

Privacy Policy

Updated and effective date: October 12, 2020

Naturalsoft Ltd ("us", "we", or "our") operates the www.naturalreaders.com website (the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from www.naturalreaders.com

Definitions

Service

Service is the www.naturalreaders.com website operated by Naturalsoft Ltd.

Personal Data

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies

Cookies are small pieces of data stored on your device (computer or mobile device).

Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processors (or Service Providers)

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User)

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

Email address

First name and last name

Phone number

Address, State, Province, ZIP/Postal code, City

Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

Usage Data

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

Session Cookies. We use Session Cookies to operate our Service.

Preference Cookies. We use Preference Cookies to remember your preferences and various settings.

Security Cookies. We use Security Cookies for security purposes.

Use of Data

Naturalsoft Ltd uses the collected data for various purposes:

To provide and maintain our Service

To notify you about changes to our Service

To allow you to participate in interactive features of our Service when you choose to do so

To provide customer support

To gather analysis or valuable information so that we can improve our Service

To monitor the performance of our API Service to identify problems

To detect, prevent and address technical issues

To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

Legal Basis for Processing Personal Data Under General Data Protection Regulation(GDPR)

If you are from the European Economic Area (EEA), Naturalsoft Ltd legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Naturalsoft Ltd may process your Personal Data because:

- We need to perform a contract with you

- You have given us permission to do so

- The processing is in our legitimate interests and it's not overridden by your rights

- For payment processing purposes

- To comply with the law

Retention of Data

Naturalsoft Ltd will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Naturalsoft Ltd will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Transfer of Data

Your information, including Personal Data, may be transferred to —and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Canada or the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to Canada and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Naturalsoft Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of Data

Legal Requirements

Naturalsoft Ltd may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation

- To protect and defend the rights or property of Naturalsoft Ltd To prevent or investigate possible wrongdoing in connection with the Service

- To protect the personal safety of users of the Service or the public

- To protect against legal liability

Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Naturalsoft Ltd aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.

The right to object. You have the right to object to our processing of your Personal Data.

The right of restriction. You have the right to request that we restrict the processing of your personal information.

The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

The right to withdraw consent. You also have the right to withdraw your consent at any time where Naturalsoft Ltd relied on

your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents Google Analytics

JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page:

<https://policies.google.com/privacy?hl=en>

Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processor we work with is:

Stripe

Their Privacy Policy can be viewed at

<https://stripe.com/us/privacy>

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

What information do we collect from student children or minors?

We don't collect any personally identifiable information (the term "personally identifiable information" uses the definition provided in FERPA).

We only collect the minimal amount of information from students necessary to create accounts on our Service: a unique email, a password, and a unique code they have been given by their teacher (the subscription owner) to join a class account. Beyond this information, students can submit files, audio, or images depending on the activities.

We use Google Analytics to track and monitor use of the Service.

How do we use the information?

We will not require children to provide more personal information than is reasonably necessary in order to participate in the Service.

The children's personal information is never sold or rented to anyone, including marketers or advertisers.

If we discover that we have collected information from a child in a manner inconsistent with COPPA, FERPA or any other applicable laws or regulations, we will take appropriate steps to delete the information.

What children's information is visible to others?

No student's information is made available or visible to the public, or to any other student accounts and users, through our product.

How long do we keep children's information?

We only keep a child's personal information for as long as his or her student account is active, unless we are required by law to retain it:

Consistent with the requirements of FERPA and COPPA in the United States and of GDPR in Europe, among other applicable laws, we only collect, use, and retain student minimum information for purposes for which they were authorized to use our product.

Deleting a user account: If a student's account is deleted, all the account information will be destroyed at the same time.

Automatically deleting user documents: All documents uploaded by the student account will be deleted automatically one year after it is uploaded.

Parental Choices

Any parent or guardian that wants copies of their children's personal information that we may have stored can log into the student account in the Service, or contact us by email at support@naturalreaders.com.

New York Ed. Law 2-D Compliance

In compliance with the requirements set forth in New York Education Law § 2-D:

We don't collect any personally identifiable information (PII), PII, as defined by Education Law § 2-d and the Family Educational Rights and Privacy Act ("FERPA"), including direct identifiers such as a student's name or identification number, parent's name, or address; and indirect identifiers such as a student's date of birth, which when linked to or

combined with other information can be used to distinguish or trace a student's identity.

Internal access to education records are limited to individuals that are determined to have legitimate educational interests

Students' information will not be sold or released for any Commercial or Marketing purposes

Safeguards associated with industry standards and best practices including, but not limited to, encryption, firewalls and password protection are used when student information is stored or transferred

We will notify the educational agency, in the most expedient way possible and without unreasonable delay, of any breach of security resulting in an unauthorized release of student, teacher or principal data, as outlined in applicable State and Federal laws.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

By email: sales@naturalreaders.com