

## **Privacy Policy Statement of YuJa**

YuJa Inc. is committed to protecting your privacy. References to “we”, “us”, “our” and “YuJa” in this document shall mean YuJa Inc., a Delaware corporation. This privacy policy document (“Privacy Policy”) applies to all the products, services and websites owned by YuJa, its subsidiaries and affiliated companies (collectively referred to as “Services”). References to “you”, “your”, “user” in this document shall mean a user of YuJa Services.

YuJa Privacy Policy is an integral part of terms and conditions for use of YuJa Services.

If you are using YuJa Services on behalf of your employer, or educational institution, this Privacy Policy does not supersede terms of any agreements between YuJa and any other party. It also does not alter terms of any agreement that you may have with your employer or educational institution.

### **Personal Information:**

Any personal information, e.g., name, address, telephone number, academic information and credit cards, (“Personal information”) that you provide to YuJa is used to provide you with more personalized educational services and experience. YuJa will not sell, trade, loan or rent your Personal information to any third party. We will only use the Personal information to (a) understand and meet your product needs and preferences (b) develop new services and product offerings (c) enhance existing service and product offerings (d) manage our day-to-day business and internal operations, (e) meet legal and regulatory requirements in the jurisdictions in which we operate.

To be able to serve you, Personal information may be collected, stored, or processed on our behalf by highly trusted third-party service providers. Except where we are required by law to disclose information, we require any agent organization or person acting on our behalf to agree to comply with our Privacy Policy.

### **Changes to Privacy Policy:**

YuJa may occasionally update this Privacy Policy to reflect institution and customer feedback. Changes may also be made in accordance with privacy legislation in the jurisdictions in which we operate. We encourage you to periodically review this Privacy Policy.

### **Use of Cookies:**

In order to improve Services of YuJa, we may use ‘Cookies’. In this context, “Cookies” refers to pieces of data that your internet web browser stores on your computer when you visit a website. We may use Cookies to provide us information on how you use our products and services to better our Services. If you do not like the use of Cookies, you may set your browser to not accept Cookies, however, by doing so you may not be able access some of the Services.

**Content Collected during the Course of Providing Services to Educational Institutions (“Content”):**

YuJa collects certain personal data from users during the course of providing our Services. We consider such data as strictly confidential and generally use this data only for providing and improving Services. Our collection, sharing and use of Content is governed by our agreements with educational institutions or corporations and applicable federal, state and international laws. In the U.S., we adhere to the provisions of the Family Educational Rights and Privacy Act (FERPA), and applicable state and federal laws.

**Security:**

YuJa maintains reasonable technical, administrative, and physical processes to safeguard the information that is stored on servers that are located in the jurisdictions where we operate. The information may be protected by use of encryption, firewalls, logical and physical access controls. If you have any concerns or questions regarding this contact us at the address given below.

**Personal Information from Children:**

YuJa does not knowingly collect personal information from children without the consent of a parent, concerned school, or educational institution. Please contact [Company.Counsel@yuja.com](mailto:Company.Counsel@yuja.com) if you believe we have inadvertently collected information about any children under 13, so that we can delete such information as soon as possible.

**Privacy Shield**

YuJa complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information transferred from European Union and Switzerland to the United States, respectively. YuJa has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/list>.

In compliance with the EU-US and Swiss-US Privacy Shield Principles, YuJa commits to resolve complaints about your privacy and our collection or use of your personal information. YuJa acknowledges the right of EU and Swiss individuals to access their data. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact YuJa at:

Company Counsel

YuJa Inc. | 2168 Ringwood Ave. | San Jose, CA 95131

Email: [Company.Counsel@yuja.com](mailto:Company.Counsel@yuja.com)

YuJa has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacyshield/for-eu-consumers> for more information and to file a complaint. Please note that if your complaint is not resolved through any of the above channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

If your complaint is not satisfactorily addressed, and your inquiry or complaint involves human resource data, you may have your complaint considered by an independent recourse mechanism: for EU/EEA Data Subjects, a panel established by the EU data protection authorities (“DPA Panel”), and for Swiss Data Subjects, the Swiss Federal Data Protection and Information Commissioner (“FDPIC”). To do so, you should contact the state or national data protection or labor authority in the jurisdiction where you work. YuJa agrees to cooperate with the relevant national DPAs and to comply with the decisions of the DPA Panel and the FDPIC. YuJa’s Privacy Shield compliance is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

**Contact YuJa:**

YuJa welcomes your comments regarding this Privacy Policy. If you believe we have not adhered to this Privacy Policy, please contact us at [Company.Counsel@yuja.com](mailto:Company.Counsel@yuja.com). We will make reasonable efforts to address any concerns you may have.

YuJa can also be contacted at the following mailing address:

Attention: Company Counsel  
YuJa Inc.  
2168 Ringwood Ave.  
San Jose, CA 95131

This document was last updated on April 6, 2018.