

Last update: 2018.08.01

This policy covers how Relearn, ("Relearn," "we," "us," or "our") treats personal information that it collects and receives on relearn.jp, sites, and applications related to Relearn. This notice tells you what information we collect, steps we take to protect and secure it, how we use and share information, and finally, how you can contact us with questions or concerns.

1. Information We Collect

1.1. Data you provide to us

Relearn collects personal information (name, email and password) when you register with us, use Relearn products or services (language preferences and time zone location), or post content on a Relearn site.

You have choices about the information in your profile, photo, location or additional contact information. This additional profile information will assist other users in finding and communicating with you but it's your choice whether to include sensitive information or not. Please do not post or add personal data to your profile that you would not want to be publicly available.

Relearn may also collect information about your payment transactions with us and with some of our business partners. This information might include necessary information to process your due payments to us, such as your credit card number.

1.2. Service Use

We may log usage data from your browser when you visit or use our site. We use log-ins, cookies, and internet protocol ("IP") addresses to identify you and log your use and the pages you request.

1.3. Cookies

We use cookies and similar technologies (e.g., pixels and ad tags) to recognize you and/or your device(s) on, off and across different devices. We also allow some others to use cookies as described in our Cookie Policy. You can control cookies through your browser settings and other tools.

2. How We Use Information

Relearn uses information for the following general purposes: products and services provision, billing, identification and authentication, services improvement, contact, research, and anonymous reporting.

2.1. Our Services

Relearn may use your personal information where it is necessary to complete a transaction, to operate or improve the Relearn products and services or to do something that you have asked us to do.

2.2. Communications

We may send you service, technical and administrative emails, messages and other types of communications in connection with any of our paid products and services. You have the possibility to opt-out from our promotion emails.

2.3. Security

We may use your data (including your communications) if we think it's necessary for security purposes or to monitor and prevent possible fraud or other violations of our Terms of use or this Privacy Policy and/or attempts to harm our users.

2.4. Advertising

Advertisements appearing on and off the Relearn Sites, Products or Services and may be delivered to users by Relearn or one of our Web advertising partners using the following data:

- Information from cookies, pixels or ad tags (such as browser type and IP address)
- User provided information
- Information from your use of our services (e.g., pages visited, lessons taken)

Relearn does not share any personally identifiable information with advertisers. Relearn may share general demographic information (such as aggregated statistics about members' language interests) and non-personally identifiable information (such as browser type and IP addresses) with advertisers and partners.

Relearn does not give advertisers access to your individual personal account information.

3. How We Share and Disclose Information

Relearn does not share personal information we learn about you from your use of the Relearn web sites, products and services with others except as described in this policy.

When you provide personal information through using Relearn you are however sharing your personal information with Relearn and its affiliated entities. The use of your personal information by these organizations is subject to this policy.

3.1. Our Services

Relearn will display the first name and last name on your profile. Relearn will display your name and any other user-submitted profile information on your profile according to the preferences you set in your account.

Email addresses and full names may be used when a user invites a friend via email to join Relearn and when Relearn sends notifications to a user related to their use of Relearn.

Relearn may share your personal information where it is necessary to complete a transaction or to operate.

3.2. Service providers

In the course of operating our business it may be necessary or appropriate for us to provide access to your personal information to others such as our service providers, contractors and select vendors so that we can operate Relearn and our business.

3.3. Compliance with Laws

We may share your personal information to respond to subpoenas, court orders, or legal process, to establish or exercise our legal rights or, defend against legal claims and if in our judgment in such circumstances disclosure is required or appropriate.

We may share your personal information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our various terms of use, or as otherwise required by law.

3.4. Change to Relearn's Business

As we continue to develop our business, we may also buy or sell all or part of our business. In such transactions, personally identifiable information you have shared with us is generally one of the business assets that will be transferred. The transferred personally identifiable information will remain subject to the promises made in this privacy policy or subsequent policies to which you have consented.

3.5. With Consent

Relearn may share information with third parties when we have explicit consent to do. It will be clear at the point of collection who is collecting the personal information and whose privacy statement will apply.

4. Cookie Policy

- A cookie is a small amount of data, which often includes an anonymous unique identifier that is sent to your browser from a web site's computers and stored on your computer's hard drive.
- If you reject all cookies, you may not be able to use Relearn services or products that require you to "sign in" and you may not be able to take full advantage of all offerings.
- You can configure your browser to accept all cookies, reject all cookies or notify you when a cookie is set.
- Relearn uses its own cookies for a number of purposes, including to:
 - Require you to re-enter your password after a certain period of time has elapsed to protect you against others accidentally accessing your account contents.
 - Keep track of preferences.
 - Estimate and report our total audience size and traffic.
 - Conduct research to improve the content and services provided.
 - Ensure that visitors are not repeatedly offered the same advertisements and to customize advertising based on browser type and user profile information.
- Relearn lets other entities that show advertisements or provide services on some of our web pages set and access their cookies on your computer. Other entities' use of their cookies is subject to their own privacy policies, and not this policy. Advertisers or other entities do not have access to Relearn cookies.

5. Information Relating to Children

- Protecting the privacy of young children is especially important. For that reason, Relearn does not knowingly collect personally identifiable information through the

Relearn web site from persons under 13 years of age, and no part of Relearn service is directed to persons under 13.

- If you are under 13 years of age, then please do not use or access the Relearn service or web site at any time or in any manner.

6. Third Party Advertising

Advertisements appearing on the Relearn Site may be delivered to users by Relearn or one of our Web advertising partners. Our Web advertising partners may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement. In this way, ad servers may compile information about where you, or others who are using your computer, saw their advertisements and determine which ads are clicked on. This information allows an ad network to deliver targeted advertisements that they believe will be of most interest to you. This privacy policy covers the use of cookies by Relearn and does not cover the use of cookies by any advertisers.

Relearn does not share any personally identifiable information with advertisers. Relearn may share general demographic information (such as aggregated statistics about members' interests and occupations) and non-personally identifiable information (such as browser type and IP addresses) with advertisers and partners. Relearn does not give advertisers access to your individual personal account information. However, by selecting, interacting with or viewing an ad you are consenting to the possibility that the advertiser will make the assumption that you meet the targeting criteria used to display the ad.

7. Changes to this Privacy Policy

Relearn may revise, modify or update this policy. We may notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your particular Relearn account or by placing a prominent notice on our site. You are encouraged to check this policy frequently for any changes as your continued use of the Relearn service indicates your consent to such changes.

8. Confidentiality and Security

No data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. Once we receive your information, we take reasonable measures to secure it on our systems.

If Relearn learns of a security breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using Relearn or providing personal information to us you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of those sites, products and services. We may post a notice on our applicable web sites if a security breach occurs. If this happens, you will need a web browser enabling you to view the applicable web sites. We may also send an email to you at the email address you have provided to us in these circumstances.

9. Managing your Preferences and Personal Information

You can edit your own account information in the Relearn Site. You can also ask our customer service to change, update or fix data. Most personal information you may provide is entirely optional. We do not request additional personal information from minors.

You can ask us for a copy of your personal data collected by Relearn.

You can delete your applicable account by visiting the applicable account deletion page.

If you cannot use the settings and tools to delete, edit or request your information, contact Customer for additional access and assistance:

- Email: admin@relearn.jp

10. International Users

The Relearn web site is hosted in the U.S. and is intended for and directed to users around the world. We may transfer your personal data to countries other than the one in which you live. Our database server providers comply with the E.U.-U.S. Privacy Shield and Swiss-U.S. Privacy Shield to enable the safe transfer of data according to the European Union and Swiss data protection laws. If you are accessing this web site from other regions with laws or regulations governing personal data collection, use, and disclosure, please be advised that through your continued use of this web site, which is governed by this privacy policy, and our Terms of Service, you are transferring your personal information to the U.S. and you consent to that transfer.