

## LEVELA

### Privacy Policy

**Last updated: 13 August 2025**

Prudence Foundation (“we”, “our”, “us”) takes the privacy and protection of your personal data seriously. We are the data controller for personal data collected in connection with your use of Levela (the “Platform”). We are established in Hong Kong with a registered address at 13th Floor, One International Finance Centre, 1 Harbour View Street, Central, Hong Kong.

This Privacy Policy sets out the basis on which we will process any personal data we collect from you, or that you provide to us, in connection with your use of the Platform.

Please read this Privacy Policy carefully so that you understand your rights and how we will collect, use, and process your personal data. This Privacy Policy supplements any other privacy-related notices and policies we may provide to you from time to time and is not intended to override them. If you do not agree with this Privacy Policy, you should not use the Platform or otherwise provide your information to us.

For ease of reference, here is a summary of the information contained in this Privacy Policy.

- **Who does this Privacy Policy apply to?**

This Privacy Policy applies to any user of the Platform. The Platform is intended for users aged 16 and older. If you are under the age of legal majority in your jurisdiction (e.g., under 18), your parent or legal guardian must agree to this Privacy Policy on your behalf.

- **What information do we collect and why?**

We collect information you provide during registration, such as your name, email address, age, gender, and country, to set up and manage your account. We also collect data about your usage of the Platform, such as your progress through learning modules and quiz results, to provide our services, track your progress, and improve our offerings.

- **Who do we share your information with?**

Your information may be shared with our affiliates and selected third-party service providers who support the operation of the Platform (e.g., cloud hosting). We may also be required by law or a court order to disclose certain information.

- **Where do we store your information and for how long?**

Your information is stored in Singapore. Our support and technical teams may access your information from our offices around the world to support the Platform's operation. We will retain your information for as long as you maintain an account with us, or until you choose to permanently delete it.

- **What rights do I have over my information?**

Depending on your location, you may have certain rights regarding your personal data, such

as rights of access, correction, deletion, or the right to object to our processing of your information.

- **How can you get in touch with us?**

If you have any questions, you can contact our Data Privacy Officer at our registered address above or email us at [\[Your DPO/Privacy Contact Email\]](#).

- **How will we notify you of changes to this Privacy Policy?**

We may update this Privacy Policy from time to time. We will note the "Last Updated" date at the top and encourage you to check this page periodically for changes.

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## THE INFORMATION WE COLLECT, HOW WE USE IT, AND HOW LONG WE STORE IT

This section explains the types of personal data we collect from you and why. It also identifies the legal basis we rely on to process your personal data where required by law. We do not keep your data for longer than is necessary.

Personal Data	Use	Legal Basis for Processing	Retention Period
Information you provide to us directly			
<b>Account Information:</b> Username, password, email address.	We use this information to create and manage your account, communicate with you about your account, and ensure its security.	Performance of our contract with you (the Terms of Service); Legitimate interest (for security and communication).	Stored for as long as you maintain an account with us, or until you choose to permanently delete your account.

<b>Profile Information:</b> Your name, age, country of residence.	We use this information to personalize your learning experience, conduct aggregated and anonymized analysis on Platform usage to make improvements, and ensure the Platform is age-appropriate.	Consent; Legitimate interest (to improve our services).	Stored for as long as you maintain an account with us, or until you choose to permanently delete your account.
<b>Information collected automatically</b>			
<b>Usage and Activity Data:</b> Your progress through learning modules, quiz scores, content viewed, features used (e.g., daily challenges), Settings Push notifications, Language Preferences and other interactions with the Platform.	We use this information to deliver the Platform's core features, such as tracking your learning progress, enabling you to resume modules, and providing personalized feedback. We also use this data in an aggregated and anonymized form for analytics to improve the Platform.	Performance of our contract with you (to provide the service); Legitimate interest (to improve our services).	Stored for as long as you maintain an account with us, or until you choose to permanently delete your account.
<b>Technical Information:</b> IP address, device type and Device ID, operating system, browser type, Location, .	We use this technical information to ensure the Platform functions correctly, for security purposes, and for analytics.	Legitimate interest (for functionality, security, and analytics).	Stored for the duration necessary to provide the service and for security analysis.

## WHO WE SHARE YOUR INFORMATION WITH

We may share your personal data with:

- **Companies within our corporate group** who help operate the Platform.
- **Third-party service providers** who process data on our behalf, such as cloud and data hosting providers. These providers may only use your data in accordance with our instructions and this Privacy Policy.
- **Legal, regulatory, or judicial authorities** where we are legally required to disclose information, to comply with the law, to protect the safety and security of our users and the public, or to enforce our legal rights.
- **Third parties in connection with a business transaction**, such as a merger, sale of assets, or bankruptcy.

## WHERE WE STORE YOUR INFORMATION

The personal data we collect from you will be stored in [Singapore](#). Our support and technical teams are located in our and/or our affiliates' offices around the world and may have access to your information to support the Platform. We take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy and applicable data protection laws.

## SECURITY

We implement appropriate technical and organizational measures to protect your personal data. However, no transmission of information via the internet is completely secure. While we do our best to protect your data, we cannot guarantee its security, and any transmission is at your own risk.

## YOUR RIGHTS

Depending on the laws of your jurisdiction, you may have the following rights in relation to your personal data:

- **Access:** The right to access the personal data we hold about you.
- **Correction:** The right to correct any of your personal data we hold that is inaccurate.
- **Erasure (Deletion):** The right to request the deletion of your personal data in certain circumstances.
- **Portability:** The right to receive a copy of your personal data and to have it transferred to a third party in certain circumstances.
- **Objection:** The right to object to our processing of your personal data in certain circumstances.
- **Restriction of Processing:** The right to require us to stop processing your personal data, other than for storage, in certain circumstances.
- **Withdrawal of Consent:** Where we rely on consent, you have the right to withdraw it at any time.

You may be able to exercise some of these rights through the settings in your Levela account. To exercise any of your rights, please contact us at [\[Your DPO/Privacy Contact Email\]](#).

## USERS UNDER THE AGE OF MAJORITY

The Platform is intended for users aged 16 and older. If you are at least 16 years old but are considered a minor in your country (e.g., under 18), you must have your parent or legal guardian's permission to use the Platform, and they must review and agree to this Privacy Policy on your behalf.

## THIRD-PARTY LINKS

Our Platform may contain links to other online platforms or services operated by third parties. We are not responsible for their content or privacy practices. Any information you submit to these third parties is subject to their own privacy policies.

## COMPLAINTS

If you have complaints about how we process your personal data, please contact us at [\[Your DPO/Privacy Contact Email\]](#), and we will respond to your request as soon as possible. You may also have the right to lodge a complaint with your local data protection authority.

## CONTACT

For any questions, comments, or concerns about this Privacy Policy, please contact our Data Privacy Officer at [\[Your DPO/Privacy Contact Email\]](#).

## LANGUAGE

Except as otherwise prescribed by law, in the event of any inconsistency between the English language version and a local language version of this Privacy Policy, the English language version will prevail.

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## JURISDICTION-SPECIFIC TERMS

If you are located in one of the jurisdictions below, these terms apply in addition to the terms above.

### Indonesia

- **Consent:** By agreeing to this Privacy Policy, you consent to our collection, use, and sharing of your personal data in accordance with this policy.
- **Age of Majority:** The age of majority is 21. If you are under 21 and not married, your parent or guardian must consent on your behalf.
- **Data Breach:** In the event of a data breach, we will notify you as required by local law.

### Malaysia

- **Minors:** If you are agreeing to this Privacy Policy on behalf of a user under the age of 18 (a minor), you consent to the processing of the minor's personal data and agree to take responsibility for their actions and compliance with this policy.

### Philippines

- **Your Rights:** In addition to the rights listed above, you have the right to be informed about the processing of your data, including automated decision-making, and the right to seek damages for inaccurate, incomplete, or unlawfully obtained personal data.
- **Consent:** By consenting to this policy, you agree to the processing, sharing, and cross-border transfer of your data as described herein.

#### Singapore

- **Cross-border Transfer:** By using the Platform, you consent to the cross-border transfer of your information to any country where we have databases or affiliates, including but not limited to [List of countries, e.g., Japan, Australia, Hong Kong].
- **Data Protection Officer:** Our designated data protection officer can be contacted at [Your DPO/Privacy Contact Email].

#### Thailand

- **Acknowledgement:** By using the Platform, you acknowledge that you have read, understood, and agree to this Privacy Policy. The age of majority is 20. If you are under 20, your parent or guardian must consent on your behalf.

#### Vietnam

- **Consent:** By accepting this Privacy Policy, you expressly authorize us to collect, use, store, process, and transfer your personal data as described.
- **Cross-border Transfer:** When we transfer your data outside of Vietnam, it will be subject to the same or higher levels of security and data protection.
- **Age of Majority:** The age of majority is 18. If you are between 16 and 18, your parent or guardian must consent on your behalf.