

Effective date: October 17, 2024

PRIVACY POLICY OF NOVAKID INC.

This Privacy Policy (the “**Policy**”) explains how **Novakid Inc.** (registered seat: 548 Market St 8291, San Francisco, CA 94104-5401, USA; hereinafter: “**Novakid**”, “**Company**”, “**we**”, or “**us**”) collects, stores, uses, and discloses personal information from its users (“**you**”, “**user**”) in connection with our educational app (“**App**”) operated and developed by the Company including using the App in a guest mode. The processing and collecting of personal data by Novakid shall be in harmony with the directly applicable data protection laws in effect:

(i) In case of personal data processing, the Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: “**GDPR**”), furthermore the recommendations of the Article 29 Data Protection Working Party (hereinafter: “**WP29**”) and of the European Data Protection Board (hereinafter: “**EDPB**”) shall apply.

(ii) For the collection and processing of personal data of Brazilian individuals, Brazil’s Law No. 13,709, of August 14, 2018 on the Brazilian General Data Protection Act (in Portuguese: Lei Geral de Proteção de Dados, hereinafter: “**LGPD**”) shall apply.

(iii) Furthermore, in respect of Californian individuals Novakid complies with the Senate Bill No. 1121 California Consumer Privacy Act of 2018 (hereinafter: “**CCPA**”).

(iv) For the collection and processing of personal data of individuals residing in other countries, where the personal data regulations are in place and apply to the foreign entities, Novakid is in compliance with those regulations as well.

The Company is the data controller of any data which constitutes personal data, and which is uploaded when using our services.

The Company is bound in honor to protect personal data, especially children’s personal data if any; therefore, the Company will keep confidential the personal data received and take all necessary steps to secure data processing.

Before your child starts using the App developed by Novakid, we want to make sure you understand how Novakid collects and uses your personal information and what rights are available for you in relation to your personal data. Please read and make sure you understand this Policy. If you do not agree with this Policy or our practices, you may not use our App or our services.

1. DEFINITIONS

The following definitions are determined according to the GDPR:

‘personal data’: shall mean any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

‘consent’: shall mean any freely given, specific, informed and unambiguous indication of the will of the Data Subject by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

‘data controller’: shall mean the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by European Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

‘data processing’: shall mean any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

‘data processor’: shall mean a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

‘third party’: shall mean a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

‘personal data breach’: shall mean a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

‘recipient’: shall mean a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with European Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

‘supervisory authority’: shall mean one or more independent public authorities provided by each Member State which is responsible for monitoring the application of the

GDPR in order to protect the fundamental rights and freedoms of natural persons in relation to processing and to facilitate the free flow of personal data within the European Union;

‘supervisory authority concerned’: shall mean a supervisory authority which is concerned by the processing of personal data because: (a) the controller or processor is established on the territory of the Member State of that supervisory authority; (b) data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or (c) a complaint has been lodged with that supervisory authority.

2. WHAT INFORMATION DOES NOVAKID COLLECT?

Novakid may collect information that might be considered as personal data according to applicable laws and regulations. However, Novakid does not collect any unnecessary information.

2.1. We collect information that you provide us voluntarily and directly, such as when you use our App. You will provide us with a nickname, approximate age and password. This information is not required for account creation and does not to be accurate. Nickname and approximate age are solely used to generate the most appropriate learning content.

2.2. When you use our App, we collect information about the use of the App, such as, what types of educational content user views, and how the user engages or interacts with.

2.3. Some data is collected automatically when you use our App, such as device information (e.g. its type, model, operating system, settings and other technical specifications like screen size or processor or any type of combination of this data available from the device); unique device identifier; content consumed; user experience; actions taken in the App; software and hardware information; other information associated with other files stored on your device.

2.4. Novakid does not permit the use of the App directly by children and does not knowingly collect any personal information directly from children under the age of 16 without the consent and at the direction of a parent or legal guardians.

3. HOW DOES NOVAKID USE THE COLLECTED INFORMATION?

3.1. The personal data is used for purposes of providing access to the App and our service, customizing the visualized content, and improving the experience when using the App and our services, developing new features and enhancing the App, and responding to problems relating to our services.

3.2. Whenever Novakid processes data for its legitimate interest, Novakid always keeps your personal data rights in high regard and will take them into account. The users always

have the right to object to this processing. However, objecting against such data processing might affect Novakid's ability to carry out tasks above for the benefit of the user.

3.3. Where it is feasible, we anonymize personal data or use non-identifiable statistical data. We do not collect personal data in advance and store it for potential future purposes unless required or permitted by the applicable laws.

3.4. Data integrity and purpose limitation: Novakid will only collect and retain personal data which is relevant to the purposes for which the data is collected, and we will not use it in a way that is incompatible with such purposes unless such use has been subsequently authorized by you. We will take reasonable steps to ensure that personal data is reliable for its intended use, accurate, complete and current. We may occasionally contact you to determine that your data is still accurate and current.

4. HOW LONG WE RETAIN YOUR PERSONAL DATA?

We will retain your personal data for so long as it is needed to fulfill the purposes outlined in this Policy or until you withdraw your consent, unless a longer retention period is required or permitted by law (such as legal requirements, further for the establishment, exercise or defense of legal claims).

When we have no longer or no legal basis to process your personal information, we will either delete or anonymize it, 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.

5. WILL NOVAKID SHARE ANY OF THE INFORMATION IT RECEIVES?

5.1. Information about our users is an integral part of our business, and we may share such information with our affiliated entities. Except as expressly described below, we neither rent nor sell your information to other people or nonaffiliated companies unless we have your permission.

5.2. Novakid shall not ensure access for a third party to personal data provided by you without your preliminary consent, except the cases, when data transfer is necessary for the performance of the contract or for enforcing of Novakid's legitimate interest or prescribed by law.

5.3. Novakid may share certain personal information with third party vendors in the EU or in third countries that may include:

- Cloud service providers;

- Software development tool and cloud services providers;
- Customer support services providers;
- Learning services providers;
- Professional advisers, including consultants, accountants, auditors, solicitors.

Novakid may also share your information with public authorities, court or government representatives as necessary in accordance with applicable laws and regulations.

We will require that these third parties maintain at least the same technical and organizational measures of data protection and confidentiality. Those third parties will never use your personal information for any other purpose except to provide services in connection with the App and our services.

5.4. We may disclose your personal data to some US companies. We take steps to ensure adequate safeguards are in place to protect your data, that includes implementing the European Commission's Standard Contractual Clauses for transfers of personal data between these third party service providers and partners. Please note, that above mentioned companies comply with the EU-US and the EU-Swiss Privacy Shield Frameworks, therefore transfer of your personal data to the aforementioned service providers was deemed safe until July 16, 2020. Please note that according to the judgment no. C-311/18 of the Court of Justice of the European Union, these companies are no longer considered to provide appropriate safeguards for the personal data of European citizens. For more information, you can read the judgment [here](#).

5.5. We only transfer personal data collected from individuals located within the EU only with the consent of the individuals to a third-party having a registered seat outside the EU / in the USA acting as a data processor without the appropriate safeguards set out in the GDPR, or when it is necessary for the performance of the contract. Novakid will make every effort to ensure that the personal data transferred is safe and secure and that the personal data is processed in a manner consistent with the GDPR.

6. IS INFORMATION ABOUT ME SECURE?

We take commercially reasonable measures to protect all collected information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Please understand that you can help keep your information secure by choosing and protecting your password appropriately, not sharing your password and preventing others from using your mobile. Please understand that no security system is perfect and, as such, we cannot guarantee the security of the App, or that your information won't be intercepted while being

transmitted to us. If we learn of a security systems breach, then we may either post a notice, or attempt to notify you by email and will take reasonable steps to remedy the breach.

7. SOCIAL NETWORK INTEGRATIONS

7.1. In case when you use a third party platform or social network to access the App, this third party may provide your personal data to us if you so allow. These platforms or/and social networks are not controlled by or affiliated with Novakid. Therefore, read their privacy policy and terms of use carefully so that you understand how they use your personal data and what might be shared.

At any time you may make changes to the data that these third parties share with us by changing your settings for these platforms or/and social networks, or stop allowing the App to interact with those platforms or/and social networks.

7.2. At any time, you can withdraw your consent of Novakid collecting from you and can request that we delete the personal information we have collected in connection with you or your child from our records. You can request the deletion of your data by connecting Novakid via email policy@novakidschool.com. Please keep in mind that a request to delete records may lead to blocking of your account which disables the accessibility of the App in the future.

8. YOU PRIVACY RIGHTS

8.1. Access and Retention:

You have the right to obtain confirmation of whether or not we are processing personal data relating to you, have communicated to you such data so that you could verify its accuracy and the lawfulness of the processing and have the data corrected, amended or deleted where it is inaccurate or processed in violation of the GDPR.

We encourage you to contact us at policy@novakidschool.com with your questions or concerns, or to request edits to your personal information, or to have it removed from our database. Requests to access, change or remove any personal data you provided to us will be handled within 30 days.

8.2. Additional Rights for EU Territory:

If you are from the territory of the EU, you may have the right to exercise additional rights available to you under applicable laws, including:

(a) **Right of Erasure:** In certain circumstances, you may have a broader right to erasure of personal information that we hold about you – for example, if it is no longer necessary in relation to the purposes for which it was originally collected. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

(b) **Right to Object to Processing:** You may have the right to request Novakid to stop processing your personal information.

(c) **Right to Restrict Processing:** You may have the right to request that we restrict processing of your personal information in certain circumstances (for example, where you believe that the personal information we hold about you is inaccurate or unlawfully held).

(d) **Right to Data Portability:** In certain circumstances, you may have the right to be provided with your personal information in a structured, machine readable and commonly used format and to request that we transfer the personal information to another data controller without hindrance.

8.3. **Additional Rights for Brazilian individuals**

If you are a Brazilian individual, you have the following rights in addition to the rights described in section 8.1 of this Policy:

(a) **Right of erasure:** If you would exercise this right, we will respond to you immediately, or if that is not possible, we will send a reply to you to indicate the reasons of fact or law that prevents the immediate adoption of the measure. If we are not the data processors of the data you requested the erasure of – whenever possible – we will indicate who the processing agent is.

(b) **Right to be informed:** You have the right to obtain information about what types of processing we carry out on your personal information.

(c) **Right of access:** If you request the providing of your personal data processed by us, we will grant you access to such data in 15 days of your request, if the data requested is more than the simplified request version.

(d) **Nondiscrimination:** We do not process your data for unlawful or abusive discriminatory purposes. In certain circumstances, you have the right to request a review of our data processing and the supervisory authority (the Brazilian National Authority for Protection of Data (hereinafter: “ANPD”)) may carry out an audit to verify discriminatory aspects.

(e) **Data portability:** Your data might be transferred to another service or product supplier in accordance with the regulations of the ANPD and as subjects to commercial and industrial secrets.

You also have the right to complain to the ANPD about our collection and use of your personal data. For more information, please contact the ANPD.

8.4. **Data protection officer**

If you would like to exercise the rights included in section 8 of this Policy, please contact our data protection officer (hereinafter “DPO”) at dpo@novakidschool.com or at 548 Market St 8291, San Francisco, CA 94104, USA. We will consider your request in accordance with applicable laws. To protect your privacy and security, we may take steps to verify your identity before complying with the request.

For any complaints that we can't resolve directly, please contact our European Representative Weiszbart and Partners Law Firm (address: 1052 Budapest, Kristóf tér 3. III. flr., Hungary; e-mail address: weiszbartandpartners@gmail.com).

If you don't agree with our decision, you have the right to an effective judicial remedy or to lodge a complaint to any European Data Protection Authority. You also have the right to complain to the EU Data Protection Authority about our collection and use of your personal data. For more information, please contact your local EU Data Protection Authority. The list of European National Data Protection Authorities can be found [here](#).

9. MODIFICATIONS TO THIS POLICY

If our privacy practices change, we reserve the right to modify this Policy. We will post a modified version at our website. So please review it regularly.

10. FOR THE USERS IN THE UNITED STATES

This section applies to users who are residing in the USA.

10.1. **Disclosure for California residents.** In accordance with The California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act of 2020, effective January 1, 2023 ("CPRA") and some other state privacy laws provide consumers with specific rights regarding their personal information:

- Right to know what information we collect. Right to access;
- Right to delete personal information;
- Right to opt-out of sale or sharing of personal information;
- Right to correct inaccurate personal information;
- Right to limit use and disclosure of sensitive personal information.

10.2. **Disclosure for Virginia residents.** Virginia provides additional rights to Virginia residents through the Virginia Consumer Data Protection Act ("VCDPA"). This section addresses those rights and applies only to Virginia residents acting in an individual or household context. In accordance with the VCDPA, Virginia residents have the following rights: -to confirm whether or not we are processing your personal data and to access such personal data; -to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of yours personal data; -to delete personal data provided by or obtained about you; -to obtain a copy of your personal data previously provided to us in a portable and, to the extent technically feasible, readily usable format; -to opt-out of the processing of the personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

10.3. **Disclosure for Nevada residents.** Nevada law (NRS 603A.340) requires each business to establish a designated request address where Nevada consumers may submit requests directing the business not to sell certain kinds of personal information that the business has collected or will collect about the consumer. A "sale" under Nevada law is the exchange of personal information for monetary consideration by the business to a third party for the third party to license or sell the personal information to other third parties. Please note, that we do not "sell" any part of your personal information. If you are a Nevada

consumer and wish to submit a request relating to our compliance with Nevada law, please contact us via email policy@novakidschool.com

10.4. We will not share any personal data with third parties for their direct marketing purposes to the extent prohibited by applicable legislation. If our practices change, we will do so in accordance with applicable laws and will notify you in advance.

Questions

If you have any questions concerning this Policy, the App or the services, please contact us at policy@novakidschool.com. You can also contact us at our contact office at 548 Market St 8291, San Francisco, CA 94104-5401, USA.