GRASP PATHWAYS (or “PATHS”)

PRIVACY POLICY

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About this Policy

This Privacy Notice for GRASP TECHNOLOGIES LIMITED (doing business as Grasp) ('**we**', '**us**', or '**our**'), describes how and why we might access, collect, store, use, and/or share ('**process**') your personal information when you use our services ('**Services**'), including when you:

- Visit our website at https://grasp.study or any website of ours that links to this Privacy Notice
- Use GRASP PATHWAYS (or “PATHS”). Our Platform creates curated, personalised educational lessons and related curriculum (“Lesson”) based on data and content you provide about yourself and your learning goals.
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at privacy@grasp.study.

Summary of Key Points

This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process?

When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? Some of the information may be considered 'special' or 'sensitive' in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We don't ask for sensitive personal information, such as health, religion or ethnic origin. If you include any in a chat, a note or a CV you upload, we process it only to provide the Services to you, and we don't use it for anything else.

Do we collect any information from third parties? If you sign in with Google, Google shares your name, email address and profile picture with us. If our team points us to your post on X (Twitter), we read it from X (see section 7A).

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties.

How do we keep your information safe? We have adequate organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by submitting a data subject access request (here: https://forms.gle/otzf4NFUiVoF6mRF6), or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

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1. What information do we collect?

Personal information you disclose to us

In Short: *We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- email addresses
- names
- usernames
- passwords
- your curriculum vitae (CV), if you upload one, and the background we extract from it (education, work experience, skills, age, languages, hobbies and interests); your learning goals; your conversations with the course planner and the AI mentor; highlights and notes you make in lessons and your answers to exercises; and the picture of your knowledge and preferences we build from these to personalise your lessons

Sensitive Information. We don't ask for sensitive personal information, such as health, religion or ethnic origin. If you include any in a chat, a note or a CV you upload, we process it only to provide the Services to you, and we don't use it for anything else.

Google Sign-In. You can register and sign in with your Google account. If you do, we receive your name, email address and profile picture from Google, as described in “How Do We Handle Your Social Logins?” below.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: *Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes. If advertising cookies are on, we also share your IP address and browser user agent with Meta when you sign up, to measure our ads (see section 4).

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- *Location Data.* We infer your approximate location, such as your country, from your IP address. We don't collect your device's precise location.

Google API

Our use of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.

2. How do we process your information?

In Short: *We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We process the personal information for the following purposes listed below. We may also process your information for other purposes only with your prior explicit consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account, as well as keep your account in working order.

- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfil and manage your orders.** We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see 'What Are Your Privacy Rights?' below.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. What legal bases do we rely on to process your information?

In Short: *We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.*

If you are located in the EU or UK, this section applies to you.`

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
    - Send users information about special offers and discounts on our products and services
    - Analyse how our Services are used so we can improve them to engage and retain users
    - Diagnose problems and/or prevent fraudulent activities
    - Understand how our users use our products and services so we can improve user experience
    - Read posts on X that our team points us to and suggest a course that fits (see section 7A)
    - Improve our models using pseudonymised study data, without your name or contact details, unless you opt out (see section 6)
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e. express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e. implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met

- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations
- We may disclose de-identified information for approved research or statistics projects, subject to ethics oversight and confidentiality commitments

4. When and with whom do we share your personal information?

In Short: *We may share information in specific situations described in this section and/or with the following third parties.*

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Other Users.** When you share personal information or otherwise interact with public areas of the Services, such personal information may be viewed by all users and may be publicly made available outside the Services in perpetuity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services, and view your profile.
- **Payment processor.** We use **Stripe, Inc.** to process payments. When you start a paid Membership we share the personal information required to set up and bill your subscription (name, email, our internal account identifiers, and the billing details you provide to Stripe) and we send Stripe a cancellation request when you delete your account. Stripe processes this information under its own privacy policy at https://stripe.com/privacy.
- **Email provider.** We use Loops to send service emails and, in line with your marketing preferences, product news. We share your email address, name, signup date and the data needed to render

each email, such as the title of your first lesson. Loops processes this information under its own privacy policy.

- **Cloud infrastructure.** Files you upload to the Platform (including a CV) are stored in **Google Cloud Storage**. Our database is hosted on **Google Cloud SQL**. Both are operated by Google LLC.
- **Customer support.** If you contact us, the conversation is handled in Intercom or Google Workspace email. Our team is notified of new messages through Slack, and we track problems that need fixing in Linear.
- **Advertising partners.** Where we ask for consent, only after you accept advertising cookies; elsewhere, until you opt out: Reddit receives a hashed version of your email address, your account ID, and the pages you view, the courses you view, purchases and signups; Google Ads and LinkedIn receive the identifier of the ad you arrived through and a signup event; Meta receives a signup event with a hashed version of your email address, your account ID, your IP address and browser user agent, the page you signed up on, and the identifier of the Meta ad you arrived through, if any. See our Cookie Policy.

5. Do we use cookies and other tracking technologies?

In Short: *We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Some online tracking technologies help us maintain the security of our Services and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.

We also permit third parties and service providers to use online tracking technologies on our Services for analytics and advertising, including to help manage and display advertisements, to tailor advertisements to your interests, or to send abandoned shopping cart reminders (depending on your communication preferences). The third parties and service providers use their technology to provide advertising about products and services tailored to your interests which may appear either on our Services or on other websites.

To the extent these online tracking technologies are deemed to be a 'sale'/'sharing' (which includes targeted advertising, as defined under the applicable laws) under applicable US state laws, you can opt out of these online tracking technologies by submitting a request as described below under section 'Do United States Residents Have Specific Privacy Rights?'

Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie policy.

Product analytics and session replay (PostHog)

We use PostHog to measure how the product is used and to record how visitors interact with our pages ("session replay") so we can find and fix usability problems. These recordings are masked: every input and all on-screen text is hidden, so a replay shows layout, navigation, clicks, and scrolling, but not the content you type or read. PostHog runs without cookies on our production site. Where we ask for consent, it runs only after you accept analytics cookies; elsewhere it runs by default. Either way, you can turn it off at any time in our cookie settings, and recording stops. Replay recordings are kept for up to 30 days. See our Cookie policy for details.

Google Analytics

We may share your information with Google Analytics to track and analyse the use of the Services. To opt out of being tracked by Google Analytics across the Services, visit https://tools.google.com/dlpage/gaoptout. For more information on the privacy practices of Google, please visit the Google Privacy & Terms page.

6. Do we offer artificial intelligence-based products?

In Short: *We offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies.*

As part of our Services, we offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies (collectively, 'AI Products'). These tools are designed to enhance your experience and provide you with innovative solutions. The terms in this Privacy Notice govern your use of the AI Products within our Services.

Use of AI Technologies

We provide the AI Products through third-party service providers ('AI Service Providers'), namely OpenAI, Anthropic, Google (Gemini on Google Cloud Vertex AI) and Amazon Web Services (Bedrock). As outlined in this Privacy Notice, your input, output, and personal information will be shared with and processed by these AI Service Providers to enable your use of our AI Products for purposes outlined in 'what Legal Bases Do We Rely On To Process Your Personal Information?' You must not use the AI Products in any way that violates the terms or policies of any AI Service Provider.

Our AI Products

Our AI Products are designed for the following functions:

- Create curated, personalised educational lessons and related curriculums.

How We Process Your Data Using AI

All personal information processed using our AI Products is handled in line with our Privacy Notice and our agreement with third parties. This ensures high security and safeguards your personal information throughout the process, giving you peace of mind about your data's safety.

Improving our models. We may use your study data, such as your goals, chat messages and exercise answers, with your name and contact details removed, to train, tune or customise models that improve the Services. You can opt out at any time by emailing support@grasp.study from the address on your account. The AI Service Providers above don't use your data to train their own models.

How to Opt Out

We believe in giving you the power to decide how your data is used. To opt out, you can:

- The AI Products are how the Service works, so they can't be switched off for an account. You can delete your account at any time (Section 11).

7. How do we handle your social logins?

In Short: *If you choose to register or log in to our Services using a social media account, we may have access to certain information about you.*

Our Services offer you the ability to register and log in using your Google account. Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this Privacy Notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

7A. Do we process information from X (Twitter)?

In Short: *If our team points us to your post on X, we read it to suggest a course on Grasp that fits.*

Our team uses our X account, @graspdotstudy, in two ways. In both, we only read posts that a member of our team points us to, and we don't act on posts from anyone else.

Course requests from our team. When a member of our team mentions @graspdotstudy on X, for example in reply to someone who wants to learn about a topic, we read the team member's post to

find a course on Grasp that fits. If none fits, we may create a new one. Our account then replies on X with a link to the course.

Replies to a post. A member of our team can also give us the link to a post on X where people ask to learn something. We then read the direct replies to that post through X's API: each reply's text and post ID. We use the text only to find a course on Grasp that fits the reply, and a member of our team may then answer you on X with a link to it.

We don't collect your profile, followers or other posts, and we don't use your posts for advertising. We delete the text of a post within 6 hours of finishing the search for a course. We keep the post's ID, the post it replied to, the course we found and whether we replied, so we don't read or answer the same post twice.

Our legal basis is our legitimate interest in helping people who ask to learn something find a course, which we have balanced against your interests. You can object at any time by emailing privacy@grasp.study. We will then delete what we hold about your posts and won't answer them.

8. Is your information transferred internationally?

In Short: *We may transfer, store, and process your information in countries other than your own.*

Our database and most of our services are hosted in the EU. Our AI providers (see Section 6) may process your information outside the EU, including in the United States. Regardless of your location, please be aware that your information may be transferred to, stored by, and processed by us in our facilities and in the facilities of the third parties with whom we may share your personal information (see 'When And With Whom Do We Share Your Personal Information?' above), including facilities in the United States, United Kingdom, EU, and other countries.

If you are a resident in the European Economic Area (EEA), United Kingdom (UK), or Switzerland, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this Privacy Notice and applicable law.

Where we transfer personal information outside the UK or EEA, we rely on the UK International Data Transfer Addendum or Agreement in our providers' data processing terms, or on the UK Extension to the EU-US Data Privacy Framework where the provider is certified.

9. How long do we keep your information?

In Short: *We keep your information for as long as necessary to fulfil the purposes outlined in this Privacy Notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax,

accounting, or other legal requirements). Most of your information is kept only while you have an account. The exceptions are billing records, which accounting law requires us to keep for 6 years, and the records described below.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Retention timelines for deleted accounts. When you delete your account:

- We retain your full account record for **30 days** (the grace period during which restoration is possible).
- Subscription renewals are scheduled to stop at the end of your current billing period so you aren't charged again during the grace window.
- After the 30 days, an automated purge runs: your name, email, uploaded files, lesson progress, mentor chat history, and other personal information are removed. Your account record remains in our database as an anonymous reference so that courses you published, by sharing them publicly or featuring them on Explore, stay published after your account is deleted. They are no longer attributed to you. If you want a course taken down, unpublish it before you delete your account, or ask us at privacy@grasp.study.
- Database backups taken before the purge are kept for up to 14 days, after which the data can't be recovered, even by us.
- Internal records of changes to your data are kept in our database for 30 days, then moved to an archive (see below).
- Records of changes to your account are moved to a long-term archive after 30 days and kept for accounting and dispute resolution. When your account is purged, your personal information is removed from this archive too. Billing records are kept, as accounting law requires. To request removal of an archived record, contact privacy@grasp.study.
- Courses you didn’t publish are kept in anonymised form, no longer linked to you, so the course content stays available to us for improving the Services.

10. How do we keep your information safe?

In Short: *We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or

information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

11. What are your privacy rights?

In Short: *Depending on your state of residence in the US or in some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.*

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. If a decision that produces legal or similarly significant effects is made solely by automated means, we will inform you, explain the main factors, and offer a simple way to request human review. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'How Can You Contact Us About This Notice?' below.

Your right to object

Where we rely on legitimate interests, you can object at any time. The main case is featuring a course you created on our Explore page after we have told you by email. You can object in two ways: within 30 days of our email, in Account Settings → Explore featuring, which stops us featuring any of your courses; or at any time, on the course itself, by switching off “Feature on Explore”, which keeps your share link working. You can also object to any other processing by emailing privacy@grasp.study.

If we have read your post on X, you can object to us processing it as described in section 7A.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have

the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'How Can You Contact Us About This Notice?' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account Information

You may review, change, or delete your account at any time:

- **Self-service.** Go to **Account Settings** → **Delete account** in the Platform and confirm the prompt.
- **By email.** Contact us using the details in Section 15.

When you delete your account it enters a 30-day grace period during which our support team can restore it on request. Email privacy@grasp.study before that window closes. During the grace period any active paid Membership stops renewing at the end of the billing period you're already in, so you are not charged again while you wait.

After the 30-day grace period elapses, we run an automated purge: your name, email, uploaded files, lesson progress, mentor chat history, and other personal information are removed. Your account record remains in our database as an anonymous reference so that courses you published, by sharing them publicly or featuring them on Explore, stay published after your account is deleted. They are no longer attributed to you. If you want a course taken down, unpublish it before you delete your account, or ask us at privacy@grasp.study. Payment-processor and transactional-email-provider records are also removed at this point.

We may retain some information to prevent fraud, troubleshoot problems, comply with legal requirements, or as described in Section 9 above.

12. Controls for do-not-track features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

California law requires us to let you know how we respond to web browser DNT signals. Because there currently is not an industry or legal standard for recognising or honouring DNT signals, we do not respond to them at this time.

13. Do United States residents have specific privacy rights?

In Short: *If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. More information is provided below.*

Categories of Personal Information We Collect

The table below shows the categories of personal information we have collected in the past twelve (12) months. The table includes illustrative examples of each category and does not reflect the personal information we collect from you. For a comprehensive inventory of all personal information we process, please refer to the section 'What Information Do We Collect?'

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics under state or federal law	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data	YES
D. Commercial information	Transaction information, purchase history, financial details, and payment information	YES

E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behaviour, interest data, and interactions with our and other websites, applications, systems, and advertisements	YES
G. Geolocation data	Device location	YES
H. Audio, electronic, sensory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	YES
J. Education Information	Student records and directory information	NO
K. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	YES
L. Sensitive personal Information		NO

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

We will use and retain the collected personal information as needed to provide the Services or for:

- Category A - As long as the user has an account with us
- Category B - As long as the user has an account with us
- Category C - As long as the user has an account with us
- Category D - As long as the user has an account with us
- Category F - Up to 30 days for session replays; analytics events as long as the user has an account with us

- Category G - As long as the user has an account with us
- Category I - As long as the user has an account with us
- Category K - As long as the user has an account with us

Sources of Personal Information

Learn more about the sources of personal information we collect in 'What Information Do We Collect?'

How We Use and Share Personal Information

Learn more about how we use your personal information in the section, 'How Do We Process Your Information?'

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we disclose personal information to in the section, 'When and With Whom Do We Share Your Personal Information?'

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be 'selling' of your personal information.

We do not sell personal information for money. We share limited identifiers (a hashed email address, your account ID, ad click identifiers and, for Meta, your IP address and browser user agent) with advertising partners (Reddit, Google Ads, LinkedIn and Meta) to measure our ads. Some US state laws treat this as "sharing" for targeted advertising. You can opt out at any time through the "Cookies" link in our footer, and we treat a Global Privacy Control signal from your browser as an opt-out.

Your Rights

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- Right to know whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request the deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to non-discrimination for exercising your rights

- Right to opt out of the processing of your personal data if it is used for targeted advertising (or sharing as defined under California's privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ('profiling')

Depending upon the state where you live, you may also have the following rights:

- Right to access the categories of personal data being processed (as permitted by applicable law, including the privacy law in Minnesota)
- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including the privacy law in California, Delaware, and Maryland)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including the privacy law in Minnesota and Oregon)
- Right to review, understand, question, and correct how personal data has been profiled (as permitted by applicable law, including the privacy law in Minnesota)
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including the privacy law in California)
- Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including the privacy law in Florida)

How to Exercise Your Rights

To exercise these rights, you can contact us by submitting a data subject access request, by emailing us at privacy@grasp.study, or by referring to the contact details at the bottom of this document.

Under certain US state data protection laws, you can designate an authorised agent to make a request on your behalf. We may deny a request from an authorised agent that does not submit proof that they have been validly authorised to act on your behalf in accordance with applicable laws.

Request Verification

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorised agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

Appeals

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at privacy@grasp.study. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.

California 'Shine The Light' Law

California Civil Code Section 1798.83, also known as the 'Shine The Light' law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us by using the contact details provided in the section 'How Can You Contact Us About This Notice?'

14. Do we make updates to this notice?

In Short: *Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated 'Revised' date at the top of this Privacy Notice. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

15. How can you contact us about this notice?

If you have questions or comments about this notice, you may email us at privacy@grasp.study or contact us by post at:

GRASP TECHNOLOGIES LIMITED

Level 39

One Canada Square

London, London E14 5AB

United Kingdom

16. How can you review, update, or delete the data we collect from you?

Based on the applicable laws of your country or state of residence, you may have the right to request access to, correction of, or deletion of your personal information. You can exercise these rights by:

- using the in-product self-service deletion flow at **Account Settings** → **Delete account** (deletion only), or
- submitting a data subject access request: https://forms.gle/otzf4NFUiVoF6mRF6 (access, correction, deletion).

See Section 11 for the timeline and scope of what happens after you delete your account.