights to access and correction of personal data

You have the right to request access to and correction of your personal data that is held by us. To submit such request, please contact <u>us at yocle.help@gmail.com</u>. Data access request should be made by completing and submitting the <u>Data Access Request Form</u>.

## 9. How long do we keep your personal data?

All the information, including personal data, will be regularly backed up in a secured and separate server with encryption for contingency of disaster recovery. The information will be stored as long as our Service is running. After your deletion or change of information, there would still be copies in the backups.

# 10. Security

The security of your data is important to us. We use Hypertext Transfer Protocol for secure communication (HTTPS) over the Internet.

But no method of transmission over the Internet, or method of electronic storage is absolutely secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## 11. Changes to This Policy

We may update our Policy from time to time. If a revision is material, we will try to provide a notice or inform you via your registered email address prior to any new terms taking effect. What constitutes a material change will be determined at our sole discretion.

You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page.

By continuing to access or use our Service after those revisions become effective, you agree to be bound by the revised Policy. If you do not agree to the new terms, please stop using the Service.

#### 12. Contact Us

If you have any questions about this Policy, please contact us at **yocle.help@gmail.com**.