



**Effective Date: February 16, 2026**

**Previous Versions: Jan 23, 2026**

## **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, and parents or legal guardians acting on behalf of child students.

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**

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

For all data protection enquiries, please contact:

Email: [merhaba@hurraturkiye.com](mailto:merhaba@hurraturkiye.com)

### **2. Applicable Data Protection Laws**

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; and
- 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.

## **HURRA EDUCATION INTERNATIONAL LTD**

CAPITAL OFFICE LTD KEMP HOUSE 152-160 CITY ROAD LONDON ENGLAND EC1V 2NX

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## 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 and Visual Data

- Audio and video recordings of online lessons
- Images or voice data shared during lessons

### 4.5 Technical and Device Data

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

### 4.6 Payment and Transaction Data

- Subscription details
- Payment status and invoices (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

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             |
| Child safety and quality assurance    | Legitimate interest; legal obligation |

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|                                             |                                                |
|---------------------------------------------|------------------------------------------------|
| Lesson recording and review                 | Legitimate interest; parental consent          |
| Personalised 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
- Dispute resolution

6.2 Recordings are accessed only by authorised 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 Personalised Learning

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

- Progress analysis
- Personalised content recommendations
- Lesson summaries
- Platform optimisation

7.2 AI systems operate under human oversight and do not make solely automated decisions producing legal or similarly significant effects on students.

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

## 8. Data Sharing and Third Parties

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

8.2 Personal data may be shared only with:

- In-house teachers and authorised staff
- IT, hosting, analytics, and customer support service providers
- Payment processors
- Legal, accounting, and professional advisors
- Public authorities where required by law

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

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## 9. International Data Transfers

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

- Adequacy decisions or
- Standard Contractual Clauses (SCCs)

## 10. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes outlined in this Policy or as required by law. When no longer required, data is securely deleted or anonymised.

## 11. Data Security

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

- Access controls
- Encryption and secure storage
- Staff training
- Regular system monitoring

No system is completely secure, but we continuously review and improve our safeguards.

## 12. Rights of Data Subjects

Depending on your location, you may have the right to:

- Access your personal data
- Rectify inaccurate data
- Request erasure
- Restrict or object to processing
- Data portability
- Withdraw consent at any time (where applicable)

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

Requests can be submitted to [merhaba@hurraturkiye.com](mailto:merhaba@hurraturkiye.com). We respond within statutory timeframes.

## 13. Cookies and Tracking Technologies

We use cookies and similar technologies to ensure platform functionality, security, and analytics. Detailed information is provided in our Cookie Policy.

## 14. Changes to This Policy

We may update this Privacy Policy from time to time. Material changes will be communicated through the platform or by email where appropriate.

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## 15. Contact Us

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

Hurra Education International Ltd

Email: [merhaba@hurraturkiye.com](mailto:merhaba@hurraturkiye.com)

## 16. Cookie Policy

16.1 Hurra Türkiye uses cookies and similar technologies to ensure the proper functioning, security, and improvement of the Services.

16.2 Cookies are small text files stored on a user's device that help us:

- Enable core platform functionality
- Maintain secure sessions
- Analyse platform usage and performance
- Improve user experience

16.3 We do not use cookies to knowingly collect personal data from children for advertising purposes.

16.4 Users and parents/legal guardians may manage or disable cookies through browser settings. Please note that disabling cookies may affect platform functionality.

16.5 Where required by law, cookie consent is obtained through a consent management mechanism prior to non-essential cookies being placed.

## 17. AI Transparency Notice

17.1 Hurra Türkiye is committed to transparent, ethical, and responsible use of artificial intelligence in education.

17.2 AI-supported systems are used solely to:

- Support teachers with insights
- Analyse learning progress
- Provide personalised educational recommendations
- Improve platform reliability and performance

17.3 AI systems do not replace teachers, do not make final educational decisions, and do not produce legal or similarly significant effects concerning students.

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

17.5 Parents, legal guardians, and adult learners may request further information about AI-supported processing or object to certain forms of personalisation where permitted by law.

## 18. Data Processing Addendum (DPA) – Schools and Institutional Partners

18.1 This section applies where Hurra Türkiye provides Services to schools or institutional partners acting as data controllers.

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18.2 In such cases, Hurra Türkiye acts as a data processor, processing personal data solely on documented instructions from the contracting institution and in accordance with applicable data protection laws.

18.3 Hurra Türkiye commits to:

- Process data only for the purposes of delivering educational services
- Ensure confidentiality of personal data
- Implement appropriate technical and organisational security measures
- Assist institutional partners in responding to data subject requests
- Notify partners without undue delay of any personal data breach

18.4 Sub-processors, where engaged, are subject to equivalent data protection obligations.

18.5 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.

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