WALL STREET LANGUAGES LTD.
DBA RENNERT INTERNATIONAL

PRIVACY POLICY

Protecting your private information is our priority. This Statement of Privacy applies to the www.rennert.com and Rennert International and governs data collection and usage. For this Privacy Policy, unless otherwise noted, all references to Rennert International include www.rennert.com, Rennert, Rennert New York.

This Privacy Policy explains who we are, how we obtain and use personal information about you, why we are allowed to do so by law, who has access to your personal information and what your rights are. Please review it carefully.

You can review the following sections to find out more about:

• Changes to data protection legislation
• Who we are
• What personal information we collect and why
• How we use your personal information
• Who we share your personal information with and where it is stored
• Legal grounds for using your personal information
• How long we keep your personal information
• Your rights
• How you can contact us or make a complaint

CHANGES TO THIS PRIVACY POLICY

You have the right to object to us using your personal information for our organization’s legitimate purposes. For more information about our organization’s legitimate purposes for using your personal information, and your rights and how you can exercise them, please see the sections Legal grounds for using your personal information and Your rights below.

CHANGE TO DATA PROTECTION LEGISLATION

The law concerning data protection in the EU is changing in May 2018. This Privacy Policy has been updated with effect from 25 May 2018 to reflect your rights and to let you know how we collect and use personal information about you.

We are committed to protecting your personal information. We will always keep your personal information safe and comply with applicable data protection legislation when using your personal information. This Privacy Policy explains how we will do that.
WHO WE ARE

We are Wall Street Languages LTDA, DBA Rennert International, a private limited company incorporated in (and subject to the laws of) the United States. Our registered address is at:

Wall Street Languages Ltd., DBA Rennert International
211 East 43rd Street, floor 19th
New York, NY 10017

In this Privacy Policy, Wall Street Languages LTDA is also referred to as "Rennert International", "Rennert", "we", "us" or "our."

We are the "controller" of the personal information you provide to us.
This Privacy Policy covers the use of your information by us.

WHAT PERSONAL INFORMATION WE COLLECT AND WHY

Personal information is any information which identifies you personally, whether directly (for example, your name) or indirectly (for example, information about your use of our service).

We collect information from you when you register on our site, subscribe to our newsletters, respond to one of our surveys, or fill out a form.
When registering your details or making a booking for a service through our website or by completing a form, we may collect the following from you:

**Your name:** This allows us to refer to you when speaking to you and to address any post we may need to send to you specifically.

**Your telephone number:** This is needed to enable us to communicate with you. For example, we may need to call you back regarding a booking, or if we get disconnected from you. We may also call you in response to your expressed interest in Rennert, but will only do so if you tell us that you’re happy to be contacted in such a way.

**Your mailing address:** We need your address to communicate with you and, when required, to send you information and documents related to your booking.

**Your email address:** The email address you provide may be used to send you information and updates pertaining to your booking, and/or to occasionally send you company news, updates, or related product or service information.

**Your country of residence, country of birth, nationality, passport number and passport expiry date:** We need to know these details to help you with visa-related issues concerning your booking.
Your date of birth: We need to know your date of birth to ensure you are placed in the right age-level course and/or accommodation.

Your gender: We need to know your gender to ensure we place you in the appropriate accommodation.

Your current level of English language proficiency: This information helps us tailor the services we may offer to you and to help track your learning with us.

Your credit card information: We need to know your credit card information to pay for services provided by us and to complete your booking if you are booking directly with us.

Information about any needs you may have for additional assistance (which may include information concerning your health and any medical conditions you may have): We may ask whether you have any needs for additional assistance that you would like us to take into account. This will help us tailor our services to you. For example, if you tell us that you have impaired mobility, we can ensure you are placed in accommodation that meets your needs. You don’t have to provide this information to us, and, if you choose not to, it won’t prevent us from providing our services to you (we may, however, be unable to provide any additional assistance).

Your academic results: When you study with us we will record and use your academic results to help us monitor your progress and set appropriate work in class and outside the classroom.

Emergency contact details: We need you to provide contact details for certain persons you have a close relationship to (for instance, your parents, spouse, partner, close friend or family member). We would only use this information in the event of an emergency situation involving you. By providing this information, you agree that you have informed the relevant person(s) of the provision of their contact details to us, and that they are happy for you to do so.

As part of providing our services to you, we may also collect the following information about you:

Performance record: We collect and use details of your performance during our programs to help track your learning progress and to better tailor the future provision of our services to you.

Attendance record: We collect and use details of your attendance at our programs to help track your learning progress and so that we can comply with our regulatory requirements in certain countries.
When you visit our website, you may also provide us with personal information through our use of cookies. These are essentially small text files that are stored on your device. They assist with your use of our website and enable us to distinguish you from other users so that we can understand how you navigate through our website. Please see our Cookie Policy to find out more.

We also obtain the information outlined above from other organizations that we work with (unless you have asked those organizations not to share your information). These are detailed in the table below.

<table>
<thead>
<tr>
<th>Third party</th>
<th>What information might be shared</th>
<th>Why the information might be shared</th>
</tr>
</thead>
<tbody>
<tr>
<td>With our agents</td>
<td>Information you enter into our contact forms.</td>
<td>To enable us to process and manage your booking</td>
</tr>
<tr>
<td>With New York State Department of Education</td>
<td>Information from your student file</td>
<td>To comply our regulatory requirements in New York state</td>
</tr>
</tbody>
</table>

**HOW WE USE YOUR PERSONAL INFORMATION**

In addition to the uses outlined above, we may also use your personal information to:

- personalize your experience (your information helps us to better respond to your individual needs)
- Improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you)
- Improve customer service (your information helps us to more effectively respond to your customer service requests and support needs)
- Process transactions
- Administer a contest, promotion, survey or other site feature
- Send periodic emails

We only ever use your personal information where we have a legal right to do so. Please see the *Legal grounds for using your personal information* section below for further information.

**WHO WE SHARE YOUR PERSONAL INFORMATION WITH AND WHERE IT IS STORED**

To fulfill our commitment to you, we work with several third-party organizations that perform certain tasks on our behalf. For example, we use several other organizations to assist us in operating our website, conducting our business, or servicing you, so long as these organizations agree to keep your information confidential.

We share your personal information with these third parties only to the extent necessary in order to enable them to provide the service you require on our behalf. These third parties act
on our instructions and are “processors” of your personal information.

In addition, we may disclose your personal information:

- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to protect the rights, property or safety of our organization, our customers or others; and
- to successors in title or replacement operators of all or part of our organization, subject to the data being used for the same purposes as originally specified.

The table below sets out details of the third parties to whom we disclose your personal information, and how they will use it. These organizations may only transfer your data outside of the European Economic Area if they act in accordance with our instructions and apply appropriate safeguards (for instance, use of EU model clauses) to do so. This information may be updated from time to time, but we will always obtain similar assurances in the event that we disclose your personal information to third parties.

<table>
<thead>
<tr>
<th>Name of recipient</th>
<th>Personal information shared</th>
<th>Why we share your personal information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Our entities (Rennert Staff members)</strong></td>
<td>All personal information outlined above, which is necessary for the provision of our services by our local group entity.</td>
<td>So that our local group entity may provide services on our behalf to you.</td>
</tr>
<tr>
<td><strong>Accommodation providers</strong></td>
<td>Booking information, including gender, age, nationality and any medical conditions, special needs or dietary preferences.</td>
<td>To ensure you receive the service you have booked and you are in accommodation suitable for your needs.</td>
</tr>
<tr>
<td><strong>Transport providers</strong></td>
<td>Name, arrival details, departure details and accommodation address.</td>
<td>To provide the transport service you have booked.</td>
</tr>
<tr>
<td><strong>Activity providers</strong></td>
<td>Name, age, gender.</td>
<td>To provide the transport service you have booked.</td>
</tr>
<tr>
<td><strong>Our agents</strong></td>
<td>Name, date of birth, gender, mailing address, email address, phone number, nationality, purpose of studies.</td>
<td>So that our agent partners may provide services on our behalf to you</td>
</tr>
<tr>
<td><strong>Insurance providers</strong></td>
<td>Name, age, address, arrival and departure details.</td>
<td>To provide personal insurance you have purchased.</td>
</tr>
<tr>
<td><strong>Regulatory authorities</strong></td>
<td>Name and other identifying details. Your attendance record at our programs.</td>
<td>To enable us to comply with our regulatory obligations.</td>
</tr>
</tbody>
</table>
We implement a variety of security measures to maintain the safety of your personal data when you place an order or enter, submit, or access your personal data. Your personal data will be stored locally by us but may also be stored and backed up on servers located in the United States or by our third-party cloud service provider. We ensure that your data is protected by requiring the recipients of your data to enter in standard contractual clauses which have been approved by the European Commission. If you would like to see a copy of these clauses, you can contact us using the details set out at the end of this Privacy Policy.

**LEGAL GROUNDS FOR USING YOUR PERSONAL INFORMATION**

We only collect and use your personal information if have legal grounds to do so. We rely on a number of different grounds for handling your personal information. These are as follows:

**For our organization’s legitimate purposes**

In certain circumstances, it is necessary to collect and use your personal information for the purposes of our legitimate interests as an organization, which are to:

- Understand your current level of English proficiency.
- Monitor your academic progress, provide you with feedback on this and customize your class work and work outside the classroom.
- Obtain feedback on student satisfaction in respect of the services we provide to you.

Where we rely on this legal ground for handling your personal information, we consider whether our interests as an organization are overridden by your interests or fundamental rights and freedoms. We have considered these matters and on balance, we consider that our interests described above are not outweighed by your fundamental rights and freedoms. You may request further information from us concerning the process we have followed here.

You have the right to object to the decision we have arrived at. Please see **Your rights** below.

Where we think there is a risk that one of your interests or fundamental rights and freedoms may be affected, we will not use your personal information unless we have obtained your consent to using it in that way.

**For compliance with our legal obligations**

If asked, and if obligated and authorized to do so by law, we share your personal information with law enforcement agencies, regulators, courts or other public authorities.

**For performance of our contract with you**

Aside from the information noted above that we use on the basis of our legitimate purposes and to comply with our legal obligations, we use the information we collect as part of our booking process to assist in entering into a contract with you to provide our services. This may include us providing you with a quote for provision of our services.
CONSENT

We first obtain your consent before we:

• Collect and use your information for the purpose of informing you of information about our business which may include new products, new locations and promotional offers.
• Collect and use personal information concerning your health circumstances.

You may withdraw your consent at any time. Please see Your rights below.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We retain your personal information for no longer than is necessary for the purposes for which it was provided and in accordance with our data retention policy. What this means in practice will vary between different types of information.

In summary, we keep:

• Information about your booking and studies for up to ten years.
• Information about details required to inform you of our activities and offers for up to 5 years (or the point at which you ask us to unsubscribe you from our mailing list).
• Information about your web behavior on our websites up to 38 months.

Following these periods, we will stop using the relevant information and it will either be anonymized or deleted to the extent it is technically feasible to do so.

In certain limited circumstances we may be required to retain your personal information for longer. When determining whether this is necessary for the purpose(s) for which it was provided, we take into account factors including:

• The sensitivity of the personal data we are holding and business risks we face if we delete or anonymize the data.
• Specific regulatory or other legal requirements to hold the information.

YOUR RIGHTS

You have the following rights regarding your personal information.

<table>
<thead>
<tr>
<th>Rights</th>
<th>What does this mean?</th>
</tr>
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<tbody>
<tr>
<td>Right to be informed</td>
<td>You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights. This is why we are providing you with the details of what information we keep in this Privacy Policy.</td>
</tr>
<tr>
<td>Right of access</td>
<td>You have the right to obtain access to your personal information (if we are using it) and certain other information (similar to that provided in this Privacy Policy). This is</td>
</tr>
</tbody>
</table>
so you are aware and can check that we are using your personal information in accordance with data protection law.

<table>
<thead>
<tr>
<th>Right to rectification</th>
<th>You are entitled to have your personal information corrected if it is inaccurate or incomplete</th>
</tr>
</thead>
<tbody>
<tr>
<td>Right to erasure</td>
<td>This is also known as ‘the right to be forgotten’, and, in simple terms, enables you to request the deletion or removal of your personal information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions (for example, we have the right to continue using your personal information if such usage is necessary for compliance with our legal obligations).</td>
</tr>
<tr>
<td>Right to restrict processing</td>
<td>You have the right to ‘block’ or suppress further use of your personal information in certain circumstances (for example, where you think the personal information we are using about you is inaccurate, whilst we verify its accuracy). When usage is restricted, we can still store your personal information, but may not use it further. We keep lists of people who have asked for further use of their personal information to be ‘blocked’ to make sure the restriction is respected in future.</td>
</tr>
<tr>
<td>Right to data portability</td>
<td>You have the right to obtain and reuse your personal information in a structured, commonly used and machine-readable format in certain circumstances when we use your personal information on certain legal grounds, such as consent. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party. The right to data portability does not apply to personal information which it is necessary</td>
</tr>
</tbody>
</table>
for us to process for our organization’s legitimate purposes. Please see the section *Legal grounds for using your personal information* to read about the circumstances in which we use your personal information on the basis of consent or for our organization’s legitimate purposes.

| Right to object to processing on the grounds of legitimate interests | You have the right to object to us using your personal information for our organization’s legitimate purposes. Please see the section *Legal grounds for using your personal information* to read about the circumstances in which we use your personal information for our organization’s legitimate purposes. |
| Right to withdraw consent to processing | If you have given your consent to us to use your personal information for a specific purpose, you have the right to withdraw your consent at any time (although if you do so, it does not mean that any use of your personal information up to that point is unlawful). |
| Right to make a complaint to the data protection authorities | You have the right to make a complaint to the Information Commissioner’s Office (ICO) if you are unhappy with how we have handled your personal information or believe our use of your personal information does not comply with data protection law. |

For more information about your rights or if you would like to exercise any of your rights, you are welcome to contact us at the contact details set out below under *How you can contact us.*

**HOW YOU CAN CONTACT US OR MAKE A COMPLAINT**
If you would like to exercise your data protection rights or if you are unhappy with how we have handled your personal information, you may contact us by mail at:
Wall Street Languages Ltd., DBA Rennert International
211 East 43rd Street, floor 19th
New York, NY 10017 USA
or by email at: eharrison@rennert.com

CHANGES TO THIS PRIVACY POLICY

From time to time we may update this Privacy Policy, and when we do we will provide you with an updated copy.