# PRIVACY POLICY

Last Updated: [01.07.2023] (updates will be posted here)

Nexloq UG ("Nexloq," "we," "us," "our") is committed to protecting your privacy. This Privacy Policy describes how we collect, use, and disclose personal information in connection with our mobile application Nexloq ("App"), our website, and related services (collectively, "Services"). By using our Services, you agree to the practices described in this policy. Our privacy practices are in line with the General Data Protection Regulation (GDPR).

## **About Us**

We are Nexloq UG (haftungsbeschränkt), registered under number (Aktenzeichen) HRB 253757 B, referred to as Nexloq throughout this document.

Our headquarters are located at:

Wegedornstr. 167 12524 Berlin Berlin, Germany.

In some cases, we act as a processor on behalf of educational institutions and other organizations, which act as the controller. We encourage you to review the privacy policies of these institutions to understand their data processing practices.

By using our (nexloq) services (App or Website) you will give your consent to the following policy. By making an account for nexloq App the user have to agree to the privacy policy by clicking the checkmark.

### 1. Information We Collect

We may collect and process the following categories of personal information, either on our own behalf or on behalf of one or more educational institutions:

**Account Information:** When you sign up for an account on our App, we collect your name, email address, password, unique user ID, and other account details as necessary. You can sign up using third-party services such as Facebook, Google, or Apple. We gather information from these services following their privacy policies.

**User Profile:** You can provide additional personal information in your user profile, such as your location and preferences. You can also upload and change a profile picture at any time. This picture will just be shown to the nexlog team and you.

**Usage Information:** We collect information about your interactions with the App, including your preferences, and content viewed, to give you the best possible user experience.

**Payment Information:** We collect necessary payment details when you purchase services via the App. We don't store any sensitive payment information.

**Communication:** If you contact our support team via the chat button, we collect the content of your messages and any other information you provide.

**Geolocation and Other Permissions:** We may request access to geolocation data and certain features like the gallery to enhance the user experience and to upload a profile picture.

Nexloq collects personal information in a number of ways. Information is obtained, for example, when you visit our Website, register on our App, communicate with us via social media, or subscribe to our newsletter. We may also receive personal information from associated educational institutions, subsidiaries, partners, or other service providers.

#### 2. Use of Information

### We use the information collected for the following purposes:

To create and manage user accounts, deliver products or services, and improve our services.

To send administrative information, updates, marketing communications, and respond to inquiries.

To enforce our terms and conditions, protect against abuse and malicious users, and respond to legal requests.

Nexloq utilizes personal data to deliver our services effectively. Here are some examples of how we process personal data:

Tailored Recommendations: By considering your chosen country or field of study, we provide you with program recommendations that align with your profile. This helps you discover the most suitable options.

Enhanced User Experience: To streamline and optimize your experience, we analyze your interactions with our services. This involves assessing your usage patterns, combining this data with your personal account, registration details, cookies, and similar technologies. Through this process, we can improve our search algorithms, evaluate your admission chances, and identify relevant educational opportunities.

#### To Communicate with You:

Nexloq processes contact details to effectively communicate with you, address your inquiries, and handle any complaints. This applies to both students and (potential) clients, customers, or partners.

For this purpose, Nexloq processes the following personal data: communication history, name, digital contact details, and messages. Additionally, for (potential) clients, the following data may also be processed: phone number, employer, and country.

Nexloq is authorized to process personal data for this purpose based on its legitimate interests or the legitimate interests of its educational partners. The legitimate interest is for Nexloq to be able to communicate with you and provide the best possible service by connecting you with educational institutions or other service providers of your choice. This enables Nexloq and its partners to effectively address any questions or complaints you may have in an efficient and timely manner.

## **Processing Student Applications for Specific Universities:**

Nexloq processes personal information to facilitate student applications for specific universities through Nexloq's platform, providing a streamlined application process. In this case, Nexloq acts as a processor, processing your information on behalf of the respective educational institution.

For this purpose, Nexloq processes the following personal data on behalf of the educational institution: name, digital contact details, analog contact details, passport information, educational transcripts, CV, credentials (such as English language proficiency), demographic information, shortlisted programs, preferred disciplines and countries, funding situation, preferred start period, previous education information, and work experience.

Nexloq is authorized to process personal data for this purpose as it is necessary to pursue the legitimate interests of the educational institutions. The legitimate interest is for Nexloq to provide efficient services by connecting you with the educational institutions of your choice and facilitating the application process.

## **Enabling Reviews:**

Nexloq allows you to share your valuable feedback by leaving reviews about specific educational institutions or programs.

For this purpose, Nexloq processes the following personal data (including ratings): program, educational institution, personal experiences, and overall impressions related to the educational institution and its location. Your overall rating and any additional comments you provide will be displayed on our platforms.

Please be aware that written reviews may undergo a verification process by Nexloq before being published, either automatically or manually. This process ensures that only high-quality reviews are showcased.

# **Direct Marketing:**

Nexloq processes personal information for direct marketing purposes. This means that we may use your personal data to send you newsletters, promotions, or other marketing communications. We analyze your information to tailor these communications according to your specific interests and preferences. For example, if our analysis indicates that you may be interested in certain programs or a specific country, we customize our newsletters and website content to provide relevant information. Our marketing communications may be sent through various channels, including email, social media, and your personal online account.

Nexloq is authorized to process personal data for direct marketing purposes based on your consent or our legitimate interests. You have the right to withdraw your consent or object to the processing of your personal data for direct marketing purposes at any time. The withdrawal or objection does not affect the lawfulness of the processing carried out prior to such withdrawal or objection.

To object or withdraw your consent for receiving marketing communications, please send an E-Mail to: info@nexloq.com

## **Initiating and Evaluating Business Relationships:**

We process your personal data to establish and manage business relationships, including the initiation and performance of agreements for commercial services. This also includes activities aimed at expanding our client database.

\*Legitimate interests\* could be for example:

**Service Delivery and Improvement**: Nexloq has a legitimate interest in processing personal data to deliver and improve its services. This can include making sure that the app functions correctly, tailoring the user experience, and providing program recommendations based on the user's profile and preferences.

**Direct Marketing**: Nexloq has a legitimate interest in processing personal data for direct marketing purposes. This can involve sending newsletters, promotional materials, or other communications tailored to the interests and preferences of the user.

**Security**: Nexloq has a legitimate interest in ensuring the security of its services. This can involve processing personal data to detect and prevent fraudulent activities, unauthorized access to systems or services, and to maintain the integrity of their information systems and networks.

**Internal Administration**: Nexloq has a legitimate interest in processing personal data for internal administrative purposes, such as maintaining records, managing employees, and ensuring the efficient operation of the organization.

**Research and Analytics**: Nexloq has a legitimate interest in processing personal data for research and analytics purposes, such as collecting and analyzing data for scientific, statistical, or market research purposes.

**Legal Claims**: Nexloq has a legitimate interest in processing personal data to establish, exercise, or defend legal claims, including investigations, proceedings, or disputes.

**Business Operations**: Nexloq has a legitimate interest in processing personal data to support its core business activities, as long as it respects the individual's privacy rights. This could involve processing data to facilitate student applications for universities, or to enable user reviews about specific educational institutions or programs.

Balancing of these interests with the rights and freedoms of individuals is a crucial aspect of Nexloq. Nexloq will consider and respect the privacy rights of its users when pursuing these legitimate interests.

#### 3. Information Sharing

We may share your personal information with:

**Third-Party Service Providers:** We use third-party service providers, including but not limited to, Amazon AWS and amazoncognito.com, to assist with App functionality,

analytics, and customer support. These providers are bound by contractual obligations to keep your information confidential and use it only for the services they provide to us. Third-Party providers can be: Google, Apple, Amazon, Superjoi.com and Universities the user might apply.

**Legal Compliance and Protection:** We may disclose personal information to comply with legal obligations, protect our rights, privacy, or safety, or in the event of a merger or business sale.

**Business Affiliates and Third Parties:** We may share personal data with business affiliates and third parties to enhance our services.

We may disclose personal information without your consent or consultation if we believe it is necessary to comply with legal obligations, enforce our terms and conditions, safeguard the security of our website, or prevent fraud.

# **Third-Party Websites**

Our website may contain links to third-party websites. When you click on these links, you will leave the Nexloq website/App. Please be aware that this privacy policy does not apply to third-party websites. Nexloq does not assume any liability for the privacy practices or use of your personal data by these third-party websites. Your use of such websites is at your own risk. We recommend reviewing the respective privacy policies of these third parties for more information on how they handle your personal information, if available.

#### 4. Data Security

We implement security measures from Amazon AWS to protect your personal information. However, no method of transmission over the internet or electronic storage is completely secure. We will inform users via email in case of a data breach and undertake necessary measures to mitigate the impact.

The data will be stored for the time the user has a profile at nexloq or for period of 12 months (1 year) after profile is deleted to ensure Account Recovery: Sometimes, users may choose to delete their profiles or accounts but later realize they need to regain access or reactivate their account. By retaining their data for a limited period of 12 months we are able to recover users account. We will notify the relevant supervisory authority within 72 hours, and also inform the affected users.

### 5. Your Choices & Rights

**Account Deletion:** You can delete your account at any time using the delete button in the App settings. Certain information may be retained as necessary to comply with legal obligations or for legitimate business purposes.

**Marketing Communications:** You can unsubscribe from our email newsletters by clicking the unsubscribe link in the emails.

You also have the following rights under GDPR:

Access and Copy: You can request access to or a copy of the personal data we have collected about you.

Rectification and Removal: If there are any inaccuracies in your personal data, you can request its rectification. You also have the right to request the removal of your personal data or the restriction of its processing, if there is a valid reason to do so.

Portability: You have the right to request that your personal data be transferred to another service provider.

Objection: You have the right to object to the processing of your personal data under certain circumstances.

Automated decision-making: You have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning you or similarly significantly affects you.

To exercise any of your rights, please send a request to: <a href="mailto:nexloq.inquiries@gmail.com">nexloq.inquiries@gmail.com</a> and we assist you under which circumstances you are able to erase your data.

## 6. Children's Privacy

Our App is not intended for use by individuals under the age of 13. If we become aware that we have collected personal information from a child under 13 without parental consent, we will delete the information promptly. We recommend that children between the ages of 13 and 18 obtain their parent's permission before submitting information over the Internet. By using the nexloq App or Services, you are representing that you are at least 18 years old, or that you are at least 13 years old and have your parents' permission to use the website and any Services offered by us. Age verification mechanisms is the age field in the profile settings. If the user fills out the field and age is under 13 we send out a message and ask for users age. If the user is under the age of 13 we will remove the account. If parents or guardians believe their child's data has been collected should contact us for deletion.

#### 7. International Transfers

Nexloq may share your personal data with countries outside your country of residence. This can occur when sharing information with educational institutions or our subsidiaries, with whom we have explicit agreements regarding the use of data. These agreements are often in the form of written and signed Data Processing Agreements. It's important to note that some of these countries may not provide the same level of personal data protection as your own country.

Nexloq does not routinely store your information outside the European Economic Area (EEA) and does not transfer your data outside the EEA without your consent or ensuring adequate safeguards for the secure transfer of your personal information. Adequate Safeguards are safeguards which we consider as safe and are comparable to GDPR. For example, we consider the safeguard measurements of Universities in the United Sates as safe.

If you contact, apply to, or enroll at an educational institution through Nexloq that is located outside the European Economic Area, your data will need to be transferred to that country but only with your consent.

# 8. Updates to this Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal obligations. We will provide notice of any material updates through the App or by other means. We encourage you to review this policy periodically, because any updates to this policy will be posted here.

# 9. Cookies and Similar Technologies

We use cookies and similar technologies to enhance your experience with our Services. More information about our use of cookies can be found in our Cookie Policy.

#### 10. Contact Us

For any questions about this Privacy Policy or to exercise your data protection rights, please contact us by:

Email: info@nexlog.com

Postal Address: Wegedornstr. 167, 12524 Berlin, Germany

We also provide a chat button in the App for your convenience.