

## Digital Africa and Digital Education Privacy Policy

Last Updated: February, 13, 2022

We at Digital Education, a Digital Africa LLC company (collectively Digital Africa/Digital Education or 'DA/DE') strive to protect your privacy by preparing this privacy policy with regards to the collection and processing of information through our processes and procedures.

### 1. Scope of this policy

This privacy policy (the "Policy" or the "Privacy Policy") describes how Digital Education and Digital Africa collect, uses, consults or otherwise processes an individual's Personal Data. For the purposes of this policy, "the learning management system vendor Digital Africa LLC and Digital Education., a company incorporated under the law of the state of Maryland, having its registered seat and its offices at 215 Spring Avenue, Rockville, MD, 20850, email address info@dafrica.education.

We are committed to protecting the privacy of our users and customers. This Privacy Policy is especially directed at subscribers of our learning management system developed using Canvas open source application.

This Privacy Policy is intended to inform you how we gather, define, and use information that could identify you, such as your name, email address, address, other contact details, online identifiers or other information that you provide to us when using our websites or when relying on our services. Please take a moment to read this Privacy Policy carefully.

This policy is to be read as consistent with the [Cookie Policy](#).

This policy includes a description of your data protection rights, including a right to object to some of the processing activities we carry out.

### 2. Contacting us

If you have general questions about your account or how to contact Customer Service for assistance, please send us an email at info@diafrica.education.

### 3. Collection of Information

The purpose of the Digital Africa/ Digital Education sites are is to provide a platform for organizations and educational institutions offer their education and training programs. As part of these processes, we receive and store information about you such as:

#### a) Personal Information

The majority of our eLearning features and services may require registration. Users may register ("sign-up") on-site. Upon signing-up, an account is created for the user ("Account"). Users who sign-up on-site are required to confirm their registration by clicking on an activation link which is sent to them via email. All active user accounts will have specific roles in the learning management system.

Upon registration, users are required to provide part or all of the following information below, depending on the features or services they wish to access

First and last name

Email address

Gender

Affiliated organization

#### b) Other Information

Non-personal information

We automatically track and collect certain non-personal information such as Website navigation data, Internet Protocol (“IP”) addresses, timestamps and URLs. We use this information to do internal research on our users’ demographics, interest, and behavior to better understand, protect and serve you and our eLearning community.

#### Correspondence information

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on our Website, we may store such information on our servers.

#### Payment Information

To protect you against fraud, unauthorized transactions (such as money laundering), claims and other liabilities, we only collect an identification number and order details which enable us to match each user to the payments he makes. We do not collect credit card information.

We allow our third-party payment vendor to collect information for the purpose of collecting fees from users on the Website. We do not have access to the payment information that you provide to our third-party payment vendor and this information is subject to the privacy policy of the third party payment vendor. For more information regarding what payment information our third-party payment vendor collects and how it uses this information, please see their privacy policy.

#### 4. Use of Information

We use your information to provide, analyze, administer, enhance and personalize our services and marketing efforts, to process your registration, your orders and your payments and to communicate with you on these and other topics. For example, we use information to:

1. We use your Information in order to resolve disputes; troubleshoot problems; help promote safe matching; collect fees owed; measure consumer interest in Services; inform you about offers, products, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our TOS; and as otherwise described to you at the time of collection. We may compare and review your Business Information for errors, omissions and for accuracy.
2. We use your e-mail associated with your Account in order to send you newsletters and promotions in conjunction with your use of our Services. If you do not wish to receive newsletters you may unsubscribe by clicking the un-subscription link in the newsletter e-mail. We may also send you newsletters which include third party’s offers. If you do not wish to receive these third party offers, you may unsubscribe by clicking the un-subscription link in the newsletter e-mail.
3. We may use your Business Information in order to provide benchmark analysis and aggregate statistics. This particular Business Information will be anonymized, will not contain personal identification and will not be transferred or sold to third parties in any way or format that identifies you.
4. We use Website navigation data to operate and improve the Website. We may also use Website navigation data alone or in combination with your Business Information to provide aggregated information about online learning management system performances.
5. We collect the IP Addresses to track when you use our Website. We use IP Addresses to monitor the regions from which you navigate our Website and sign-up to use our Services. Your IP-address is also registered for statistical purposes and to better our advertising and layout of

the Website. In specific, we use your IP Addresses to send the most appropriate advertising based on geographic area or information derived from your IP address. Many IP addresses are commonly associated with Internet service providers, universities, or major corporations in specific regions or localities. Aggregate information derived from IP addresses may also be reported to advertisers.

6. We do not transfer, sell or rent your Business Information to third parties for their marketing purposes other than what is stated in this Privacy Policy. We request only the information that we need to operate our Services and improve our Website's user experience. We do not use your Information to create any advertising creative.

Use of Business Information by other third parties

1. We partner with third-party advertising networks to either display advertising on our Website or to manage our advertising on other Websites. These ad network partners do not collect and do not have access to any Information. They may, however, anonymously track your internet usage by various means, for example, through the use of cookies.

2. We make reasonable efforts to make sure that our users, who use our Services, will use the information available to them solely for eLearning-related purposes. However, we cannot control their use of that information outside this scope and we are not responsible for such unauthorized uses.

3. Digital Africa/Digital Education reserves its right to share your Information with a third party in case of sale merger, control changes, reorganization or liquidation of the Company. All actions will naturally be completed in compliance with applicable laws of personal data and privacy.

Our legal basis for collecting and using the personal information described in this Privacy Policy will depend on the personal information concerned and the specific context in which we collect and use it. We will normally collect personal information from you where we need the personal information to perform a contract with you (for example to provide our services to you), where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms (for example our direct marketing activities in accordance with your preferences), or where we have your consent to do so (for example, for you to participate in specific surveys and focus groups).

In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (for example to prevent payment fraud or confirm your identity).

For questions about our use of your personal information (including legal basis and transfer mechanisms we rely on) please contact our Data Protection Office/Privacy Office by mail at: [support@dafrica.education](mailto:support@dafrica.education).

5. Protection of Information

We use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorised access, use and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information. Indicatively :

1. All our employees, independent contractors and agents have executed non-disclosure agreements, which provide explicit confidentiality protections. Any employee, independent

contractor or agent who violates such privacy and/or security policies is subject to possible termination and civil and/or criminal prosecution.

2. We do not make any of your Information available to third parties for their marketing purposes. Digital Africa/Digital Education applications run on our cloud hosting site and no data given or collected is shared with other social media platforms. If however, we share your Information with third parties, we will notify you. Please note that no transmission over the internet can guarantee confidentiality and non-disclosure, and as such, you transmit at your own risk.

3. Our learning management sites fully run with secure platform with appropriate security measure. When the Services are accessed using the internet, Secure Socket Layer (SSL) technology protects your Information, using both server authentication and data encryption. These technologies help ensure that your Information is safe, secure, and only available to you and to whom you have granted access.

4. We have implemented several spam control technologies. To report Digital Africa/Digital Education related spams, please contact us at support@dafrica.education..

5. Digital Africa/Digital Education does its utmost to secure communications and data storage in order to protect confidentiality of your Information against loss and interception by third parties. However, it is important to know that there is no zero-risk against loss or interception by others of your Information. You are responsible for maintaining the security and confidentiality of your Account's username and password.

#### 6. Storage of Information

We save your Information in our secured learning management database. If you wish that your Business Information be permanently deleted from our database when you stop using our Services, please notify us at support@dafrica.education.

Digital Africa LLC and Digital Education are United States (US) companies. If you are located outside the US and choose to provide information to us, we transfer your Information to our servers in the US. The US may not have the same data protection laws as the country in which you initially provided the Information. When we transfer your Information to the US, we will protect it as described in this Privacy Policy

#### 7. Information and Rights

Once you have provided your Personal Data, you have several rights, which you can in principle exercise free of charge, subject to statutory exceptions. These rights may be limited, for example if fulfilling your request would reveal Personal Data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. To exercise any of your rights, you can file a request here [privacy@dafrica.education](mailto:privacy@dafrica.education).

Should you have unresolved concerns, you have the right to lodge a complaint with a Supervisory Authority where you live or where you believe a breach may have occurred. We encourage you to come to us in the first instance but, to the extent that this right applies to you, you are entitled to complain directly to the relevant Supervisory Authority.

##### 7.1. Right to withdraw consent

Wherever we rely on your consent, you will be able to withdraw that consent at any time you choose and at your own initiative by logging into your account on our website (if you have one) or by contacting us at [privacy@dafrica.education](mailto:privacy@dafrica.education). The withdrawal of your consent will not

affect the lawfulness of the collection and processing of your data based on your consent up until the moment where you withdraw your consent.

#### 7.2. Right to access and rectify your data

You have the right to access, review, and rectify your Personal Data. You may be entitled to ask us for a copy of your information, to review or correct it if you wish to rectify any information like your name, email address, passwords and/or any other preferences, you can easily do so by logging into your account on our website (if you have one) or by contacting us here [privacy@dafrica.education](mailto:privacy@dafrica.education). You may also request a copy of the Personal Data processed as described in this Privacy Policy.

#### 7.3. Right to erasure

You have the right to erasure of your Personal Data processed by us as described in this Privacy Policy in case it is no longer needed for the purposes for which the Personal Data was initially collected or processed or in the event you have withdrawn your consent or objected to processing as described in this Privacy Policy and no other legal ground for processing applies. Should you wish to have your Personal Data erased, please file a request here [privacy@dafrica.education](mailto:privacy@dafrica.education).

#### 7.4. Right to restriction of processing

Under certain circumstances, you may ask us to restrict the processing of your Personal Data. This is for example the case when you contest the accuracy of your Personal Data. In such event, we will restrict the processing until we can verify the accuracy of your data. Should you wish to have your Personal Data restricted, please file a request here [privacy@dafrica.education](mailto:privacy@dafrica.education)

#### 7.5. Right to object to processing

Under certain circumstances you may object to the processing of your Personal Data, including where your Personal Data is processed for direct marketing purposes. If you no longer want to receive certain communications from us via email, simply click the unsubscription link in any of our emails.

#### 7.6. Right to data portability

Where you have provided your data directly to us and where the processing is carried out by automated means and based on your consent or the performance of a contract between you and us, you have the right to receive the Personal Data processed about you in a structured, commonly used and machine-readable format, and request portability of your Personal Data.

### 8. Other websites

Digital Africa, Digital Education and affiliated organizations websites may contain links to sites operated by third parties whose policies regarding the handling of information may differ from ours. These websites and platforms have separate and independent privacy or data policies, privacy statements, notices and terms of use, which we recommend you read carefully. In addition, you may encounter third party applications that interact with eLearning Industry's services.

### 9. Children

Since our business extends to schools that offer K-12, we collect information directly from the institutions enrolling these students.

In the event we learn that we have collected Personal Data from a child under the age of 16 without verification of parental consent, steps will be taken promptly to remove that

information. If you believe that we have or may have information from or about a child under 16 years of age, please contact us at [privacy@diafrica.education](mailto:privacy@diafrica.education)

#### 10. Changes to this Privacy Policy

We reserve the right to modify and update this Privacy Policy from time to time. We will bring these changes to your attention should they be indicative of a fundamental change to the processing or be relevant to the nature of the processing or be relevant to you and impact your data protection rights.

#### 11. Data Retention

We retain your Personal Data for as long as is required to fulfil the activities set out in this Privacy Policy, for as long as otherwise communicated to you or for as long as is permitted by applicable law.

#### 12. Applicable Law

The validity and interpretation of this Privacy Policy shall be governed by the laws of the state of Maryland without regard to Maryland's choice of law principles.

For the purposes described in this policy, your personal data will be transferred to the United States of America. When such transfer happens, we ensure that it takes place in accordance with this policy.