

PRIVACY POLICY

CONTENTS

1.	SCOPE. REGULATION	2
2.	INFORMATION WE COLLECT	2
3.	USE OF DATA	3
4.	WHEN WE DISCLOSE INFORMATION TO THIRD PARTIES	4
5.	WITH WHOM WE SHARE INFORMATION	5
6.	USE OF COOKIES	7
7.	SOCIAL NETWORK LOGIN	7
8.	TRANSFER OF YOUR INFORMATION	8
9.	RETENTION OF YOUR INFORMATION	8
10.	SECURITY OF DATA	8
11.	MINORS' PRIVACY.....	8
12.	YOUR DATA PROTECTION RIGHTS	8
13.	AUTOMATED DECISION MAKING	9
14.	CHANGES TO POLICY.....	9
15.	CONTACT US	9
16.	INTERPRETATION.....	10

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1. SCOPE. REGULATION

- 1.1. This privacy policy (the "**Policy**") governs the privacy terms of our website, located at skyeng.eu (the "**Website**"), mobile application and the tools with which we provide you or you provide us with services (altogether referred to as the "**Services**" or the "**Platform**").
- 1.2. The Policy is a legal statement, which explains how AGATON LIMITED, company registration number HE411455, address: Thiseos, 9, Flat/Office 102, Aglantzia, 2121, Nicosia, Cyprus (the "**Company**" or "**we**"), collects, retains, processes, and transfers the data about you which we receive when you access or use the Platform (the "**Personal Data**").
- 1.3. You fully agree and accept the Policy by using or providing any of the Services.
- 1.4. Please, read the Policy carefully, as it will help you to understand the scope of it and make informed decisions about sharing your Personal Data with us.

2. INFORMATION WE COLLECT

- 2.1. We collect several types of the Personal Data for various purposes to provide you with or receive by us the Services and to improve them:
 - 2.1.1. **information you give us.** You give it by filling in some prescribed forms on the Platform, or by communicating with us, for example, via e-mail, phone, messengers or social networks. It includes the information you provide us with when you register to use the Platform. If you contact us, we will keep a record of that correspondence. The information you give us may include, but not limited, to the following **Submitted Data**:

<i>Type of information</i>	<i>Which information exactly we collect</i>
2.1.1.1. contact and personal data	full name, date of birth, gender, language, home address (city and region), email address, phone number, Skype login, WeChat ID (for users in China), education (for tutors, methodologists of introductory classes (the " Methodologists ") and other contractors)
2.1.1.2. account	username, password, account settings and preferences
2.1.1.3. financial	bank account data, if we ask for it (for example, to make a payment or a refund)
2.1.1.4. identity verification	copies of identification documents, such as passport, national ID card; driving license (for tutors and the Methodologists; only if we request – for students); documents confirming education (for tutors and the Methodologists); documents confirming the age (if we ask for them); any other information you provide us with, so that we could comply with our legal obligations and you could prove your eligibility for the use of the Services
2.1.1.5. additional	links to your Google account; accounts on facebook.com, google.com; Level of knowledge (initial level and its progress); purpose of taking part in the classes; hobbies and interests; professional sphere; CVs (for tutors and the Methodologists); whether you open our emails and go via the links in them; photos, audio and video recordings of the classes, in which you participate; information about engagement into the classes; record of your consent to use camera and microphone during the classes; recordings of phone conversations with the users, including the users in charge for launching corporate programs in their companies; correspondence with the users in charge for launching corporate programs in their companies
2.1.1.6. about the user, who is a minor (if applicable) – in addition to the other information	parent's consent; parent information (full name, date of birth, gender, address (city and region), phone number, Skype, email); family members; grade and school, where the user studies; subject of interest; additional courses, classes, etc. (e. g. tutors).

- 2.1.2. **Information automatically collected.** We automatically collect certain information when you visit, use or navigate the Platform. We need this information to maintain the security and operation of the Platform, and for our analytics and reporting purposes.
 This information may include the information about computer or mobile device and their usage. The examples of such information are device information, internet protocol (IP) address, browser type and version, operating system, language settings, mobile network information, mobile operating system, type of mobile browser and version, current location, URL-links, usage information, such as the time you enter and exit the Website,

which pages you visit and which feature you use, technical information specified on the Platform, such as information about cameras, microphones, headphones and Internet speed (the "**Usage Data**").

- 2.1.3. **Data we may collect from third parties.** We may receive data about you from other sources, including third parties, which help us to update, expand, and analyze our records; prevent or detect fraud; process payments; or analyze how you use the Services (the "**Third Party Data**").
- 2.1.4. The information we collect has determined purposes such as for the use of the Services and/or for operating purposes for Company. The Company agrees to not treat any of the collected information for purposes that are inconsistent or different to the purposes for which the information was requested for.

3. USE OF DATA

- 3.1. We use the personal information we collect via the Platform and/or any of the means as described in clause 2.1.1. for the following purposes:
- 3.1.1. as it is necessary for our legitimate business interests; and/or
- 3.1.2. to enter into or perform a contract with you for using the Platform; and/or
- 3.1.3. for our regular and ordinary course of business; and/or
- 3.1.4. as you have given consent, so that we process the information; and/or
- 3.1.5. to comply with our legal obligations.
- 3.1.6. to defend our legal rights and comply with court and/or administrative orders, should it be necessary
- 3.2. Please find the description how we use your Personal Data, on which legal bases we rely, what are our legitimate interests (where appropriate):

<i>Type of data we use</i>	<i>Purpose and/or activity and legal basis</i>
3.2.1. the Submitted Data	(1) Arranging for necessary verifications; (2) to execute a contract about using the Platform between you and us at your initiative; and (3) perform this contract, which includes: (i) creating and maintaining your account; (ii) establishing and maintaining a responsible commercial relationship with you; (iii) fulfilling our obligations under the contract with you and guiding you through the contract performance; (iv) enforcing our terms, conditions and policies for the Services (v) identification of your account in our automated management systems, in particular CRM
3.2.2. the Submitted Data, the Usage Data, the Third-Party Data	(1) to verify your identity – (i) to prevent fraud, deception and other illegal activities; and (ii) confirm your eligibility to use the Services; (2) improve our counter-fraud practices. It is our legitimate interest to ensure that the Platform is not used for fraud, and all the users are eligible to use it
3.2.3. the Submitted Data, the Usage Data	for our legitimate interests: communication with you and direct marketing. If you agree, we will provide you with news, information about changes to the Services, special offers and general information about other services we offer, similar to those that you have already purchased or enquired about. The Company understands that you accept receiving this information should there be no request to cancel or to unsubscribe from receiving said information.
3.2.4. the Submitted Data; the Usage Data; the Third-Party Data	for our legitimate interests: (1) to gather analysis or valuable information, so that we could evaluate and improve our Service; (2) detect, prevent and address technical issues of our Platform; (3) administer our Platform for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; (4) ensure that we present the content of our Platform to you in the most effective manner; (5) keep our Platform safe and secure
3.2.5. the Submitted Data, the Usage Data	to comply with our legal obligations: (1) to respond in the course of legal, regulatory, arbitration procedures; (2) respond the requests for information, which are issued by public authorities or other third parties; (3) prevent harm as legally required. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine, how to respond.

- 3.3. Please find the description of the information we use based on your consent:

<i>User category</i>	<i>Personal Data we process based on your consent</i>
3.3.1. Students, including minors	copy of identification document and bank account data (if requested); full name; email address; phone number; links to the student's Google account; accounts on facebook.com; messenger accounts: WhatsApp, Viber, Telegram, Skype; whether you open our emails and go via the links in them; current location; gender; date of birth; photos, video and audio recordings of classes; Level of knowledge (initial and its progress); purpose of taking part in the classes; hobbies and interests; professional sphere; whether you open our emails and goes via the links in them; information about engagement into the classes; recordings of phone calls. For minors, in addition to the information in this clause 3.3.1: information about the student's family members; subjects of interest; additional courses, classes, etc. (e. g. tutors)
3.3.2. potential student (you register at the Platform but do not take any class)	full name; gender; email address; phone number; current location; date of birth; Level of knowledge; purpose of taking part in the classes; hobbies and interests; professional sphere; whether the user opens our emails and goes via the links in them; information about engagement into the classes; language; address (city and region); recordings of phone calls
3.3.3. user in charge for launching corporate program in your company	full name; email address; phone number; current location; recordings of phone conversations; correspondence
3.3.4. tutor	copy of identification document; photo; gender; date of birth; photos, video and audio recordings of the classes; current location; information about education; exam certificates; CV; recordings of phone conversations
3.3.5. the Methodologist or other contractor	copy of identification document; current location; photo; gender; date of birth; recordings of phone calls
3.3.6. minor student's parent	date of birth; gender; current location; recordings of phone calls

4. WHEN WE DISCLOSE INFORMATION TO THIRD PARTIES

4.1. We only share the information:

- 4.1.1. to comply with laws;
- 4.1.2. to protect your rights;
- 4.1.3. to fulfill the business obligations (for example, if it is necessary to engage a third party to provide you with the Services);
- 4.1.4. if you granted us your consent to do so.

4.2. By accepting the Policy, you fully accept and agree that we may disclose the information about you only:

- 4.2.1. **to comply with laws.** We may disclose your information where we are legally required to do so to comply with the applicable law, governmental requests, a judicial proceeding, court order, or legal process. For example, we may disclose the information in response to a court order, a subpoena, a public authorities' request to meet national security or law enforcement requirements. We may also disclose your information when we conduct or cooperate on investigations of fraud or other illegal activity, to prevent and detect fraud or any form of crime;
- 4.2.2. **to allow third parties to render the services.** We may share your data with business partners, service providers, contractors or agents performing the services for us or on our behalf and require access to such information to perform their obligations. The examples of such third parties' services are payment processing, data analysis, email delivery, hosting, customer service, providing us with access to anti-fraud databases, screening. We may allow selected third parties to use tracking technology on the Platform, which will enable

them to collect the data about how you interact with the Platform over time. We may also share the information about you with our affiliates. Affiliates include our parent companies and any subsidiaries, joint venture partners or other members of our group of companies. Our affiliates, partners and contractors will also be required to meet our standards on processing data and security;

- 4.2.3. **to transfer our business.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. We will provide you with the notice before your Personal Data is transferred and become subject to a different privacy policy;
- 4.2.4. **if you agreed.** We may disclose your Personal Data for other purposes described in section 5 if you granted us consent to do so.

5. WITH WHOM WE SHARE INFORMATION

5.1. Competent Authorities:

- 5.1.1. Upon request, and in the cases as described in clause 4.2.1.
- 5.1.2. For the resolution of any conflict or dispute arising out the relationship between the users and the Company.

5.2. Invoicing and Billing Providers

5.3. Storage Providers:

We store the data on our secured servers. The databases are copied to the Amazon Web Services' data center (Frankfurt, Germany):

<i>Storage provider</i>	<i>Who operates it</i>	<i>Where can you read the privacy policy</i>
5.3.1. Amazon Web Services	Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855, Luxembourg	https://aws.amazon.com/ru/privacy/

5.4. Advertising Platforms and Applications:

The platforms, which we use for advertising, allow us to optimize and serve advertising based on the use of the Platform by tracking the Usage Data and by using cookies.

<i>Advertising Platform</i>	<i>Who operates it</i>	<i>Purpose, for which we use it</i>	<i>Who and how stores and processes the data</i>	<i>Where can you read the privacy policy</i>	<i>How can you opt out</i>
5.4.1. Google Ads	" Google ": Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA	(1) to track your actions after you have been forwarded to our Platform by clicking the Google advertisement; (2) to measure the effectiveness of Google Ads for market research and statistical	Google	https://policies.google.com/privacy	as described at https://policies.google.com/technologies/ads , in the section

<i>Advertising Platform</i>	<i>Who operates it</i>	<i>Purpose, for which we use it</i>	<i>Who and how stores and processes the data</i>	<i>Where can you read the privacy policy</i>	<i>How can you opt out</i>
		purposes, in particular, to better understand and deliver ads and make them more relevant to you			How you can control advertising cookies
5.4.2. Facebook Pixel; Facebook SDK	"Facebook": (1) Facebook Inc., 1601 Willow Road, Menlo Park, CA 94025, USA, – if you live outside the EU; or (2) Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, – if you live in the EU	(1) to track your actions after you have been forwarded to our Platform by clicking a Facebook advertisement; (2) to measure the effectiveness of Facebook ads for market research and statistical purposes, in particular, to better understand and deliver ads and make them more relevant to you	Facebook. The data is anonymous to us. The Facebook may connect this data with your Facebook account and use it for its own advertising purposes	https://www.facebook.com/about/privacy/	(1) for Facebook Pixel – through your Facebook account settings. You can do so both for Facebook Pixel and cookies; (2) for Facebook SDK – via your device settings

5.5. Marketing and Analytics Platforms:

We share and disclose your cookies and Usage Data for the web and mobile analytics purposes and to personalize the content on our Platform: for example, to offer you not all our Services, but the ones, in which you might be interested.

<i>Provider</i>	<i>Who operates it</i>	<i>Purpose, for which we use it</i>	<i>Where can you read the privacy policy</i>	<i>How can you opt out transmitting and processing the data generated by cookies by third party provider</i>
5.5.1. Google Analytics; Firebase	the Google	(1) to track the Website traffic and your behavior at the Platform; (2) analyze, how you use the Platform to improve its performance and manage advertising placements based on your interests and preferences	https://policies.google.com/privacy	(1) for Google Analytics – by installing the add-on for your browser: https://tools.google.com/dlpage/gaoptout ; (2) for Firebase – through the device settings, such as the device advertising settings for mobile apps

5.6. CRM Providers

6. USE OF COOKIES

6.1. How we Use Cookies

- 6.1.1. We use cookies to distinguish you from other users of our Platform. This helps us to improve your experience and the Platform itself: we store your preferences and analyze, how you use the Platform.
- 6.1.2. A cookie is a small amount of data, which are stored in your web browser while you are browsing our Platform. Our Website sends cookies to your browser; your device stores them. We assign a different cookie to each device, which accesses our Platform. Using cookies will not give us access to any data on your device other than the data stored in the cookie. The cookies we collect do not store your Personal Data such as name or your address.
- 6.1.3. The cookies are stored permanently, not just for a session period. However, you can easily delete cookies in the web browser settings. You can learn more about cookies management in section 6.3.
- 6.1.4. By using the Platform, you consent to the use of cookies as specified in the Policy.

6.2. Types of Cookies we Use

<i>Cookies Type</i>	<i>Why do we use them. Other comments</i>
6.2.1. essential cookies	they are necessary to operate our Platform. Without the use of these cookies, some parts of our Platform would not function
6.2.2. functional cookies	we use them to identify your preferences and customize the Platform subject to them. Functional cookies allow us to remember the choices you have made on our Platform and store information that you have already provided (e. g. login, username, language and other preferences) to enhance your browsing experience. These features help us to improve your visit to the Platform
6.2.3. analytical and performance cookies	they: (1) collect the information about how you use our Platform, including to which pages you go most often; (2) allow us to see the patterns of how you use the Platform; and (3) help us to record any errors appearing during your use of the Platform. These cookies do not identify you and all the information is anonymous to us. We use it only to improve functioning and performance of our Platform. We may engage third parties to track and analyze, how you use our Platform, as described in the Policy
6.2.4. third party cookies	some of our third party service providers use their own cookies on our Platform and we do not control such cookies. Third parties use their cookies for analytical and targeting purposes. Using the information, which third parties collect using their cookies, is governed by their privacy policies. This Policy does not cover the use of cookies by any third party service provider. Please, see section 5 to know, with whom we share the information.

6.3. Cookies Management

- 6.3.1. You can customize cookies, delete or refuse all the cookies at any time: just activate the setting of your browser, which allows you to refuse the cookies. Please, note that this can lead to impossibility to access certain functions of the Platform.
- 6.3.2. For more information about the cookies management, including refusal from them, please refer to the settings of the browsers: [Chrome](#), [Edge](#), [Firefox](#), [Internet Explorer](#), [Opera](#), [Safari](#). You can also opt out the cookies, which are used by Google, Facebook, as specified in clauses 5.4.1., 5.4.2 and 5.4.3.

7. INITIAL LOGIN AND/OR SOCIAL NETWORK LOGIN

- 7.1. Our Platform gives you an option to register and log in using your account in Facebook or Google. If you choose to log in using your social network account, the social network provider will share your PersonalData with us. By logging in using your social network account you are authorizing us to collect, store, and use in accordance with the Policy any and all data, with which you have authorized the social network provider to provide us. Such data include: (1) "general" category of the Personal Data – your first and last name, gender, date of birth, location, username, e-mail address, phone number, links to other social networks accounts, list of friends; (2) sensitive data like your photo; (3) any other data you have chosen to make available. The data we receive from the social network provider depend on your settings and their privacy policy. We will use the received data only for the purposes that are described in the Policy.
- 7.2. When you create an account for access to and use of the Platform, you guarantee that the information you provide is accurate, current and complete at all times.
- 7.3. Your account and use of the Services is for your own personal, non-commercial use and not for the benefit of any third party. You are solely responsible for maintaining the confidentiality of your account and password, including but not limited to restriction of access to any third party, Application, Website and any electronic means (i.e. computer, tablet, etc.) by which you access the Platform or Website. You accept all responsibility and liability for all activity that takes place on your account under your credentials. You must notify the Company immediately in the event you become aware of or suspect any breach of security or unauthorized use of your account.

7.4. You may not use any username that is or infers the name or identity of another person or entity that is not lawfully available to use, a name or trademark that is subject to any rights of another person or entity other than you, without appropriate authorization. You may not use a username that is offensive, vulgar or obscene. The Company reserves the right to refuse service, terminate accounts, remove or edit content, in its sole discretion.

8. TRANSFER OF YOUR INFORMATION

8.1. The countries, to which we or the third parties we engage transfer your data, may not have the same data protection laws as your jurisdiction. So, in these cases we take reasonable security measures, which the applicable laws prescribe, to ensure that your data are properly protected when they are transferred outside your jurisdiction.

8.2. By accepting the Policy and providing us with your Personal Data, you agree to such transfers. If you don't agree to such transfers, you will no longer be able to use the Platform. When we make such transfers, we: (1) comply with our legal and regulatory obligations; and (2) implement the appropriate. We will take all the steps to ensure that your data are treated securely and in accordance with the Policy.

8.3. The Policy applies regardless of the location, in which we store or process your Personal Data.

8.4. Where we have given you (or where you have chosen) a password, which enables you to access our Platform, you are responsible for keeping this password confidential. Please, do not to share a password with anyone.

9. RETENTION OF YOUR INFORMATION

9.1. The retention period of your data depends on your user category and shall be determined under the applicable law.

9.2. After the retention period ends, we will:

9.2.1. delete your Personal Data; or

9.2.2. anonymize them, so that they can no longer be associated with you.

We may use such anonymized data for research or statistical purposes or to improve our Services. We may use them indefinitely without further notice to you.

9.3. We have to store within the mandatory period (if any) even the Personal Data, which we collected when you register an account at the Website but do not activate it (for example, do not complete verification) or do not make a payment to start using the Services. This clause 9.4 is applied only if the mandatory period is prescribed by our legal and contractual obligations.

10. SECURITY OF DATA

10.1. We adopt appropriate physical, electronic, management and technical measures to protect the security of any Personal Data we process. However, please also remember that we cannot ensure or warrant the security of your data, which you transmit to our Platform. Although we will do our best to protect your Personal Data, transmission of the Personal Data to and from our Platform is at your own risk. Please, access the Services only in a secure environment: for example, use firewalls, choose the provider, which encrypts the traffic, etc. After we receive the Personal Data, we use strict procedures and security features to try to prevent unauthorized access. However, we will not be liable for any damages, which relate to unauthorized access to the Personal Data.

11. MINORS' PRIVACY

11.1. Our Services are for general audience and can be used by minors. Minors can access some publicly available parts of the Website and its content without providing us with Personal Data. However, the minors, who wish to get access to all the content and features of our Services, have to register with us. This requires collecting certain Personal Data from them. We may ask you to provide us with the information and documents confirming the age. If the you are a minor, we may require to provide us with the documents confirming your emancipation or legal consent of your parent or legal guardian.

11.2. In addition, we use certain technologies, such as cookies, to automatically collect information from our users (including minors) when they visit or use the Platform. We collect, process, store and disclose the minors' data as described in the Policy.

12. YOUR DATA PROTECTION RIGHTS

12.1. Your data protection rights are:

<i>Right</i>	<i>What you may do</i>	<i>How to execute the right</i>
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12.1.1. to access the Personal Data	(1) obtain a confirmation, if we process your Personal Data; (2) access your Personal Data and the information, how we use your Personal Data	please, contact us, as specified in section 15
12.1.2. to rectify inaccurate data	request that any incomplete or inaccurate Personal Data about you are corrected	please, contact us, as specified in section 15
12.1.3. to object to processing	object to processing your Personal Data if we process them based on the legitimate interests (please, see the examples of our legitimate interests in clauses 3.2.2–3.2.4), use them for direct marketing or statistical purposes	please, contact us, as specified in section 15
12.1.4. to make us your data portable	request that in certain circumstances we provide you with a copy of your Personal Data in structured, commonly used and machine-readable format	please, contact us, as specified in section 15
12.1.5. to have your data erased	request that we delete your Personal Data in some circumstances – for example, we no longer need them, or you withdraw your consent, which was the basis for processing	please, contact us, as specified in section 15
12.1.6. to withdraw consent to processing the data	withdraw your consent for processing of your Personal Data	please, contact us, as specified in section 15
12.1.7. to restrict the processing	ask to restrict or stop collection, use, processing and/or disclosure of your Personal Data	please, contact us, as specified in section 15
12.1.8. to withdraw consent to electronic marketing	opt out receiving our marketing emails	please, contact us, as specified in section 15 or click the unsubscribe link in any our marketing email
12.1.9. to be informed about the safeguards, which we arrange the data transfer to a third country or an international organization	ask us about these safeguards	please, contact us, as specified in section 15
12.1.10. to file complaints	to complain to a data protection authority about our collection and use of your Personal Data	please, contact your local data protection authority

12.2. Please, keep in mind that there may be exceptions to these rights under the Cyprus data protection law, with which we must comply, or under the legislation, with which a data processor we engage must comply. Thus, we may reject the request about execution of your rights where permitted or required by these laws.

12.3. If we reject your request, we will describe the grounds for it in our response. In any case, you may file a complaint for our refusal to the supervisory authority.

12.4. Please, note that we may ask you to verify your identity before we respond the request and, in certain circumstances, charge a fee to cover our costs. Our time limit to respond is one month after we receive the request. If it takes longer to process your request, we will notify you. In any case, we cannot extend the response timeframe for more than two months after the first month for response passes. This clause 12.4 is not applied to your requests, which are specified in clauses 12.1.8, 12.1.10.

12.5. If you opt out our marketing emails (clause 12.1.8), we will still need to send you Services-related emails, which are necessary to administrate and use your account.

13. AUTOMATED DECISION MAKING

We don't apply automated decision making (making user profiles based on the Personal Data, etc.).

14. CHANGES TO POLICY

We may modify the Policy at any time. If we make material changes to the Policy, we may notify you on our Platform or via email. We will also change the version number and issue date at the beginning of the Policy. Any changes we make to the Policy are effective on or after the issue date. Each new version replaces any prior version of the Policy. We encourage you to review the Policy frequently to be informed of how we are protecting your information.

15. CONTACT US

If you have questions, comments or requests, which relate to the Policy, please contact our Data Protection Officer at dpo@skyeng.eu

16. INTERPRETATION

16.1. References to **clauses** and **sections** mean references to clauses and sections of this Policy. Expression "**including**" and other similar expressions mean including, without limitation.

16.2. The definitions in the Policy shall have the following meanings:

- 16.2.1. **Company** has the meaning specified in clause 1.2;
- 16.2.2. **Facebook** has the meaning specified in clause 5.4.2;
- 16.2.3. **Methodologist** has the meaning specified in clause 2.1.1.1;
- 16.2.4. **Personal Data** has the meaning specified in clause 1.2;
- 16.2.5. **Platform** has the meaning specified in clause 1.1;
- 16.2.6. **Policy** has the meaning specified in clause 1.1;
- 16.2.7. **Services** has the meaning specified in clause 1.1;
- 16.2.8. **Submitted Data** has the meaning specified in clause 2.1.1;
- 16.2.9. **Third Party Data** has the meaning specified in clause 2.1.3;
- 16.2.10. **Usage Data** has the meaning specified in clause 2.1.2;
- 16.2.11. **we** has the meaning specified in clause 1.2;
- 16.2.12. **Website** has the meaning specified in clause 1.1.