

ALEEM PRIVACY NOTICE

Last Modified: July 30th, 2025

This Privacy Notice explains how Individual Entrepreneur "ALTAY" ("Aleem," "we," "us," or "our") collects, uses, shares, and otherwise processes personal data in connection with our Telegram Mini App «Aleem» (the "App"), our website located at aleem.io (the "Website"), and the related content, platforms, services, products, and other functionality offered on or through our services (collectively, the "Services").

This Privacy Notice does not address our privacy practices relating to Aleem job applicants, employees, and other personnel.

Please note this Privacy Notice is not a contract and does not create any legal rights or obligations.

REGION-SPECIFIC DISCLOSURES

This Privacy Notice is designed to apply to our Service users globally. We may choose or be required by law to provide additional disclosures relating to the processing of personal information in certain countries, regions, or states. Please refer to the relevant sections below for disclosures that may be applicable to you:

- **If you are located in the European Economic Area (Member States of the European Union together with Iceland, Norway, and Liechtenstein), United Kingdom, or Switzerland:** Please refer to the "Additional EU, UK, and Switzerland Privacy Disclosures" section for European-specific privacy disclosures.
- **If you are a resident of the State of California, Colorado, Connecticut, Nevada, Utah or Virginia in the United States:** Please refer to the "Additional U.S. State Privacy Disclosures" section for U.S. state-specific privacy disclosures.

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1. WHAT IS PERSONAL DATA?

When we use the term "personal data" in this Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to a person or household. It does not include aggregated, de-identified, or anonymized information that is maintained in a form that is not reasonably capable of being associated with or linked to a person.

2. HOW WE COLLECT AND USE PERSONAL DATA

We collect various types of Personal Data to provide and improve our Services.

2.1. Personal Data Collected from Individuals

The categories of personal data we collect submitted to us by individuals through the Services may include:

- **Account Information:** Including your Telegram public profile information (e.g., username, Telegram ID, profile picture, if permitted by Telegram settings and API), which we use to administer your account, provide you with relevant Service-related information, and for customer support purposes.
- **Onboarding and Personalization Information:** Your responses to onboarding questions upon first accessing the App, concerning your language goals, current language proficiency, interests, and learning preferences. We use this information to personalize your learning experience.
- **User Content:** Text files (e.g., personal documents, textbooks, books) and URLs of internet resources (e.g., articles, YouTube videos) that you voluntarily upload or provide to create personalized Lessons in the App. We process this content to extract learning material (words, phrases, context) and generate Lessons for you.
- **Payment Information:** When you subscribe to our paid Services, you provide payment data directly to our third-party payment processor (e.g., GetCourse Pay). We do not store your full credit card details, but we may receive transaction information (e.g., transaction ID, payment status, partial card number for identification) to manage your Subscription. The payment processor's use of your personal data is governed by their privacy notice.
- **Communications with Us:** Information you provide when contacting customer support (e.g., your name, contact details, content of your inquiry). We use this information to investigate and respond to your inquiries, enhance the services we offer, and manage our organization.
- **Feedback Information:** We may collect feedback and ratings you provide relating to our services or products. We use this information to communicate with you, conduct market research, inform our marketing and advertising activities, and improve and grow our business.
- **Other Information:** Any other information that you provide to us online, by phone, or in person, which we use to respond to your request, provide you the requested services, and to inform our marketing and advertising campaigns.

2.2. Personal Data Collected Automatically

When you use the App, we automatically collect certain information:

- **Usage Data:** Information about your interaction with the App, such as features used, lessons viewed, exercises completed, your learning progress, time spent in the App, selected words and phrases, interactions with the AI assistant, and analysis of your learning behavior.
- **Device and App Data:** Information about the device you use to access the App (e.g., device type, operating system, Telegram version), if technically available and necessary for the App's operation or analytics.
- **Log Files and Technical Information:** IP address, access time, information about App crashes, and diagnostic information. This is standard practice for most online services and helps us ensure security and improve App performance.
- **AI-Generated Data:**
 - **Personalized Educational Content:** Individual learning plans, lesson recommendations, word and phrase lists generated by AI based on your goals, level, interests, and progress.
 - **"AI Memory":** Information that the App's AI stores to personalize your learning experience (e.g., your preferences, language strengths and weaknesses, topics covered). You may have the ability to view and partially manage this information in your Profile settings.

- **Analysis of Interests and Behavior:** Inferences made by AI based on your interactions with the App for further customization of the Services.

2.3. Personal Data from Third Parties

We also obtain personal data from third parties, which we often combine with personal data we collect either automatically or directly from an individual.

- **Our Affiliates:** We may receive personal data from other companies and brands owned or controlled by Aleem, and other companies owned by or under common ownership as Aleem.
- **Service Providers:** Our service providers that perform services solely on our behalf, such as audience measurement, marketing providers, payment processors, and providers of AI technologies, collect personal data and may share some or all of this information with us. The information may include contact information, demographic information, payment information, information about your communications and related activities, and information about your subscription(s). We may use this information to administer and facilitate our services, your subscriptions, and our marketing activities.
- **Business Partners:** We may receive your information from our business partners, such as companies that offer their products and/or services on our Services. We may use this information to administer and facilitate our services, your orders, and our marketing activities.
- **Information from Authentication Services:** Some parts of our Services may allow you to log in through a third-party social network or authentication service such as Facebook, Google, or Apple. These services will authenticate your identity and provide you the option to share certain personal data with us, which could include your name, email address, address book and contacts, or other information. The data we receive is dependent on that third party's policies and your privacy settings on that third-party site. We use this information to operate, maintain, and provide to you the features and functionality of the Services. We may also send you service-related emails or messages (e.g., account verification, purchase confirmation, customer support, changes, or updates to features of the App, technical and security notices).
- **Other Sources:** In addition to third-party data providers, we may also collect personal data about individuals that we do not otherwise have from, for example, publicly available sources, or through transactions such as mergers and acquisitions. We use this information to operate, maintain, and provide to you the features and functionality of the Services, as well as to communicate directly with you, such as to send you email messages about products and services that may be of interest to you.

2.4. Other Uses of Personal Data

In addition to the above, we may use personal data to:

- Fulfill or meet the reason the information was provided, such as to fulfill our contractual obligations, to deliver the Services you have requested, including through the use of Artificial Intelligence ("AI") / generative AI and machine learning tools that may be integrated into our Services;
- Manage our organization and its day-to-day operations;
- Communicate with individuals, including via email, text message, social media, and/or telephone calls;
- Request individuals to complete surveys about our organization, organizations we partner with, and Services;
- For marketing and advertising purposes, including to market to you or offer you through email, direct mail, phone, or text message information and updates on products or

services we think that you may be interested in;

- Administer, improve, and personalize our Services, including by recognizing an individual and remembering their information when they return to our Services;
- Process payment for our Services;
- Facilitate customer benefits and services, including customer support;
- Identify and analyze how individuals use our Services;
- Conduct research and analytics on our customer and user base and our Services;
- Administer, identify, and facilitate potential product improvements or future product developments (including training and refining automated tools leveraging AI);
- Test, enhance, update, and monitor the Services, or diagnose or fix technology problems;
- Help maintain the safety, security, and integrity of our property and Services, technology assets, and business;
- To enforce our Terms of Service, to resolve disputes, to carry out our obligations and enforce our rights, and to protect our business interests and the interests and rights of third parties;
- Prevent, investigate, or provide notice of fraud or unlawful or criminal activity;
- Comply with contractual and legal obligations and requirements;
- To fulfill any other purpose for which you provide personal data; and
- For any other lawful purpose, or other purpose that you consent to.

Where you choose to contact us, we may need additional information to fulfill the request or respond to inquiries. We may provide you with additional privacy-related information where the scope of the inquiry/request and/or personal data we require fall outside the scope of this Privacy Notice. In that case, the additional privacy notice will govern how we may process the information provided at that time.

3. COOKIES AND OTHER DATA COLLECTION TECHNOLOGIES

We may participate in interest-based advertising and use third-party advertising companies to serve you targeted advertisements based on your Browse history. We permit third-party online advertising networks, social media companies, and other third-party services to collect information about your use of our Services over time so that they may play or display ads on our Services, on other websites or services you may use, and on other devices you may use.

Typically, though not always, the information used for interest-based advertising is collected through tracking technologies, such as cookies, web beacons, embedded scripts, location-identifying technologies, and similar technology, which recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the App/Website, AdID, and other similar information. We may share a common account identifier (such as a hashed email address or user ID) with our third-party advertising partners to help identify you across devices. We and our third-party partners use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you and others on such platforms. We may do this by providing a hashed version of your email address or other information to the platform provider.

We may engage in the following:

- **Information about the device you use:** Such as your IP address, browser type, Internet service provider, device type/model/manufacturer, operating system, date and time stamp, and a unique ID that allows us to uniquely identify your browser, mobile device, or your account (including, for example, a persistent device identifier or an Ad ID), and other such information. We may also work with third-party partners to employ technologies, including

the application of statistical modeling tools, which permit us to recognize and contact you across multiple devices.

- **Information about the way you access and use our Services:** For example, the site from which you came and the site to which you are going when you leave our Services, how frequently you access the Services, whether you open emails or click the links contained in emails, whether you access the services from multiple devices, and other Browse behavior and actions you take on the Services.
- **Information about how you use the Services:** Such as the pages you visit, the links you click, the ads you view and click on, videos you watch, and other similar actions. We may also use third-party tools to collect information you provide to us or information about how you use the Services and may record your mouse movements, scrolling, clicks, and keystroke activity on the Services and other Browse, search or purchasing behavior. These tools may also record information you enter when you interact with our Services or engage in chat features through our Services.
- **Information about your location:** Such as general geographic location that we or our third-party providers may derive from your IP address.
- **Analytics information:** We may collect analytics data or use third-party analytics tools such as Google Analytics to help us measure traffic and usage trends for the Services and to understand more about the demographics of our users (including through the use of automated tools leveraging AI). You can learn more about Google's practices at <http://www.google.com/policies/privacy/partners> and view its opt-out options at <https://tools.google.com/dlpage/gaoptout>.

All of the information collected automatically through these tools allows us to improve your customer experience. For example, we may use this information to enhance and personalize your user experience, to monitor and improve our Services, and to improve the effectiveness of our Services, offers, advertising, communications, and customer service. We may also use this information collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our services; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; (g) train and refine automated tools leveraging AI; and (h) otherwise to plan for and enhance our services.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies; however, doing so may negatively impact your experience using the services, as some features and services may not work properly. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it.

We and our third-party partners may also use cookies and tracking technologies for advertising purposes. For more information about your choices regarding cookies, please see the "Control Over Your Information" section below.

4. OUR DISCLOSURE OF PERSONAL DATA

We do not sell your Personal Data to third parties. We may disclose your personal data with the following categories of recipients only when necessary to provide the Services, or as required by law:

- **With Affiliates:** We may disclose personal data between and among Aleem and its

current and future parents, affiliates, subsidiaries, and other companies under common control or ownership.

- **Online Advertising Partners:** We may also share personal data with advertising networks or permit these partners to collect information from you directly on our websites to facilitate online advertising, such as search engines and social network advertising providers to serve targeted ads to you or to groups of other users who share similar traits, such as likely commercial interests and demographics, on third-party platforms. For more information, including how to opt out of interest-based advertising, please see the "Control Over Your Information" section below.
- **Service Providers (Subprocessors):** We engage trusted third-party service providers that perform business or operational services for us or on our behalf. These may include:
 - **Payment Systems:** Such as GetCourse Pay, for processing your Subscription payments. They receive data necessary for payment processing directly from you.
 - **Hosting Providers and Cloud Service Providers:** For data storage and ensuring the operation of the App.
 - **Analytics Service Providers:** For analyzing App usage to improve it (data is usually transferred in aggregated or anonymized form).
 - **Basic AI Technology Providers:** If our AI is built upon foundational models from third-party developers (e.g., OpenAI, Google, Anthropic), we may transfer data to them (including User Content) for processing within the scope of providing you with AI functions. We ensure that such transfers are carried out with adherence to confidentiality and security requirements. We enter into agreements with such providers obligating them to protect your Personal Data and to use it only for providing services to us.
- **Business Transaction or Reorganization:** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal data to a third-party during negotiation of, in connection with, or as an asset in such a corporate business transaction. Personal data may also be disclosed in the event of insolvency, bankruptcy, or receivership, in compliance with applicable law.
- **Legal Obligations and Rights:** We may disclose personal data to third parties, such as legal advisors and law enforcement:
 - in connection with the establishment, exercise, or defense of legal claims;
 - to comply with laws or to respond to lawful requests and legal process;
 - to protect the rights and property of Aleem, our agents, customers, and others, including to enforce our agreements, policies, and our Terms of Service;
 - to detect, suppress, or prevent fraud;
 - to reduce credit risk and collect debts owed to us;
 - to protect the health and safety of us, our customers, or any person; or as otherwise required by applicable law.
- **With Your Consent or At Your Direction:** We may disclose personal data about you to certain other third parties with your consent or at your direction.
- **Anonymized or Aggregated Data:** We may share anonymized or aggregated data (which does not identify you personally) with third parties for research, statistical, or marketing purposes.

5. THIRD-PARTY DATA COLLECTION AND ONLINE ADVERTISING

We may participate in interest-based advertising and use third-party advertising companies to serve you targeted advertisements based on your Browse history. We permit third-party online

advertising networks, social media companies, and other third-party services to collect information about your use of our online services over time so that they may play or display ads on our Services, on other websites or services you may use, and on other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through tracking technologies, such as cookies, web beacons, embedded scripts, location-identifying technologies, and similar technology, which recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the Services, AdID, and other similar information. If permitted by your device settings, they may also collect location data through GPS, Wi-Fi, or other methods. We may share a common account identifier (such as a hashed email address or user ID) with our third-party advertising partners to help identify you across devices. We and our third-party partners use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research. We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you and others on such platforms. We may do this by providing a hashed version of your email address or other information to the platform provider. Please see "Online Ads" of the "Control Over Your Information" section below, to learn how you can opt out of interest-based advertising.

We may engage in the following:

- **Social Media Widgets and Advertising:** Our Services may include social media features, such as the Facebook "Like" button, LinkedIn, Twitter, or other widgets. These social media companies may recognize you and collect information about your visit to our Services, and they may set a cookie or employ other tracking technologies. Your interactions with those features are governed by the privacy policies of those companies.
- **Social Media Platforms:** We may display targeted advertising to you through social media platforms, such as Facebook, Twitter, LinkedIn, and other social media forums. These companies have interest-based advertising programs that allow us to direct advertisements to users who have shown interest in our services while those users are on the social media platform, or to groups of other users who share similar traits, such as likely commercial interests and demographics. We may share a unique identifier, such as a user ID or hashed email address, with these platform providers or they may collect information from our website visitors through a first-party pixel, in order to direct targeted advertising to you or to a custom audience on the social media platform. These advertisements are governed by the privacy policies of those social media companies that provide them. If you do not want to receive targeted ads on your social networks, you may be able to adjust your advertising preferences through your settings on those networks.
- **Third-Party Partners:** We work with a variety of third-party partners to provide advertising services. For example, we may also utilize certain forms of display advertising and other advanced features through Google Analytics. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to the Services. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>, or by visiting NAI's online resources at [suspicious link removed]. To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Digital Advertising Alliance's (DAA) resources and/or the Network Advertising Initiative's (NAI) online

resources, at <www.aboutads.info/choices> or [suspicious link removed]. You may also be able to limit interest-based advertising through the settings menu on your mobile device by selecting “limit ad tracking” (iOS) or “opt-out of interest-based ads” (Android). You may also be able to opt-out of some — but not all — interest-based advertising served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app. Please note that when you opt out of receiving interest-based advertisements, this does not mean you will no longer see advertisements from us or on our Services. It means that the online ads that you do see from DAA program participants should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third-parties’ opt-out options or programs or the accuracy of their statements regarding their programs. In addition, third parties may still use cookies to collect information about your use of our Services, including for analytics and fraud prevention as well as any other purpose permitted under the DAA’s Principles.

6. DATA RETENTION

The criteria used to determine the period for which personal data about you will be retained varies depending on the legal basis under which we process the personal data:

- **Contract:** Where we are processing personal data based on a contract, we generally will retain your personal data for the duration of the contract plus some additional limited period of time that is necessary to comply with law or that represents the statute of limitations for legal claims that could arise from our contractual relationship.
- **Legitimate Interests:** Where we are processing personal data based on our legitimate interests, we generally will retain such information for a reasonable period of time in order to fulfill the legitimate interests, taking into account your fundamental interests and your rights and freedoms.
- **Consent:** Where we are processing personal data based on your consent, we generally will retain your personal data until you withdraw your consent, or otherwise for the period of time necessary to fulfill the underlying agreement with you or provide you with the applicable service for which we process that personal data.
- **Legal Obligation:** Where we are processing personal data based on a legal obligation, we generally will retain your personal data for the period of time necessary to fulfill the legal obligation.
- **Legal Claim:** We may need to apply a “legal hold” that retains information beyond our typical retention period where we face threat of legal claim or intent to establish a claim. In that case, we will retain the information until the hold is removed, which typically means the claim or threat of claim has been resolved.

Generally, we retain your Account data as long as your Account is active. After Account deactivation, some data may be stored for a reasonable period of time to fulfill legal obligations (e.g., financial reporting), resolve disputes, enforce our agreements, or for backup purposes. User Content uploaded for creating Lessons may be stored for the period of your Account activity, so you can reuse it, or deleted earlier at your request or according to App settings. Anonymized data may be retained indefinitely by us for analytical and research purposes.

7. CONTROL OVER YOUR INFORMATION

- **Access to Your Device Information:** You may control the Services’ access to your device information through your “Settings” app on your device. For instance, you can withdraw permission for the Services to access your microphone, network devices, and geolocation, and to integrate with your other applications.
- **Email Communications Preferences:** You can stop receiving promotional email communications from us by clicking on the “unsubscribe” link provided in such

communications. You may not opt-out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Services, technical and security notices).

- **Push Notifications:** You can stop receiving push notifications from us by changing your preferences in the iOS or Android notifications settings menu.
- **Modifying and Deleting your Information:** If you have an account with us, you may update your account information and adjust your account settings by logging into your account. Please note that changes to your settings may require some time to take effect. If you have any questions about modifying or updating any information in your account, please contact us at getenglish2023@gmail.com.

8. LINKS TO THIRD-PARTY WEBSITES AND SERVICES

For your convenience, our Services may provide links to third-party websites or services that we do not own or operate. We are not responsible for the practices employed by any websites or services linked to or from the services, including the information or content contained within them. Your Browse and interaction on any other website or service are subject to the applicable third party's rules and policies, not ours. If you are using a third-party website or service, you do so at your own risk. We encourage you to review the privacy policies of any site or service before providing any personal data.

9. CHILDREN'S PRIVACY

Our Services are not intended for children under the age of 15. We do not knowingly solicit or collect personal data from children under the age of 15. If we learn that any personal data has been collected inadvertently from a child under 15 we will delete the information as soon as possible. If you believe that we might have collected information from a child under 15, please contact us at getenglish2023@gmail.com.

As noted in our Terms of Service, if you are a minor, you may only use the App with the consent and supervision of a parent or legal guardian. We may use technical means (e.g., an age gate) to prevent the registration of children who have not reached the specified age without proper consent.

10. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to change this Privacy Notice from time to time at our sole discretion. We will notify you about material changes in the way we treat personal data by updating the "Last Modified" date at the top of this Privacy Notice, and/or by placing a prominent notice on our Website and/or within the App. It is your responsibility to review this Privacy Notice periodically. Your continued use of the App after the changes come into effect signifies your agreement with the updated Policy.

11. CONTACT US

If you have any questions regarding this Privacy Notice, or any other privacy-related questions, please send an email to getenglish2023@gmail.com.

12. ADDITIONAL U.S. STATE PRIVACY DISCLOSURES

Last Updated: July 30th, 2025

For residents of the States of California, Colorado, Connecticut, Utah, and Virginia: These Additional U.S. State Privacy Disclosures ("U.S. Disclosures") supplement the information contained in our Privacy Notice by providing additional information about our personal data processing practices relating to individual residents of these States. Unless otherwise expressly stated, all terms defined in our Privacy Notice retain the same meaning in these U.S. Privacy Disclosures.

For the purposes of these U.S. Disclosures, personal data does not include publicly available information or de-identified, aggregated or anonymized information that is maintained in a form

that is not capable of being associated with or linked to you.

12.1. Collection and Use of Personal Data

We collect various categories and types of personal data from a variety of sources and for a variety of purposes. In the last 12 months, we may have collected the following categories of personal data:

- **Identifiers:** such as Telegram username, Telegram ID, email address (if provided), or other similar identifiers.
- **Personal Data:** as defined in the California customer records law.
- **Protected Classification Characteristics:** such as demographic data (if provided during onboarding).
- **Commercial Information:** such as information about products or services purchased or considered (e.g., subscription type), and information about your use of the Services.
- **Internet/Network Information:** such as your Browse history within the App/Website, log and analytics data, search history within the App, and information regarding your interaction with our App/Website.
- **Geolocation Data:** such as information about your general geographic location that we or our third-party providers may derive from your IP address.
- **Sensory Information:** such as voice input if you utilize voice recognition features for language practice.
- **Inferences:** including information generated from your use of the Services reflecting predictions about your interests and preferences (e.g., "AI Memory").

For more information about our collection of personal data, the sources of personal data, and how we use this information, please see the "How We Collect and Use Personal Data" section of our Privacy Notice.

12.2. Disclosure of Personal Data

As described in the "Our Disclosure of Personal Data" section of our Privacy Notice, we disclose personal data with a variety of third parties for business purposes. In the previous 12 months, we have disclosed all of the categories of personal data we collect, explained above, to third parties for a business purpose. The categories of third parties to whom we disclose your personal data for a business purpose may include: (i) other affiliates in our family of companies; (ii) our service providers and advisors (including payment processors, hosting providers, analytics providers, and basic AI technology providers); and (iii) marketing providers.

12.3. Sale of Personal Data and Sharing for Targeted Advertising

We do not "sell" personal data as defined by some U.S. state privacy laws. In the previous 12 months, we have shared for targeted advertising purposes the following categories of personal data to third parties, subject to your settings and preferences and your Right to Opt Out: Identifiers, Commercial Information, Internet/Network Information, and Inferences.

Please see the "Third-Party Data Collection and Online Advertising" section of our Privacy Notice to learn more about how third-party advertising networks, social media companies, and other third-party businesses collect and disclose your personal data directly from your browser or device through cookies or tracking technologies when you visit or interact with our Services or otherwise engage with us.

12.4. Sensitive Information

The following personal data elements we collect may be classified as "sensitive" under certain privacy laws ("sensitive information"):

- Account name and password (if applicable for other integrated services, beyond Telegram ID);
- Financial account, debit card, or credit card number in combination with any required

security or access code (processed by third-party payment processors). As described in our Privacy Notice, we use account name/Telegram ID and financial information (via third-party processors) to provide certain of our products and services. We do not sell sensitive information, and we do not process or otherwise share sensitive information for the purpose of targeted advertising.

12.5. De-identified Information

We may at times receive, or process personal data to create, de-identified information that can no longer reasonably be used to infer information about, or otherwise be linked to, a particular individual or household. Where we maintain de-identified information, we will maintain and use the information in de-identified form and not attempt to re-identify the information except as required or permitted by law.

12.6. Your Privacy Rights

Depending on your state of residency and subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights:

- **Right of Access:** You may have the right to obtain: confirmation of whether, and where, we are processing your personal information; information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods; information about the categories of recipients with whom we may share your personal information; and a copy of the personal information we hold about you.
- **Right of Portability:** You may have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
- **Right to Rectification or Correction:** You may have the right to obtain rectification or correction of any inaccurate or incomplete personal information we hold about you.
- **Right to Deletion or Erasure:** You may have the right, in some circumstances, to require us to delete or erase your personal information.
- **Right to Opt-Out:** You may have the right to opt-out of certain processing activities. For example, you may have the right to opt-out of the use of your personal information for targeted advertising purposes, or to “sell” or “share” your personal information with third parties in certain contexts.
- **Right to Appeal:** In the event that we decline to take action on a request exercising one of your rights set forth above, you have the right to appeal our decision.

Depending on your state of residency, you may also have the right to not receive retaliatory or discriminatory treatment in connection with a request to exercise the above rights. However, the exercise of the rights described above may result in a different price, rate, or quality level of product or service where that difference is reasonably related to the impact the right has on our relationship or is otherwise permitted by law.

12.7. How to Exercise Your Privacy Rights

To Exercise Your Privacy Rights:

Please submit a request by reaching out to customer support at getenglish2023@gmail.com.

We will need to verify your identity and confirm you are a resident of a state that offers the request right(s) before processing your request. In order to verify your identity, we will generally require the matching of sufficient information you provide us to the information we maintain about you in our systems. As a result, we require requests to include your name, email address (if associated with your account), and state of residency. Although we try to limit the personal data collected in connection with a request to exercise any of the above rights, certain requests

may require us to obtain additional personal data from you. In certain circumstances, we may decline a request, particularly where we are unable to verify your identity or locate your information in our systems, or where you are not a resident of one of the eligible states.

To Exercise the Right to Opt Out of the Selling of Personal Data, or Sharing or Processing Personal Data for Targeted Advertising Purposes:

Unless you have exercised your Right to Opt Out, we may share personal data (including Identifiers, Commercial Information, Internet/Network Information, and Inferences) to certain third-party ad networks, social networks, and advertising partners to deliver targeted advertising (also known as “cross-context behavioral advertising”) and personalized content to you on our services, on other sites and services you may use, and across other devices you may use, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research. The third parties to whom we share personal data may use such information for their own purposes, in accordance with their own privacy statements.

You do not need to create an account with us to exercise your Right to Opt Out. However, we may ask you to provide additional personal data so that we can properly identify you in our dataset and to track compliance with your opt out request. We will only use personal data provided in an opt out request to review and comply with the request. If you chose not to provide this information, we may only be able to process your request to the extent we are able to identify you in our data systems.

For Cookie-Based Targeted Advertising Opt-Outs: To exercise your right to opt-out as it relates to the use of cookies and other tracking technologies for analytics and targeted ads, please use the cookie manager available on the aleem.io website (if applicable) or adjust your browser settings.

For Non-Cookie-Based Opt-Outs: You may submit a request by emailing getenglish2023@gmail.com.

12.8. Authorized Agents

In certain circumstances, you are permitted to use an authorized agent to submit requests on your behalf through the designated methods set forth above where we can verify the authorized agent’s authority to act on your behalf. In order to verify the authorized agent’s authority, we generally require evidence of either (i) a valid power of attorney or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending on the evidence provided and your state of residency, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

12.9. Appealing Privacy Rights Decisions

Depending on your state of residency, you may be able to appeal a decision we have made in connection with your privacy rights request. All appeal requests should be submitted by emailing us at getenglish2023@gmail.com with the subject line, “Privacy Request Appeal.”

- **Colorado Residents:** If your appeal is denied, you may contact the Colorado Attorney General to address your concerns.
- **Connecticut Residents:** If your appeal is denied, you may contact the Connecticut Attorney General to submit a complaint.
- **Virginia Residents:** If your appeal is denied, you may contact the Virginia Attorney General to submit a complaint.

12.10. Minors Under Age 16

We do not sell personal data of consumers we know to be less than 16 years of age unless they have opted in (“Right to Opt In”). Please contact us at getenglish2023@gmail.com to inform us if

you, or your minor child, are under the age of 16.

If you are under the age of 18 and you want to remove your name or comments from our website or publicly displayed content, please contact us directly at getenglish2023@gmail.com. We may not be able to modify or delete your information in all circumstances.

If you wish to submit a privacy request on behalf of your minor child in accordance with applicable jurisdictional laws, you must provide sufficient information to allow us to reasonably verify your child is the person about whom we collected personal data and you are authorized to submit the request on your child's behalf (i.e., you are the child's legal guardian or authorized representative).

12.11. "Shine the Light" Disclosures

The California "Shine the Light" law gives residents of California the right under certain circumstances to request information from us regarding the manner in which we share certain categories of personal data (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal data with third parties for their own direct marketing purposes.

12.12. Notice of Financial Incentives

We may provide financial incentives to prospective customers who allow us to collect and retain personal information, such as your name, email address, and phone number. These incentives may result in differences in our prices or services offered to consumers, and may include a lower price for goods and services (e.g., free trials, discounts, and other promotions). For example, the financial incentives we may provide include free and open access to Aleem, including a free trial of Aleem's Services, credits and promotions as part of our referral program, or prospective customers providing an email address can take advantage of certain free offerings by being automatically signed up to receive email updates from Aleem. We have determined in good faith that the value of the personal information we receive from you and the relationship we establish is reasonably related to the value of the free offerings we provide. Additional financial incentive terms may be made available to you when you sign up for the applicable offering. You may withdraw from our financial incentive programs at any time by contacting us at getenglish2023@gmail.com. You may also opt out of receiving marketing updates from Aleem by following any available opt-out instructions in the communications you receive, or by contacting us at getenglish2023@gmail.com.

13. ADDITIONAL EU, UK, AND SWITZERLAND PRIVACY DISCLOSURES

Last Updated: July 30th, 2025

This section provides additional information relevant to individuals located in the European Economic Area (EEA), the United Kingdom, and Switzerland concerning our processing of your personal data.

13.1. Controller and Contact Information

The Data Controller of your Personal Data is: Individual Entrepreneur "ALTAY" BIN: 060927500459 Legal Address: Republic of Kazakhstan, Shymkent, Samal-3 microdistrict, building 6465.

For all questions related to the processing of your Personal Data and the exercise of your rights, you can contact us at getenglish2023@gmail.com or through other communication channels specified in the Terms of Service.

13.2. Legal Bases for Processing

We process your Personal Data based on the following legal grounds:

Purpose of Processing	Types of Data (examples)	Legal Basis (for EU/EEA Users)
Providing and personalizing	Account, onboarding, User	Performance of a contract

Purpose of Processing	Types of Data (examples)	Legal Basis (for EU/EEA Users)
Services	Content, usage data, AI-generated data	(Terms of Service)
Creating and managing your Account	Account, onboarding data	Performance of a contract
Generating personalized Lessons with AI	Onboarding, User Content, usage data, AI-generated data	Performance of a contract
Providing AI assistant for practice	Usage data (text/voice input), AI-generated data (feedback)	Performance of a contract
Managing "AI Memory" for adaptive learning	Onboarding, usage data, AI-generated data	Performance of a contract
Processing Subscription payments	Payment information (processed by processor), transaction information	Performance of a contract
Communicating with Users	Account, contact information from inquiries	Performance of a contract, Legitimate interest
Sending service messages (updates, tech notices, security)	Account, contact information	Performance of a contract, Legitimate interest
Responding to support inquiries	Contact information from inquiries, Account data (for identification)	Performance of a contract, Legitimate interest
Improving the App and developing new features	Usage data (aggregated/anonymized), technical info, user feedback	Legitimate interest (service improvement)
Ensuring security and fraud prevention	Log files, IP address, usage data, Account data	Legitimate interest (protecting service and users)
Marketing communications	Account data (e.g., email, if provided), Subscription history	Explicit consent of the User
Compliance with legal obligations	Any necessary data as requested by authorized bodies	Legal obligation

13.3. AI and Automated Decision-Making/Profiling

You are informed and agree that the App actively uses AI technologies to provide and personalize the Services. This includes:

- **Personalization of Educational Content:** AI analyzes your goals, level, interests (from onboarding), your progress, and User Content to create individual Lessons and recommendations.
- **Analysis of Learning Behavior:** AI may analyze how you interact with the App to determine your strengths and weaknesses, interests, preferred learning methods, and adapt the Service.
- **Generation of Feedback:** AI provides feedback on your exercises, writing, and speaking practice.
- **Profiling for Personalization:** We use profiling (analysis of your data to understand your preferences and characteristics as a learner) solely to make your learning more effective and engaging.

We strive to ensure the transparency of our AI systems. The "AI Memory" feature in your Profile may provide you with some information about what data AI uses for personalization, and may allow you to adjust it. Automated decisions made by AI in the App (e.g., selection of the next

Lesson) are aimed at improving your user experience and typically do not have legal or other significant consequences for you. If in the future we use automated decision-making that may have such consequences, we will ensure compliance with relevant legal requirements, including your right to obtain information, challenge the decision, and human intervention, where applicable. You have the right to object to profiling in certain cases, as specified in the "Your Rights as a Data Subject" section.

13.4. International Data Transfers

Our Services are available to users worldwide. Your Personal Data may be collected, transferred, stored, and processed in the Republic of Kazakhstan (where Aleem is registered) and in other countries where we or our service providers have facilities. Data protection laws in these countries may differ from the laws of your country of residence. If you are located in the European Economic Area (EEA), United Kingdom, or Switzerland, we will ensure appropriate safeguards for the transfer of your Personal Data outside these regions, for example, by using Standard Contractual Clauses (SCCs) approved by the European Commission, or on the basis of an adequacy decision, if applicable to the recipient country. By using the App, you consent to such transfer, storage, and processing of your Personal Data.

13.5. Your Rights as a Data Subject

In accordance with applicable data protection legislation (in particular, GDPR for EU/EEA and UK users), you have the following rights regarding your Personal Data:

- **Right to Access:** You have the right to request information on whether we process your Personal Data, and if so, to access this data and certain related information.
- **Right to Rectification:** You have the right to request the rectification of inaccurate Personal Data we hold about you.
- **Right to Erasure ("Right to be Forgotten"):** You have the right to request the deletion of your Personal Data in certain cases (e.g., if the data is no longer needed for the original purposes, if you have withdrawn consent, or if the data was processed unlawfully).
- **Right to Restriction of Processing:** You have the right to request the restriction of processing of your Personal Data in certain circumstances (e.g., if you contest the accuracy of the data, or if the processing is unlawful but you object to deletion).
- **Right to Data Portability:** You have the right to receive the Personal Data you have provided to us in a structured, commonly used, and machine-readable format, and the right to transmit this data to another controller without hindrance from us, if the processing is based on consent or a contract and is carried out by automated means.
- **Right to Object:** You have the right to object to the processing of your Personal Data based on our legitimate interests, including profiling. In this case, we will cease processing unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims.
- **Right to Object to Direct Marketing:** If we process your Personal Data for direct marketing purposes, you have the right to object to such processing at any time.
- **Rights related to Automated Individual Decision-Making:** If decisions based solely on automated processing (including profiling) produce legal or similarly significant effects concerning you, you have the right to human intervention, to express your point of view, and to contest such a decision (if such decisions apply).
- **Right to Withdraw Consent:** If the processing of your Personal Data is based on your consent (e.g., for marketing communications), you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to its withdrawal.

How to Exercise Your Rights: To exercise any of these rights, please contact us using the contact details provided in Section 11. We may ask you to confirm your identity before fulfilling your request. We will respond to your request within the timeframes set by applicable law (usually within one month for GDPR).

Right to Lodge a Complaint: If you believe that the processing of your Personal Data violates applicable data protection law, you have the right to lodge a complaint with a competent supervisory authority for data protection in your country of residence, place of work, or place of the alleged infringement.

13.6. Children's Privacy (GDPR-K)

Our App is not intended for the intentional collection of Personal Data from children under 16 years of age (or other minimum age established by your country's legislation for child consent to data processing). If you are a parent or guardian and believe that your child has provided us with Personal Data without your consent, please contact us. We will take steps to remove such information and terminate the child's account.

13.7. Cookies and Similar Technologies

Telegram Mini Apps have their own specific operational characteristics within the Telegram environment. If our App or its associated website (e.g., landing page for Subscription processing) uses cookies or similar tracking technologies (e.g., pixels, web beacons), we will provide you with a separate cookie notice and/or include relevant information in this section or a separate Cookie Policy. Such notice will contain information about the types of cookies used, the purposes of their use (e.g., strictly necessary, analytical, marketing), and how you can manage your consent to their use (e.g., through browser settings or a cookie consent banner).