

## PRIVACY POLICY

*This privacy policy (**Privacy Policy**) will help you understand what information we collect at VASUDHAIVA KUTUMBAKAM GROUP PRIVATE LIMITED (Formerly known as Leverage Ed-Tech Private Limited)(**Company**), why we collect it, how the Company uses it, including if and how we share the information with third parties, and the choices you have.*

When we talk about “we,” “our,” or “us” in this Privacy Policy, we are referring to the Company. When we talk about “you” in this Privacy Policy, we are referring to the User.

By using the Website and providing your data to the Company, you agree to the terms of this Privacy Policy, for your use of the Website. This Privacy Policy may be modified by the Company from time to time in its sole discretion, and any modifications shall be made effective and binding upon you through posting by the Company on the Website.

By mere use of the Website, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy.

### A. INFORMATION WE COLLECT AND RECEIVE

#### 1. Your Data

Your data may contain 'sensitive personal data or information' or 'personal information' as defined under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (**Data Protection Rules**). The Company will collect, use, process, and transfer such information as prescribed under the Data Protection Rules. Where the Company collects or processes your data, it does so on your behalf. Your data may include the following types of data, but is not restricted to: name, gender, date of birth, nationality, home address, source of funds, employment status (including industry type), any political exposure or not, email ID, phone-numbers and other contact information.

#### 2. Other Information

- **Account creation information:** In the course of the usage of the Website, the Users provide information such as an email address and password.
- **Billing and other information:** For transactions undertaken on the Website, our third-party payment processors may collect and store billing address and credit card information.
- **Website usage information:** This is information about how you are accessing and using the Website, which will include administrative and support communications with us and information about the transactions undertaken through the Website.
- **Contact information:** With your permission, any contact information you share is collected (such as an address book from a device) when using the Website. We may also collect your phone number and email address to contact you. You may also receive SMSs, emails, phone calls, etc., in connection with the Website.
- **Log data:** When you use the Website, our servers may automatically record information, including information that your browser or mobile device sends

whenever you visit or use a website. This log data may include your Internet protocol address, the address of the web page you visited before using the Website, your browser type and settings, the date and time of your use of the Website, information about your browser configuration and plug-ins, language preferences, and cookie data.

- **Third party data:** The Company may also receive information from affiliates in our corporate group, our partners, or others that we use to make our own information better or more useful. This might be aggregate level information, such as which IP addresses go with which pin codes, or it might be more specific information, such as about how well an online marketing or email campaign performed.

### **3. Retention**

The information above would be collected and retained by the following entity:

*VASUDHAIVA KUTUMBAKAM GROUP PRIVATE LIMITED (Formerly known as Leverage Ed-Tech Private Limited)*

We will not retain any sensitive personal data or information for longer than is required for the purpose for which such data or information was collected or may lawfully be used or is otherwise required under any other law for the time being in force. We may retain anonymized data for as long as is required.

We may provide information to service providers to help us bring you the services we offer. Specifically, we may use third parties to facilitate our business, such as to host the service at a co-location facility for servers. Where we utilize third parties for the processing of any personal information, we implement reasonable contractual and technical protections limiting the use of that information to our specified purposes.

### **4. Our Cookie Policy**

We send cookies (small files containing a string of characters) to your computer, thereby uniquely identifying your browser. Cookies are used to track your preferences, help you login faster, and aggregated to determine user trends. This data is used to improve our offerings, such as providing more content in areas of greater interest to a majority of users.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Some of our features and services may not function properly if your cookies are disabled.

## **B. PURPOSE OF COLLECTION**

The Company may process information including sensitive personal data or information concerning you both internally and externally (so far as reasonably necessary) for the purposes mentioned below (**Purposes**).

You have the option to refrain from disclosing your sensitive personal data or information to the Company. You will also have the option of withdrawing consent previously provided to the Company. However, exercising this option may hamper the Company's ability to provide you with any or all of the features of the Website.

## 1. Your data

The Company will access and use your data as reasonably necessary and in accordance with your instructions to (a) provide, maintain and improve the Website; (b) to prevent or address service, security, technical issues, or at your request in connection with support matters; (c) as required by law, and (d) as expressly permitted in writing by you.

## 2. Other information

We use other information in connection with the Website. Specifically:

- We collect personal information from you to identify you, to provide you with information required to service you, and to help us deliver a superior career enhancement experience. Information collected enables us to give you convenient access to our service offerings and products, and may help us tailor your career experience.
- We also may ask for information at other times, such as when you enter contests or other promotions sponsored by us and/or our partners. If you use a feature that requires payment of a fee, our third-party payment processors may collect your credit card data or payment account information.
- When you use one of our paid products, we track the web pages, and information that has been accessed by you, and store it on our servers. This enables us to track items that you have completed, and those that you need to see.
- By using the Website and/or registering yourself with us you authorise us to contact you via email or phone call or text message and offer you our services, imparting product knowledge, offer promotional offers running on the Website & offers offered by third parties, for which reasons, personally identifiable information may be collected. Notwithstanding the fact that you have also registered yourself under DND or DNC or NCPR service, you still authorise us to give you a call from LeverageEdu for the above-mentioned purposes for a period of 365 days from the date of your registration with us.
- **To communicate with you by:**
  - *Responding to your requests:* If you contact us with a problem or question, we may retain those communications in order to process your inquiries, respond to your requests and improve our services.
  - *Sending emails and notifications:* By accepting the terms of this Privacy Policy you give us the permission to send you Website notifications and administrative emails and messages including text messages. You hereby consent to receiving text messages from us, however you have the option to opt out later. We may also contact you to inform you about changes on the Website, its offerings, and important Website related notices, such as security and fraud notices. These emails and notifications are considered part of the Website and you may not opt-out of them. In addition, we sometimes send

emails about new service offerings or other news about the Company which we feel might be useful for you.

- **Billing and account management:** We use account data to administer accounts and keep track of billing and payments.
- **Communicating with you and marketing:** We often need to contact you for invoicing, account management and similar reasons. We may also use your contact information (with us) for our own marketing or advertising purposes. You can opt out of these at any time.
- **Investigating and preventing bad things from happening:** We work hard to keep the Website secure and to prevent abuse and fraud.

This Privacy Policy is not intended to place any limits on what we do with data that is aggregated and/or de-identified so it is no longer associated with an identifiable User of the Website.

## **C. THIRD PARTY CONTENT AND LINKS**

We may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve our customized content. Clicking on links may take you to sites outside our domain. We are not responsible for the privacy practices of other websites. We encourage our users to be aware when they leave our site to read the privacy statements of each and every website that collects personally identifiable information. This Privacy Policy applies solely to information collected by our Website.

## **D. YOUR CHOICES**

### **1. Your Data**

You provide us with instructions on what to do with your data. You have many choices and control over your data. For example, you may provision or deprovision access to the Website, enable or disable third party integrations, manage permissions, change retention and export settings and transfer or assign your data.

### **2. Access to Sensitive Personal Data or Information**

You will have the right, upon request, to access and review the information provided by you and held by the Company. Upon discovering that the information provided is inaccurate or deficient in any manner, you will have the right to request suitable changes or amendments to such information, which may be provided by the Company, when feasible.

### **3. Other Choices**

In addition, the browser you use may provide you with the ability to control cookies or other types of local data storage. Your mobile device may provide you with choices around how and whether location or other data is collected and shared. The Company does not control these

choices, or default settings, which are offered by makers of your browser or mobile device operating system.

#### **E. SHARING AND DISCLOSURE**

The Company will not publish or disclose your personal information pertaining to you without your prior consent, unless it is required to do so in order to facilitate use of the Website, or if mandated by law, or if you have previously provided your consent. The Company may disclose personal information with its employees, officers, agents, consultants, contractors, attorneys, etc., on a need to know basis for the Purposes.

The Company will disclose any sensitive personal data and information in the following limited circumstances:

- If there is a legal requirement or if it is ordered to do so by a court of competent jurisdiction;
- To any government agency if required by law for the purposes of verification of identity, or for prevention, detection, or investigation of crime (including cyber incidents), or for prosecution or punishment of offences;
- Enforce applicable Terms of Use, including investigation of potential violations thereof;
- Detect, prevent, or otherwise address fraud, security or technical issues;
- Protect against imminent harm to the rights, property or safety of leverageedu.com EdTech Private Limited, its users or the public as required or permitted by law. We may share with third parties certain pieces of aggregated, non-personal information, such as the number of users subscribed to a particular product, or the number of users registered on our website. Such information does not identify you individually.

#### **F. TRANSFER**

The Company may transfer personal information pertaining to you to third parties for the Purpose. You are expressly notified that the transfer may also be to foreign jurisdictions where your personal information may be processed by third-party service providers and vendors, or our group companies, in relation to the Purpose.

#### **G. MONITORING**

The Company will, as far as possible, respect your privacy and autonomy while you use its electronic communication systems.

#### **H. PUBLIC FORUMS**

When you use certain features on our Website like the discussion forums and you post or share your personal information such as comments, messages, files, photos, will be available to all users, and will be in the public domain. All such sharing of information is done at your own risk. Please keep in mind that if you disclose personal information in your profile or when posting on our forums this information may become publicly available.

## **I. SECURITY**

The security of your personal information and sensitive personal data and information provided by you is important to us. We follow generally accepted industry standards to protect your information. All information gathered on the Website is securely stored on the “AWS Cloud Platform” cloud servers.

If you use a feature requiring payment of a fee, our third-party payment processors transmit your credit card data to our bank for processing. If they encounter a problem with payment, they may review the order information with you and their bank to resolve it. We do not share your email address or your personal information with third party marketers.

While no computer system is completely secure, the measures implemented by our payment partners reduce the likelihood of security problems to a level appropriate to the type of data involved.

We use reasonable technical, administrative, and physical security measures for the purpose of safeguarding all data you share with us. We also have comprehensive internal policies in place to prevent unauthorized access to your data. We take adequate steps to ensure that third parties we share data with also adopt reasonable level of security practices and procedures to ensure the privacy and security of your information.

However, we are not responsible for any loss, unauthorised access, safety issue or any harm caused to you by any misuse of your personal information, unless it is a direct and foreseeable consequence of negligence and non-compliance on our part only. You hereby acknowledge that we are not responsible, in particular, for any third-party action or action on your part leading to loss, damage or harm to you or any other person.

The Company shall not be held liable for any loss whatsoever incurred by you, due to unauthorized access to your electronic devices.

## **J. GRIEVANCE OFFICER AND GRIEVANCE REDRESSAL**

- If you have any concerns or questions in relation to this Privacy Policy, you may address them to our grievance officer whose details are set out below:

Email: [grievance@leverageedu.com](mailto:grievance@leverageedu.com)

- In the event, you have any complaints or concerns regarding the usage of your user data, you may write to us electronically at [grievance@leverageedu.com](mailto:grievance@leverageedu.com), or send a letter to us at:

VASUDHAIVA KUTUMBAKAM  
GROUP PRIVATE LIMITED  
(Formerly known as Leverage  
Ed-Tech Private Limited)  
B1/A5, Block E, Mohan  
Cooperative Industrial.  
New Delhi, South East Delhi,  
New Delhi 110044

India

- Within 24 (twenty-four) hours of the receipt of your email, the grievance officer will acknowledge your email, and shall dispose of the same within 15 (fifteen) days of the receipt of your email, upon conducting necessary hearings and discussions.

**K. CONTACT US**

If there are any questions regarding this privacy policy, you may contact us by writing to us at: [admin@leverageedu.com](mailto:admin@leverageedu.com)

**L. DISCLAIMER**

The information contained on this Website is for general information purposes only. The information is provided by the Company and while we endeavor to keep the information up to date and correct, we make no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability with respect to the website or the information, products, services, or related graphics contained on the Website for any purpose. Any reliance you place on such information is therefore strictly at your own risk.

In no event will we be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arise out of, or in connection with, the use of this Website.

Through this Website you are able to link to other websites which are not under the control of the Company. We have no control over the nature, content and availability of those sites. The inclusion of any links does not necessarily imply a recommendation or endorse the views expressed within them.

Every effort is made to keep the Website up and running smoothly. However, the Company takes no responsibility for, and will not be liable for, the Website being temporarily unavailable due to technical issues beyond our control.

**M. DATA DELETION**

You can send your data deletion request to us through email. In order to get your data deleted from our servers, send an email to [datadel@leverageedu.com](mailto:datadel@leverageedu.com) with a subject "Data Deletion < Your Email ID >".