

Young Link Privacy Policy

Effective date: 1st July 2025

Welcome to Young Link (“we”, “us” or “Young Link”). We help educational institutions (“you” and “your”) better understand the behavioural dynamics of students in the class (“students”). This Privacy Policy explains how we collect, use, share and the rights concerning use of your personal data and students personal data when you access or use our websites (including <https://www.younglink.cz/>) (“Websites”), platform (“Platform”) (collectively our “Services”). By accessing our Services, you agree to the collection and use of your personal data in accordance with this Privacy Policy. If you do not agree with this policy, please do not use our Services.

This Privacy Policy is designed to comply with applicable data protection laws, including the California Consumer Privacy Act (the “CCPA”). We strive to meet the highest standards of data protection and ensure transparency in our data processing practices.

- (A) Unless otherwise defined in this Privacy Policy, terms used have the same meaning as in the Terms of Use.
- (B) This Privacy Policy was last modified on the effective date indicated at the top of the Privacy Policy and may be updated to reflect changes in legislation.
- (C) We do not knowingly collect or ask for information from people under the age of 16. If you are such a person, please do not use our service or send us your information. We delete information that we learn is collected from a person under the age of 16 without verified parental consent.

1 Who processes your personal data?

- 1.1 Your personal data are being processed by our company **YoungLink Inc.**, with its registered address at 16192 Coastal HWY, Lewes, Sussex, DE, 19958 (the “Controller”, “we”, “us” or “our”).
- 1.2 To learn more about personal data management or if you have any other questions, you're welcome to contact us.
- 1.3 **This Privacy Policy only covers data collection and processing undertaken by Young Link. The Privacy Policy does not address, nor we are not responsible or directly or indirectly liable for, the privacy practices of your use of the Services.**

2 What is our role under FERPA?

- 2.1 When we provide our Services to schools or educational institutions, Young Link acts as a school official under the Family Educational Rights and Privacy Act (“FERPA”). This means we

process students' personal data on behalf of and under the direct control of the educational institution, and only for legitimate educational purposes as defined by the school.

- 2.2 We do not access, use, or disclose students' personal data for any purpose other than to provide our Services to the school, in accordance with applicable law and our contractual agreement with the school.
- 2.3 When we act as a school official under FERPA, the educational institution remains responsible for determining whether consent is required for the processing of students' personal data. **Any such consent, where applicable, must be obtained by the school or educational institution, not by us.**
- 2.4 If you are a student or a parent/guardian and wish to exercise any data protection rights under FERPA, **please contact your school or educational institution directly.** We will support the school in responding to your request in accordance with FERPA requirements as outlined in this Privacy Policy.

3 What personal data is collected?

We may collect the following types of information about you:

3.1 Personal Data of you

We may collect information that may identify you, provided by you voluntarily when you use our Services. This includes:

- **Personal Identification Information:** When you create an account we may require personal data such as your first name, last name, email address, school and any other information that may identify you that, or you provide when registering or using our services.

3.2 Technical Information of you

We may collect information that alone does not identify you, but when aggregated with other information may identify you, when you use our Services. This includes:

- **Usage Data:** We collect information about how you use our platform, such as the pages you visit, the features you use, the time you spend on our site, and other analytical data.

- **Technical Information:** This includes your IP address, browser type, operating system, device information, and other technical details that help us optimize the platform's performance.
- **Cookies and Tracking Data:** We use cookies and similar technologies to track your activity on our platform and store certain information. This helps us provide a personalized experience and improve our services.

We and/or our authorised external service providers (*as stated in this Privacy Policy*) may automatically collect the above technical data when you visit or interact with our Services.

3.3 Personal Data of students

We may collect information that may identify your students. This information is provided by you on behalf of your class when you use our Services, including:

- **Personal Identification Information:** This includes the students first name, last name, age, sex, class name and identification of legal representative and any other information that may identify the student that you provide when using our services.

3.4 Cookies

3.4.1 We sometimes place small data files called cookies and similar technologies on your device. A cookie is a small text file that the website saves on your device when you visit it. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Permanent cookies last until you or your browser delete them or until they expire.

3.4.2 We use cookies for the following reasons:

- We use our session-based and also permanent functional cookies which enable the Services to remember your actions and preferences (*e.g.*, to remember that you are logged in) so you don't have to keep re-entering them whenever you come back to the website or browse from one page to another.
- We may use analytical cookies for the improvement of our Services. We may collect data such as device data, browsing data and interactions with the Services. You can withdraw to analytical cookies at any time through your browser settings.
- We may use marketing cookies including social pixels, for retargeting you on other websites. You can withdraw your consent to marketing cookies at any

time through your browser settings.

- Our Services and the communications generated from using our Services, such as promotional emails, may contain electronic images known as “web beacons”. Web beacons generally work in conjunction with cookies, and we may use them in the same way we use cookies.

3.4.3 How to control cookies?

- We inform you about the use of cookies on your device when you visit our website for the first time and, if applicable, we ask for your consent to use the cookies. The cookies will not be used for any purposes other than the ones stated above. Later, you may choose to accept or refuse cookies by selecting the appropriate settings in your browser.
- As mentioned above, in some cases we also may use cookies provided by third-parties (service providers). The list of such third-parties cookies of which you might encounter through our service is listed below. We are not responsible for third-party sites and their privacy practices. These companies collect and use this information under their own privacy policies and are responsible for their practices concerning cookies.

4 What are the purposes and legal basis for processing your personal data and students personal data?

4.1 We process your personal data personal data in order to:

4.1.1 carry out the agreement existing between us based on your decision to use our Service

This purpose includes mainly the following processing activities:

- creating and providing your account from personal data you provide upon registration;
- informing you about updates of our Service;
- notifying you about updates of our Terms of Use and this Privacy Policy;
- responding to you in relation to any queries you may have with respect to our Services;
- resolving potential agreement-related troubleshooting problems and disputes.

We process the email address, payment information and other data provided by you voluntarily when you use our Service.

4.1.2 market our Services

We may market current or future Services to You if you subscribe to our marketing or consent to marketing cookies, as described above.

You can stop direct marketing communications from us by:

- adjusting your preferences within the Platform; or
- withdrawing your consent through **contacting us**.

4.1.3 improve our Services

We use deidentified personal information and platform outputs:

- to influence current and future features;
- to prevent and detect security flaws and user interface issues.
- to improve the models that power our Services. We will not share or display your platform data to any other user.

4.2 We process students personal data personal data in order to:

4.2.1 provide our service

We use anonymised personal information and platform inputs to analyse the behaviour of students and assign them to a category based on our insights. This may be determined as profiling in some states.

We only collect and process student data in this way on receiving consent from the student (if over 16 years old) or the parent.

Students or the student's parent can opt out by:

- withdrawing your consent through **contacting the school using the service**.

4.2.2 improve our Services

We use deidentified personal information and platform outputs:

- to influence current and future features;
- to prevent and detect security flaws and user interface issues.
- to improve the models that power our Services. We will not share or display students' platform data with any other user.

5 Who are recipients of your personal data and students' personal data?

- 5.1 We only share personal data within the organisation of Young Link and the group of companies into which the Young Link belongs, unless one of the following circumstances applies.

5.1.1 it is necessary for the performance and improvement of our Services.

To the extent that our external service providers (sub-processors) need access to your personal data to help us perform our Services for you, we have taken the appropriate contractual and organisational measures to ensure that your personal data are processed in accordance with all applicable laws and regulations.

When indicated, providers will only receive your technical data upon your consent.

Below is a non-exclusive list of our sub-processors:

- Google Analytics (Google LLC., United States)
- Microsoft Azure (Microsoft Corporation., United States)
- AWS (Amazon Web Services, Inc., United States)
- Hubspot (HubSpot, Inc., United States)

The list of external service providers we use may change from time to time as we change or remove some of the providers listed above and/or put in place other providers to assist us in providing the Services. All sub-processors are required to enter into data processing agreements with us. These agreements stipulate that the subprocessors must adhere to strict data protection and confidentiality obligations in line with relevant data protection laws.

It is necessary for legal reasons

We may share your personal data with recipients outside the Controller if we have a good-faith belief that access to and use of your personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, properties or safety of the Controller, our users or the public as far as in accordance with the law. When possible, we will inform you about such processing.

6 International transfers of data

- 6.1 If we are involved in a merger, acquisition or other reorganisation, your information may be transferred as part of that deal. We will notify you (for example, via a message to the email address associated with your account) of any such deal and outline your choices in that event.

7 What is the storage period?

- 7.1 We store your personal data for as long as necessary to fulfill the purposes for which it was collected. This includes complying with legal, accounting, or reporting obligations. The

specific retention periods depend on the type of data and the purposes for which we process it.

8 What are your rights?

- 8.1 **Right of access** - The Controller offers you access to your personal data we process. This means you can contact us and request from us a confirmation whether or not your personal data are being processed and if so, you have the right to request access to your data, which we will provide to you in the form of a so-called "registry" (stating, in particular, purposes, categories of personal data, categories of recipients of personal data, storage periods or criteria for determining storage periods).
- 8.2 **Right to rectification** - You have the right to have inaccurate personal data we have stored about you rectified.
- 8.3 **Right to erasure** - You may also ask us to erase your personal data from our systems. We will comply with such requests unless we have a legitimate ground to not delete your personal data.
- 8.4 **Right to restriction of processing** - You may request us to restrict certain processing of your personal data. If you restrict certain processing of your personal data, this may lead to fewer possibilities to use our Services and website.
- 8.5 **Right to data portability** - You have the right to receive your personal data from us in a structured, commonly used and machine-readable format in order to transmit the personal data to another controller.
- 8.6 **How to use your rights** - You may exercise your rights above, free of charge, by contacting us. We may require confirmation of your identity depending on your request.

9 What are students' rights?

- 9.1 Students (and, where applicable under law, their parents/guardians) are entitled to the same rights described in this Privacy Policy.
- 9.2 If you are a student or a parent/guardian and wish to exercise any data protection rights, please contact your school or educational institution directly. We will support the school in responding to your request in accordance as outlined in this Privacy Policy.

10 May you complain?

- 10.1 In case you consider our processing activities of your personal data to be inconsistent with the applicable data protection laws, you may lodge a complaint with the local supervisory authority for data protection.

11 How is your data secured?

- 11.1 We take all reasonable, appropriate security measures to protect the Controller and our customers from unauthorised access to or unauthorised alteration, disclosure or destruction of personal data we hold. Measures include, where appropriate, encryption, firewalls, secure facilities, access rights systems, and following privacy-by-design practices such as data minimization and anonymization.
- 11.2 Should a security breach occur that is likely to have negative effects to your privacy, we will inform you about the breach as soon as reasonably possible. If you have any questions, feel free to contact us.

12 CCPA Notice

- 12.1 If you are a resident of California, under the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws this Section applies to your use of the Services.
- 12.2 For purposes of this Section, the terms “Business,” “Business Purpose,” “Commercial Purpose,” “Consumer,” “Personal Information,” “Processing,” “Sell,” “Service Provider,” “Share,” and “Verifiable Consumer Request” shall have the meanings outlined in the CCPA. All references to “Personal Data,” “Controller,” “Processor,” and “Data Subject” in this Section shall be deemed to be references to “Personal Information,” “Business,” “Service Provider,” and “Consumer,” respectively, as defined in the CCPA.
- 12.3 The Parties Agree agree that Company is a Service Provider for the purposes of the CCPA (to the extent it applies) and Company is receiving Personal Information from you in order to provide the Services pursuant to the Agreement, which constitutes a Business Purpose.
- 12.4 You shall disclose Personal Information to Company only for the limited and specified purposes described in this Policy.
- 12.5 Company shall not Sell or Share Personal Information provided by you under the Agreement.
- 12.6 Company shall notify you if it makes a determination that it can no longer meet its obligations under the CCPA.
- 12.7 Company shall comply with all obligations applicable to Service Providers under the CCPA, including by providing Personal Information provided by Customer under the Agreement the level of privacy protection required by CCPA.
- 12.8 You have the rights in this Privacy Policy in addition not to be discriminated against for exercising these rights. You may exercise any of these rights by contacting us.

13 Contacting Us

- 13.1 If you have any questions or concerns about this Privacy Policy or our data protection practices, please contact us at:
- Name:
 - Email: info@younglink.cz

- Mailing Address: YoungLink sro, Roháčova 946/49, 397 01, Písek