

Qrise Privacy Policy

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Thank you for joining Qrise.

We respect the privacy of our users and are committed to transparency about how we collect, use, store, and disclose personal data. This Privacy Policy describes how personal data is processed when you use the Qrise website, mobile applications, application programming interface (API), and other related services (collectively, the “Services”).

Unless expressly stated otherwise, this Privacy Policy applies to all users of the Qrise platform, including students, experts, authors of educational materials, and platform visitors.

By using the Qrise Services, you confirm that you have read this Privacy Policy and agree to the personal data processing practices described herein. If you do not agree with this Privacy Policy or other documents governing use of the Qrise Services, you must not use the platform Services.

Personal data is processed in accordance with Regulation (EU) 2016/679 (GDPR) and the applicable laws of the Republic of Cyprus.

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1. Data We Collect

We collect certain data directly from you, including data you provide to us, data concerning your learning activity, and data from third-party platforms that you connect to Qrise. We also collect certain data automatically, such as information about your device and the Services you access or use. The data described in this section may be subject to collection, recording, organization, storage, alteration, retrieval, encryption, pseudonymization, deletion, combination, and transfer.

1.1 Data You Provide to Us

We may collect different types of data depending on how you use the Services. When you create an account and use the Services, including through a third-party platform, we collect data that you provide directly to us.

Account Data

To use certain platform functions, you must create a user account. We collect and store your email address, password, and account settings. Depending on the functions used, we may request

additional information, including a telephone number for authentication, information about professional activity, areas of expertise, specialization, and other data necessary to use the Services. If you register as an expert, we may request additional information to verify your identity and process payments.

Legal basis: performance of a contract; legitimate interests in providing the Services, ensuring platform security, preventing fraud, and verifying users' identities.

Profile Data

You may provide profile information such as a photograph, headline, biography, language, website reference, social media profiles, country, or other information. Your profile data may be visible to other users.

Legal basis: performance of a contract; legitimate interests in providing enhanced platform functions and communicating information about the source of materials.

Public Content

Some Services allow you to communicate with other users or publish materials, including by uploading courses or other materials, posting reviews, questions or answers, sending messages to students or instructors, or posting photographs or other uploaded content. Such public content may be visible to other users in accordance with the Terms of Use, including Section 5, "Qrise Rights to Content You Post."

Legal basis: performance of a contract; legitimate interests in providing the Services, enhanced platform functions, and marketing.

Learning Data

When you access materials, we collect information about courses, assignments, laboratory work, workspaces, and tests you have started or completed; content purchases and credits; subscriptions; completion certificates; your interaction with instructors, teaching assistants, and other students; and essays, answers, or other items submitted to meet course and related material requirements.

Legal basis: performance of a contract; legitimate interests in providing the Services, enhanced platform functions, platform security, fraud prevention, marketing, and advertising.

Student Payment Data

If you make a purchase, we collect information necessary to process it, such as your name, billing address, and postal code. You may choose to store some information for future orders. Payment and billing data, including your name, card information, billing address, and postal code, must be provided directly to our payment service providers. We may receive limited information from those providers, such as notice that a new card has been issued and the last four digits of the card, to facilitate payments. Qrise does not store full card numbers, CVV/CVC codes, or other sensitive payment card data. Such information is processed only by certified payment service providers.

Legal basis: performance of a contract; legal obligations; legitimate interests in facilitating payments, preventing fraud, ensuring security, and complying with regulatory requirements.

Instructor Payment Data

If you are an instructor, you may connect a PayPal, Payoneer, Tipalti, or another payment account to receive payments. When you configure a payment account, we collect and use information such as the payment-account email address, account number, physical address, and other data needed to

send payments. In some cases, we may collect ACH or bank-transfer details. To comply with applicable law, we work with vetted third parties that collect tax data under the laws of Cyprus, the European Union, and other applicable jurisdictions. Tax data may include residence information, a taxpayer identification number, biographical information, and other personal information required for taxation. For security reasons, Qrise does not collect or store sensitive bank-account information. Collection, use, and disclosure of payment, billing, and tax data are also governed by the privacy policy and terms of the payment-account provider.

Legal basis: performance of a contract; legal obligations; legitimate interests in providing the Services, facilitating payments, preventing fraud, ensuring security, and complying with regulatory requirements.

Data From Accounts on Other Services

We may receive information through your social media or other accounts when they are connected to your Qrise account. If you sign in through Google, Apple, Facebook, LinkedIn, or another third-party service, that platform may provide information through an API or another integration method. This may include your username, email address, unique account identifier, profile image, and other data you authorized the service to share.

Legal basis: legitimate interests in verifying identity, simplifying registration and sign-in, ensuring platform security, and improving user experience.

Promotions and Surveys

We may invite you to participate in a survey or promotion, such as a contest, prize draw, or competition, through the Services or a third-party platform. If you participate, we collect and store information you submit, such as your name, email address, postal address, date of birth, or telephone number. This Privacy Policy applies unless the official promotion rules or another privacy notice states otherwise. Data may be used to administer the promotion or survey, notify winners, and distribute prizes. To receive a prize, you may need to permit publication of certain information, for example on a winners page. If a third-party platform is used, its privacy policy also applies.

Legal basis: performance of a contract; legitimate interests in administering promotions, delivering prizes, and complying with regulatory requirements.

Communications and Support

If you request support or report a problem or concern, whether or not you have an account, including when communicating with our AI virtual assistant, we collect and store your contact details, communications, and other data such as your name, email address, location, Qrise user identifier, refund-transaction number, and any other information you provide or that we collect automatically. We use this data to respond to and address your request or concern.

Legal basis: legitimate interests in customer and technical support, fraud prevention, and security.

We store the data described above and associate it with your account. Qrise's use and transfer to any other application of information received through Google APIs, including materials uploaded by instructors, complies with the Google API Services User Data Policy, including the Limited Use requirements.

1.2 Data Collected by Automated Means

When you access or use the Services, including when viewing our materials, we collect certain data automatically.

System Data

Technical information about your computer or device, including IP address, device type, operating-system type and version, unique device identifier, mobile advertising identifiers, browser, browser language, domain, platform type, and other system data.

Legal basis: performance of a contract; legitimate interests in providing the Services, customer and technical support, preventing fraud, ensuring security, improving the product, marketing, and advertising.

Usage Data

Statistics concerning use of the Services, including materials viewed, time spent on pages or in the Services, pages visited, features used, search queries, clickstream data, date and time, referring source, and other usage data.

Legal basis: legitimate interests in providing the Services, improving user experience and the product, security, fraud prevention, marketing, and advertising.

Approximate Geolocation Data

Approximate geographic location, including country, city, and coordinates estimated from your IP address.

Legal basis: legitimate interests in improving user experience, preventing fraud, ensuring security, complying with regulatory requirements, marketing, and advertising.

The data above, referred to collectively as “Cookie Data,” is collected through server logs and tracking technologies as described below. We store this data and associate it with your account. Depending on your cookie and browser settings, this data may also be provided to Google for advertising purposes.

2. How We Collect Data About You

We use cookies, web beacons, and similar tools to collect the data described above. Some tools allow you to opt out of certain collection.

2.1 Cookies and Data Collection Tools

Cookies are small text files stored by your browser that may collect, store, and exchange information about your activity on websites, including Qrise. Cookies allow us to remember information about your visits, such as preferred language settings, and make the website easier to use. We may also use pixel tags in emails to track delivery and opening.

Qrise and service providers acting on our behalf, such as Google Analytics and third-party advertising providers, use server logs and automated collection tools including cookies, tags, scripts, personalized links, device or browser fingerprint information, and web beacons (collectively, “Data Collection Tools”) when you access or use the Services. These tools automatically track and collect certain System Data and Approximate Geolocation Data. In some cases, data collected through these tools is linked with other data collected under this Privacy Policy.

2.2 How We Use Data Collection Tools

Qrise uses the following categories of Data Collection Tools:

- **Strictly Necessary.** These tools enable access to the website and basic functions such as sign-in and access to materials, secure the website, protect against fraudulent sign-ins, and detect and prevent improper or unauthorized use of your account. They are necessary for the Services to function; disabling them may make parts of the website unavailable.
- **Functional.** These tools remember browser information and preferences, provide additional website functions, personalize the display of relevant materials, and remember settings that affect the appearance and behavior of the Services, such as language or video volume.
- **Performance.** These tools help us evaluate and improve the Services by providing usage and performance information, visit counts, traffic sources, and application-download sources. They also allow us to test versions of Qrise and understand preferred functions, materials, and opened emails.
- **Advertising.** These tools are used to show relevant advertising on our website and/or other websites based on usage and system data and information collected by advertising providers. Advertising may reflect recent or historical activity on other websites and services. We may provide service providers with a hashed, anonymized version of your email address and content you shared through the Services to support targeted advertising.
- **Social Media.** These tools support social media functions such as sharing content with friends or networks. They may track activity across websites to develop interest profiles and display targeted advertising.

You may configure your browser to warn you when cookies are placed, restrict permitted cookie types, or reject cookies. Rejecting cookies may prevent use of some or all Service functions and may reduce functionality. Additional choices are described in Section 6.1.

3. Purposes for Which We Use Your Data

We use your data to provide the Services, communicate with you, troubleshoot, protect against fraud and abuse, improve and update the Services, analyze use, provide personalized advertising, and for other purposes required by law or necessary to protect security and integrity. We retain data for as long as necessary for the purposes for which it was collected. If you have a Qrise account, we delete data after account termination unless retention is required by law or necessary for security and integrity.

We use data generated through your use of the Services to:

- provide and administer the Services, facilitate learning, issue completion certificates, personalize content, and enable interaction with other users;
- process payments to instructors and other third parties;
- process requests and orders for materials, goods, services, information, or functions; confirm delivery; detect fraud or policy violations; and enforce Qrise policies;
- communicate with you about your account, respond to questions, send administrative messages, notify you of Service changes and agreement updates, send course-progress information and messages about relevant materials, rewards, new services, promotions, newsletters, and instructor content, and send push notifications that you can control in application settings;
- manage your account and preferences and personalize the Services;
- support technical operation, troubleshooting, security, and prevention of fraud and abuse;
- verify instructor identity;
- obtain user feedback;
- market products, services, surveys, and promotions;

- offer commercial subscription plans to prospective customers;
- supplement data through third-party data providers or analytics services;
- identify unique users across devices;
- display and target advertising, including cross-device advertising;
- improve the Services and develop new products, services, and functions, including improving the reliability of AI use under the GenAI Policy for instructors;
- analyze trends and traffic and track purchases and usage;
- advertise the Services on third-party websites and applications;
- comply with legal requirements and permissions; and
- protect the safety and integrity of users, employees, third parties, the public, or the Services.

We may process information you enter into our generative artificial intelligence (GenAI) functions to provide a response to your question or request. We do not use your personal data to train or fine-tune GenAI models.

4. Parties With Whom We Share Your Data

We share certain data with instructors, other students, companies that provide services to us, Qrise affiliates, business partners, analytics and data-enrichment providers, social media providers, promotion and survey administrators, and advertising companies that help market the Services. We may also share data as necessary for security, legal and regulatory compliance, or corporate restructuring. We may share data in aggregated or anonymized form, or with your consent.

We may disclose data in the following circumstances:

- Instructors and teaching assistants. We share available information about you, excluding your email address, with instructors or teaching assistants for materials you access or ask about so they can improve those materials. This may include country, browser language, operating system, device settings, referring website, course enrollment, and course review activity.
- Other students and instructors. Depending on your settings, content you provide and profile information may be visible to other persons. When you ask an instructor or teaching assistant a question, information about you, including your name, may be visible.
- Service providers, contractors, and agents. We share data with companies that provide services on our behalf, including payment processing, fraud and abuse prevention, data analysis, marketing and advertising, retargeting and affiliate marketing, email and hosting, and customer support. They may access personal data only as instructed and only to provide requested services, and must protect it at a level consistent with this Privacy Policy.
- Qrise affiliates. We may share data within our corporate group where entities are under common ownership or control and sharing is necessary to deliver and support the Services.
- Business partners. We have arrangements with websites and platforms that distribute our Services or refer users to Qrise. Depending on your location, we may share data with trusted partners.
- Continuing-education credit organizations. If you select a course eligible for continuing professional education, we may provide relevant information when requested by the organization issuing the credit.

- Analytics and data-enrichment services. When using tools such as Google Analytics or data-enrichment services such as ZoomInfo, we may share limited contact information or de-identified data. De-identified data excludes direct identifiers such as name and email and replaces them with a token. Providers may compare it with public databases to provide analytics and allow more relevant communication and marketing.
- Social media features. Social features may permit providers to receive information such as IP address and pages visited and to place cookies. Their own privacy policies govern their use of data.
- Promotions and surveys. We may share data necessary to administer, market, or sponsor promotions and surveys, comply with law, publish winner lists, process entries, or follow official rules.
- Advertising. We may use and share Cookie Data with advertising providers and networks to understand user demographics and preferences. Providers may collect Cookie Data through Data Collection Tools, provide targeted behavioral advertising, conduct analytics, and share data with us. Opting out of behavioral advertising does not prevent receipt of general advertising. Google Ads may use cookies to display advertisements based on visits to our or other websites and to measure campaign statistics. You may manage these choices through the Google Ads settings page.
- Security and legal compliance. We may disclose any category of data when we reasonably and in good faith believe disclosure is requested in a judicial, governmental, or legal inquiry; required to comply with a subpoena, order, or valid request; necessary to enforce our Terms, Privacy Policy, or other agreements; necessary to detect, prevent, or respond to fraud, abuse, misuse, possible violations of law or rules, security issues, or technical issues; necessary to protect the rights, property, or safety of Qrise, users, employees, the public, or the Services; made to auditors or legal advisers in connection with their duties; or required or permitted by law.
- Change of control. If Qrise undergoes a merger, acquisition, separation, liquidation, bankruptcy, or sale of some or all assets, we may transfer or disclose data to a successor or prospective successor, including during due diligence.
- Aggregated or anonymized data. We may use and disclose aggregated or anonymized information for any purpose.
- With your permission. With your consent, we may share data with third parties not covered by this Privacy Policy.

When you follow references to third-party websites, their privacy policies govern the collection, use, and disclosure of personal data.

5. Security

We use reasonable technical and organizational safeguards appropriate to the type and sensitivity of stored data to protect personal data against unauthorized access, alteration, disclosure, loss, or destruction. No Internet-connected system can be completely secure, and we cannot guarantee that unauthorized third parties will never access communications between you and Qrise, the Services, or information provided to us.

Your password is an important part of our security system, and you are responsible for protecting it. Do not share it with third parties. If you believe your password or account has been compromised, change your password immediately and contact support.

6. Your Rights

You have rights concerning use of your data, including choices to opt out of promotional emails, certain cookies, and collection by some third parties. You may update or terminate your account through the Services and contact us to exercise personal data rights. Parents who believe we inadvertently collected personal data from their minor child should contact us to request deletion.

6.1 Your Choices About Use of Your Data

You may choose not to provide certain data, but some Service functions may then be unavailable.

- Promotional communications. You may unsubscribe by following instructions in the email or changing email preferences in your account. Regardless of your choices, we may send transactional or relationship communications, including administrative notices, order confirmations, important Service changes, and policy notices.
- EEA cookie choices. If you are in the European Economic Area, you may opt out of certain Data Collection Tools through the cookie settings available on Qrise pages.
- Browser and device settings. Your browser or device may allow control of cookies, local storage, location data, and other information.
- Targeted advertising. You may manage cookies used for targeted advertising through the Network Advertising Initiative, Digital Advertising Alliance, Your Online Choices in the EEA, Digital Advertising Consortium in Japan, Google Ads settings, and the mechanisms provided by advertising partners such as Taboola.
- Analytics and enrichment. You may use the opt-out mechanisms offered by Google Analytics, Mixpanel, ZoomInfo, and Clearbit.
- Mobile and desktop advertising. Apple iOS, Android, and Microsoft Windows provide settings for controlling personalized in-app advertising. For other devices and operating systems, review the relevant privacy settings.

Questions about cookies may be sent to: (Qrise email address).

6.2 Accessing, Updating, and Deleting Personal Data

You have the right to access personal data collected and stored by Qrise and to update it.

- Updating or correcting data. Sign in to your account and update information that you provided directly.
- Deleting your data. Students may follow the account-deletion process in profile settings. Instructors may follow the applicable instructor account-deletion process. If you have difficulty terminating the account, contact support.
- Data that may remain visible. After account deletion, some information may remain visible to other users, including data copied, stored, or shared by others; public content posted or distributed by you or others; or information placed on a third-party platform.
- Retention after deletion. We may retain data for as long as we have a lawful basis, including to comply with legal obligations, resolve disputes, enforce agreements, prevent fraud, secure the platform, or protect legitimate interests. We may retain and disclose such data under this Privacy Policy after account deletion.
- Exercising your rights. To request access, correction, restriction, or deletion, contact us at the email address in the Contact Information section or through Qrise support. We may request additional information to verify identity and protect personal data from unauthorized access. We respond within the periods required by applicable data protection law, including the GDPR.

6.3 Children's Privacy

We respect children's privacy and encourage parents and legal guardians to supervise children's use of online services. Persons under 18 may use the Services only with consent from a parent or legal guardian where required by applicable law. If we learn that a child's personal data was collected without a valid legal basis, we will take reasonable steps to delete it.

A parent who believes Qrise may have obtained personal data concerning a child below the applicable age may request deletion at: (Qrise email address).

7. Rules Applicable in Certain Jurisdictions

If you are in the European Economic Area, the United Kingdom, or Switzerland, you may have the following rights regarding personal data:

- the right to information about how and on what grounds personal data is processed;
- the right to access personal data and receive a copy;
- the right to correct inaccurate or incomplete data;
- the right to erasure where provided by applicable law;
- the right to restriction of processing;
- the right to data portability in a structured, commonly used, machine-readable format;
- the right to object to processing where provided by law;
- the right to withdraw consent at any time;
- the right to lodge a complaint with a competent data protection authority.

To exercise these rights, use the contact details in the Contact Information section. Qrise handles data-subject requests within the periods and procedures required by the GDPR and other applicable law.

7.1 Users in the European Economic Area and the United Kingdom

If you are in the EEA or the United Kingdom, you may request access to your data in PDF format and request correction, deletion, restriction, or objection to processing. You may use the information in Section 6.2 to submit a request. If you are in the EEA, the United Kingdom, or Switzerland, you may also lodge a complaint with a data protection supervisory authority.

Personal data may be processed by service providers and technical partners outside the EEA, the United Kingdom, and Switzerland, including for transaction processing, payment facilitation, and support services as described in Section 4. We use standard contractual clauses adopted by the European Commission to facilitate transfers from the EEA to third countries and enter into data processing agreements that restrict and regulate processing. By submitting data or using the Services, you acknowledge such transfer, storage, and processing by Qrise and its authorized providers.

7.2 International Data Transfers

Where necessary, personal data may be transferred to and processed by Qrise service providers and technical partners located outside the European Economic Area. In such cases, Qrise implements appropriate safeguards in accordance with the GDPR and other applicable law.

8. Updates and Contact Details

If we make material changes to this Privacy Policy, we will notify users by email, in-product notice, or another mechanism required by law. Changes take effect on the date of publication. Questions, concerns, or disputes may be submitted by email or post.

8.1 Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. If we make material changes, we will notify you by email, by a notice published through the Services, or as required by applicable law. Unless otherwise stated, changes take effect when published.

Where permitted by applicable law, continued access to or use of the Services after the effective date of changes constitutes acceptance of the amended Privacy Policy. The amended Privacy Policy supersedes all prior versions.

8.2 Interpretation

Capitalized terms not defined in this Privacy Policy have the meanings assigned in the Qrise Terms of Use.

8.3 Questions

For questions, concerns, or disputes concerning this Privacy Policy, contact our privacy team, including our data protection officer, at: (Qrise email address).