

## Privacy Policy

Last updated: 29 November 2022

This Privacy Policy discloses the privacy practices of Wedevx Inc., having its business address at 1210 South Indiana Avenue apt 6500, Chicago, IL 60605, our affiliates, offices, subsidiaries, and associated companies (“Wedevx,” “we” or “us”).

Wedevx receives, collects, stores and manages personal information according to the following Privacy Policy, with the goal of incorporating the “Privacy by Design” approach. When collecting your personal information, Wedevx ensures the secure storage of your data by taking appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of personal information.

By using our website <https://wedevx.co> (“**Website**”), you agree to the terms and conditions of this Privacy Policy.

This Privacy Policy forms a binding agreement between Wedevx and you, being our customer, partner, or user.

### **Information for California Residents:**

If you are a California resident, please refer to the “Additional Information for California Residents” below.

#### **1. Data Collected**

##### **1.1 Data that you voluntarily provide us with:**

- 1.1.1 You may provide us with your personal information in a number of ways, including, without limitation, when you:
- register your profile on the Website;
  - upload your CV, professional, educational, and other content on the Website;
  - get verified by Wedevx or our authorized service provider;
  - subscribe to or purchase any service on the Website;
  - contact us to purchase our services or in relation to any business matter;
  - use the Website and services;
  - submit information in your profile;
  - submit any feedback, or comment;
  - download certain content or products from our services;
  - fill out and submit any form;
  - have previously provided us with personal information prior to this Privacy Policy or last updates coming into effect;
  - subscribe to our email list, and/or service updates;
  - attend our hosted events;
  - request support;

- contact us directly in person or via any medium, including but not limited to by mail, telephone, and commercial electronic messages;
- communicate with us for any matters and interact with or browse the Website generally.

1.1.2 Personal information that we may receive includes, but is not limited to:

Type of personal information	Details	Legal Basis
Account information	A user may register as a student or instructor. Students submit email address, password, and submit account settings. Instructors submit full name, email address, password, date of birth, phone number, residence address, occupation, and professional information, such as company name, title, skills, interests, education, work experience, biography, language spoken.	<ul style="list-style-type: none"> <li>- Performance of contractual obligations</li> <li>- Legitimate interests</li> </ul>
Billing and payment information	Billing address and ZIP code; payment method details; payment account details, etc.	<ul style="list-style-type: none"> <li>- Performance of contractual obligations</li> <li>- Legitimate interests</li> </ul>
Content information	Any content you upload on the Website, such as your videos, learning materials, answers to questions, student materials, etc.	<ul style="list-style-type: none"> <li>- Performance of contractual obligations</li> <li>- Legitimate interests</li> </ul>
Links to social media networks	Such as LinkedIn, Tiktok, etc.	<ul style="list-style-type: none"> <li>- Performance of contractual obligations</li> <li>- Legitimate interests</li> </ul>
More detailed personal and contact preferences	Any information you share with Wedevx	<ul style="list-style-type: none"> <li>- Performance of contractual obligations</li> <li>- Legitimate interests</li> </ul>

1.1.3 Wedevx may receive this data from you when you manually enter such data, link your public profiles, submit your content, or we may receive such data from third parties. We may combine such data.

1.1.4 By giving us this data, you consent to this data being collected, used, disclosed, and transferred as described in this Privacy Policy.

## 1.2 Data that we collect automatically

1.2.1 We collect data from every visitor and customer of our Website and services, in particular, we automatically collect data about your visit to the Website, your usage of our services, and your browsing activities. This anonymized information may include IP address, browser type, browser language, cookies data, performance specifications of the customer's hardware and software, date and time of access to the Website, other information about how you interacted with our Website and our services.

### **1.3 Data from your use of the Website and our products**

1.3.1 We may receive data about how and when you use the Website, store it in log files or other types of files associated with your account, and link it to other information we collect about you. This data may include, for example, your IP address, time, date, browser used, and actions you have taken within the Website. This type of data helps us to improve our Website, services, and products for both you and all of our customers.

### **1.4 Data from third party sources**

1.4.1 We may obtain additional information from third parties sources, such as advertisers, games, or services you use, or social media networks (such as Instagram, Facebook) for which you have approved our access. When you access our services through social media networks, or when you connect our services to social media networks, you are authorizing Wedevx to collect, store, and use such additional information and content in accordance with this Privacy Policy. We use this information to supplement the information we collect about you in order to provide more relevant, safer experiences for you and improve our services, analytics, and advertising. If we combine or associate information from other sources with information that we collect through our services, we will treat the combined information in accordance with this Privacy Policy.

### **1.5 Cookies and tracking**

1.5.1 Cookies are small data files that are placed on your computer or mobile device when you visit a website. Website owners use cookies to make their websites operate, improve functionality and user experience, as well as to provide reporting information.

1.5.2 We may set our own cookies and use third parties cookies (e.g. for advertising, statistics, and analytics).

1.5.3 We use different types of cookies, including:

- 1) **Essential website cookies:** these are important cookies as they are necessary to provide you with services available through our Website, such as access to secure areas.
- 2) **Performance and functionality cookies:** these cookies are necessary to enhance the performance and functionality of our Website but are non-essential to their use. However, without these cookies, certain functionality may become unavailable.
- 3) **Analytics and customization cookies:** these cookies collect information that is used either in aggregate form to help us understand how our Website is being used or how effective our

marketing campaigns are, to help us customize our Website for you in order to enhance your experience, or to personalize our content and ads.

- 4) **Advertising cookies:** these cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed, and in some cases selecting advertisements that are based on your interests. Please read the following link to know more about online advertising: <https://www.networkadvertising.org/understanding-online-advertising/>.
- 5) **Social Media cookies:** these cookies are placed by social media plugins, and other tools meant to provide or improve the content on a website (for example, services that allow the playing of video files, or that create comments sections).

1.5.4 You may opt out from cookies at any time by customizing your cookie preferences. However, in some cases, we will not be able to provide you with all services.

## 1.6 Data from third party sources

1.6.1 We may receive some information about you, such as name, email address, demographic information, IP address, and location from third parties.

## 1.7 Opting-Out

1.7.1 You may decline to have your personal information collected via third party tracking technologies by navigating to the settings feature in your browser and declining all third party cookies or declining third party cookies from specific sites, or, for mobile, limiting ad tracking or resetting the advertised identifier via the privacy settings on your mobile device.

1.7.2 You can use the following third party tools to decline the collection and use of information for the purpose of serving you interest based advertising:

- <http://www.networkadvertising.org/choices/>
- <http://www.youronlinechoices.com/>
- <http://optout.aboutads.info/?c=2&lang=EN>
- [www.allaboutcookies.org](http://www.allaboutcookies.org)

## 2. Use of the Data

2.1. We only use your personal information for the following purposes:

- 2.1.1 to perform transactions requested by you;
- 2.1.2 to set up your account and profile;
- 2.1.3 to provide the services, facilitate learning facilities, facilitate communication between users and instructors;
- 2.1.4 to process payment on your behalf;
- 2.1.5 to process payments to instructors;

- 2.1.6 to process verification of instructors;
- 2.1.7 to allow you to participate in contests, or rewards programs;
- 2.1.8 to personalize your experience when using our services;
- 2.1.9 to maintain our relationships with you, promote Wedevx;
- 2.1.10 to send you informational and promotional content that you may subscribe to or unsubscribe;
- 2.1.11 to communicate about our Website, products, services and provide customer care in response to your inquiries;
- 2.1.12 to enforce compliance with the applicable law;
- 2.1.13 to protect our rights and safety as well as the rights and safety of our customers and third parties;
- 2.1.14 to contact you via surveys to conduct research about your opinion of our services;
- 2.1.15 to provide information to representatives and advisors;
- 2.1.16 to prosecute and defend a court, arbitration, or similar legal proceeding;
- 2.1.17 to respond to lawful requests by public authorities, including to meet national security or law enforcement requirements;
- 2.1.18 to provide suggestions about products that you may be interested in and which you may opt out;
- 2.1.19 to transfer your information in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition.

### **3. Minors**

3.1 Minors and children under age of 18 (or other legal age of your country of residence) should not use our Website. We do not knowingly transact or form any binding legal relationship with minors. If you access our Website, you represent that you have the legal capacity to enter into a binding agreement. If you are under 18, we require that you inform a parent or guardian about our Privacy Policy as well as obtain their consent to use our Website.

### **4. Sharing of Data**

4.1 We do not share personal information, unless:

- 4.1.1 Doing so is appropriate to carry out your own request;
- 4.1.2 We believe it is needed to enforce our Privacy Policy, or if it is legally required;
- 4.1.3 We believe it is needed to detect, prevent or address fraud, security or technical issues;
- 4.1.4 Otherwise protect our property, legal rights, or that of others.

4.2 We may share your information with:

**Your instructors:** we share your information with instructors to facilitate the educational process, so that instructors can communicate

with you. We do not share your email address with instructors.

**Our operating offices:** we share our operating offices and in any other places where the parties involved in the processing are located. Wedevx has in place an intra-group transfer agreement to safeguard these personal data transfers. If, in the future, we re-organise or transfer all or part of our business, we may need to transfer your information to new entities or third parties through which our business will be carried out. Depending on customer's location, the data may be transferred to a country other than where the customer is located. If any such transfer takes place, you can contact Wedevx for enquiring more details.

**Our service providers:** we share your information with authorized third parties, such as providers of cloud services, and other information technology services providers, email communication software and email newsletter services, advertising and marketing services, payment processors, customer relationship management, and customer support services, and web analytics services.

**Our education entities:** we share your information with professional education organizations upon your request or request of such professional education organization for verification of credits.

**Our agents:** we employ and contract with people and other entities that perform certain tasks on our behalf and who are under our control (our "Agents"). We may need to share personal information with our Agents in order to provide products or services to you. Unless we tell you differently, our Agents do not have any right to use personal information or other information we share with them beyond what is necessary to assist us.

4.3 This is the list of our third party service providers with contact and other details. Please contact us to receive an updated list of our third party service providers.

Stripe	<a href="https://stripe.com/">https://stripe.com/</a>	Stripe, Inc. The One Building, 1, Lower Grand Canal Street, Dublin 2, Ireland	For payment processing
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Youtube	<a href="https://www.youtube.com/">https://www.youtube.com/</a>	YouTube LLC 901 Cherry Ave San Bruno California 94066	For marketing purpose
Instagram	<a href="https://www.instagram.com/">https://www.instagram.com/</a>	Facebook Inc. 1 Hacker Way Menlo Park, CA 94025	For marketing purpose
TikTok	<a href="https://www.tiktok.com/en/">https://www.tiktok.com/en/</a>	TikTok Inc. 5800 Bristol Parkway, Suite 100, Culver City, CA 90230	For marketing purpose
Twitter	<a href="https://twitter.com/">https://twitter.com/</a>	Twitter, Inc. 1355 Market Street, Downtown San Francisco, California, United States	For marketing purpose
LinkedIn	<a href="https://www.linkedin.com/">https://www.linkedin.com/</a>	LinkedIn Corporation 1000 W. Maude Avenue Sunnyvale, CA 94085 USA	For marketing purpose
Vimeo	<a href="https://vimeo.com/">https://vimeo.com/</a>	Vimeo.com Inc. 555 West 18th Street New York, NY 10011 United States	For marketing purpose
Snapchat	<a href="https://www.snapchat.com/">https://www.snapchat.com/</a>	Snap, Inc. 2772 Donald Douglas Loop N, Santa Monica, CA 90405, United States	For marketing purpose
Kommo crm	<a href="https://www.kommo.com/">https://www.kommo.com/</a>	QSOFT LLC Columbus Ave Suite 407 San Francisco,	For marketing purpose

		CA 94133, United States	
Google (authentication)	<a href="https://safety.google/authentication/">https://safety.google/authentication/</a>	Google LLC 1600 Amphitheatre Parkway in Mountain View, California	For user authorization
Apple (authentication)	<a href="https://appleid.apple.com/">https://appleid.apple.com/</a>	Apple Inc., One Apple Park Way, Cupertino, California	For user authorization
GitHub (Microsoft)	<a href="https://github.com/">https://github.com/</a>	88 Colin P Kelly Jr St San Francisco, CA 94107 United States	For development purposes
Kubernetes (Google)	<a href="https://cloud.google.com/kubernetes-engine">https://cloud.google.com/kubernetes-engine</a>	Cloud Native Computing Foundation c/o The Linux Foundation 548 Market St PMB 57274 San Francisco, CA 94104-5401	For development purposes
Aws (Amazon)	<a href="https://aws.amazon.com/">https://aws.amazon.com/</a>	Amazon.com, Inc. Corporation Service Company 300 Deschutes Way SW, Suite 208 MC-CSC1 Tumwater, WA 98501	For development purposes
ClickFunnels	<a href="https://www.clickfunnels.com">https://www.clickfunnels.com</a>	3443 W. Bavaria St., Eagle, Idaho 83616.	For marketing purpose
Google Analytics	<a href="https://developers.google.com/analytics/">https://developers.google.com/analytics/</a>	Google LLC 1600 Amphitheatre	For marketing purpose



		Parkway in Mountain View, California	
Google Search Console	<a href="https://www.google.com/?client=safari">https://www.google.com/?client=safari</a>	Google LLC 1600 Amphitheatre Parkway in Mountain View, California	For marketing purpose
Sanity CMS	<a href="https://github.com/sanity-io">https://github.com/sanity-io</a>	88 Colin P Kelly Jr St San Francisco, CA 94107 United States	For website development purposes
Calendly	<a href="https://calendly.com/">https://calendly.com/</a>	Calendly LLC 115 E Main St., Ste A1B Buford, GA 30518 United States	For scheduling calls with customers
Mixpanel	<a href="https://mixpanel.com/">https://mixpanel.com/</a>	Avenida Diagonal, 442 – P. 3 PTA. 1 08037, Barcelona, Spain.	For marketing purpose
Hotjar	<a href="https://www.hotjar.com/">https://www.hotjar.com/</a>	Hotjar Ltd Dragonara Business Centre 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141 Malta	For marketing purpose
Sengrid	<a href="https://sendgrid.com/">https://sendgrid.com/</a>	1801 California Street, Denver	For marketing purpose
Slack	<a href="https://slack.com/">https://slack.com/</a>	Slack Technologies Limited Salesforce Tower 60 R801, North Dock Dublin Ireland	For communication with app students

## **5. Safeguarding your Personal Information**

5.1 The protection of your personal information is vital to us. We take commercially reasonable measures to protect your personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the personal information. These security measures include, but are not limited to, 2-factor authentication, SSL certificate for HTTPS.

5.2 Our employees, contractors, and any business partners can access personal information on a need-to-know basis, and under strict duties of maintaining confidentiality. We use encryption for sensitive information and we test our system on a regular basis to ensure we comply with industry practices and standards. While we strive to use commercially acceptable means to protect your personal information, no method of transmission over the Internet, or method of electronic storage, is completely secure, and we cannot guarantee absolute security of any data.

5.3 You agree to protect the security of your login information and password and not to transfer such information to any third party. We will not be liable to you for the use of your account by any third party.

5.4 If you become aware of any unauthorized use of your account, you shall immediately notify us in writing.

## **6. Access to your Personal Information**

6.1 You may access your personal information held by us to correct, update and remove inaccurate or incorrect data. You have the following rights:

6.1.1 delete some or all personal information that we held about you;

6.1.2 change or correct your personal information that we held about you;

6.1.3 object to, or limit or restrict, use of your personal information;

6.1.4 right to access and/or take your personal information: you can ask us for a copy of your personal information in machine readable form;

6.1.5 access information we hold about you.

## **7. Changes to the Privacy Policy**

7.1 We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make major changes in the way we collect or use information, we will notify you by posting an announcement on the Website or sending you an email.

## **8. Merge of Company**

8.1 If Wedevx merges with, or is acquired by, another company or organization, or sells all or a portion of its assets, your personal information may be disclosed to our advisers and any prospective purchaser or any prospective purchaser's adviser, and may be among the assets transferred. However, personal information will always remain subject to this Privacy Policy.

## **9. Data Retention**

9.1 We retain your personal information for as long as we need it to fulfil the purposes for which we originally collect it or as needed to provide with our services, except if required

otherwise by law. Personal information collected for the purpose of the legitimate interests shall be retained as long as needed to fulfill such purposes. In certain cases, it is allowed to retain personal information for a longer period if the user has explicitly consented to such processing until the consent is withdrawn. In some cases, we may determine the period of data retention based on the period we need to access the data for the provision of services, receiving payment, or for any other auditing or legal purposes. Once the retention period expires, the personal information will be deleted without any possibility to rectify or transfer the deleted personal information.

## 10. Additional Information for California Residents

10.1 In this section we describe how we handle personal information of California residents under the California Consumer Privacy Act (“CCPA”). This clause covers personal information that we collect, share and use for the last 12 months.

10.2 We describe the personal information that we collect in section 1 “Data Collected”. The section 2 “Use of the Data” contains information on how we use personal information.

10.3 We share certain personal information in accordance with section 4 “Sharing of Data”. However, we do not sell your personal information to third parties.

10.4 In accordance with the CCPA, California residents are entitled, in addition to other rights described in this Privacy Policy, to:

10.4.1 **Request deletion.** You have the right to request deletion of your personal information that we collect from you;

10.4.2 **Request copy.** You have the right to ask for a copy of all or part of personal information that we retain about you over the last 12 months;

10.4.3 **Designated agent.** You are entitled to designate an agent who is able to make requests on your behalf. The agent should access your account to make a request.

10.4.4 **List of service providers.** You have the right to request a list of third parties with whom we shared personal information (if any) and what kind of information we shared during the previous calendar year.

10.5 If you want to exercise your rights, please contact us at [support@devxschool.com](mailto:support@devxschool.com).

10.6 Wedevx does not tolerate discrimination. The quality of our services is equal for all our customers, irrespective of whether you decide to exercise your rights under the CCPA.

## 11. Contact Us

11.1 If you have any questions about this Privacy Policy, or want to submit a written complaint to us about how we handle your personal information, please contact us at:

[support@wedevx.co](mailto:support@wedevx.co)

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