

PRIVACY POLICY

Version control

Date	Action	Next review
	New policy	N/A
	Policy reviewed and approved by Board	

WE WILL POST ANY CHANGES TO THIS PRIVACY POLICY IN A NOTICE OF THE CHANGE AT THE BOTTOM OF OUR WEB PAGE WITH A HYPERLINK THERETO. WE WILL ALSO SEND YOU AN EMAIL DESCRIBING SUCH CHANGES. PLEASE REGULARLY REVIEW THIS PRIVACY POLICY. NEVERTHELESS IF YOU CONTINUE TO USE OUR SERVICES, YOU ARE BOUND BY ANY CHANGES THAT WE MAKE TO THIS PRIVACY POLICY.

1. INTRODUCTION

Cresconova Labs ("Cresconova", "we," "us," or "our") respects the privacy of its users which includes the parent or legal guardians of students aged 8 – 16 who attend our in person educational programmes in the UK ("User," "Students", "your," or "you"). This Privacy Policy (the "Privacy Policy") explains how we collect, use, disclose, and safeguard your information when you use Cresconova's services. Cresconova is a non-profit education company that fosters critical thinking, social-emotional learning, collaboration and problem solving by providing educational courses and consulting at our Education Centre ("Services").

By using our Services or visiting our Education Centre, you agree to the terms of this Privacy Policy. If you do not agree, please do not use our Services.

Cresconova is committed to protecting the privacy of its Users whose information is collected and stored while using Cresconova's Services.

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION AND HOW WE WILL TREAT IT. BY ACCESSING OR USING OUR WEBSITE OR SERVICES YOU AGREE TO ACCEPT ALL THE TERMS CONTAINED IN THIS PRIVACY POLICY AND ACKNOWLEDGE AND AGREE WITH THE PRACTICES DESCRIBED HEREIN. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS AND USE OUR SERVICES OR WEBSITE.

If you have any questions regarding this privacy policy, please send us an email to christine.braun@cresconova.org.

WE DO NOT SELL YOUR PERSONAL INFORMATION, NOR DO WE INTEND TO DO SO. WE DO NOT GIVE ACCESS TO YOUR PERSONAL INFORMATION TO THIRD PARTIES EXCEPT TO OUR AFFILIATED ENTITIES, TO ASSIST US IN THE PROVISION OF OUR

SERVICES TO YOU, WHERE STIPULATED IN OUR DATA PROTECTION POLICY OR WHERE REQUIRED BY LAW. FOR THE AVOIDANCE OF DOUBT, WE MAY ALSO SHARE YOUR PERSONAL INFORMATION WITH CRESCONOVA ACADEMY, INC., A NOT FOR PROFIT CORPORATION OF THE STATE OF DELAWARE, IN ORDER TO PROVIDE OR ENHANCE OUR SERVICES TO YOU.

1. KEY DEFINITIONS

- a. "Courses" means the learning courses provided to students by Cresconova Labs.
- b. "Education Centre" means our premises at 47 Redcliffe Gardens, London, SW10 9JH.
- c. "Educator" means the teachers engaged in providing lessons and instruction and responsible for developing a personalised plan for the students.
- d. "Parent" means the parent or legal guardian of the student User who acts on behalf of the student User to provide the required consent for the student User under these Terms and our Privacy Policy, and is responsible for registering the student User by creating the account and paying for the Courses.
- e. "Parental Consent Form" means the form signed by the parent or legal guardian providing consent for Cresconova to collect, process and use Student's data to carry out the services in compliance with this Privacy Policy and our Terms of Service.
- f. "Submissions" means the video submissions of homework activities created by Students and uploaded by Parents as may be requested from time to time
- g. "Student" means the child who is undertaking instruction through the Courses.

2. WHAT INFORMATION DO WE COLLECT?

When you register to enrol your child with Cresconova, we collect personal information (also referred to as personally identifiable information or "PII") which may include Parents' and Students' name, address, online contact information such as your email address or username, phone number, town, country of residence, and age, grades and the type of school attended by the Student. We may also collect certain biometric data such as facial recognition or fingerprints where required for registration and safeguarding purposes. The information so collected will be stored on our servers at the Education Centre. You are able to change your personal information via email (info@cresconovalabs.org), in person at the Education Centre or through your profile or account settings on our Website.

We may collect audio and video information through the Submissions provided by you. The Education Centre employs Closed Circuit Television (CCTV) surveillance on its premises to enhance the safety and security of students, staff and visitors. The primary purposes of CCTV use includes (i) safeguarding students and staff, (ii) deterring and preventing criminal activity, (iii) monitoring and investigating incidents and (iv) supporting the effective management of the Education Centre. CCTV footage is recorded and stored securely in compliance with the Data Protection Act 2018 and the General Data Protection Regulation. Footage will be retained for a maximum period of 30 days, unless it is required for an ongoing investigation or legal proceedings. Access to CCTV footage is restricted to authorised personnel only. This includes

the Chief Creative Officer and other individuals explicitly authorised by Cresconova. Requests for access by external parties, such as law enforcement agencies, will be considered on a case-by-case basis and granted only when legally permissible.

Cresconova's Data Protection Officer is responsible for ensuring compliance with data protection regulations. The DPO can be contacted at legal@cresconovalabs.org for any queries related to CCTV use and data privacy.

Cresconova will regularly review and monitor the use of CCTV to ensure compliance with data protection regulations and the effectiveness of the surveillance system. Any changes to this policy will be communicated to pupils, staff and visitors in a timely manner.

We currently do not collect or store any credit cards or bank information, as we are using a third-party payment processor. However, we will update this Privacy Policy if we start using and storing such information. We will also inform you via reasonable means if we start collecting such information from you. We may require details of financial eligibility for Fee Remission applications, which information will be treated confidentially and stored securely on our servers. Such information will be retained for a maximum period of 30 days after receipt.

3. HOW DO WE COLLECT INFORMATION?

We collect personal information from you in the following ways:

- a. Upon registration via our Website or through the completion of online forms at the Education Centre;
- b. In email, text, and other electronic messages between you and us, or via our Website;
- c. When you interact with our advertising and applications on third-party website and services, if those applications or advertising include a link to this Privacy Policy;
- d. From you registering for a course, which includes details of transactions you carry out on our Website;
- e. When you subscribe to a newsletter;
- f. From your responses to a survey;
- g. From forms filled out by you;
- h. From records or copies of correspondences (including email addresses) if you contact us; and
- i. When you provide information to be published or displayed on our Website.

We may collect information from you automatically when you navigate through our Website in the following ways:

- a. Information obtained through browser cookies;
- b. Information obtained through flash cookies;
- c. Web beacons on our Website;
- d. Web beacons on emails sent by us; and
- e. Other tracking technologies.

4. HOW DO WE USE YOUR INFORMATION?

We use the information that you provide to:

- a. Personalise your experience in using our Services;
- b. Improve our customer service;
- c. Provide you with information, products, or services requested from us;

- d. Improve the Education Centre or Website;
- e. Administer contests, promotions, and surveys both at our Education Centre or on our Website;
- f. Process transactions;
- g. Anonymise data and aggregate data for statistics;
- h. Contact you for other purposes with your consent;
- i. Contact you about our products and services that may be of interest; and
- j. To evaluate the Students' activities and provide feedback;
- k. Send you periodic emails, via the email address provided by you to (i) send information, respond to inquiries, and/or other requests or questions; (ii) process course registrations and send information and updates pertaining to such registrations; (iii) send additional information related to your product and/or service; and (iv) market to our mailing list or continue to send email to you after the original transaction has occurred;
- l. To handle complaints in accordance with our Complaints Policy; and
- m. To assess eligibility for Fee Remission in accordance with our Scholarship Policy
- n. Present our Website and their contents to you;
- o. Provide you with notices about your account and/or subscription, including expiration and renewal notices;
- p. Carry out obligations and enforce rights arising from contracts entered into between you and us, including billing and collection;
- q. Notify you about changes to our Website and any products or Services;
- r. Allow you to participate in interactive features on our Website;
- s. Ensure compliance with applicable laws.

5. LEGAL BASIS FOR PROCESSING

We process your data under one or more of the following bases:

- Consent (e.g. parental consent for Students)
- Performance of a contract
- Legal obligation
- Legitimate interests (e.g. safeguarding, service improvement).

6. OUR COOKIE POLICY

Cookies are small pieces of text used to store information on web browsers. Cookies are used to store and receive identifiers and other information on computers, phones, and other devices. Other technologies, including data we store on your web browser or device, identifiers associated with your device, and other software, are used for similar purposes. In this Privacy Policy, we refer to all of these technologies as "Cookies."

We use Cookies on our Website to (a) help remember and process items in the shopping cart, (b) understand and save your preferences for future visits, (c) keep track of advertisements, (d) compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future, and (e) allow trusted third-party services that track this information on our behalf. You can set your browser to refuse all or some browser Cookies, but it may affect your user experience. We honour Do Not Track signals and, if one is in place, we will not track, plant cookies, or use advertising.

We allow third party behavioural tracking and links to third-party web pages. Occasionally, at our discretion, we may include or offer third-party products or services on our Website. These

third-party sites have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our Website and welcome any feedback at [about these sites](#).

7. USE OF ARTIFICIAL INTELLIGENCE

Cresconova is committed to leveraging innovative technologies to enhance the educational experience. Artificial Intelligence (“AI”) tools may be integrated into certain classes to support and improve teaching and learning outcomes. The use of AI in education aims to provide personalised learning and offer new educational opportunities.

AI tools will be used in various classes and activities, including but not limited to:

- Personalized learning platforms: For children under 13, these platforms will operate in a sandbox environment where no data is recorded or held.
- Data management for older students: For students aged 13-16, data can be held, but only on platforms suitable for this age group.
- AI tool design and creation: Teaching students how to design and create AI tools.

Cresconova is dedicated to protecting the privacy and security of all pupils and staff. The use of AI tools will comply with the Data Protection Act 2018 and the General Data Protection Regulation. The following measures will be implemented to safeguard personal data:

- AI tools will only collect and process personal data necessary for educational purposes (and only for children age 13 +)
- Personal data will be anonymised wherever possible to protect individual privacy
- Access to AI-generated data will be restricted to authorised personnel only
- Regular audits will be conducted to ensure compliance with data protection regulations.

Cresconova will maintain transparency regarding the use of AI tools in education. Students, parents and staff are hereby informed about the intended use of AI technologies, their purposes and if any data being collected. Consent will be obtained from parents or guardians for the use of AI tools involving students.

Cresconova will ensure that AI tools are used ethically and responsibly. This includes:

- Avoiding bias in AI algorithms to ensure fair and equitable treatment of all students
- Promoting inclusivity and accessibility in AI-supported learning
- Regularly reviewing and updating AI practices to reflect best ethical standards

The use of AI tools in education will be regularly reviewed and monitored to assess their impact and effectiveness. Feedback from students, parents and staff will be taken into account to make necessary adjustments and improvements.

8. HOW DO WE PROTECT INFORMATION WE COLLECT?

Our IT systems receive regular security scans and penetration tests. Our Website also receives regular malware scans. In addition, our Website uses an SSL certificate as an added security measure. We require username and passwords for our employees who can access your personal information that we store and/or process on our servers. In addition, we actively prevent third parties from getting access to your personal information that we store and/or process on our servers. We accept payment by credit card through a third party credit card processor on our behalf. We will implement reasonable security measures every time you (a)

register for a course, or (b) enter, submit, or access your information, or (d) access our Website.

We typically do not store hard copy data. However, if any physical records are retained, they will be securely stored to ensure their protection and disposed of in accordance with our Data Retention Policy.

9. DATA SECURITY MEASURES.

Security Measures. We have implemented measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our Website.

Fair Information Practice Principles. In the event of a personal data breach, we will notify you within seventy-two (72) hours via (i) email and/or (ii) our Website.

10. DISCLOSURE OF PERSONAL INFORMATION

There are times when we may share Personal Information that you have shared with us to enable us to provide you over Services, including contractors, service providers, and third parties such as Cresconova Academy, Inc. ("Affiliates"). This section discusses only how Cresconova may share such information with Partners. We will ensure that our Affiliates protect your Personal Information. The following describe how and with whom we may share your Personal Information:

Disclosure of Personal Information.

- . We may disclose aggregated, de-personalized information about you that does not identify any individual to other parties without restriction, such as for marketing, advertising, or other uses.
- . We may disclose personal information to entities we collaborate with, including Cresconova Academy, Inc.
- . We may disclose personal information to contractors, services providers, and other third parties.
- . We require all contractors, service providers, and other third parties to whom we disclose your personal information to be under contractual obligations to keep personal information confidential and to use it only for the purposes for which we disclose them.
- . We may disclose personal information in the event of a merger, sale of business, etc.
- . We require all other Partners, to whom we disclose your personal information, to enter into contracts with us to keep personal information confidential and use it only for the purposes for which we disclose it to such Partners.
- . We may disclose personal information to fulfil the purpose for which you have provided it.
- . We may only disclose personal information as described in this Privacy Policy or with your consent.

Other Disclosure of Personal Information.

- . We will disclose personal information (i) to comply with any court order, law, or legal process, including to respond to any government or regulatory request, (ii) to enforce or apply any other agreements, including for billing and collection purposes, (iii) if we believe it is necessary or appropriate to protect the rights, property, or safety of Cresconova, our customers or others (including, without limitation, for safeguarding purposes), and/or (iv) if it is necessary or appropriate to protect the rights, property, or safety of Cresconova, our customers, students or others, and this includes exchanging information with other companies and organisations for the purposes of safeguarding, fraud protection and credit risk reduction.

Third Party Disclosure.

- . We do not sell, trade, rent, or otherwise transfer personal information to others, unless we provide you with advance notice. This does not include other parties who assist us in providing the Services, operating our Website, conducting our business, so long as those parties agree to keep this information confidential.
- . We do not provide personally identifiable visitor information for marketing purposes.

Choices Users Have About How Cresconova Uses and Discloses Information.

- a. Parental Consent Form – Users can refuse consent or request that their consent is qualified when submitting the Parental Consent Form.
- b. Tracking Technologies and Advertising. You can set your browser to refuse some or all the browser cookies, but if you disable or refuse cookies, some parts of our Website may not be accessible or function properly.
- c. Disclosure of Users' Information for Third-Party Advertising. Users can opt-out by (i) checking the relevant box when we collect the data; (ii) logging into the Website and adjusting their preferences in their account profile by checking or unchecking the relevant boxes, or (iii) emailing us their opt-out request at legal@cresconovalabs.org. Users receiving promotional email can opt-out by sending a return email requesting to be omitted from future promotional email distributions. This opt-out will not apply to information provided by Cresconova for course purchases, warranty registration, or other transactions.

11. GDPR and Data Protection Compliance

We are headquartered in the United Kingdom. All of our operations are located in the United Kingdom. Your Personal Information, which you give to us during registration or use of our Services or Website, may be accessed/collected by us in the United Kingdom. If you are registering for our Services or visiting our Website from outside the United Kingdom, be aware that your Personal Information may be transferred to, stored, and processed in the United Kingdom. Our servers and our third-party hosting services partners are located in the United Kingdom. By using our Services or accessing our Website, you consent to any transfer of your Personal Information for processing in the UK or other countries.

We comply with the EU Standard Commercial Clauses (“SCCs”) per EU Decision 2021/914, as amended by the UK Addendum with respect to the transfer of Personal Data from the UK to the US and other countries for Processing, as defined in the GDPR. If there is any conflict between the terms and conditions in this Privacy Policy and your rights under the SCCs, the terms and conditions in the SCCs will govern.

You are the Controller, as defined in the GDPR, and the Exporter, as defined in the New SCCs, of the Personal Data and we are a Processor, as defined in the GDPR, and the Importer of such Personal Data.

You agree to comply with the GDPR rules that apply to Controllers and the SCCs rules that apply to Data Exporters. We agree to comply with the GDPR rules that apply to Processors and the SCCs rules that apply to Data Importers.

We agree to fully comply with the letter and the spirit of the GDPR and the SCCs with respect to the transfer of your Personal Data for Processing outside the UK.

- Upon request, we will provide you with a list of your Personal Data that we will process and a copy of the SCCs under which we will transport your Personal Data for processing.
- If we cannot satisfy any request or dispute to your satisfaction, we will agree to arbitrate or litigate the dispute in the EU jurisdiction in which you reside.
- We will only transfer your Personal Data to a third country in accordance with documented instructions from you. We may transfer your Personal Data to Cresconova, Inc. in the US where you have provided consent for us to do so.
- Your Personal Data will be transferred and stored in an encryption format.
- Only our employees, who have a need to access your Personal Data to enable us to meet our contractual and legal obligations to you, will be given access to your Personal Data.
- Such employees will be given a Username and Password to access your Personal Data.
- We will keep an automated record of all persons who have accessed your Personal Data.

d. Rights of Data Subjects. To make any of the following requests, with respect to this Privacy Policy, our Terms or Use, and/or Personal Data, please contact us (i) via email at legal@cresconovalabs.org, or (ii) by writing to us at Cresconova Academy, 47 Redcliffe Gardens, London, SW10 9JH.

- Access: You can request more information about the Personal Information we hold about you. You can also request a copy of the Personal Information.
- Rectification: If you believe that any Personal Information we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. Please contact us as soon as possible upon noticing any such inaccuracy or incompleteness.
- Objection: You can contact us to let us know that you object to the collection or use of your Personal Information for certain purposes.
- Erasure: You can request that we erase some or all of your Personal Information from our systems.
- Restriction of Processing: You can ask us to restrict further processing of your Personal Information.

- **Portability:** You have the right to ask for a copy of your Personal Information in a machine-readable format. You can also request that we transmit the data to another entity where technically feasible.
- **Withdrawal of Consent:** If we are processing your Personal Information based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, it may limit your ability to use some/ all of our Services and you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Information, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- **Right to File Complaint:** You have the right to lodge a complaint about our practices with respect to your Personal Information with the supervisory authority of your country or EU Member State. Please go to https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm to locate your Data Protection Authority in the EU. You may contact the UK's Information Commissioner at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.
- We will respond to your inquiry within thirty (30) days of the receipt.

12. MODIFICATIONS TO OUR PRIVACY POLICY

Cresconova reserves the right, at its sole discretion, to change or modify this Privacy Policy at any time. In the event we modify this Privacy Policy, such modifications shall be binding on you only upon your acceptance of the modified Privacy Policy. We will inform you about the modifications on our Privacy We will inform you about the modifications as set forth at the beginning of this Agreement. In any event, your continued use of our Website shall constitute your consent to such changes.

13. LIST OF THIRD-PARTY SERVICE PROVIDERS

Cresconova uses the following third-party service providers

Name of Third-Party Service Provider	Contact Information
Shopify, Inc.	Website: https://www.shopify.com/ Address: 151 O'Connor Street, Ottawa ON KP 2L8 Canada
Google Pay	Website: https://pay.google.com Address: 1600 Amphitheatre Parkway Mountain View, California 94043 USA
Applewood Fire & Security	Website: https://www.apple-wood.co.uk Address: 2 The Quarry, Betchworth, RH3 7BY
Cresconova, Inc.	Website: https://www.cresconova.org/cresconova-global-online-courses/-/welcome-to-cresconova-global
YH2 Capital International Ltd	Universal Building, 364 -366 Kensington High Street, London, W14 8NS

Additionally, if you have any questions or concerns about our third-party service providers, please email us at legal@cresconovalabs.org.

14. COPYRIGHT INFRINGEMENT NOTICE

If you believe that content on our website infringes your copyright under UK law, you may request removal of that content by submitting a written notice to us. Please include the following details:

- Your full name and contact information
- A description of the copyrighted work that you believe has been infringed
- A description of the material that you claim is infringing and its location on our website
- A statement confirming that you believe in good faith that the use of the material is not authorised by the copyright owner, its agent, or the law
- A statement that the information in your notice is accurate and that you are the copyright owner or authorised to act on behalf of the owner
- Your signature (physical or electronic)

Send notices to:

Email: legal@cresconovalabs.org

Post: Copyright Officer, Cresconova Labs, 47 Redcliffe Gardens, London, SW10 9JH, UK

We reserve the right to request additional information or clarification if needed. Please note that knowingly making false claims of infringement may result in legal liability.

15. ANTI-BRIBERY COMPLIANCE

Cresconova is committed to operating with integrity and in full compliance with the UK Bribery Act 2010. We prohibit all forms of bribery and corruption. Cresconova, its employees, officers, trustees, and representatives must not engage in bribery directly or through third parties, nor offer, promise, give, request, or accept bribes or facilitation payments. Financial transactions will be accurately recorded, and internal controls and training implemented to prevent misconduct. Any concerns regarding bribery or corruption should be reported promptly. All partners, students, parents and suppliers are expected to comply with equivalent anti-bribery standards and must not engage in any conduct that could implicate Cresconova in a breach of the Bribery Act 2010.

CONTACT US

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at:

- Data Protection Officer: Harriet Deakin
- Email: legal@cresconovalabs.org
- Address: Cresconova Labs, 47 Redcliffe Gardens, London, SW10 9JH

PLEASE NOTE: IF YOU USE OUR SERVICES OR WEBSITE, YOU HAVE AGREED TO AND ACCEPTED THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY AND THE TERMS AND CONDITIONS SET FORTH IN OUR TERMS OF USE OR OUR TERMS OF SERVICE, AS APPLICABLE. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY OR OUR TERMS OF SERVICE, PLEASE DO NOT USE OUR SERVICES OR WEBSITE.