

SHANGHAI COMMUNITY INTERNATIONAL SCHOOL PRIVACY POLICY

We take your privacy seriously.

We at Shanghai Community International School ("SCIS," "we," "us," "our") know that our users ("you," "your") care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. By visiting or using the www.scis-china.org website and domain name, and any other linked pages, features, content, mobile applications, or any other services we offer from time to time by in connection therewith (collectively, the "Website"), you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

I. WHAT DOES THIS PRIVACY POLICY COVER?

In general, you can browse the SCIS website without telling us who you are or revealing any personal information about yourself. The only information we gather during general browsing is from standard server logs. These include your IP (Internet Protocol) address, domain name, browser type, operating system, and information such as the web site that referred you to us, the files you download, the pages you visit, and the dates/times of those visits. These will not specifically identify you. The information will be used internally only for Web site traffic analysis. The purpose of this data collection is so that SCIS can better understand the preferences of its visitors and improve its site and services. This information is never connected with any personal information you supply to us if you register on our website.

This Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Website. This policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for any Services. If you are under 13, please do not attempt to register for any Services or send any information about yourself to us, including your name, address, telephone number, or email address. No one under age 13 may provide any personal information to us or on the Services. In the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that

we might have any information from or about a child under 13, please contact us at <u>communications@scis-china.org</u>.

II. WHAT INFORMATION DOES SCIS COLLECT?

We gather various types of Personal Information from our users, as explained more fully below. We may use this Personal Information to personalize and improve our services, to allow our users to set up a user account and profile, to contact users, to fulfill your requests for certain products and services, to analyze how users utilize the Website, and as otherwise set forth in this Privacy Policy. We may share certain types of Personal Information with third parties (described in this Section and in Section III below). We collect the following types of information:

A. Information You Provide to Us

 We receive and store any information you knowingly provide to us. For example, we collect Personal Information such as your name, email address, browser information, and third-party account credentials (for example, your log-in credentials for Facebook or other third-party sites). If you provide your third-party account credentials to us, you understand some content and/or information in those accounts ("Third Party Account Information") may be transmitted into your account with us if you authorize such transmissions, and that Third Party Account Information transmitted to our Website is covered by this Privacy Policy. You can choose not to provide us with certain information, but then you may not be able to register with us or to take advantage of some of our features. We may anonymize your Personal Information so that you cannot be individually identified and provide that information to our partners.

B. Information Collected Automatically

• Whenever you interact with our Website, we automatically receive and record information on our server logs from your browser including your IP address, "cookie" information, and the page you requested. "Cookies" are identifiers we transfer to your computer or mobile device that allow us to recognize your browser or mobile device and tell us how and when pages in our Website are visited and by how many people. You may be able to change the preferences on your browser or mobile device to prevent or limit your computer or device's acceptance of cookies, but this may prevent you from taking advantage of some of our Website's features.

- When we collect usage information (such as the numbers and frequency of visitors to the Website), we may also provide this aggregate information to our partners; our partners may use such information to understand how often and in what ways people use our Website, so that they, too, can provide you with an optimal experience. We never disclose aggregate information to a partner in a manner that would identify you personally.
- C. E-mail and Other Communications
 - We may contact you, by email or other means; for example, we may communicate with you about your use of the Website. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make emails more interesting and improve our service. If you do not want to receive email or other mail from us, please indicate your preferences by contacting <u>communications@scis-china.org</u>.

SCIS may use cookies to collect, store and sometimes track information for statistical purposes, to improve the products and services we provide, or to save your settings and to provide customizable and personalized services. These cookies do not enable third parties to access any of your personally identifiable information.

We use a tool called "Google Analytics" to collect information about your use of the Site.

We do not combine the information collected through Google Analytics with information that you provide us. Google Analytics uses a cookie to generate information about how you use the Site. You can learn about how Google uses that information by referring to the <u>Google Analytics Terms of Service</u> and the <u>Google Privacy Policy</u>.

III. WILL SCIS SHARE ANY OF THE PERSONAL INFORMATION IT RECEIVES?

We neither rent nor sell your Personal Information in personally identifiable form to anyone. We may share your Personal Information in personally identifiable form with third parties as described below.

A. Agents: We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

- B. User Profiles and Submissions: Certain user profile information, including without limitation a user's name, location, and any video or image content that such user has uploaded to the Website, may be displayed to other users to facilitate user interaction within the Website or address your request for Company's services. Any content you upload to your public user profile, along with any Personal Information or content that you voluntarily disclose online in a manner other user can view (on discussion boards, in messages and chat areas, etc.) becomes publicly available, and can be collected and used by others. Your username may also be displayed to other users if and when you send messages or comments or upload images or videos through the Website and other users can contact you through messages and comments. Additionally, if you sign into the Website through a third-party social networking site or service, your list of "friends" from that site or service may be automatically imported to the Website, and such "friends," if they are also registered users of the Website, may be able to access certain non-public information you have entered in your Website user profile. Again, we do not control the policies and practices of any other third-party site or service.
- C. Business Transfers: SCIS may choose to buy or sell assets. In these types of transactions, user information is typically one of the business assets that is transferred. This holds true if we are acquired, partner, or are in arrears and the sale of all assets is part of any required acquisition by a third party.
- D. Protection of SCIS and Others: We may release Personal Information when we believe in good faith that release is necessary to comply with law or court order; enforce or apply our conditions of use and other agreements; or protect the rights, property, or safety of SCIS, our employees, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.
- E. With Your Consent: Except as set forth above, you will be notified when your Personal Information may be shared with third parties and will be able to prevent the sharing of this information.

IV. IS PERSONAL INFORMATION ABOUT ME SECURE?

Your personal information is protected by a password for your privacy and security. If you access a third-party site or service, you may have additional or different sign-on protections via that third-party site or service. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-on mechanisms appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

www.scis-china.org



We endeavor to protect the privacy of your Personal Information we hold in our records, but we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

The Website may contain links to other sites. We are not responsible for the privacy policies and/or practices on other sites. When following a link to another site you should read that site's privacy policy.

V. HOW CAN I CHANGE MY PERSONAL INFORMATION?

You can update the information you have provided us, such as email address, can be updated by emailing <u>communications@scis-china.org</u>.

VI. WHAT CHOICES DO I HAVE?

- You can always opt not to disclose information to use, but keep in mind some information may be needed to register with us or to take advantage of some of our special features.
- You may be able to add, update, or delete information as explained in Section V above. When you update information, however, we may maintain a copy of the unrevised information in our records. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.
- If you do not wish to receive email or other mail from us, please email <u>communications@scis-china.org</u>. Please note that if you do not want to receive legal notices from us, such as this Privacy Policy, those legal notices will still govern your use of the Website, and you are responsible for reviewing such legal notices for changes.

VII. CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we use Personal Information, we will notify you by posting an announcement on our Website or sending you an email. You are bound by any changes to the Privacy Policy when you use the Website after such changes have been first posted. The effective date of this Privacy Statement is January 29, 2020

VIII. Data Privacy

Shanghai Community International School (SCIS), situated in Shanghai, People's Republic of China, is committed to upholding the principles of data privacy and protection as mandated by Chinese laws and regulations. This data privacy policy serves as an essential component of our handbook, outlining our legal obligations and commitment to safeguarding personal data. The school collects and processes personal information for legitimate educational, administrative, and support purposes. All data handling is conducted in strict compliance with Chinese data protection laws. This data privacy policy underscores our dedication to maintaining a secure and compliant learning environment within the legal framework of the People's Republic of China.

IX. QUESTIONS OR CONCERNS

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to <u>communications@scis-china.org</u>. We will make every effort to resolve your concerns.