

Product Privacy Policy

Canglory Education and its affiliates and subsidiaries (collectively, "Canglory," "we," "our," or "us") are committed to protecting your privacy. We have prepared this Privacy Policy to describe how we collect, use, disclose, share or otherwise process your personal data processed by our products and any other Canglory products that link to this Privacy Policy (collectively "Products").

This Privacy Policy is generally applicable to all of Canglory's Products unless otherwise specified.

By using our Products, you are agreeing to this Privacy Policy. If you do not agree to be bound by the Privacy Policy, or disagree with the personally identifiable information collection and use practices.

1. Compliance with applicable privacy and data protection laws

Canglory's Privacy Policy and procedures are developed with reference to all applicable privacy and data protection laws, regulations and guidelines issued by the relevant authorities in relevant jurisdictions, including the Personal Data (Privacy) Ordinance (Cap. 486, Laws of Hong Kong).

2. Data you provide to us

We collect information from you, such as first and last name, gender, e-mail and mailing addresses, professional title, company name, and password when you create an account to log in to our network. When you order services on our site or Apps, you provide us or our third-party payment processor with the same information identified above. We also may retain information on your behalf, such as files and messages that you store using your account. If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail. When you participate in one of our surveys, we may collect additional profile information. We also collect other types of personal information and demographic information that you provide to us. Your provision of personal data is generally voluntary.

3. Data collected via technology

Our servers (which may be hosted by a third party service provider) collect information from you, including browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit. We also use cookies and web beacons (as described below) and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit and the solutions and information for which you searched and which you viewed. Like most Internet services, we automatically gather this data and store it in log files each time you visit our site, use our Apps, or access your account on our network. We may link this automatically-collected data to personally identifiable information.

4. "Cookies"

"Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our site.

5. "Web beacons"

"Web beacons" are digital images we use to log information on our site and in our emails. We use web beacons to manage cookies, count visits, and to learn what marketing works and what does not. We also use web beacons to tell if you open or act on our emails.

6. "Flash cookies"

"Flash cookies" are used to store your preferences such as volume control or to display content based upon what you view on our websites to personalize your visit. Third party partners who provide certain

features on our websites, such as videos, may place Flash cookies on your device. Flash cookies are different from other cookies because of the amount of, type of, and way in which data is stored. Cookie management tools provided by your browser usually will not remove Flash cookies. To learn more about Flash cookies, who has placed Flash cookies on your device, and how to manage privacy and storage settings for Flash cookies click here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html#117118. We do not permit third parties who place or track Flash cookies to use the personal information they collect for advertising or marketing purposes.

Most web browsers are set to accept cookies by default. If you prefer, you can typically remove and reject cookies from our site with your browser settings. If you remove or reject our cookies, it will affect how our site and services work for you.

7. Analytics

We use analytics services to help analyze how users use the site and Apps. These services use cookies and scripts to collect and store information such as how users interact with our Apps, errors users encounter when using our apps, device identifiers, how often users visit the site, what pages they visit, and what other sites they used prior to coming to the site. We use the information we get from Moodle and LearnerScript Analytics only to improve our site, our Apps, our services and to provide reports to our users. We do not tie the information gathered using third party analytics to your personally identifiable information.

8. Blogs/forums

Our Products may offer a publicly accessible blog and community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them.

9. Use of your data

In general, personal information you submit to us is used either to respond to requests that you make, or to aid us in providing a better user experience for you. Canglory uses your personal information in the following ways:

- to create and maintain your account;
- to identify you as a user in our system;
- to operate, maintain, and improve our site, Apps, and services;
- to personalize and improve your experience;
- to send you administrative e-mail;
- to respond to your comments or inquiries;
- to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and
- to make telephone calls to you, from time to time, as a part of secondary fraud protection or to solicit your feedback with your permission.

10. Duration of retention

We will not keep your personal information for any purpose(s) for longer than is necessary and we will only retain relevant personal information that is necessary in relation to the purpose of collection. Reasonable steps will be taken to delete or destroy the information when it is no longer necessary for any of the purposes above.

11. Disclosure of your personal information

We will share your personal information with third parties only in the ways that are described in this Privacy Policy or with your consent.

We may share your personal information with third party service providers for the sole purpose of providing you with the services that we offer you through our site. For example, we may share data with service providers who host our websites or provide email services on our behalf. When data is shared, we require the receiving party to ensure that the security and retention period of your personal data in compliance with the applicable laws.

12. Other disclosures

Canglory may disclose information about you if it believes such disclosure is necessary to (a) comply with laws or to respond to lawful requests and legal process; or (b) protect or defend the rights, safety, or property of Canglory, users of the services, or any person including to enforce our agreements, policies, and terms of use or (c) in an emergency to protect the personal safety of any person.

We may also share information about you in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of our business or assets to another company. In the event that information is shared in this manner, notice will be posted on our site.

We may also use de-identified and/or aggregated data for our own use. We do not use information collected through the Products for advertising or marketing purposes

13. Right of access or correction of to personal information

You have the right to request access to and correction of their own personal data.

You may change some of your personal information in your account by editing your profile within the service. You may also request changes or deletions by e-mailing us at the e-mail address set forth below or contacting us through our help desk. We will respond to your request, when permitted by law, within 30 days. We may be unable to delete information that resides in our archives.

14. Security of your personal information

Canglory has implemented reasonable security measures to help protect your personal information unauthorized or accidental access, use, processing, disclosure, loss or destruction. Measures have been taken to ensure the integrity, prudence and competence of persons having access to your personal data and that it is processed by secured means.

Whilst we implement reasonable security measures to protect your personal information, please be aware that no method of transmission over the internet, nor any method of electronic storage, is completely secure. As such, Canglory cannot guarantee the absolute security of your personal data. Any information you choose to submit or share whilst using our services is done so at your own risk. If you have any questions about security on our site or Apps, you can contact us at the contact information set forth below.

15. Direct Marketing

Subject to your consent and where permitted by law, we may use your personal data (including your name, contact details and information relating to your use of the Product) for promotional or marketing purposes and conduct direct marketing to market products or services which may be relevant to you such as **support learning, professional development and academic administration**. We may also share your personal data with our business partners for direct marketing of market Products which may be relevant to you, but only with your prior consent.

If you do not wish to receive direct marketing communications from us, you may write to us by email at the address provided below to opt out from direct marketing activities.

16. Contact information

Canglory welcomes your comments or questions regarding this Privacy Policy. Please e-mail us at: support@cangloryeducation.com .

17. Changes to this Privacy Policy

Canglory may change this Privacy Policy from time to time. If we make any changes to this Privacy Policy, we will change the "Last Updated" date above. If such changes are material, a notice of the changes will be posted along with the revised Privacy Policy. We encourage you to visit this Privacy Policy on our

website from time to time for the latest on our privacy practices.