

Privacy Policy

Updated: January 14, 2022

This privacy policy (the “**Privacy Policy**”) is designed to provide users (“**you**”) of our online learning platform and service (the “**UClass**” or “**Service**”) with clear information relating to how Youdao (Hong Kong) Limited and its affiliates (“**Youdao**” or “**We**”) process your personal data or personal information (“**Personal Information**”). In general, We only collect, share, and otherwise process Personal Information in order to provide users with our products.

In this Privacy Policy, you will find the following information:

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1. What is Personal Information and who is the provider and controller?

What is Personal Information?

Personal Information refers to any information that could identify you either 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.

Who is the service provider?

A service provider is a for-profit legal entity that processes personal information on behalf of a business pursuant to a written contract for a business purpose. The types of service providers to whom we entrust personal information include service providers for: IT and related services; the provision of information and services you have requested; payment processing; customer service activities; and the provision of the Business Services, such as Alibaba Cloud, Firebase, Google, Facebook, Apple, China Unicom, China Mobile, China Telecom, Stripe, Paypal.

Who is the controller?

A controller is the entity that determines how and why Personal Information are processed. For the processing activities described in the Privacy Policy, Youdao acts as the controller.

2. Who are We?

Youdao (Hong Kong) Limited is a Hong Kong company established at 1/F XIU PING COMM BLDG 104, JERVOIS ST SHEUNG WAN, HK and registered under number 2407111. For UClass, We has appointed a Data Protection Officer whom you can contact at contact@uclass.net for all matters relating to personal data, including in particular the exercise of your rights in relation to UClass's processing of your data.

3. What Personal Information Do We collect from you?

Personal information that you may provide to us, that Students may provide to us, that Parents may provide to us about Students, through the Service or otherwise, or that We may automatically collect, when you use the UClass service, includes:

- **Account Information**, provided when a Parent creates an account on our Services. When creating an account, we may request certain information, such as username and password, (we may obtain this information when a Parent choose to register or log-in via a third-party platform, e.g., Facebook, Google). Refusal to provide part or all of such information may result in the inability to use the Services.
- **Device Information**: We automatically collect information about the device you use to access the UClass, such as your computer's IP address.
- **Contact Information**, such as email, phone number, name and address that you may provide.
- **Student Data**, that Parents provide about Students to register them for our Service, such as Student's name or age. We will not make this information publicly available on our website.
- **Student Performance Data**, when Students use our Service, we may record and store their progress and performance ("**Student Performance Data**"). We use this data in order to provide our Service and to analyze and improve our Service.
- **User-Generated Information**, the information uploaded, provided, or created by users while using the Service.
- **Payment Information**, such as parents' credit card information, billing address, bank account number as well as any other information necessarily required when parents make a purchase.
- **Marketing Information**, such as your preferences for receiving communications about our activities, events, and publications, and details about how you engage with our communications. Where required under applicable law, We will obtain your separate consent for sending you marketing information.
- **Publicly-available Information**, including comments describing support for and experience with our websites or mobile applications (if any) and information that parents or others publish on social media, testimonials, blogs or other forums, such as tweets, comments, photographs, or video or audio content.
- **Feedback or Correspondence**, such as when you contact us so that We can provide customer support.
- **Other Information** that We may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

In some cases, We will also collect Personal Information about you indirectly from other sources.

We may, with users' consent where required under applicable law collect and use personal information obtained from third party platforms such as Facebook, Google, Amazon, WeChat and other accounts you use to interact with us ("Third-Party Accounts"), such as parents' name, user name or profile picture, friend list and other details parents may have on your Third-Party Account profile ("Third-Party Information"). We may also obtain parents' personal information from other third parties, such as marketing partners, and publicly available sources.

If parents choose to login to the Services via a third-party platform or social media network, or otherwise connect your account on the third-party platform or network to your account through the Services, we may collect information from that platform or network. For example, this information may include your Facebook username, user ID, profile picture, cover photo, and networks to which parents belong (e.g., school, workplace). Parents may also have the opportunity to provide us with additional information via the third-party platform or network, such as a list of parents' friends or connections and email address.

We do not have access to your Third-Party Account passwords. The data we receive from Third-Party Accounts is dependent upon your privacy settings with these third parties. You should always review, and if necessary, adjust your privacy settings on Third-Party Accounts before linking or connecting them to our Services. We use Third- Party Information to operate, maintain, and provide to you the features and functionality of the Services, to process and ship orders including textbooks, to provide customer Services, and to communicate directly with you, such as to send you information about your orders, product sales, special offers, and new features of the Services. Where required under applicable law, we will obtain your consent before sending you information relating to special offers and product sales.

The personal information we collect is subject to this Privacy Policy. The information collected and stored by a third party remains subject to the third party's privacy practices, including whether the third party continues to share information with us, the types of information shared, and your choices with regard to what is visible to others on that third party website and service. The third party may allow you to remove the application or feature, in which case we will no longer collect information about you through the application or feature, but we may retain the information previously collected in compliance with all applicable laws.

4. Why and how do We use your Personal Information?

We only use Personal Information collected through the UClass for the purposes outlined below:

- **Provide the UClass Service:** We use your Personal Information in order to provide you with the UClass and any online learning services that you request.
- **Communicate with You:** We rely on your prior consent, where required by applicable law, in order to use your Personal Information to send you marketing communications, promote our products and services, and invite you to events.
- **For Research and Development:** We may analyze your use of the Services to analyze and improve the Services and to develop new functions and/or Services, including by studying user interactions and use of the Services.
- **Legal Reasons:** We may use your Personal Information to comply with applicable law, respond to valid legal process, investigate or participate in civil discovery, litigation, or other adversarial legal proceedings, or investigate potential violations of or enforce our [Terms of Service].

- **With your consent:** In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

5. Who do We share your Personal Information with?

For the purposes referred to under this Privacy Policy, We may share your Personal Information with certain recipients. Such recipients will either act as another controller or as processor acting on behalf and upon our instructions.

The processors which We may share your Personal Information with are the following:

- **Our Affiliates:** We may share Personal Information with our affiliates for the purpose consistent with this Privacy Policy.
- **Third Party Service Providers:** We may share Personal Information with third party service providers for the purpose of: IT and related services; the provision of information and services you have requested; payment processing; customer service activities; and the provision of the Business Services (i.e., Alibaba Cloud, Firebase, Google, Facebook, Apple, China Unicom, Chine Mobile, China Telecom, Stripe, Paypal).
- **Legal Purposes:** We may disclose your Personal Information to any person or authority to comply with applicable law, respond to valid legal process, investigate or participate in civil discovery, litigation, or other adversarial legal proceedings, or investigate potential violations of or enforce our [Terms of Service].
- **With Consent:** We may communicate your Personal Information to any other person subject to your prior consent.

We do not sell your Personal Information to third parties.

6. How long do We retain your Personal Information?

We retain your Personal Information for no longer than necessary for the purposes identified under this Privacy Policy.

With respect to the services provided to our customers, We will keep your Personal Information during the period of our contractual relationship, extended by the applicable limitation period. With regard to marketing communications with prospects, We will keep your Personal Information for *three (3) years* after the last correspondence with Us.

With respect to the processing carried out in order to protect our rights, property and security as well as the one of our customers, Youdao will keep your Personal Information for the time of the relevant dispute or statute limitation period.

As to the processing carried out in order to comply with a legal obligation, We will keep your Personal Information for the duration of such obligation.

Upon expiry of the applicable data retention period, We undertake to erase or irrevocably anonymize the relevant Personal Information.

7. European Data Protection Specific Information

Data Subjects Rights

If you are in the European Economic Area (“EEA”), Switzerland, or the United Kingdom (“UK”), You have various rights in relation to the processing of your Personal Information:

- **Access** to Personal Information processed concerning you;
- **Correct** inaccurate Personal Information;
- **Delete** any Personal Information concerning you;
- **Restrict processing**;
- Receive your Personal Information provided to us in an interoperable format (**data portability**);
- **Object** to the processing on grounds relating to your particular situation.

In order to exercise any of your rights, or if you have any other questions about our use of your Personal Information, please send a request at the contact details specified at the end of this Privacy Policy. Please note that We may request you to provide us with additional information in order to confirm your identity and ensure that you are entitled to access the relevant Personal Information.

In any case, you also have the right to lodge a complaint with the competent data protection authority.

Legal Bases for Processing

We rely on the following legal bases when we process Personal Information about individuals in the EEA, Switzerland, or the UK.

- **Contractual Necessity:** We process Personal Information for the management of our relationship on the basis of the contract between Youdao and you in order to provide you with the UClass and any online learning services that you request, send you communications related to your purchase, manage our relationship and carry out any related administration, etc.
- **Consent:** We rely on your prior consent, to send you marketing communications to promote our products and services, and invite you to events, and to store cookies on your device as described in the section specific to cookies. In this regard, please note that you have the right to withdraw your consent at any time (without calling into question the processing previously carried out) by sending a request at the contact details specified at the end of this Privacy Policy.
- **Legal Obligations:** We process Personal Information to comply with the legal obligations to which We are subject.
- **Legitimate interests, unless overridden by your interests or fundamental rights and freedoms:** We process Personal Information based on our legitimate interests which consist in: (i) complying with non-EU laws and responding to requests from, and other communications with, competent public, governmental, judicial or other regulatory authorities; (ii) meeting our corporate and social responsibility commitments; and (iii) protecting our rights, property or security and the one of our clients. In this respect, please note that you have the right to be informed about how We have assessed that it is in our legitimate interest to collect your Personal Information for these purposes by sending a request at the contact details specified at the end of this Privacy Policy.

International Data Transfers

As We are located in Hong Kong, your Personal Information needs to be transferred to Hong Kong for the purposes referred to under this Privacy Policy.

We rely on certain affiliates and service providers for the purpose of providing our services, which are also located out of the European Economic Area (“EEA”), and this may therefore imply transfers of your Personal Information outside of the EEA, in the United States, Hong Kong, mainland China or other countries/regions may be.

Nevertheless, We will take all steps reasonably necessary to ensure the secure processing of any personal data in accordance with this Privacy Policy. Such transfers are carried out in accordance with appropriate safeguards. In these cases, we will ensure that your personal information is adequately protected in accordance with this Policy as well as laws and regulations.

8. California Privacy Rights

California Consumer Privacy Act

The California Consumer Privacy Act of 2018 (CCPA) provides California residents the right to request:

- **Disclosure of our practices:** The categories of Personal Information we collect, the categories of sources from which the Personal Information is collected, our purpose(s) for collecting the Personal Information, and the categories of third parties with whom we have shared Personal Information.
- **Access** to specific pieces of your Personal Information we have collected.
- **Deletion** of any of your Personal Information we have collected.
- **Opt out of “sale”:** That your Personal Information not be sold to third parties. As noted above, We do not sell Personal Information to third parties.

As required by the CCPA, we will not discriminate against you for exercising any of these rights.

You may exercise your rights by sending a request at the contact details specified at the end of this Privacy Policy. We will acknowledge receipt of your request within 10 business days, and provide a substantive response or notify you of the reason and extension period within 45 days. Under the CCPA, only you or an authorized agent may make a request related to your Personal Information. We must verify your identity to respond to certain requests. We may do so by requiring you to log into your Youdao account, provide information relating to your Youdao account or other additional information, or give a declaration as to your identity under penalty of perjury.

To opt out of the use of cookies on the UClass for interest-based advertising purposes, follow the instructions below.

California’s Shine the Light Law

California Civil Code Section 1798.83, also known as “Shine The Light” law, permits California residents to annually request, free of charge, information about the disclosure of their Personal

Information (if any) to third parties for the third parties' direct marketing purposes in the preceding calendar year. We do not share Personal Information with third parties for such purposes.

9. Children's Privacy Notice

Our product is an online learning tool designed for children. In the course of providing this product, we may receive information from children. The following provides additional information about how we collect, use and share Personal Information from children under the age of 13 ("Children"). We require a parent or legal guardian ("Parent") to create an account on behalf of their Child, and we seek the verifiable consent of the Parent before collecting Personal Information about their Child. If you discover that your Child has created an account or provided Personal Information without your consent, please contact us using the contact details specified at the end of this Privacy Policy to request that we delete your Child's Personal Information.

What Personal Information Do We Collect From Children?

- **Device Information:** We automatically collect information about the device you use to access the UClass, such as your computer's IP address.
- **Student Data,** that Parents provide about Students to register them for our Service, such as Student's name or age. We will not make this information publicly available on our website.
- **Student Performance Data,** when Students use our Service, we may record and store their progress and performance ("**Student Performance Data**"). We use this data in order to provide our Service and to analyze and improve our Service.
- **User-Generated Information,** the information uploaded, provided, or created by users while using the Service.
- **Other Information** that We may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

Why And How De We Use Children's Personal Information?

- **Provide the Uclass Service:** To provide the UClass and any online learning services you request.
- **For Research and Development:** We may analyze Children's use of the Services to analyze and improve the Services and to develop new functions and/or Services, including by studying user interactions and use of the Services.
- **Legal Reasons:** We may use Children's Personal Information to comply with applicable law, respond to valid legal process, investigate or participate in civil discovery, litigation, or other adversarial legal proceedings, or investigate potential violations of or enforce our [Terms of Service].

Who Do We Share Children's Personal Information With?

- **Our Affiliates:** We may share Personal Information with our affiliates for the purpose consistent with this Privacy Policy.
- **Third Party Service Providers:** We may share Personal Information with third party service providers for the purpose of: IT and related services; the provision of information and services you have requested; payment processing; customer service activities; and the

provision of the Business Services (i.e., Alibaba Cloud, Firebase, Google, Facebook, Apple, China Unicom, China Mobile, China Telecom, Stripe, Paypal)..

- **Legal Purposes:** We may disclose Children’s Personal Information to any person or authority to comply with applicable law, respond to valid legal process, investigate or participate in civil discovery, litigation, or other adversarial legal proceedings, investigate potential violations of or enforce our [Terms of Service], or if such disclosure is necessary to protect and defend our rights, property or security or the one of our clients.
- **With Consent:** We may communicate a Child’s Personal Information to any other person subject to their Parent’s consent.

10. Cookies

Cookies are small text files that are placed on your device when you browse our UClass platform. We use Cookies for providing users with a simpler and easier-to-use personalized web experience. Cookies enables us to serve you better and faster, and to make your experience on UClass Service more personal.

For example, to make the login process of the UClass platform faster, you can choose to save the username in a Cookies. This will make it easier and faster to login into UClass Service next time. Cookies can help us to determine the webpages and content you are connected to, the time you spend on certain UClass Service and the UClass service you have chosen.

Using such technologies, we, our service providers, and our business partners may automatically log information about you, your computer or mobile device (if any), and activity over time occurring on or through the Services and other online services. We use them for the following purposes:

- **Remember your identity.** For example: Cookies and web beacons help us identify you as our registered user, or save your preferences or other information provided by you to us.
- **Analyze your use of our services.** We can use Cookies and web beacons to understand for which activities you use Youdao Service, or which services or service is the most popular, We may request your consent prior to using Cookies and web beacons for these purpose.
- **Advertising optimization.** Cookies and web beacons help us to provide you with advertisements related to you based on your information instead of general advertising, We may request your consent prior to using Cookies and web beacons for these purpose.

If you consented to our use of cookies but later wish to opt out, you may change, at any time, your cookies preferences through the browser (if you access UClass Services via a browser) or user selection mechanism, you can use your browser settings in order to block the cookies. The following links provide instructions in order to manage your cookies preferences:

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Safari: <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Internet Explorer: <http://windows.microsoft.com/en-US/windows-vista/Block-or-allow-cookies>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences?redirectlocale=en-US&redirectslug=Enabling+and+disabling+cookies>

In addition, if you do not want Google Analytics to be used in your browser, you can

- Disable the Google Analytics browser add-on at <https://tools.google.com/dlpage/gaoptout> ; and/or
- Opt-out through the Network Advertising initiative consumer opt-out system accessible at the following link: <http://optout.networkadvertising.org/#/> .

In addition, you may wish to visit www.aboutcookies.org , which contains comprehensive information on how to do this on a wide variety of browsers.

Moreover, you can use another online service enabling you to manage the advertisement cookies placed on your devices: <http://www.youronlinechoices.com/> .

11. Do-Not-Track Signals

Do-Not-Track is an initiative that developed a signal that an Internet user may activate to inform websites that the user does not want to have their data tracked. The UClass does not currently respond to such signals.

12. Third Party Links

Our UClass may contain links to third-party websites, tools or services. Those third parties have separate and independent privacy policies that you are invited to read carefully. This Privacy Policy does not apply to your use of such third-party sites, tools or services. We do not own or control those third parties, and We assume no responsibility or liability for their content and activities.

13. Modifications to the Privacy Policy

We reserve the right to change this Privacy Policy at any time. In case there is a substantial change, we will notify you in this respect. If such change to the Privacy Policy requires your consent, you will have the choice to consent as to whether or not We may use your information in a different manner.

14. Who can you contact if you have queries or complaints?

If you have any questions, you may contact us by email at the following address: contact@uclass.net .