



Privacy Policy

Effective April 10, 2025

1. [Scope of this Policy](#)
2. [Agreement to Terms](#)
3. [Information We Collect](#)
4. [Cookies](#)
5. [How We Use Your Information](#)
6. [How We Share Your Information](#)
7. [How We Store and Safeguard Your Information](#)
8. [Your Privacy Choices](#)
9. [Children's Privacy](#)
10. [Additional Disclosure for European Union \(EU\) and United Kingdom \(UK\) Residents](#)
11. [Third-Party Links and Business Partners](#)
12. [Effective Date and Changes to This Privacy Policy](#)
13. [How to Contact Us](#)

1. Scope of this Policy

Alelo Inc. (referred to as "Alelo," "we," "us," "our") respects your privacy and values your trust. We are committed to ensuring that the personal information stored by our systems is suitably protected and used appropriately. The purpose of this Privacy Policy is to inform you of the treatment and handling of information that we may learn about you from using our Enskill educational platform (the "Enskill Platform"), our Content Navigator service ("Content Navigator"), our corporate website at <https://www.alelo.com> (the "Corporate Site," and together with the Enskill Platform, our "Sites"), your engagement with our content, and/or by use of any of our services, including Content Navigator (collectively, the "Service"). If you have any questions regarding this information or our privacy practices, please see the section entitled Contact Information at the end of this Privacy Policy.

Section 9 of this Privacy Policy addresses Alelo's collection, treatment, and handling of information that we may learn about children under 13 years of age.

2. Agreement to Terms

By using or accessing our Service in any manner, you acknowledge that you accept the practices and policies outlined below and the policies outlined in our Terms of Service, and you hereby consent that we may collect, use, and disclose your personal information as described in this Privacy Policy. If you do not agree with the terms of this Privacy Policy or our Terms of Service, then you should immediately discontinue use of the Service without providing us any personally identifiable information.

3. Information We Collect

The information we may collect from you depends on your interaction with our Service and, in particular, whether you use our Enskill Platform, Content Navigator, or visit our Corporate Site. We have described the information we collect from each of the Enskill Platform, Content Navigator, and our Corporate Site below.

You are not required to provide all of the personal information identified below to use our Service or to interact with us, but certain functionality will not be available if you do not provide certain personal information. For example, if you do not provide certain personal information, we may not be able to respond to your requests, allow you to register for the Enskill Platform, or provide you with promotional notices that we believe you may find valuable.

Information collected as part of the Enskill Platform

If you use our Enskill Platform, we may collect the following categories of personal information (a) directly from you (such as when you create an account, send communications to us, or complete surveys); (b) from the device and browser that you use to access the Enskill Platform, or (c) from cookies:

- *Identifiers.* We may collect your name, email address, and account username and password.
- *Education Information.* If you access the Enskill Platform through your school, we may collect the name of the educational institution in which you are enrolled, the class in which you are enrolled, and your student identification number.
- *Professional and/or Employment Information.* If you access the Enskill Platform through your employer, we may collect the name of your employer, your job title, and other details about your employment.
- *Audio Recordings and Inferences from Those Recordings.* We may collect and transcribe recordings of your speech for educational purposes, including to assess your performance and mastery of course learning objectives and to customize your educational plan.
- *Device Information.* We may collect information from the device you use to access our Sites. This information may include online identifiers, IP address, browser and device type, and geolocation information.
- *Interaction with the Enskill Platform.* We may collect information concerning your interaction with the Enskill Platform, including when you access the platform, which pages you visit, and your activity on the platform.

Information collected from using our Content Navigator

If you use our Content Navigator service, we may collect the following categories of information (a) directly from you (such as when you converse with the Content Navigator bot, complete feedback surveys, or when you contact us) or (b) from the device and browser that you use to access the Content Navigator:

- *Identifiers.* We may collect your first and last name.
- *Device Information.* We may collect information from the device you use to access our Service. This information may include online identifiers, IP address, browser and device type, and geolocation information.
- *Interaction with the Content Navigator.* We may collect information concerning your communications with the Content Navigator, in some

cases this may include characteristics or demographic information such as health background, ethnicity, gender, information about medical conditions, and any other information you choose to provide. This information is used by the Content Navigator service to provide information that is relevant to the user.

Information collected as part of our sales and marketing efforts, including through our Corporate Site

If you use our Corporate Site, we may collect the following categories of information (a) directly from you (such as when you request a product demonstration or otherwise send communications), (b) from the device and browser that you use to access our Corporate Site, or (c) from cookies:

- *Identifiers.* We may collect your name, email address, and phone number.
- *Device Information.* We may collect online identifiers, IP address, browser and device type, and geolocation information.
- *Interaction with our Corporate Site.* We may collect information concerning your interaction with our Corporate Site, including when you access the site and which pages and content you view.

4. Cookies

We store certain information that gets collected automatically at our end through cookies and other similar technologies. A cookie is a small string of information that a website that you visit transfers to your browser for identification purposes. Cookies can be used to follow your activity while using a website or across websites, and that information helps companies understand your preferences and tendencies, as well as improve and personalize your website experience. Some cookies are necessary to operate a website, while others can be functional or analytical (as discussed in more detail below).

Cookies on our Sites are generally divided into the following categories:

- *Strictly Necessary Cookies.* These are required for the operation of our Sites. They include, for example, cookies that enable you to log into password-protected portions of the Sites. These cookies are session cookies that are erased when you close your browser.
- *Functional Cookies.* These improve the functional performance of our Sites and make it easier for you to use them. For example, cookies are used to remember that you previously visited the Sites and asked to remain logged into it (e.g., this saves your username). These cookies qualify as persistent cookies because they remain on your device for us to use during your next visit to one of our Sites. You can delete these cookies as detailed below.
- *Analytical/Performance Cookies.* These allow us to recognize and count the number of users on our Sites and allow us to understand how such users navigate through our Sites (e.g., when and which pages are visited, in what order the pages are visited, and where a user is located). This helps improve how the Sites work, for example, by ensuring that users can find what they are looking for easily. We use Google Analytics for part of this process. For more information about Google Analytics, please visit <http://www.google.com/policies/privacy/partners/> and <http://www.google.com/analytics/learn/privacy.html>. You can opt-out of Google Analytics' collection and use of data generated by your use of the Site by going to <https://tools.google.com/dlpage/gaoptout>.
- *Targeting Cookies.* These record your visit to the Sites and the pages you have visited and the links you have followed, to recognize you as a previous visitor, and to track your activity on the Sites and other websites you visit. These cookies are used to display ads on other websites based on your visits to our Sites and other online activity. These cookies qualify as persistent cookies because they remain on your device. We use advertising networks to advertise on third-party websites and you may opt-out or change your preferences for each of these services as detailed below:

Facebook: You may opt-out from Facebook's interest-based ads by following the instructions at <https://www.facebook.com/help/568137493302217>.

LinkedIn: You may opt-out from LinkedIn's interest-based ads by visiting the "Advertising data" page within your LinkedIn profile settings.

You can prevent the use of certain cookies by modifying your internet browser settings, typically under the sections "Help" or "Internet Options." If you disable or delete certain cookies in your internet browser settings, you may still access our Sites, however, you might not be able to access or use important functions or features of our Sites, and you may, for example, be required to re-enter your log-in details.

Do-Not-Track Signals

At this time, Alelo does not recognize automated browser signals regarding tracking mechanisms, which may include "do-not-track" instructions.

5. How We Use Your Information

We collect and use your personal information for the following purposes:

- Provide the Enskill Platform and tailor the educational experience to you;
- Provide services requested by or reasonably anticipated within the context of our relationship with you;
- Provide the Service (including Content Navigator) and tailor the content to your interests'
- Manage your account, including tracking your username and password and learning history;
- Manage our relationship with you and respond to your inquiries and requests;
- Analyze your use of the Service;
- Provide relevant promotional materials and other marketing;
- Administer promotions, events, or surveys;
- Assess the effectiveness of our social media programs;
- Detect security incidents and protect against malicious, deceptive, fraudulent, or illegal activity or prosecute those responsible; and
- Comply with legal and regulatory obligations.

6. How We Share Your Information

Alelo may share your personal information with the categories of third parties below:

- *Our subsidiary, Alelo TLT, LLC;*
- *Service providers, including companies that host our Sites, IT outsourcing providers, speech recognition and speech-to-text processing providers, customer relationship management system providers, marketing providers, and web analytics providers;*
- If you use the Enskill Platform in connection with a course at an educational institution, we may share information from our Enskill Platform with your *instructor and/or the educational institution* in which you are enrolled. Instructors have the right to access learner data that is necessary for their teaching responsibilities. Instructors have a responsibility to maintain the confidentiality of learner data. Instructors should not access data beyond what is required for their teaching duties.
- If you use the Content Navigator service, we may share your personal information with the *third-party business partner* operating the website that hosts the Content Navigator service.
- If you have provided your consent to participate in research, we may share speech recordings with *research organizations* for research purposes.
- *Advisers and financial institutions, including legal, tax, auditors, risk and compliance, notaries, and business continuity support services;*
- Where permitted by applicable law, with *third parties in connection with a corporate restructuring, sale, transfer, or assignment of assets or business merger, divestiture, or other changes to the company's control or financial status;*
- *Government bodies, dispute resolution organizations, law enforcement agencies, or third parties* in connection with (a) responding to a subpoena, search warrant, or other lawful request for information that we receive, (b) cooperating in a law enforcement or similar investigation; or (c) otherwise protecting our rights, as applicable.

7. How We Store and Safeguard Your Information

We maintain reasonable technical and organizational measures to protect personal information from loss, misuse, alteration, or unintentional destruction. Unfortunately, the transmission of information via the Internet is not completely secure. Although we make commercially reasonable efforts to protect your personal information, we cannot guarantee the security of your information as it is transmitted to us. To the extent permitted under applicable law, we assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized access by third parties, or other causes beyond our control.

8. Your Privacy Choices

We offer visitors to our Corporate Site the opportunity to sign up to receive our newsletter, emails, or other marketing communications. If you signed up to receive our newsletter, emails, or other marketing communications, you may unsubscribe at any time by clicking "unsubscribe" at the bottom of any Alelo marketing email. Please note that you cannot unsubscribe from certain correspondence from us, including messages relating directly to your Enskill Platform registration and account.

If you wish to view, amend, or delete the personal information we hold about you, please contact us at DPO@alelo.com.

9. Children's Privacy

This section describes Alelo's collection, treatment, and handling of information that we may learn from children under 13 through their use of the Enskill Platform. Our Corporate Site and the Content Navigator service are not intended for use by people under 13 years of age and we do not knowingly or intentionally gather personal information about visitors to our Corporate Site or Content Navigator service who are under the age of 13.

Collection of Information

Alelo only collects and processes personal information through the Enskill Platform from a child under 13 where that student's school, district and/or teacher has contracted with Alelo and consented to the collection of the

student's information. Alelo collects and uses personal information from students under 13 solely for the educational purposes authorized by the school, district, or teacher, and not for any other commercial purpose.

Alelo collects the following information from students under 13: name, email address, account username and password, student identification number, class and/or school where the student is enrolled, the student's interaction with the Enskill Platform (including when the student accesses the platform and the pages he or she visits), and speech recordings. We collect this information to determine whether the student is authorized to use the Enskill Platform, to track the student's performance and activity, and to generate reports for the student's teacher and/or school administrators.

Alelo also collects certain information from the device that is used by the student to access the Enskill Platform. This may include online identifiers, IP address, browser and device types, and geolocation information. We collect this information to determine whether the student's computer meets the minimum system requirements to run the Enskill Platform, to improve the functionality and performance of the platform, and to detect and protect against security incidents.

Sharing of Information

Alelo uses service providers, including companies that host the Enskill Platform, IT outsourcing providers, speech recognition and speech-to-text processing providers, and web analytics providers. Alelo may share information with these service providers in connection with the services they provide, and we contractually prohibit the service providers from retaining, using, or disclosing any personal information belonging to students under 13 other than as is required to provide the services. Personal information is not publicly available or available to users other than as described in this paragraph.

In the event of a corporate restructuring, sale, transfer, or assignment of assets or business merger, divestiture, or other changes to the company's

control or financial status, we may disclose information to the prospective seller or buyer of such business or assets.

We may also share information with government bodies, dispute resolution organizations, law enforcement agencies, or third parties in connection with a lawful request for information, as part of our cooperation in a law enforcement or similar investigation, or otherwise to protect our rights, as applicable.

Review, Access and Retention of Information

Alelo will delete students' personal information upon request and, in any event, accounts belonging to students under 13 that are inactive for 12 months are deleted. Voice recordings are deleted after 12 months.

Alelo allows teachers, schools, and/or districts to review and delete the personal information collected from their students. If you are a parent and/or legal guardian and wish to review or delete the personal information belonging to your child, please contact us at DPO@alelo.com.

If we learn we have collected personal information from a student under 13 other than pursuant to this section, or if we learn that a student under 13 has provided us personal information beyond what we requested from him or her, we will delete that information as quickly as possible. If you believe that a student under 13 may have provided us personal information in violation of this section, please contact us at DPO@alelo.com.

10. Additional Disclosure for European Union (EU) and United Kingdom (UK) Residents

Data Transfers

As a US company, most of our operations are conducted in the United States and in order to provide the Service, personal information will be processed in the United States, where laws regarding processing of personal information may be less stringent than the laws in your country. We provide appropriate protections for cross-border transfers as required by applicable law for international data transfers. With respect to transfers originating from the

European Economic Area, we implement the standard contractual clauses approved by the European Commission. Where required by such laws, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below.

Retention of Your Personal Information

We typically retain personal information for as long as necessary to fulfill the purposes for which the information was collected; as otherwise needed to address tax, corporate, compliance, employment, litigation, and other legal rights and obligations; and as otherwise permitted by law. We retain speech audio recordings until no longer needed.

Legal Basis for Processing Your Personal Information

Where required, we have several different legal grounds on which we collect and process your personal information for the purposes set out in the *How We Use Your Information* section above, including: (i) as may be necessary to perform a contract with you; (ii) as necessary to comply with a legal obligation; (iii) consent (where consent has been provided as appropriate under applicable law); and (iv) as necessary for our legitimate interests (such as when we act to maintain our business generally, including maintaining the safety and security of the Service).

Automated Decision-Making

We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or that otherwise significantly affects you.

Your Rights

As available and except as limited under applicable law, individuals in the EU and UK have the rights described below:

- **Access.** You have the right to request a copy of the personal information we are processing about you, which we will provide to you in electronic form.

- Rectification. You have the right to require that any incomplete or inaccurate personal information that we process about you is amended.
- Deletion. You have the right to request that we delete personal information that we process about you, unless, for example, we are required to retain such data in order to comply with a legal obligation or to establish, exercise or defend a legal claim.
- Restriction. You have the right to request that we restrict our processing of your personal information where: (i) you believe such data to be inaccurate; (ii) our processing is unlawful; or (iii) we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not want us to delete it.
- Portability. You have the right to request that we transmit the personal information we hold with respect to you to another data controller.
- Objection. Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your situation (e.g., direct marketing). We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data to establish, exercise or defend a legal claim.
- Withdrawing Consent. If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

Some rights may be limited, and we may need to retain certain personal information, as required or permitted by applicable law. To inquire about our exercise of the rights listed above, at any time, contact us at DPO@alelo.com with the subject line "Privacy" so that we can get your email to the right team, or log-in to your account. We will respond to your request consistent with applicable law.

If you feel that your request or concern was not satisfactorily resolved by us, you have the right to lodge a complaint with your local data protection authority.

11. Third-Party Links and Business Partners

In an attempt to provide increased value to our visitors, we may choose various third-party websites (e.g., social media network) to link to within our Site. In addition, we provide the Content Navigator service to our business partners who host the Content Navigator on their website. We have no control over these websites, each of which has separate privacy and data collection practices independent from us. As such, we have no responsibility or liability for these independent policies or actions and are not responsible for the privacy practices of the content of any such websites. Please note that these other websites may send their own cookies to users, collect data, or solicit personal information, and we encourage you to review their policies before engaging with these third-party websites.

12. Effective Date and Changes to This Privacy Policy

This Privacy Policy is effective as of the date at the top of this Policy. Alelo has the discretion to update this Privacy Policy at any time. When we do, we will revise the effective date at the top of this page. We encourage users to frequently check this page for any changes and to stay informed about how we are helping to protect that personal information we collect, especially before you provide information, and particularly personal information, directly to us through the Service. In the event of a material change to this Privacy Policy, we will provide a conspicuous message either through our Sites or via an email address associated with your account informing you of the change.

If you have any questions about Alelo's Privacy Policy or our information practices, please contact us at support@alelo.com.

13. Contact Information

If you have any questions or comments relating to the Service or these Terms, please contact us at the information below.

Alelo Inc.
2390 Las Posas Rd., Unit C
P.O. Box 454
Camarillo, CA 93010, USA
DPO@alelo.com