Pregrade's Privacy Policy

Last updated on July 9, 2024

At Learnovate Technologies Limited, doing business as Pregrade ('Pregrade', the 'Service', the 'Site', or 'We/Us/Our') takes your privacy seriously. We are committed to protecting your privacy in accordance with the relevant data protection laws in force in places included but not limited to Hong Kong SAR. This Privacy Policy is incorporated into and is part of Pregrade's Terms of Conditions. By using Pregrade, you ('you', 'User', or 'Customer') consent to the Privacy Policy and we may update it from time to time, as necessary according to any changes in the applicable law.

This privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have questions or concerns, please contact us at pregrade@learnovate.ai.

Please read the following to learn more about our Privacy Policy.

Information We Collect

Non-Personal Information Collected

To improve the quality of Pregrade, we track information provided to us by your browser using cookies or by our software application when you view or use Pregrade, such as the website you came from (known as the "referring URL"), the type of browser you use, the device from which you connected to Pregrade, the time and date of access, and other information that does not personally identify you. We track this information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a User's browser from our servers and are stored on the User's computer hard drive. Sending a cookie to a User's browser enables us to collect Non-Personal Information about that User and keep a record of the User's preferences when utilizing our services, both on an individual and aggregate basis.

Personal Information Collected When You Register for an Account and Use Our Service

To use Pregrade, you would need to submit your information such as name, email address, password, occupation, phone number, educational data, and school information for the sign-up process. We only ask for the minimum required personal data to provide our Service. By registering, you are authorizing us to collect, store, and use your information in accordance with this Privacy Policy.

How You May Modify Your Personal Information

Users may access, amend, and delete the Personal Information collected during the registration directly in Pregrade or contacting customer support directly at pregrade@learnovate.ai
We will work with the institution or the User to respond to those requests in the time requested by the User or otherwise as required by law.

Payment Information Collected

Payment information includes the Personal Information required for payment collection by our payment processors under their terms.

Submitted Uploaded Documents and Information for Grading Collected

To use the Service, you would need to upload documents and provide other relevant information such as essay question, grading level, batch name, and other necessary information to submit a batch of essays for grading. By registering for an account to use Pregrade, you are authorizing us to collect, store, use your information and the submitted documents in accordance with this Privacy Policy. The submitted documents remain the intellectual property of the student, teacher, or institution, and they retain copyright.

Children's Privacy

Pregrade is not directed to anyone under the age of 13 or otherwise under the age of consent in their jurisdiction. Pregrade does not knowingly collect or solicit information from anyone under the age of 13 or allow anyone under the age of 13 to sign up for the Service. If we learn that we have gathered Personal Information from anyone under the age of 13 without the consent of a parent or guardian, we will delete that information as soon as possible. If you believe we have collected such information, please contact us at: pregrade@learnovate.ai.

In the event that a Customer chooses to use our Services with Users under the age of 13 or otherwise under the age of consent in their jurisdiction, Pregrade replies to the Customer to obtain any necessary prior, verifiable parental or legal guardian consent.

Parents wishing to review or request deletion of their child's Personal Information should contact the Customer. We will work directly with our Customer to facilitate any such requests.

How We Use and Share Information

Personal Information

We highly value your Personal Information and have implemented measures to ensure its security. Unless specified otherwise in this Privacy Policy, we do not sell, trade, rent, or otherwise share for marketing purposes your Personal Information with third parties, products, or services without your explicit consent.

We do, however, share Personal Information with vendors who perform services for us. These could include email servers that need access to your email address to send communications from

us. These vendors use your Personal Information strictly at our direction and in compliance with our Privacy Policy.

In general, we use the Personal Information you provide to facilitate our communication with you. For instance, we may use Personal Information to:

- Respond to your questions
- Seek feedback from you
- Provide you with technical support
- Notify you about product updates

Non-Personal Information

Generally, we use Non-Personal Information to enhance Pregrade and tailor the user experience. We also aggregate Non-Personal Information to identify trends and analyze usage patterns on Pregrade.

This Privacy Policy does not restrict our use or disclosure of Non-Personal Information. Consequently, we reserve the right to use and disclose such Non-Personal Information at our discretion to our partners, advertisers, and other third parties.

In the event we undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are allowed by this Privacy Policy, and that any acquirer of our assets may continue to process your Personal Information as specified in this Privacy Policy.

If our information practices change in the future, we will post the updated policies on the Site so that you may opt out of the new information practices. We encourage you to check the Site periodically if you are concerned about how your information is used.

Use of AI on the Documents You Upload and Submit to Grade

The uploaded documents and information you submit on Pregrade to grade essays are collected, stored, and used to provide an essay grading service. We do not use your personal, Non-Personal Information, or uploaded essays and documents to train or improve our Al models or third party products or services. We do not sell your data and documents to outside vendors or third party products or services. The submitted documents remain the intellectual property of the student, teacher, or institution, and they retain copyright.

Third Party Services

We may engage with authorized third party service providers or partners to facilitate our delivery of the Services and to provide certain features on our behalf, such as data hosting, analytics, content delivery, maintenance, security, and similar functions. These third parties may require a

limited amount of information, including personal information, in order to deliver their services on our behalf. All information that is sent to and from third parties is securely encrypted.

We might also share Personal Information with external parties if we believe in good faith that access, utilization, preservation, or disclosure of the information is reasonably necessary to:

- Comply with any applicable legal process or enforceable governmental request
- Enforce our Terms of Conditions, including investigation of potential violations
- Address fraud, security, or technical issues
- Protect against harm to the rights, property, or safety of our users or the public as required or permitted by law

As part of the Service, we may provide links to or compatibility with other websites or applications. However, please note that we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through our Site and Service.

As such, this Privacy Policy does not extend to your use of a third-party website accessed by selecting a link on our Site or via our Service. If you access or use the Service through or on another website or application, the privacy policy of that other website or application will govern your access or use.

We strongly recommend our users to review the privacy statements of any other websites before deciding to use them. This will ensure that you have a clear understanding of how these websites collect, use, and share your information.

Data Retention

We may retain certain User and Customer Personal Information for the period necessary to enable the continued use of the Services, to fulfill the purposes outlined in this Privacy Policy, for legally permissible business purposes, or as otherwise required by law. How long we retain specific Personal Information varies depending on its type and use, after which it will be deleted.

We may retain Non-Personal Information, including aggregated, de-identified, or anonymized data for lawfully permissible purposes.

How We Protect Information

Personal and Non-Personal Information

We employ a variety of security measures designed to safeguard your information from unauthorized access. Protection of your account is facilitated by your account password, and we strongly encourage you to to maintain the confidentiality of your Personal Information by not disclosing your password and by logging out of your account after each use.

To further secure your information against potential security breaches, we have put into operation certain technological security measures. These include:

- Encryption of data
- Use of firewalls
- Application of secure socket layer (SSL) technology

How We Protect Your Submitted Documents and Information For Grading

Your uploaded grading information is stored and used securely by Pregrade. We securely encrypt the data uploaded by you and it is access limited. Pregrade only permits properly trained, authorized employees and vendors to access your data. In general this may include:

- You experience a technical issue using the Site and need our help
- Gathering feedback of the Service
- To enhance the user experience of the Service
- To provide customer support

We do not sell your data and documents to outside vendors or third party products or services. The submitted documents remain the intellectual property of the student, teacher, or institution, and they retain copyright.

Despite these measures, it is important to note that no security measures are foolproof. There remains a possibility, however slight, that your information could be accessed, disclosed, altered, or destroyed by breaching such firewalls and secure server software. By using our Service, you acknowledge that you understand and agree to assume these risks.

Your Rights Regarding the Use of Your Personal Information

Opt-out policy

You possess the right at any time to prevent us from contacting you for marketing purposes. Every time we send out a newsletter communication to a User, you have the choice to opt out of receiving future promotional communications. This can be done by following the unsubscribe instructions provided in each newsletter email. It is important to note that, regardless of the promotional preferences you indicate either by unsubscribing or opting out, we may continue to send you administrative emails. These could include, for instance, periodic updates to our Privacy Policy. Your receipt of such administrative communications is considered part of your relationship with us, and they are necessary to provide you with updates and services related to your use of our Service.

We do not send email messages on behalf of third parties.

Updates to This Policy

The Company reserves the right to change this policy and our Terms of Service at any time as our services evolve.. We will notify you of significant changes to our Privacy Policy by sending a notice to the primary email address specified in your account or by placing a prominent notice on our site. So that you are aware of when changes have been made we will also adjust the "Last Updated" date in this Privacy Policy. The "Last Updated" note of this policy indicates when it was last revised, and updates will become effective when they are posted.

Contact Us

If you have any questions regarding this Privacy Policy or the practices of this Site, please contact us by sending an email to: pregrade@learnovate.ai

Company Address

Learnovate Technologies Limited 72 Tat Chee Avenue, Innocentre, Kowloon Tong, Hong Kong