Privacy Policy

23 August 2020

1- Introduction

This policy relates to the Advanced Learning World (ALW) digital education platform operated by Advanced Learning for Education Company (known as Advanced Learning Company (ALC)). The platform was developed to enhance the education of school-age students in Saudi Arabia. The policy relates specifically tohow the busines handles private data belonging to users of the system.

The policy applies to the following, regarding their use of the platform:

- School-age students
- Parents or guardians of the students
- Teachers and mentors providing services using the platform
- ALC Administrative staff.

Any individual using the platform should review this policy and not use the platform unless they agree with thepolicy.

ALC is committed to the protection of private user data and will investigate fully any cases where we judge thispolicy has not been applied properly.

2- What private data we gather

We gather the following private data in the ALW platform:

- Basic personal data for individuals using the platform, including name, date of birth, gender, email address, physical address, school grade, username, password, photograph, and phone number
- Learning data for students such their consumption of digital content, scores achieved in exercises and tests, list of subjects being studied, individual learning profiles, lesson attended, mentor sessions attended, and the type of content being studied
- Records of phone calls, video calls and emails
- Chat messages between user of the system
- Performance data for mentors and teachers such as ratings by students, number of sessions provided, duration of sessions and number of no-shows
- Performance data for admin staff including ratings, number of tasks performed and the duration of tasks
- Recoded live lessons and mentoring sessions with students and parents; in such cases, we will advise

those concerned that the session may be recorded

- We will not retain data on payment mechanisms. For example, credit card numbers.

3- How we hold the data

ALW is a cloud-based platform using the Microsoft Azure cloud system. The data is held securely within thisplatform using Secure Sockets Layer (SSL) protection. The cloud platform is highly secure using Microsoft technology and a fail-over system is used to protect the data in case the main cloud platform fails.

The platform makes use of external systems for some of its functionality including for video communication and for user chat. In such cases, private data may be held within these systems. In such cases, ALC will takereasonable steps to confirm private data is held securely and not communicated to other parties.

4- How we use the data

We use the data for the following purposes:

- To communicate with parties who have provided the data by phone, email, or other mechanisms
- To review recorded live lessons after they have taken place as part of the learning process
- To review recorded mentor sessions for performance monitoring and other business operations
- To inform parents and guardians of the performance of students having linked accounts to their own. We will not provide parents or guardians with data related to other specific student's accounts, although we may provide averaged and anonymised data for such students
- To improve the learning experience of our stduents by analysing their learning profile and comparing this with anonymised and averaged data for other stduents
- To provide performance data on teachers and admin staff. This data may be used to feedback performance results and as input to Human Resources processes within ALC
- To assist operations by seeking feedback on the platform. This will be used to plan and implement improvements to the platform, the educational content and company operations
- To assist ALC staff with general marketing operations and busines intelligence by understanding patternsof usage, performance feedback, and other similar data
- To assist with marketing the platform to current users. For example, encouraging trial users to upgrade toa paid account, encouraging standard level subscribers to upgrade to premium account status and encouraging those that have discontinued their account to re-join

5- Data maintenance

- It is the responsibility of our data providers to inform us of any updates. This can be done though the platform or direct to ALC staff
- ALC will seek to keep private data up-to-date, but we rely on mainly on the data owners to provide us with the necessary information for this purpose
- If we judge some or all of the private data is incorrect, we may request the user correct the data. If no such update is provided, or possible, we will delete such incorrect data

6- Sharing the data

We will not share private data from the platform with any organisation outside ALC, except:

- Where we contract with a company to assist ALC in an area such as marketing, platform development or platform operation. In such cases, we will seek to include a confidentiality clause in our contracts with such organisations to protect private data
- Where we use freelance staff to assist with company operations. In such cases, we will seek to include a confidentiality clause in our contracts with such freelancers to protect private data
- We will not sell or share the data to third parties without the owners' consent
- We will share private data if compelled to do so by Government officials.

7- Deleting data

- We will retain private data for those no longer using the platform for a limited period of time (maximum one year) to assist operations and to improve our services. For example, where a stduents decides to re-join the platform after a period away
- We will delete data immediately if reasonably requested by the owner of such data
- We will delete any offensive, mis-leading or otherwise undesirable data and will close accounts for any individuals providing such data to the platform
- We will not delete data if compelled to do so by Government officials.