PRIVACY POLICY

Adawati Al Arabia Educational Services S.P.C ("**We**") are committed to protecting and respecting your privacy.

This policy (together with our terms of use www.adawati.com and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.adawati.com you are accepting and consenting to the practices described in this policy.

1 Information we collect from you

- 1.1 We may collect and process the following data about you:
 - 1.1.1 **Information you give us.** This is information about you that you give us by filling in forms on our site www.adawati.com (**our site**) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey and when you report a problem with our site. The information you give us may include your name, age, address, e-mail address and phone number, educational information, financial and credit card information, personal description and photograph.
 - 1.1.2 **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
 - technical information, including [the Internet protocol (IP) address used to connect your computer to the Internet,] [your login information,] [browser type and version,] [time zone setting,] [browser plug-in types and versions,] [operating system and platform,];
 - (b) information about your visit, including [the full Uniform Resource Locators (URL),] [clickstream to, through and from our site (including date and time),] [products you viewed or searched for'] [page response times,] [download errors,] [length of visits to certain pages,] [page interaction information (such as scrolling, clicks, and mouse-overs),] [methods used to browse away from the page,] [page response times][length of visits to certain pages] and any phone number used to call our customer service number.
 - 1.1.3 **Information we receive from other sources.** This is information we receive about you if you use any of the other websites we operate or the other services we provide. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, educational institutions, etc.). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

2 Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

3 Uses made of the information

- 3.1 We may use information held about you in the following ways:
 - 3.1.1 **Information you give to us.** We may use this information:
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - (b) to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
 - (c) to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (email or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the order or registration form) or otherwise indicate this clearly to us;
 - (d) to notify you about changes to our service;
 - (e) to ensure that content from our site is presented in the most effective manner for you and for your computer.
 - 3.1.2 **Information we collect about you.** We may use this information:
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - (b) to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
 - (c) to allow you to participate in interactive features of our service, when you choose to do so;
 - (d) as part of our efforts to keep our site safe and secure;

- (e) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- (f) to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- 3.1.3 **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

4 **Disclosure of your information**

- 4.1 You agree that we have the right to share your personal information with:
 - 4.1.1 Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.
 - 4.1.2 Selected third parties including:
 - (a) our professional advisers;
 - (b) business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 - (c) advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
 - (d) analytics and search engine providers that assist us in the improvement and optimisation of our site;
 - (e) credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
 - 4.1.3 We will disclose your personal information to third parties:
 - In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
 - (b) If Adawati Al Arabia Educational Services S.P.C or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
 - (c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Adawati Al Arabia Educational Services S.P.C, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

5 Where we store your personal data

- 5.1 The data that we collect from you will be transferred to, and stored in the US. Data may also be processed by staff operating outside Bahrain or the US who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.
- 5.2 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 5.3 User accounts on the Adawati site are created by individual users, parents and educational institutions. We do not permit children under the age of 13 to create a user account or subscribe to a service and we do not knowingly collect personally identifying information from children under the age of 13 without the consent of a parent or educational institution.
- 5.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6 Your rights

- 6.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data or otherwise indicating this clearly to us. You can also exercise the right at any time by contacting us at info@adawati.com.
- 6.2 Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

7 Access to information

7.1 You have a right to get a copy from us of the personal information we hold about you. If you wish to receive a copy of this information please address your request to us (contact details below). We will deal with your request promptly and in any case at least within 45 days of the date of receiving it. We will correct or delete inaccurate or incomplete personal information we hold about you at your request.

8 Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

9 Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to <u>info@adawati.com</u>.