Effective Date: May 21, 2026

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HURRA EDUCATION INTERNATIONAL LTD – PRIVACY POLICY

Hurra Education International Ltd 152–160 Capital Office Ltd, Kemp House, City Road, London, United Kingdom, EC1V 2NX Company Number: 14126405

This Privacy Policy ("Policy") explains how Hurra Education International Ltd ("Hurra Türkiye", "we", "us", or "our") collects, uses, stores, shares, and protects personal data in connection with our websites, online learning platforms, mobile applications, and educational services (collectively, the "Services").

This Policy applies to all users aged 4 and above, including: adult students, child students aged 4–17, parents or legal guardians acting on behalf of child students, website visitors and users interacting with our AI-supported assistants and chatbot systems

This Policy forms an integral part of our Terms and Conditions. By accessing or using the Services, you acknowledge that you have read and understood this Policy.

1. Data Controller

1.1 Hurra Education International Ltd acts as the data controller for personal data processed under this Policy.

Company Information
HURRA EDUCATION INTERNATIONAL LTD
CAPITAL OFFICE LTD
KEMP HOUSE 152–160 CITY ROAD
LONDON, UNITED KINGDOM, EC1V 2NX

1.2 For all data protection enquiries, please contact:

- Email: merhaba@hurraturkiye.com
- Phone: +90 539 516 70 70

2. Applicable Data Protection Laws

2.1 We process personal data in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The EU General Data Protection Regulation (GDPR), where applicable
- The UK Data Protection Act 2018
- Turkish Personal Data Protection Law No. 6698 (“KVKK”)
- Other applicable data protection laws depending on the user’s country of residence.

3. Children's Privacy and Parental Consent

3.1 Protecting children's privacy is a core principle of Hurra Türkiye.

3.2 Child students may only use the Services through an account created and managed by a parent or legal guardian. We rely on verifiable parental or legal guardian consent as the legal basis for processing children's personal data.

3.3 We do not knowingly collect personal data directly from children without parental involvement. If we become aware that personal data has been collected in violation of this Policy, we will take prompt steps to delete such data.

4. Categories of Personal Data We Collect

Depending on whether the user is an adult student, child student, or parent/legal guardian, we may collect the following categories of personal data:

4.1 Identification and Account Data

- Full name
- Username or profile identifier
- Date of birth or age range
- Relationship between parent/legal guardian and child student

4.2 Contact Data

- Email address
- Telephone number
- Country of residence

4.3 Educational and Usage Data

- Lesson attendance records
- Language proficiency level
- Homework submissions and learning progress
- Teacher feedback and assessments
- Interaction data during lessons

4.4 Audio, Visual and Communication Data

- Audio and video recordings of online lessons
- Images or voice data shared during lessons
- Voice recordings of phone calls
- Transcripts of conversations
- AI-generated lesson summaries and interaction summaries
- Images, voice data, and written content shared during lessons or chatbot interactions
- Requests and messages submitted through our website chatbot or AI assistant systems

4.5 Technical and Device Data

- IP address
- Device identifiers
- Browser type and operating system
- Log data, timestamps, usage analytics and interaction records

4.6 Payment and Transaction Data

- Subscription details
- Payment status, invoices and transaction history (payment card data is processed securely by third-party payment providers and is not stored by Hurra Türkiye)

5. Purposes and Legal Bases for Processing

5.1 We process personal data for the following purposes and legal bases:

Purpose	Legal Basis
Account creation and service delivery	Performance of a contract
Provision of online lessons	Performance of a contract
AI-supported chatbot and communication services	Legitimate interest; consent where required
Autonomous communication management and smart callback systems	Legitimate interest
Appointment coordination and customer support	Performance of a contract
Platform optimization and AI system improvement	Legitimate interest
Child safety and quality assurance	Legitimate interest; legal obligation
Lesson recording and educational review	Legitimate interest; parental consent
Personalized learning and progress tracking	Legitimate interest; consent where required
Customer support and communications	Performance of a contract; legitimate interest
Legal compliance and dispute resolution	Legal obligation
Platform security and fraud prevention	Legitimate interest

6. Lesson Recording and Monitoring

6.1 Online lessons may be recorded for:

- Educational quality assurance
- Teacher training
- Student safety
- AI-supported lesson analysis
- Service improvement
- Dispute resolution

6.2 Recordings are accessed only by authorized personnel and retained for a limited period in accordance with legal requirements.

6.3 Recordings are not used for marketing or promotional purposes without explicit additional consent.

7. Artificial Intelligence and AI-Supported Services

7.1 Hurra Türkiye uses artificial intelligence technologies responsibly and under human oversight to improve educational and communication services.

7.2 Hurra Türkiye uses AI-supported tools to enhance learning outcomes, including:

- Progress analysis
- Personalized educational recommendations,
- Lesson summaries
- Sentiment analysis
- Smart communication routing
- AI chatbot interactions
- Voice and text-based digital assistant services
- Platform optimization and service reliability

7.3 AI systems:

- Operate under human supervision
- Do not replace teachers
- Do not make solely automated decisions producing legal or similarly significant effects
- Are regularly evaluated for accuracy, security, and fairness

7.4 Personal data used for AI-supported personalization is limited to what is strictly necessary and is never used for unrelated advertising or profiling.

7.5 AI processing is subject to human oversight, regular evaluation, and bias-mitigation measures.

7.6 Parents, legal guardians, and adult learners may request additional information regarding AI-supported processing where permitted by applicable law.

8. AI Chatbot and Digital Assistant Services

8.1 Hurra Türkiye may provide AI-supported chatbot and voice assistant services through websites, messaging systems, or telephone communication channels.

8.2 These systems may:

- Respond to user questions
- Provide educational information
- Coordinate appointments

- Perform callback operations
- Create AI-generated summaries
- Analyze interaction quality
- Route support requests

8.3 Within these systems, the following may be processed:

- Voice recordings
- Written messages
- Conversation transcripts
- Technical interaction logs
- AI-generated analyses and summaries

8.4 Where required by applicable law, users are informed when interacting with AI-supported systems.

9. Data Sharing and Third Parties

9.1 We do not sell personal data, including children's data.

9.2 Personal data may be shared only with:

- In-house teachers and authorized personnel
- IT, hosting, analytics, and customer support service providers
- AI infrastructure providers
- Speech synthesis and text analysis providers,
- Payment processors
- Legal, accounting, and professional advisors
- Public authorities where required by law

9.3 All third parties are bound by confidentiality and data protection obligations consistent with this Policy.

10. International Data Transfers

10.1 Where personal data is transferred outside the UK or EEA, we ensure appropriate safeguards, including:

- Adequacy decisions or
- Standard Contractual Clauses (SCCs)
- Equivalent lawful transfer mechanisms

11. Data Security and Infrastructure Standards

11.1 We implement appropriate technical and organizational measures to protect personal data, including:

- End-to-end encryption
- SSL/TLS secure transmission protocols
- Access controls
- Secure local/private VPS infrastructure
- Staff confidentiality obligations
- Regular system monitoring and security reviews
- Logging and audit systems

11.2 Where possible, data is hosted on infrastructure under our direct administrative control rather than unmanaged public cloud systems.

11.3 Although no system can guarantee absolute security, we continuously review and improve our safeguards.

12. Data Retention

12.1 We retain personal data only for as long as necessary to fulfil the purposes outlined in this Policy or as required by law.

12.2 When personal data is no longer required:

- It is securely deleted
- Destroyed
- Or anonymized in accordance with legal and operational requirements

13. Rights of Data Subjects

13.1 Depending on applicable law, users may have the right to:

- Access their personal data
- Correct inaccurate data
- Request deletion
- Restrict or object to processing
- Request portability of their data
- Withdraw consent where processing relies on consent

13.2 Parents and legal guardians may exercise these rights on behalf of child students.

13.3 Requests can be submitted to merhaba@hurraturkiye.com. We respond within statutory timeframes.

14. Cookies and Tracking Technologies

14.1 We use cookies and similar technologies to ensure platform functionality, security, and analytics, as well as to improve user experience and personalize our services.

14.2 We do not knowingly use cookies to collect children's personal data for advertising purposes.

14.3 Users may manage cookies through browser settings. Disabling cookies may affect certain platform functions.

14.4 Where legally required, consent for non-essential cookies is obtained through a consent management system.

15. Data Processing Addendum: Schools and Institutional Partners

15.1 Where Hurra Türkiye provides services to schools or institutional partners acting as data controllers, Hurra Türkiye may act as a data processor.

15.2 In such cases, we:

- Process data only on documented instructions
- Maintain confidentiality
- Implement appropriate security measures
- Assist partners with data subject requests
- Notify partners of personal data breaches without undue delay

15.3 Sub-processors engaged by Hurra Türkiye are subject to equivalent data protection obligations.

15.4 Upon termination of the Services, personal data shall be returned or securely deleted in accordance with contractual and legal requirements, unless retention is required by law.

16. Changes to This Policy

16.1 We may update this Privacy Policy from time to time. Material changes will be communicated through the platform, chatbot systems, website notices, or email where appropriate.

17. Contact Us

17.1 For questions, requests, or complaints regarding this Privacy Policy, please contact:

- Hurra Education International Ltd
- Email: merhaba@hurraturkiye.com