



Compass Learning App– Privacy Policy

Effective Date – February 17, 2024

This Privacy Policy describes how Afrique Consult Limited's learning App 'Compass', hereinafter referred to as 'we', 'us' or 'our' collects, uses, shares and protects the personal information of users of our virtual learning platform, hereinafter referred to as the 'Platform'. This policy is compliant with Google Family Policy Requirements, the Children's Online Privacy Protection Act (COPPA) and the General Data Protection Regulations (GDPR). By using the platform, you consent to the collection and processing of your personal information as described below

1. Information We Collect

- a. **Personal information:** we collect personal information provided by users such as names, emails, usernames and other information necessary for user registration, account management and communication
- b. **Educational information:** we may collect educational information, including student and teacher profiles, educational records, grades, assignments and other relevant data required for the provision of educational services on the Platform
- c. **Usage information:** we automatically collect information about users' interactions with the Platform, including IP addresses, device information, browser type, operating system, pages visited and referring URLs. We may collect analytics data to improve the performance and functionality of the Platform
- d. **Cookies and Similar Technologies:** we may use cookies and similar technologies to enhance user experience, collect usage information and enable certain features of the Platform. Users can manage their cookie preferences through their browser settings as provided for by our Cookies Policy

2. Use of Personal Information

- a. **Provide Services:** we use personal information to provide and improve services, customize user experience and deliver educational content, communicate with users and respond to inquiries and support requests.
- b. **Analytics and Research:** we may use anonymized and aggregated data for analytical purposes, research and to improve the effectiveness of the Platform, including its features, content and user interface
- c. **Compliance and legal purposes:** we may use personal information to comply with applicable laws, regulations and legal processes, enforce our Terms of Service, protect our rights and the rights of others and prevent fraud and unauthorized access

3. Sharing of Personal Information



Compass Learning App– Privacy Policy

- a. **Third-Party Service Providers:** we may share personal information with trusted third-party service providers who assist us in delivering our services, such as hosting providers, analytics providers, support providers and communication tools. These providers are bound by contractual obligations to protect the confidentiality and security of personal information
- b. **Legal requirements:** we may disclose personal information if required to do so by law, regulation or legal process or if we believe in good faith that such disclosure is necessary to protect our rights, safety or the rights, safety or property of others
- c. **Consent:** we may share personal information with third parties outside the scope of this policy if we obtain consent from the individuals concerned.

4. Children's Privacy

- a. **COPPA Compliance:** this Platform is intended for general audiences, including children under the age of 13. We do not knowingly collect personal information from children under 13 without verified parental consent. If we become aware that we have collected personal information from a child under 13 without parental consent, we will delete that information promptly
- b. **Parental Rights:** Parents or legal guardians have the right to review, request deletion of or refuse further collection or use of their child's personal information. They can contact us using the information provided in Section 7 to exercise these rights.

5. Data Security

- a. We implement reasonable security measures to protect personal information from unauthorized access, use, disclosure or destruction. We are bound by contractual obligation to protect the confidentiality and security of personal information

6. International Data Transfers

- a. **GDPR Compliance:** if you are accessing this platform from a location outside the European Economic Areas (EEA), your personal information may be transferred to and processed in countries that may have different data protection laws than your country of residence. In such cases, we will ensure that adequate safeguards are in place to protect your personal information in accordance with applicable data protection laws.
- b. **Standard Contractual Clauses:** in the event of international data transfers to countries without an adequacy decision from the European Commission, we may rely on the European Commission's Standard Contractual Clauses or other appropriate safeguards to ensure the protection of your personal information.



Compass Learning App– Privacy Policy

7. Your Rights and Choices

- a. **Access and Correction:** you have the right to access and update your personal information held by us. If you wish to exercise this right, please contact us using the information provided in Section 8
- b. **Data Portability:** subject to certain conditions and limitations, you may have the right to receive a copy of your personal information in a structured, commonly used and machine-readable format
- c. **Consent Withdrawal:** if we rely on your consent as the legal basis for processing your personal information, you have the right to withdraw your consent at any time. Please note that withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- d. **Marketing communications:** if you no longer wish to receive marketing communications from us, you can unsubscribe by following the instructions provided in the communication nor by contacting us using the information in Section 8
- e. **Data Retention:** except in cases where a user has requested for data deletion, we will retain your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law
- f. **Data deletion:** you may either request the deletion of your personal information under certain circumstances, such as when it is no longer necessary for the purposes for which it was collected or if you have withdrawn your consent or
 - i. You can also delete your account using the following steps:
 - Go to the settings on your App
 - Select Delete Account
 - Confirm you want to delete your account
 - Proceed to delete your account

8. Contact Us

if you have any questions, concerns or requests regarding this Privacy Policy, or if you would like to exercise your rights as described in Section 7, please contact us at

Afrique Consult Limited
PO Box 10812 – 00100
NAIROBI, KENYA



Compass Learning App– Privacy Policy

Email: compass@afriqueconsult.com / afriqueconsultltd@gmail.com

We will respond to your inquiries and requests promptly and in accordance with applicable data protection laws

9. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. Any updates will be effective upon posting the revised policy on our Platform. We encourage you to review this Policy periodically for the latest information on our privacy practices.

By continuing to use our Platform after any changes to this Privacy Policy, you acknowledge and agree to the revised terms