



Web3Campus Privacy Policy

At Web3Campus (“Web3Campus”, “we”, “us”, “our”) we respect your privacy rights. We have created this privacy policy (“Privacy Policy”) to explain how we treat the information collected and received from your use of our Services (as defined in our Terms of Use or “TOU”) provided through the website, <http://www.Web3Campus.com> and any other websites or applications we own, operate, or control (the “Website(s)”). This Privacy Policy applies only to the Services, and we are not responsible for the practices of persons, companies, institutions or websites that Web3Campus does not control, manage, or employ. Capitalized terms not defined herein have the meanings set forth in the TOU.

Please read this Privacy Policy as well as our TOU carefully, as they govern your use of Web3Campus. If you do not agree to this Privacy Policy, please do not use our Services.

Web3Campus, Inc. is the data controller of your information. Please see the “Contact Information” section below for additional details. Please note that if you obtain access through Sponsored Services or our Employee and Enterprise Sponsored Access Services, the third-party sponsoring your participation in the Online Courses may provide us information subject to our agreement with them and therefore the third-party sponsor may be the controller with respect to such data.

Important Information About Using Our Services

Please understand that by submitting any information to us, you acknowledge that we may collect, use, disclose and retain such information in accordance with this Privacy Policy and our TOU, and as permitted or required by law. If you do not agree with these terms, then please do not provide any information to us. Web3Campus may offer social sharing features as part of its Services which, among other features, allows you to make your careers Profile (as described below in Profiles and Career Services Section) public as well as sharing your details and information, including your Online Course progress with others outside of the Web3Campus Website(s) (“Social Sharing”). By electing to participate in any of our Social Sharing Services, you acknowledge that any information

or materials you include in your Profile can be viewed by other persons accessing the Website(s), including potential or existing employers, as well as by others on applicable third-party websites. You also acknowledge that information you share through Social Services may remain accessible on third party websites and/or to those you have shared the information with in the event you make your Profile private after having made it public and/or ceasing to share your information and that Web3Campus has no control over the access of or use of information provided to third parties via Social Sharing outside its Website(s).

What Information We Collect

Information You Provide Us

We collect a variety of information that you provide directly to us. In general, we collect information from you through:

- Using any of our Services, including registering for a User Account through the Website(s)
- Making a purchase from us, including registering and enrolling in any Online Course
- Signing up for email updates
- Uploading or posting to public forums included through the Services
- Submitting requests or questions to us via forms or email
- Requesting customer support and technical assistance

The types of data we collect directly from you include:

- Name, address, telephone number and email address
- Log-in credentials, if you register a User Account with us
- Information about purchases or other transactions with us, such as your shipping address. Please note, however, that we do not collect, store, or transmit financial account information. Instead, we use a third-party payment processor to process our payments
- Information about your customer service and maintenance interactions with us
- Demographic information, such as your gender, socio-economic status, and other personal information

- Information you provide to us in connection with any application or admissions process, including, for example, educational and work experience, prerequisite knowledge, any pre-assessment you complete, your goals, and other information
- Information you provide in connection with career services, for example, salary information, job placement information, career goals, work experience, and other information
- User-generated content you upload or post to public forums through the Services. Information needed in order to comply with any procedures, laws, and regulations which apply to us where it is necessary for our legitimate interests or the legitimate interests of others
- Information from third parties about you in connection with any referral programs we may offer
- Any other information you choose to directly provide to us in connection with your use of the Services

Participation in Online Courses.

If you desire to participate in an Online Course, you will be asked to provide us with certain information necessary to conduct such an Online Course. This information may include, among other things, your name and email address. Web3Campus, or its third-party service providers, may also collect certain information from you in conjunction with assignments, exams and other assessments related to the Online Course. For example, as part of a proctored exam for an Online Course, Web3Campus (or its third party service providers) may collect certain information from you in order to (a) verify or authenticate your identity or submissions made by you, such as a signature for a test or assignment log, a photograph or recording of you (e.g., using a webcam) or information included on a government issued or other photo identification card or document, or (b) monitor your performance during an exam to confirm that you are abiding by the applicable test rules or requirements (e.g., confirming that you are not using prohibited resources). Web3Campus may also collect information from you or about your performance or accomplishments related to the course, such as quiz/exam scores, grades, project evaluations, teacher evaluations and other evaluations of your performance or accomplishments.

Profiles and Career Services.

You can choose to share additional information, such as your work experience, resume and transcript, your picture, and answers to questions about your experience, studies and work preferences, when you create a professional profile through the career services we offer through our Services. You can also share information by updating your Profile, uploading documents, or answering questions or surveys we email you or present to you through our Services. Collectively, the professional profile and the materials you provide through the career services are referred to as simply your "Profile."

Please note, that by electing to make your Profile public, you acknowledge that:

- Your Profile and all the included information, materials, documents and pictures will be shared with, and publicly viewed by, other third parties also accessing the career services portal and the Services (including without limitation, potential employers, recruiters, other students or persons, and us);
- Employers and other third parties accessing the career services portal can contact you via your email address (or any other contact information you have provided in your Profile); and
- You and we can share your Profile and all the included information, materials, documents and pictures with employers, recruiters or career related third parties.

Information We Collect Through Automated Means

Analytics Information

When you use our Services, we and our service providers (which are third party companies that work on our behalf) may use cookies, and similar technologies to track, collect and aggregate certain information including, among other things, which pages of our Website(s) were visited, the order in which they were visited, when they were visited, the URLs from which you linked to our Website(s), and which hyperlinks were "clicked." Collecting such information may involve logging the IP address, operating system and browser software used by each user of the Website. Through such information, we may be able to determine from an IP address a user's Internet Service Provider and the general geographic location (city/state) of his or her point of connectivity.

We also use or may use these technologies to help us determine and identify repeat visitors, the type of content and sites to which a user of our Website(s) links, the length

of time each user spends at any particular area of our Website(s), and the specific functionalities that users choose to use.

We use third-party web analytics services (such as those of Google Analytics) on our Website(s) to collect and analyze usage information through cookies and similar tools; engage in auditing, research, or reporting; assist with fraud prevention; and provide certain features to you. We also provide a limited amount of your information (such as your email address and sign-up date) to Intercom, Inc. ("Intercom") so that Intercom can analyze Website usage on our behalf, which allows us to improve our Services. We may also use third-party services, as a medium for communications, either through email, or through messages within our Service(s). The use of these any such medium may be subject to the terms and conditions and privacy policy for those service providers and you should carefully review those terms and conditions.

Online Advertising

We may allow third party companies, including advertising companies (such as Facebook, Google, Twitter, Quora and Bing), to place cookies on our website. These cookies enable such companies to track your activity across various sites where they display ads and record your activities so they can show ads that they consider relevant to you as you browse the Internet. These Cookies store information about the content you are browsing together with an identifier linked to your device or IP address.

These Cookies also allow us and third parties to know whether you've seen an ad or a type of ad, and how long it has been since you've last seen it. This information is used for frequency capping purposes, to help tailor the ads you see, and to measure the effectiveness of ads.

Do Not Track Signals

Currently, we do not monitor or take any action with respect to Web browser signals or other mechanisms for the expression of choice regarding collection of information about an individual over time and across third-party web sites or online services (e.g., Web browser "do not track" signals).

Information We Collect from Social Media and Other Content Platforms

If you log-in to, or connect to, a third-party network (e.g., through a social network), or log-in to our Services, through a social network site (e.g., Facebook), you may allow us to have access to and store certain information from your social network profile. This includes your name, gender, profile picture, depending on your settings on such

services. If you do not wish to have this information shared, do not use a social networking connection to access the Services. For a description of how social networking sites handle your information, please refer to their privacy policies and terms of use, which may permit you to modify your privacy settings.

Referral Programs

We may offer certain Users the opportunity to refer (Referrers) their friends (“Referees”) to the Site through a third-party referral program whereby both Referrers and Referees may obtain credits or other rewards through such referrals. To the extent we offer such programs, the Referrers may share information about the Referees, including email addresses for the purpose of sharing the referral offer. We may also share the Referrer’s email and name with the Referee as well as provide the Referrer the confirmation of the Referee’s acceptance of the referral which may include Referee’s email in connection with providing any such referral program.

How We Use The Information We Collect

We use your information for various purposes depending on the types of information we have collected from and about you and the specific services you use, in order to:

- Send you information in connection with the Services
- Respond to your communications and requests
- Manage and process Online Courses, including but not limited to tracking attendance, progress and completion; administering exams, projects, and other assessments; verifying a User’s identity as part of a proctored exam or exit interview for an Online Course; and monitoring performance during an exam to confirm that you are abiding by the applicable testing rules or requirements
- Provide Services to you, such as services that you request in conjunction with the Online Courses
- Contact you by email, postal mail, or phone (including via SMS messages) regarding Web3Campus and third-party products, services, surveys, research studies, promotions, special events and other subjects that we think may be of interest to you
- Customize the content we provide through the Services
- Help us better understand your interests and needs, and improve the Services

- Engage in analysis, research, and reports regarding use of the Services
- Secure the Services
- Comply with any procedures, laws, and regulations which apply to us where it is necessary for our legitimate interests or the legitimate interests of others
- Establish, exercise, or defend our legal rights where it is necessary for our legitimate interests or the legitimate interests of others

Combined Information.

For the purposes discussed in this Privacy Policy, we may combine the information that we collect through the Services with information that we receive from other sources, both online and offline, and use such combined information in accordance with this Privacy Policy.

Aggregate/Anonymous Data

We may aggregate and/or anonymize any information collected through the Website so that such information can no longer be linked to you or your device (“Aggregate/Anonymous Information”). We may use Aggregate/Anonymous Information for any purpose, including without limitation for research and marketing purposes, statistical analyses of Website(s) usage, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors.

How We Share and Disclose Your Information

Web3Campus will share your information in the following ways:

- **Service Providers.** We provide access to or share your information with operations and maintenance contractors and other third parties who perform services on our behalf. They have access to perform these services but are prohibited from using your information for other purposes. They provide a variety of services to us, including billing, sales, marketing, test proctoring, product content and features, advertising, analytics, research, customer service, data storage, security, fraud prevention, payment processing, and legal services.
- **Employers.** We may share the information that we collect from you when you participate in an Online Course if the course is sponsored or paid for by your employer. For example, we may share with your employer pre-assessment results, the Online Courses you are interested in, your progress in the course, including

project status, time spent actively involved in or with an Online Course or interacting with your Mentor, and/or evaluations and performance assessments. If you make your Profile public on the Website, and your employer has access to the Website, then your employer will have the ability to view your Profile information and materials. This information may be shared at any time during the course or afterwards.

- **Educational Institutions and Scholarship Partners.** If you are taking a course sponsored or associated with a particular Educational Partner (e.g., such as a university or scholarship/sponsored partner), we may share information about you and your performance with the university or scholarship partner, including to report on your progress in the course. Information shared with our Educational Partners will be subject to the privacy policies and procedures of such partners.
- **Business Partners.** With your consent, Web3Campus may share information that can be used to directly connect you with third party business partners, such as companies that may be offering products or services or other opportunities that may be of interest to you.
- **Protection of Web3Campus and Others.** By using the Website, you acknowledge and agree that we may access, retain and disclose the information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process (e.g. a subpoena or court order) or law; (b) enforce our Terms of Use, this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; (d) respond to your requests for customer service; and/or (e) protect the rights, property or personal safety of Web3Campus, its agents and affiliates, its users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, compliance with applicable law, and spam/malware prevention, and similar purposes.
- **Profiles and Career Services.** If you make your Profile public, your information will be publicly accessible and further share with our network of hiring partners, including, without limitation, performance in online courses, demographic information (such gender), details of your Profile and other information related to your work experience and goals.

- **Related Entities and Affiliates.** We may share information with our affiliated companies that are under the common ownership or control of Web3Campus, Inc.
- **Business Transfers.** As we continue to develop our business, we may buy, merge, or partner with other companies. In such transactions, (including in contemplation of such transactions) user information may be among the transferred assets. If a portion or all of Web3Campus's assets are sold or transferred to a third-party, customer information (including your email address) would likely be one of the transferred business assets. If such transfer is subject to additional mandatory restrictions under applicable laws, Web3Campus will comply with such restrictions.
- **Aggregate/Anonymous Information.** From time to time, Web3Campus may share Aggregate/Anonymous Information about use of the Services, such as, but not limited to, publishing a report on usage trends or survey results, as well graduation rates, careers studies and success rates, and other demographic information provided to us by our Students. The sharing of such data is unrestricted.

Data Subject Rights and Your Choices

You may have certain rights with respect to your information as further described in this section.

Your Legal Rights

If you would like further information in relation to your legal rights under applicable law or would like to exercise any of them, please contact us using the information in the "Web3Campus Contact Information" section below at any time. Your local laws, such as in the European Union, may permit you to request that we:

- provide access to and/or a copy of certain information we hold about you
- prevent the processing of your information for direct-marketing purposes (including any direct marketing processing based on profiling)
- update information which is out of date or incorrect
- delete certain information which we are holding about you
- restrict the way that we process and disclose certain of your information
- transfer your information to a third-party provider of services
- revoke your consent for the processing of your information

We will consider all requests and provide our response within the time period stated by applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interests or to comply with a legal obligation.

To the extent that you make such a request, we require certain information to help verify your request and prevent fraudulent information and removal requests. Specifically, we ask that you provide the following pieces of information:

1. Username and email address associated with your Web3Campus User Account;
2. Online Courses currently or previously enrolled in;
3. Approximate date of User Account registration;
4. Information you want to view and/or request removed;
5. Country of residence; and
6. A statement under penalty of perjury that all information in your request is truthful and that this is your User Account or that you have the authorization to make the request on behalf of the owner of the User Account.

Depending on the circumstances and the information you request, we may require additional methods of verification in our discretion.

Communications & Notification Preferences and Opting Out

We provide our Users with the opportunity to update their information or to opt out of having their contact information used for purposes not directly related to payment or servicing of your account.

If you are a Student and wish to opt out of any of the communications offered by Web3Campus, you may do so at any time. Log into your account, select the Settings page, and navigate to 'Notification Preferences.' From there, you can manage Web3Campus communication subscriptions, including text message study reminders, mentor communications, Career Services support (if applicable), community notifications, and marketing and promotional communications by selecting or de-selecting any of the methods from which you wish to opt out or opt in. If you are not a Student, or wish to opt out through alternative means, you may opt out as follows:

- Contact us by email at support@web3campus.com

Please identify the communication methods (e.g., phone, email, or SMS text message) by which you desire to stop receiving messages.

You may unsubscribe from our commercial or marketing email communications at any time by following the unsubscribe instructions located at the bottom of such emails. If you have opted in to receive marketing text message communications from Web3Campus, you can opt out of those messages by following the instructions in those messages or by contacting us at the information provided above.

Please note that, regardless of your request, we may still use and share certain information as permitted by this Privacy Policy or as required by applicable law. For example, you may not opt out of certain operational emails, such as those reflecting our relationship or transactions with you.

Retention of Your Information

We keep your information for no longer than necessary for the purposes for which it is processed. The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.

Third Party Links and Features

The Services contain links to third-party websites such as social media sites, and also contain third-party integrations (such as the Facebook “like” button, Slack/Github integration, or YouTube) and functionalities. If you choose to use these sites or features, you may disclose your information not just to those third-parties, but also to their users and the public more generally depending on how their services function. Web3Campus is not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your information will be subject to the privacy policies of the third-party websites or services, and not this Privacy Policy. We urge you to read the privacy and security policies of these third-parties.

In the provision of the Services, Web3Campus utilizes YouTube API services. Such API service is maintained and operated by YouTube, LLC, 901 Cherry Avenue, San Bruno, CA 94066, United States, with YouTube, LLC being a subsidiary of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States. As a condition of accessing Web3Campus Services on YouTube, you warrant and represent that you have read and fully agree to the YouTube Terms of Service and the Google Privacy Policy as updated and amended from time to time.

Children's Privacy

Web3Campus is intended for general audiences and not for children under the age of 13. If we become aware that we have inadvertently collected “personal information” (as defined by the United States Children’s Online Privacy Protection Act) from children under the age of 13 without legally-valid parental consent, we will take reasonable steps to delete it as soon as possible. We also comply with other age restrictions and requirements in accordance with applicable local laws.

International Users

Web3Campus stores information about visitors to our Website and users on servers located in the United States. By using our services, you consent to the storage of your information inside the United States. If you are using the services from outside the United States and the European Union, please know the information you submit will be transferred to and stored in servers in the United States or other countries. The data protection and other laws of the United States and/or other countries might not be as comprehensive as those in your country. By submitting your data and/or using our services, you acknowledge the transfer, storing, and processing of your information in and to the United States.

As described above, Web3Campus also may subcontract the processing of your data to, or otherwise share your data with, service providers and others in countries other than your country of residence, including the United States, in accordance with applicable law. Such third parties may be engaged in, among other things, the provision of services to you, the processing of transactions and/or the provision of support services. By providing us with your information, you acknowledge any such transfer, storage or use.

If we provide any information about you to any such non-European Union entities, we will take appropriate measures to ensure such companies protect your information adequately in accordance with this Privacy Policy. These measures include signing Standard Contractual Clauses in accordance with European Union and other data protection laws to govern the transfers of such data. For more information about these transfer mechanisms, please contact us as detailed in the “Web3Campus Contact Information” section below.

If applicable, you may make a complaint to the data protection supervisory authority in the country where you are based. Alternatively, you may seek a remedy through local courts if you believe your rights have been breached.

How We Protect Your Information

We consider the confidentiality and security of your information to be of the utmost importance. Web3Campus takes a variety of technical, administrative, and physical measures to protect your information from disclosure to or access by third parties. Please note that we do not guarantee the security of information, as no method of internet transmission or storage is completely secure. Also note that we may retain and store your information in our databases and systems even after your Web3Campus account is deactivated as long as we have a legitimate purpose to do so and in accordance with applicable law.

Information for California Residents

In addition to the information detailed in this privacy policy, California law provides for specific rights for California residents. California residents may request access to Personal Information, request a copy of their Personal Information, or request that their Personal Information be deleted. You may make these requests through your account by navigating to your Settings or by submitting a request to support@web3campus.com. Consistent with California law and to provide for the security of Personal Information, Web3Campus will verify requests from California residents, as well as requests received from authorized agents acting on behalf of California residents.

Changes To Our Privacy Policy

Please note that we review our privacy practices from time to time, and that these practices are subject to change. Any change, update, or modification will be effective immediately upon posting on our Website(s). You can know if the Privacy Policy has changed since the last time you reviewed it by checking the “Effective Date” included at the beginning of the document. If we make a material change to the Policy, you will be provided with appropriate notice in accordance with legal requirements. By continuing to use the Services, you are confirming that you have read and understood the latest version of this Privacy Policy. Be sure to return to this page periodically to ensure familiarity with the most current version of this Privacy Policy.

Web3Campus Contact Information

If you have any questions, comments or complaints about this Privacy Policy, please contact us:

Email: support@web3campus.com