

LEVELA

Privacy Policy

Last updated: 12th August 2026

Prudence Foundation (“**we**”, “**our**”, “**us**”) takes the privacy and protection of your personal data seriously. For the purpose of data protection laws, we are the data controller of your personal data which we collect and process 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 explains how and why we process your personal data when you use our Platform, as well as your choices and rights in relation to your personal data.

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 18 and older, or in the case of a jurisdiction where the legal age of majority is higher, such higher age. (“**Minimum Age**”) If you are under the Minimum Age, you must not use the Platform.

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

We collect information you provide during registration, such as email address, age range, gender, name 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. 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 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 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 and/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 privacy@prudential.com.hk.

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

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

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 to the extent required by data protection laws in your jurisdiction. To the extent the laws in your jurisdiction do not recognise the legal basis of legitimate interest or another legal basis specified in the table below for a particular purpose, you consent to the processing of your personal data for that purpose by consenting to the processing in this Privacy Policy.

We do not keep your data for longer than is necessary to fulfil the relevant purpose described below unless we are required or permitted to do so under law.

For further details on how long we keep your data, please refer to the time periods set out below.

Personal Data	Use	Legal Basis for Processing (if applicable)	Retention Period
Information you provide to us directly			
Account Information: Email address	We use this information to: ● create and manage your account; ● communicate with you about your account	Performance of our contract with you (to provide the Platform and to communicate with you).	Stored for as long as you maintain an account with us, or until you choose to delete your account.

	and the Platform; and		
Profile Information: Your name, age range, country and gender (optional).	We use this information to personalize your user experience when using the Platform. We may also use this information to send you marketing materials which we think may be of interest to you. We also use this data in an aggregated and anonymized form for analytics to analyse your use of the Platform to make improvements to the Platform, and to ensure the Platform is age-appropriate.	Legitimate interest (to improve our services and to provide a personalised user experience to you). Consent (to the extent we send you direct marketing).	Stored for as long as you maintain an account with us, or until you choose to delete your account, or withdraw your consent (in the case of direct marketing).
Information collected / generated automatically from your use of the Platform			

Usage and Activity Data: 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 Platform). Legitimate interest (to improve the Platform).	Stored for as long as you maintain an account with us, or until you choose to delete your account.
Technical Information: User name, password IP address, device type and device ID, operating system, browser type.	We use this technical information to ensure the Platform functions correctly, for security purposes, and for analytics to improve the Platform.	Legitimate interest (for functionality, security, and analytics).	Stored for as long as you maintain an account with us, or until you choose to delete your account.

WHO WE SHARE YOUR INFORMATION WITH

Only where necessary will we share your personal data with third parties. Situations where this occur are:

- **Companies within our corporate group** who help operate and support the provision of the Platform. All affiliates may only use your personal data in accordance with this Privacy Policy.
- **Third-party service providers** who process personal data on our behalf in order to facilitate our provision of the Platform to you. 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 about you to comply with the law, to protect the safety and security of our Platform, our users and the public, to exercise or defend legal claims or to enforce our legal rights or our terms of service with you.
- **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 globally, including in Australia, Singapore and Hong Kong, and may have access to your personal data to support the Platform's operation. We take steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy and applicable data protection laws.

By acknowledging this Privacy Policy, you consent to the transfer of your personal data, which may include the cross-border transfer of your information to any country where we have databases or affiliates and, in particular, to Australia, Singapore and Hong Kong.

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 where you are located and 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 as the legal basis for processing, you have the right to withdraw it at any time. Where consent is required to process your personal information, if you do not consent to the processing or if you withdraw your consent, we may not be able to deliver the expected service.

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 privacy@prudential.com.hk.

USERS UNDER THE AGE OF MAJORITY

The Platform is intended for users aged 18 and older, or in the case of a jurisdiction where the legal age of majority is higher, such higher age. If you are under the Minimum Age, you must not use the Platform.

Other than as provided above, we do not knowingly collect personal information from users under the Minimum Age for any purpose. If you believe that we have personal information of a user under

the Minimum Age without lawful consent, please contact us at privacy@prudential.com.hk.

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.

CONTACT

For any questions, comments, or concerns about this Privacy Policy or if you have complaints about how we process your personal data, please contact our Data Privacy Officer at privacy@prudential.com.hk 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.

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.

JURISDICTION-SPECIFIC TERMS

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

Thailand

- **Local Representative:** Our local representative in Thailand is Prudential Life Assurance (Thailand) Public Company Limited, located at 944 Mitrtown Office Tower, 10th, 29th – 31st Floor Rama 4 Road, Wangmai, Pathumwan, Bangkok, 10330.
- **Local Data Protection Officer (DPO):** Please contact us via email at dpo@prudential.co.th
- **Local applicable law:** If you reside in Thailand, we shall comply with the Personal Data Protection Act B.E. 2562 (2019) and relevant data protection laws including any other applicable laws ("**Personal Data Protection Laws**").
- **Your Rights:** Subject to the provisions of Personal Data Protection Law, apart from the aforementioned rights on "**YOUR RIGHTS**" section, you also have "**Right to lodge a complaint**": you can complain to a data protection authority or the competent authority where you believe our collection, use, and/or disclosure of your personal data is unlawful or noncompliant with Personal Data Protection Laws where applicable. We would, however, appreciate the chance to deal with your concerns before you approach the authority, so please contact us in the first instance.

Privacy and cookies

When you visit our website at <https://levela.app/> (the “website”), we use cookies, log files, pixel tags, web beacons, scripts, tags and similar files or technologies (collectively, “cookies”) to provide you with the website and to enhance your experience. Cookies are small files which, when placed on your device, enables us to provide certain features and functionalities, such as allowing the website to work more efficiently. Cookies collect and store information we automatically collect about your device and use of the Platform.

Cookies we use on this website

We have listed all the cookies currently used on this website. We use third party cookies (i.e. those set by a third party, such as analytics providers). The cookies we use can be categorised into the following types:

- **Strictly Necessary Cookies:** These cookies are essential to the functioning of the Platform and we cannot provide the Platform without them.
- **Security and Functionality Cookies:** These cookies are used to ensure the security and functionality of the Platform.
- **Performance / Analytics Cookies:** These cookies allow us to collect information about your use of the Platform and allow us to provide you with a better user experience and to improve the Platform.

What cookies your device downloads depends on the pages or services you use on the website or how you were brought to this website.

Name	Description	Category	Expiration
_ga	Used to distinguish users by assigning a unique ID.	Performance/ Analytics	Expires after 2 years
_gid	Used to distinguish users.	Performance/ Analytics	Expires after 24 hours.
_gat	Used to throttle request rates, limiting data collection on high-traffic sites.	Performance/ Analytics	Expires after 1 minute.
AMP_TOKEN	Contains a token to retrieve a client ID from the AMP Client ID service.	Performance/ Analytics	Expires after 1 year
gac	Contains campaign-related information for the user.	Performance/ Analytics	Expires after 90 days.
__Secure-1PAP ISID, __Secure-3PAP ISID, APISID, SAPISID:	These cookies are used for security purposes to store user preferences and information when accessing Google services.	Security and functionality.	Expires after 2 years

__Secure-1PSID, __Secure-3PSID, SID	These cookies are used for security purposes to store user preferences and information when accessing Google services.	Security and functionality.	Expires after 2 years
__Secure-1PSIDCC, __Secure-3PSIDCC, SIDCC	These cookies are used for security purposes to store user preferences and information when accessing Google services.	Security and functionality.	Expires after 1 year
__Secure-1PSIDTS, __Secure-3PSIDTS	These cookies are used for security purposes to store user preferences and information when accessing Google services.	Security and functionality.	Expires after 1 year
_ga, _ga_SENSZ293P1	These cookies are used by Google Analytics to distinguish users and track their behavior on the website.	Analytics	Expires in 2 years
AEC	This cookie ensures that requests within a browsing session are made by the user and not by other sites.	Security and functionality.	expires in 6 months
HSID, SSID	These cookies are used for security purposes to store user preferences and information when accessing Google services	Security and functionality.	expires in 2 years
NID	stores user preferences and settings, which can include language settings, search preferences, and other customization options that enhance the user's experience when using Google services.	Security and functionality	expires in 6 months

How to refuse the use of cookies

We do not currently use a cookie banner. By continuing to use our website, you acknowledge that cookies will be placed on your device for the purposes described in this Privacy Policy.

You may refuse the use of cookies by selecting the appropriate settings in your browser – for instructions on rejecting cookies via your browser, visit our page at <https://levela.app/cookies>. However, if you do this you may lose some useful functionality such as personalisation and ‘keep me signed in’ and ‘remember me’ features.

Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. (‘Google’). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Data collected

We may automatically process some technical data such as your IP address via cookies to identify what companies have interacted with the website. This processing only identifies a company name and will not be used to identify an individual. We use your IP address to track traffic flows and to make our websites easier for you to use and to better understand how our websites are used.