

PRIVACY POLICY

At **Wumbox**, the **privacy and security of our users, especially children, is of utmost importance to us**. We are **committed to protecting and respecting the privacy of all users** of our application. This privacy policy **describes how we collect, use, and protect users' personal information**.

ABOUT THE INFORMATION COLLECTED AND ITS USE

Information we collect

It is important to note that our application **only records personal information provided by the responsible adult**. This information is obtained **at the time of user registration**. This information includes:

- **Registration Information:**
 - Username (alias or first name if the adult prefers)
 - Email
 - Password
- **Device Information:**
 - Type of device
 - Operating system
 - Application version
- **Information on User Progress within the Application:**
 - **Usage:** frequency of use, session duration, activities completed
 - **Performance:** correct answers, incorrect answers, scores, exercise characteristics, types of errors, educational achievements
 - **Timing:** activation time, total resolution time

We do not collect sensitive information from children during gameplay.

Use of information

The personal information collected will be used to:

- Improve the user's **learning experience**
- Gain a better **understanding of how the application is used**
- **Personalize content** and educational activities for each user
- **Improve the application**, detect and fix technical and usability issues
- **Perform analysis and statistics** to enhance the application and users' learning
- **Comply with legal and regulatory obligations**
- Conduct **academic research** on the impact of the application on learning processes

Considerations on the use of information

- We adhere to the **principle of data minimization**, collecting only the minimal and

necessary information to ensure a proper learning experience within the application.

- **Personal data will only be retained as long as the user remains active** or until the deletion of the data is requested.
- **Personal information of users will not be shared, sold, or rented** to third parties.
- We follow the **principle of proactive responsibility**, committing to comply with all necessary obligations and measures to ensure the safe and responsible use of the collected data.

When data is used for academic research or educational impact studies, we ensure that it is anonymized or aggregated, meaning that personal identifiers are removed. This protects user identities while allowing us to gain insights to improve our services and contribute to educational research.

We use AI and machine learning tools, such as Vertex AI and Gemini models, to personalize user experiences and adapt content based on individual learning patterns. This means that some personal data may be used to drive AI-based adaptive learning features, enabling a more customized and engaging experience.

Information security

We take **appropriate technical and organizational measures to protect users' personal information** against unauthorized access, disclosure, alteration, and destruction. Additionally, we maintain internal policies and procedures to ensure that personal information is collected and used appropriately.

User rights

Users have the **right to access, correct, or delete their personal information**. Additionally, users can object to the processing of their personal information or **withdraw their consent at any time**. To exercise these rights, users can **contact us** using the following contact information:

- **Contact Phone:** +54 9 11 7365-0998
- **Contact Email:** contacto@wumbox.com

Changes to the Privacy Policy

We **may update this privacy policy from time to time**. We will notify users of significant changes to our privacy policy via email or in-app notifications, so you are always aware of how your information is being handled. We encourage you to review this policy periodically, but important updates will be communicated directly.

REGULATION 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

In **compliance with current legislation**, Wumbox (hereinafter, also the APP) commits to adopting the necessary technical and organizational measures, according to the level of security appropriate to the risk of the data collected.

Laws incorporated in this Privacy Policy

This privacy policy is adapted to the current Spanish and European regulations on the protection of personal data on the internet. Specifically, it respects the following laws:

- **Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016:** Concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data (GDPR).
- **Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights (LOPD-GDD).**
- **Royal Decree 1720/2007, of December 21:** Which approves the Regulation for the development of Organic Law 15/1999, of December 13, on the Protection of Personal Data (RDLOPD).
- **Law 34/2002, of July 11, on Information Society Services and Electronic Commerce (LSSI-CE).**

Identity of the data controller

The data controller for the personal data collected on Wumbox is OXED Inc. Their contact details are as follows:

- **Contact Phone:** +54 9 11 7365-0998
- **Contact Email:** contacto@wumbox.com

Personal data registration

In compliance with the GDPR and LOPD-GDD, we inform you that personal data collected by Wumbox through forms on its pages will be incorporated into our database to facilitate, expedite, and fulfill the commitments established between Wumbox and the User, or to maintain the relationship that is established in the forms that the User fills out, or to address a request or query from the User. Additionally, in accordance with the GDPR and LOPD-GDD, unless the exception provided in Article 30.5 of the GDPR applies, a record of processing activities specifying, according to their purposes, the processing activities carried out and other circumstances established in the GDPR will be maintained.

Principles applicable to the processing of personal data

The processing of the User's personal data will be subject to the following principles as outlined in Article 5 of the GDPR and Article 4 and following of Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights:

- **Principle of Lawfulness, Fairness, and Transparency:** User consent will be required at all times with completely transparent information about the purposes for which personal data is collected (see "Information We Collect").
- **Principle of Purpose Limitation:** Personal data will be collected for specified, explicit, and legitimate purposes (see "Use of Information").
- **Principle of Data Minimization:** Only the strictly necessary personal data will be collected

in relation to the purposes for which they are processed (see "Considerations on the Use of Information").

- **Principle of Accuracy:** Personal data must be accurate and kept up to date.
- **Principle of Storage Limitation:** Personal data will only be retained in a way that allows identification of the User for as long as necessary for the purposes of their processing (see "Considerations on the Use of Information").
- **Principle of Integrity and Confidentiality:** Personal data will be processed in a manner that ensures their security and confidentiality. Data encryption will be used at all times. HTTPS will be used for all communications.
- **Principle of Proactive Responsibility:** The Data Controller will be responsible for ensuring that the above principles are complied with (see "Considerations on the Use of Information").

Categories of personal data

The categories of data processed in Wumbox are solely identifying data. Under no circumstances are special categories of personal data, as defined in Article 9 of the GDPR, processed.

Legal basis for processing personal data

The legal basis for processing personal data is **consent**. Wumbox is committed to obtaining the **express and verifiable consent of the User for the processing of their personal data** for one or more specific purposes. This express consent is **obtained during the first login**.

The User has the right to withdraw their consent at any time. Withdrawing consent is as easy as giving it. To withdraw consent, the User must communicate through one of the following means:

- **Contact Phone:** +54 9 11 7365-0998
- **Contact Email:** contacto@wumbox.com
- Or through **Settings**

As a general rule, the withdrawal of consent will not condition the use of the app.

When the User must or can provide their data through forms to make inquiries, request information, or for reasons related to the app's content, they will be informed if the completion of any of them is mandatory because they are essential for the correct development of the operation performed.

Purposes for processing personal data

Personal data is collected and managed by Wumbox for the purpose of facilitating, expediting, and fulfilling the commitments established between the app and the User, or maintaining the relationship established in the forms that the User fills out, or to address a request or inquiry. The data will be used to improve the quality and functioning of the app.

At the time personal data is obtained, the User will be informed about the specific purpose(s) for which the personal data will be processed; that is, the use or uses that will be made of the information collected (see "About the Information Collected and Its Use").

Retention periods for personal data

Personal data will only be retained for the minimum time necessary for the purposes of their processing or until the User requests their deletion.

Recipients of personal data

The User's personal data will not be shared with third parties. In any case, at the time personal data is obtained, the User will be informed about the recipients or categories of recipients of the personal data.

Personal data of minors

In accordance with Articles 8 of the GDPR and 7 of Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights, only individuals over the age of 14 can give their consent for the lawful processing of their personal data by Wumbox. If the User is under 14 years of age, the consent of the parents or guardians will be required for the processing, and this will only be considered lawful to the extent that they have authorized it.

Confidentiality and security of personal data

Wumbox commits to adopting the necessary technical and organizational measures, according to the level of security appropriate to the risk of the data collected, to ensure the security of personal data and to prevent accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to transmitted, stored, or otherwise processed personal data.

However, since Wumbox cannot guarantee the absolute invulnerability of the internet or the total absence of hackers or others who may fraudulently access personal data, the Data Controller commits to promptly notify the User when a personal data security breach occurs that is likely to result in a high risk to the rights and freedoms of natural persons. As defined in Article 4 of the GDPR, a personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

Personal data will be treated as confidential by the Data Controller, who commits to informing and ensuring through a legal or contractual obligation that such confidentiality is respected by its employees, associates, and anyone to whom it makes the information accessible.

Rights arising from the processing of personal data

Users have the following rights recognized in the GDPR and Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights, and can exercise these rights with respect to Wumbox:

Right of access

Users have the right to obtain confirmation as to whether Wumbox is processing their personal data and, if so, to access their specific personal data and information about the processing that Wumbox has carried out or is carrying out. This includes, among other things, information available on the origin of such data and the recipients of the communications made or planned.

Right to rectification

Users have the right to request the modification of their personal data if it is inaccurate or incomplete, taking into account the purposes of the processing.

Right to erasure ("Right to be Forgotten")

Users have the right, as long as current legislation does not stipulate otherwise, to request the deletion of their personal data when it is no longer necessary for the purposes for which it was collected or processed; when the user withdraws their consent and there is no other legal basis for processing; when the user objects to the processing and there is no legitimate reason to continue; when the personal data has been processed unlawfully; when the personal data must be deleted to comply with a legal obligation; or when the personal data has been obtained from a direct offer of information society services to a child under 14 years of age. In addition to deleting the data, the Data Controller, taking into account the available technology and the cost of its application, must take reasonable steps to inform other controllers processing the personal data of the user's request to delete any links to those personal data.

Right to restriction of processing

Users have the right to restrict the processing of their personal data when they contest the accuracy of their personal data; when the processing is unlawful; when the Data Controller no longer needs the personal data, but the user requires them for the establishment, exercise, or defense of legal claims; and when the user has objected to the processing.

Right to data portability

When processing is carried out by automated means, users have the right to receive their personal data from the Data Controller in a structured, commonly used, and machine-readable format and to transmit those data to another controller. Whenever technically possible, the Data Controller will transmit the data directly to that other controller.

Right to object

Users have the right to object to the processing of their personal data or to request that the processing be stopped by Wumbox.

Right not to be subject to automated decision-making, including profiling

Users have the right not to be subject to a decision based solely on automated processing, including profiling, except where the applicable legislation provides otherwise.

Users can exercise their rights by sending a written communication to the Data Controller with the reference "GDPR-wumbox.com," specifying:

- Name, surname(s), and a copy of the user's ID. In cases where representation is admitted, identification by the same means of the person representing the user, as well as the document accrediting the representation, will also be necessary. The photocopy of the ID can be replaced by any other valid means in law that certifies identity.
- Specific request with the reasons for the request or the information the user wants to access.
- Address for notifications.
- Date and signature of the applicant.
- Any document that accredits the request made.

This request and any other attached document can be sent to the following postal address and/or email:

- **Postal Address:** Paraguay 647, 7 27, Buenos Aires, Argentina
- **Email:** contacto@wumbox.com

Complaints to the supervisory authority

If the User considers that there is a problem or infringement of the current regulations in the way their personal data is being processed, they will have the right to effective judicial protection and to file a complaint with a supervisory authority, particularly in the State where they have their habitual residence, place of work, or place of the alleged infringement. In the case of Spain, the supervisory authority is the Spanish Data Protection Agency (<http://www.agpd.es>).

Acceptance and changes to this Privacy Policy

It is necessary for the User to have read and be in agreement with the terms of personal data protection contained in this Privacy Policy, as well as to accept the processing of their personal data so that the Data Controller can proceed in the manner, during the periods, and for the purposes stated. The use of the app will imply acceptance of its Privacy Policy.

Wumbox reserves the right to modify its Privacy Policy, according to its own criteria, or motivated by a legislative, jurisprudential, or doctrinal change by the Spanish Data Protection Agency. Changes or updates to this Privacy Policy will not be explicitly notified to the User. The User is advised to check this page periodically to stay informed of the latest changes or updates.

This Privacy Policy was updated to adapt to Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and the free movement of such data (GDPR) and to

Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights.