This Privacy Notice was last updated on October 5, 2023 Contact us at info@nylanguagecenter.com.

Your Privacy Matters at New York Language Center!

Hey there! We care about your privacy, and we want to be totally upfront about how we handle your information at New York Language Center. This page explains everything you need to know in simple terms. By using our website and services, you're agreeing to our approach. If you'd like to know more, feel free to click on each of the links provided below, to read our more in-depth <u>Privacy Notice</u>.

Types of data we collect

Tell me why

- School enrollment data
- Contact details
- Financial information
- Data that identifies you
- Data on how you use the New York Language Center website

How we use your data

How exactly?

- To provide services
- To help us improve New York Language Center services
- To give personalized student support
- To send you marketing messages (but only if you tell us to)
- To help you with immigration requirements

Third parties who process your data

What do they do?

The following services help us keep New York Language Center running by storing or processing your data on our behalf:

- Analytics: Google Analytics.
- Payments: Square, Paypal, Zelle
- Social Media: Facebook, Instagram, Google
- Online classes: Google Meet

We use cookies

How can I choose?

- We use only necessary cookies to run and improve the service
- You can turn off cookies, but this will mean that we can't recognize you and we can't resolve issues as easily

When and how we collect data

Am I included?

- We collect data from people browsing our website and students of New York Language Center, when
 - You browse any page of our website
 - You receive emails from us
 - You submit a general inquiry or chat with us through WhatsApp for support
 - You opt-in to marketing messages, or request more information

Know your rights

What can I do?

• Access or delete information we hold on you

- Opt-out of marketing communications
 Transfer your data to another service
 Be forgotten by New York Language Center
 Complain about us

If you have any concerns about your privacy at New York Language Center, please email us at info@nylanguagecenter.com.

Read the full Privacy Notice here.

Table of Contents

Your Privacy Matters at New York Language Center

General Information 3

Responsibilities 3

When and how we collect data 3

Types of data we collect 4

Types of data we do not collect 4

How and why we use your data 5

Sharing of Your Information 5

Cookies 6

Your privacy choices and rights 6

How secure is the data we collect? 7

Where do we store the data? 7

How long do we store your data? 8

This Privacy Notice was last updated on October 5, 2023

Your Privacy Matters at New York Language Center

3

Here's how we protect your data and respect your privacy.

General Information

The site to which the following Privacy Notice applies is: www.nylanguagecenter.com ("the Website"). We're located at 2710 Broadway, 2nd Floor New York, NY 10025 USA. You can reach our data protection officer at info@nylanguagecenter.com.

Responsibilities

Our responsibility: If you are a New York Language Center student, or just visiting our website, this privacy notice applies to you. If you are a registered student of New York Language Center we act as the 'data controller' of personal information about you and your use of services provided by New York Language Center. If you're looking for a job at New York Language Center, check out our employee privacy notice. You can request a copy of our employee privacy notice, by sending an email to us at info@nylanguagecenter.com.

Your responsibility: Read this Privacy Notice

When and how we collect data

From the first moment you interact with New York Language Center, we are collecting data. Sometimes you provide us with data, sometimes we collect data about you.

Here's when and how we collect data:

- You browse any page of our website
- You use New York Language Center student services
- You receive emails from us
- You become a student
- You contact us for support or inquiries
- You opt-in to marketing messages

Types of data we collect

- Identifiers: "Identifiers" covers a broad range of information, including things like name, email address, and billing address. We collect personal information that falls into this category. For example, for enrolled students we will need payment information to pay tuition (such as a credit card). We collect IP addresses when you connect to our service online. These sorts of identifiers are connected to your New York Language Center account on the NYLC App. There are also identifiers we use for purposes like advertising (third party advertising cookies on our website) that we do not associate with your account, but that can be used to reach you with promotional messages on other websites and applications.
- Internet or other electronic network activity information: Our service is an online service, so we collect CCPA personal information in this category, such as your interactions and activities within our service.
- Sensitive data: we may collect sensitive data if you receive an immigration visa through the New York Language Center. This could include information about racial or ethnic origin.
- School enrollment data: For enrolled students, the school stores a record of personal details in our database. This information is used in connection with program planning and development and to provide alumni with certain services (i.e. transcripts, certificates of completion, student verification letters, and receipts). School enrollment data includes:
 - First and last name, date of birth
 - Contact information (e.g., phone number, email address, city & country of origin, mailing address)
 - NYLC school branch
 - Classes and grades
 - Full or Part-time status
 - Dates of Attendance and Attendance record
 - Payment history
 - Visa information when a student obtains an I-20 from the school

Types of data we do not collect

• *Children's data:* The New York Language Center's website is not intended for or directed to users under the age of 18. We do not knowingly or intentionally collect personal information from children under the age of 13 or other minors. Where appropriate, we take reasonable measures to determine that our users are adults of legal age and to inform minors not to submit information to the Website or the Services, or in response to advertisements.

• Students age 17 and younger: if you're a student 17 years or younger, we will only collect and process your personal information after we receive authorization to process your data from your parent or a legal guardian.

How and why we use your data

We can only use your data for certain reasons and where we have a legal basis to do so. Here are the reasons for which we process your data:

- Processing tuition payments
- *Improving the New York Language Center website:* Testing features, managing landing pages, traffic optimization and data analysis and research.
- Student Services and Support: Providing you with Notifying you of any changes to our service
- *Newsletter:* Sending you emails and messages about our student services, and content.
- *Marketing:* Identifying you as someone who might become a New York Language Center student.
- Immigration support: for international students who apply for a visa.

Sharing of Your Information

New York Language Center may share your personal information, with the following:

• Fidelo: student database

The following describes some of the ways that your personal information may be disclosed to third parties:

- We may employ third parties to perform services or functions on our behalf in order to improve our Websites, merchandising, marketing and promotional efforts, communications or other services. Those third parties may include authorized contractors, consultants and other companies working with us. They only have access to personal information needed to perform their functions, and they may not share any personal information with others or use it for any other purpose than providing or improving New York Language Center's services and offerings.
- We may share your information with third parties whom we believe have information of interest to you. In addition, we may share certain non-personal information with third parties for advertising, promotional and other purposes. For example, we may work with third party advertising companies, to serve and track our ads. These third parties may install other cookies. Our advertising partners may use the non-personal information they collect from our Websites, in the aggregate, to help us better market and serve our customers.

This Privacy Notice applies only to the Websites and our student services and does not address the practices of third parties who may collect your personal information. You may visit other websites, through links on the Websites, which may collect, use and share your personal information in accordance with their own privacy policies (for example, when you visit us through social media). The information practices of those websites/apps are not covered by this Privacy Notice, and we encourage you to be very cautious before you disclose your personal information to others. In order to provide you with the information, products or services which you have requested, we may share or transfer your personal information with our parent, affiliates or subsidiaries, or third party agents acting on their behalf.

The New York Language Center Parties may be obligated to cooperate with various law enforcement inquiries. New York Language Center Party reserves the right to disclose or transfer personal information and non-personal information about you and your activities on our Websites in order to comply with a legal requirement or request from law enforcement or other government officials, administrative agencies or third parties as we, in our sole discretion, determine necessary or appropriate for the administration of justice, or in connection with an investigation of fraud, or violations of any other law, rule or regulation, or other rules or policies of our Websites, the rights of third parties, or an investigation of any other activity that may expose us or you to legal liability, or to investigate any suspected conduct which New York Language Center in its sole discretion deems improper.

Where personal information is transferred to a third party in a country outside the UK or European Economic Area (EEA) that is not considered to offer an adequate level of protection for personal information, we conduct a transfer risk assessment and ensure that we have in place a binding contract with them containing the current version of the standard contractual clauses with them. Generally, we use the European Commission Standard Contractual Clauses, supplemented by the UK's International Data Transfer Addendum. We continually monitor this transfer mechanism.

Cookies

We use cookies. Unless you adjust your browser settings to refuse cookies, we (and these third parties) will issue cookies when you interact with New York Language Center. These may be 'session' cookies, meaning they delete themselves when you leave New York Language Center, or 'persistent' cookies which do not delete themselves and help us recognize you when you return so we can provide a tailored service.

You can block cookies by activating a setting on your browser allowing you to refuse the setting of cookies. You can also use our cookie banner to manage your preferences. You can also delete cookies through your browser settings. If you use your browser settings to disable, reject, or block cookies (including essential cookies), certain parts of our website or app will not function fully. In some cases, our website or app may not be accessible at all. Please note that where third parties use cookies we have no control over how those third parties use those cookies.

New York Language Center utilizes Google Analytics for aggregated, anonymized website traffic analysis. In order to track your New York Language Center session usage, New York Language Center places a Google Analytics cookie (_ga) with a randomly-generated ClientID in your browser. This ID is anonymized and contains no identifiable information such as email, phone number, name, etc. New York Language Center uses Google Analytics to track aggregated website behavior, such as what pages you looked at, for how long, etc. This information is important for improving the New York Language Center website user experience and determining New York Language Center's site effectiveness. If you wish to remove Google Analytics from your site experience, you can install the <u>Google Analytics Opt-Out Browser Add-On</u>.

Your privacy choices and rights

To make requests, or if you have a question regarding our privacy practices, please contact our Privacy Office at <u>info@nylanguagecenter.com</u>. ATTN: Privacy Offfice. If you would like to submit

a request you can request that at <u>info@nylanguagecenter.com</u> and allow 10 days for processing and compliance.

- You can choose not to provide us with personal information: If you choose to do this, you can continue to use the website and browse its pages, but we will not be able to process transactions without personal information.
- You can turn off cookies: You can block cookies by activating a setting on your browser allowing you to refuse cookies. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to use the New York Language Center website, but certain services may not work effectively.
- We do not to sell your personal information.
- You can ask us not to use your data for marketing: We will inform you (before collecting your data) if we intend to use your data for marketing and if third parties are involved. You can opt out from marketing by emailing us at <u>info@nylanguagecenter.com</u>.
- You have the right to access information we hold about you: We will provide you with the information within 10 days of your request. We'll tell you if we can't meet your request for any reason. This includes the right to ask us supplementary information about:
 - The categories of data we're processing
 - The purposes of data processing
 - The categories of third parties to whom the data may be disclosed
 - How long the data will be stored (or the criteria used to determine that period)
 - Your other rights regarding our use of your data
- You have the right to make us correct any inaccurate personal information about you.
- You have the right to transfer your data to another service: We will give you a copy of your data in CSV so that you can provide it to another service. If you ask us and it is technically possible, we will directly transfer the data to the other service for you. We will not do so to the extent that this involves disclosing data about any other individual.
- You have the right to be 'forgotten' by us:_You can do this by asking us to erase any personal information we hold about you, if it is no longer necessary for us to hold the data for purposes of your use of New York Language Center.
- You have a right to file a complaint regarding our use of your data: Please tell us first, so we have a chance to address your concerns. You can send your complaint to info@nylanguagecenter.com.

How secure is the data we collect?

We have physical, electronic, and managerial procedures to safeguard and secure the information we collect. We have installed encryption software conforming to the Secure Socket Layers (SSL) protocol to safeguard all of the commerce related (i.e. credit card and billing address) information you send to us. All information is stored on our servers in a secure location. Please remember:

- You provide personal information at your own risk: unfortunately, no data transmission is guaranteed to be 100% secure
- If you believe your privacy has been breached, please contact us at info@nylanguagecenter.com

Where do we store the data?

The personal information we collect is processed at our headquarters in New York, U.S.A. If we transfer or store your information from outside the United States, we take steps required by law to ensure that your privacy rights continue to be protected as outlined in this Privacy Notice. Normally, this involves us conducting a data transfer risk assessment and requiring our suppliers to enter binding contractual commitments with us designed to protect your data.

How long do we store your data?

If we have your contact information for marketing purposes, we will delete your personal information from our systems after two years.

This privacy notice was last updated on October 5th, 2023.