

## PRIVACY POLICY

**Vasudhaiva Kutumbakam Group Private Limited** (“**Leverage Career**” or “**Company**” or “**We**” or “**Our**” or “**Us**”) owns and operates this website. This privacy policy (“**Privacy Policy**”) is prepared and published in accordance with the provisions of, the Information Technology Act, 2000, the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 and other rules and regulations made thereunder.

This Privacy Policy sets out the manner in which the Company collects, stores, shares, discloses and uses the data of its employees, associates, business partners, service providers and their respective customers and other visitors of the Website (collectively referred to as “**Users**” or “**You**” or “**Your**”). This Privacy Policy explains how We collect Your Personal Information (*defined below*) on the websites of Leverage Career (“**Website**”), online portals, mobile applications, device software, customer support, service touchpoints and interaction through authorized distributors and sellers (collectively referred to as “**Platform**”).

This Privacy Policy outlines Our commitment to protecting Your Personal Information and how We use it. By using Our Website or services, you agree to the terms and conditions of this Privacy Policy.

This electronic record is generated by a computer system and does not require any physical or digital signatures. This Privacy Policy is subject to change at any time without notice. To make sure You are aware of any changes, please review this Privacy Policy periodically. The Company shall not be liable to any User in case of any unauthorized installation, access or use of the Website.

### CONSENT

Collection, use and disclosure of information which has been designated as Personal Information and/or SPDI (*defined hereunder*) requires Your express consent, and only You voluntarily provide Us with Your Personal Information during Your use of the Website and the services thereon. By visiting and/or using the Website, or giving Us Your information, it would be deemed that You have fully read and understood the terms of this Privacy Policy and have given Your express consent to the terms and conditions of this Privacy Policy, including the collection, storage, sharing, and use of Your information provided herein. If You do not agree with the terms and conditions of this Privacy Policy, please do not proceed further to use and/or access the Website. If You are visiting and accessing the Website on behalf of another person i.e. a natural person or an entity, You represent that You are authorised to act for such person or been authorized by such person to (i) accept this Privacy Policy on such person’s behalf, and (ii) consent on behalf of such person to Our collection, storage, sharing and use of such persons information in terms of this Privacy Policy. You also affirm that the information provided by you is accurate, lawful, and does not violate any applicable laws.

Our products and services are intended for the general public, and We do not knowingly collect personal data from children under the age of 18 without parental or guardian consent. If you are a child and have submitted your personal data to Us by mistake, please ask your parent or guardian to contact us. Parents or guardians who wish to request the deletion of

their child's data may reach out to Us through Our designated channels, and We will take appropriate action in accordance with applicable law.

## **COLLECTION, STORAGE AND USE OF INFORMATION RELATED TO YOU**

### **Information We Collect**

This Privacy Policy explains how We collect personal and non-personal information, classified as mandatory or voluntary and, use, disclose, and protect such information through the Website.

We may collect various types of information from You in the course of You using the Website, which may include but is not limited to your personal information - which is any information that exclusively identifies You i.e. Your name, date of birth, gender, email address, mobile number, school or institution details, employment history, exam results, educational and professional details, passport and identification details, registration details (via web forms, device onboarding or customer service calls) demographic information (such as country and postcode) ("**Personal Information**") and non-personal information - which is information that does not identify You but is related to You nonetheless such as job title, preferences, interests, geolocation, and use of the Website.

In certain cases, We may also collect and/or have access to sensitive personal data or information ("**SPDI**") such as passwords, identification documents, financial information of certain Users only with consent from such Users. For a full definition of what constitutes SPDI, please refer to the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, as amended from time to time.

Further, We may retain records of any correspondence You have with Us or information You provide in any communication, including but not limited to emails, WhatsApp messages, and calls. This information is retained to:

- Respond to Your queries;
- Process Your applications; and
- Improve Our service delivery.

You may access Our Website through third-party websites, and you may provide Us with information through third-party sign-in services. We may store this information as per the relevant laws and guidelines. However, We shall not be held responsible for any loss, damage, or misuse of this information as We do not control third-party websites or their privacy policies.

We collect certain information automatically, such as the specifications of the device being used by You (including model and operating system), app usage patterns and diagnostic logs, and mobile device management data, including geolocation when enabled. Additionally, We collect data from Our channel partners, service providers, and educational institutions that use Our solutions.

We collect only the Personal Information and SPDI that We believe to be relevant and is required: (i) to provide effective services; (ii) for contractual necessity; and (iii) for compliance with legal obligations. You may, at any instance, choose not to provide Us such Personal

Information and/or SPDI, however, in such a case We may not be able to offer you (partially or entirely, as the case may be) the services provided by us. Additionally, We collect Your Personal Information in order to record, support and facilitate the provision of services to You, including, *via* third parties who You agree to engage with through the use of the Website, to assist You with customer service, technical support issues, to follow up with You, to otherwise support Your relationship with Us and/or to prevent fraud and unlawful activities.

In the event that you engage in any transaction with Us, We may collect certain additional information, including, *inter alia*, your billing address, credit or debit card number, credit or debit card expiration date, and/or other details pertaining to the relevant payment instrument, as well as tracking information relating to cheques or money orders, as applicable.

In general, You can browse the Website without telling Us who You are or revealing any Personal Information about Yourself. Once You give Us Your Personal Information, You are not anonymous to Us. Where possible, We indicate which fields are required and which fields are optional. You always have the option to not provide information by choosing not to use a particular service or feature on the Website.

### **Logs and Cookies**

In an effort to make Our Website effective, certain information may be collected each time You visit the Website. Such information may be stored in server logs. These encrypted statistics do not identify You personally but provide Us the information regarding Your visit to the Website and the type of user who is accessing the Website and certain browsing activities by You. We may gather data related to IP address of Your server from where the Website is being accessed, the type of browser (Internet Explorer, Firefox, Opera, Google Chrome, etc.), the operating system of Your system, software identifiers, URLs, onsite behavior, and the duration of Your stay on Our Website along with the date and time of Your access. Some of this data is provided directly by You, while others may be obtained indirectly from third parties.

This data is used by Us to, *inter alia*, (i) understand the use and number of users visiting the Website; (ii) recognize returning users; (iii) save user preferences to enhance navigation and user experience; (iv) enhance system security, system analytics and services; and (v) analyse usage trends of the Platform. Some of the information related to the Website and Your visit to the Website may be shared with the sponsors, investors, advertisers, developer, strategic business partners and/or Our vendors and/or some associates in order to enhance and grow Our business, but We assure You that the information will never include any of Your Personal Information or SPDI. Only aggregated and anonymized insights would be created from this information.

When You use the Website, Our servers (which may be hosted by a third-party service provider) may collect information indirectly and automatically about Your activities on the Website; for instance by way of cookies. A cookie is a small amount of data that is sent to a user's browser from a web server and is eventually stored on a user's computer hard drive. This anonymous information is maintained distinctly and is not linked to the Personal Information You submitted to us. Whether You want Your web browser or the application to accept cookies or not is up to You. If You haven't changed Your computers or the application settings, most likely Your browser/application already accepts cookies. If You choose to

decline cookies, You may not be able to fully experience all features of the Website. You can also delete Your browser cookies or disable them entirely, but this may significantly impact Your experience with the Website and may make parts of the Website non-functional or inaccessible.

We also use the log file like other website/application servers which is the standard measure. They include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks. We use them to analyze trends, administer the site, track a user's movement and gather broad demographic information for aggregate use. IP addresses, etc. are not linked to personally identifiable information.

We do not trade or sell Your Personal Information and SPDI in any manner, except as specified herein, or unless when express consent is sought from You in this behalf.

## **METHODS OF DATA PROCESSING**

We may collect and process personal data through various methods, including but not limited to:

- Cookies
- Weblogs
- Surveys
- Web forms
- Newsletter sign-ups
- Registration for events or activities
- Information requests

## **Why We collect the Information**

Leverage Career collects Personal Information for the purpose of identifying individuals, assessing their eligibility, and providing career advisory, training, recruitment, and international mobility services in connection with nursing and Ausbildung programs.

The personal information collected may be used to:

- Evaluate eligibility for participation in programs, prospective employers, and applicable regulatory or licensing requirements;
- Provide personalised career guidance, training, recruitment, and placement services;
- Communicate program-related updates, documentation requirements, timelines, and other relevant information; and
- Improve the quality of our services, operational efficiency, and overall user experience.

Personal information is collected and processed only to the extent necessary to fulfil the above purposes and in accordance with applicable data protection laws.

## **How We Use the Information We Collect**

If You elect to share Personal Information or SPDI with us, We may use the same for the following purposes:

- for program assessment and enrolment;

- for training, recruitment and placement facilitation;
- for compliance with the employer, embassy or regulatory requirements;
- to register and manage user accounts or devices;
- to provide software updates, technical support, and warranty services;
- to send You important information regarding the Website, changes to Our terms, conditions, and policies and/or other administrative information;
- to help You address Your problems with the Website including addressing any technical problems;
- to conduct internal reviews and data analysis for the Website;
- to protect the integrity of the Website;
- for proper administering and activity tracking on the Website;
- to make disclosures as may be required under applicable law;
- for optimization of Our website;
- To monitor system performance and product safety;
- To prevent fraud or unauthorized use

#### **How We Share Personal Information and SPDI**

The Website may use aggregated or anonymized Personal Information and SPDI for statistical and analytical purposes, and all aggregated or anonymized Personal Information and SPDI shall be the exclusive property of the Company. We may disclose Personal Information or SPDI as described below with Our trusted third parties, including distribution partners and service centers, third-party service providers under data protection agreements (“**Client**”), to facilitate You with the services. Third party service providers and third-party business partners that are subject to this Privacy Policy.

- Client: Based on Your election to participate on the Website and availing the services thereon, which shall constitute express consent to interact with and share Your information (including Personal Information and SPDI) with the Client, We shall enable the Client to access Your information (including Personal Information and SPDI). Also, You agree that the sharing of Your Personal Information and SPDI with the Client, and the use and storage of the same by the Client, shall be the sole responsibility of the Client and the Company shall under no circumstances whatsoever be liable for the same. The Client shall be independently responsible for use of such data and information, as agreed by You with the Client.
- Third-Party Service Providers: We employ other entities and individuals to perform functions on Our behalf. Examples include: facilitating transactions on the Website, sending communications, processing data, assessing credit and compliance risks, analyzing data, assessing financial information and educational history, conducting customer relationship management, etc. These third-party service providers have access to Your information to perform their functions but are not permitted to use it for any other purposes.
- Third-Party Business Partners: We engage with third-party business partners as service providers. These third-party business partners may be granted access to aggregate or anonymize Personal Information, SPDI and non-personal information, and may use such anonymize Personal Information, SPDI and other information for commercial purposes.

Additionally, We may also disclose Your Personal Information and/or SPDI if We believe in good faith that such disclosure is reasonably necessary to: (i) enforce our Terms & Conditions or this Privacy Policy; (ii) respond to claims that an advertisement, posting or other content violates the rights of a third party; (iii) protect the rights, property, or personal safety of the Company, its users, or the general public; or (iv) detect, prevent, or otherwise address fraud, security breaches, or technical issues.

Under no circumstances will We sell or share any Personal Information and/or SPDI about You to or with any person or organization except (i) as authorized by You; (ii) in connection with facilitating the Website; (iii) to the extent You make any use of Our Website and various services and products thereon; (iv) as may be required by law or court order; or (v) as otherwise set forth herein.

### **Data Localization and Security of Personal Information and SPDI**

Leverage Career implements industry-standard technical and organizational measures to protect Personal Information against loss, misuse, unauthorized access, disclosure, or destruction. Your information will be stored and processed in India and may also be stored and processed outside India at the request of any Client, however, Your information may be accessed from multiple countries. Whenever We transfer information to other jurisdictions, We ensure that the information is transferred in accordance with this Privacy Policy and as permitted by applicable data protection laws.

We implement reasonable measures to protect against unauthorized access to and unlawful interception of Personal Information and SPDI. However, no internet application can fully eliminate security risks. We are not responsible for any breach of security or for any actions of any third parties that receive Your Personal Information and SPDI. Notwithstanding anything contained in this Privacy Policy or elsewhere, We shall not be held responsible for any loss, damage, or misuse of Your Personal Information and SPDI, if such loss, damage, or misuse is attributable to a Force Majeure Event (*as defined below*).

A “*Force Majeure Event*” shall mean any event that is beyond the reasonable control of Us and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, orders/notifications as implemented by the government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, etc.

### **Retention of Personal Information and SPDI**

We keep Your Personal Information and SPDI to enable Your continued use of the Website, for as long as it is required to fulfil the relevant purposes described in this Privacy Policy, or as may be required by law (including for tax and accounting purposes), or as otherwise communicated to You.

### **Uninstalling the Platforms**

Your Personal Information and SPDI shall not be deleted automatically upon uninstallation of the Platforms. We shall retain specific Personal Information and SPDI depending on the

purpose for its use, and We shall delete such information (i) if requested by You, except the anonymized information/data; and/or (ii) in accordance with the applicable law.

## **CHOICES AVAILABLE REGARDING COLLECTION, USE AND DISTRIBUTION OF INFORMATION**

To protect against the loss, misuse, and alteration of the information under Our control, We have in place appropriate physical, electronic and managerial procedures. For example, Our servers are accessible only to authorized personnel and Your information is shared with employees and authorized personnel on a need-to-know basis to complete the transaction and to provide the services requested by You. Although We endeavor to safeguard the confidentiality of Your personally identifiable information, transmissions made by means of the internet cannot be made absolutely secure. By using the Platforms, You agree that We cannot guarantee, give no warranties, and shall have no liability for disclosure of Your information due to malicious attacks, errors, commission or omissions not wilfully initiated by Leverage Career in transmission and/or unauthorized acts of third parties.

Please note that We will not ask You to share any Personal Information or SPDI via email or telephone. If You receive any such request by email or telephone, please do not respond/divulge any Personal Information or SPDI and forward the information relating to the same to [grievance@leverageedu.com](mailto:grievance@leverageedu.com) for necessary action.

### **Access and Choice**

You can view, update, and delete certain information about Your account and Your interactions with the Platforms. If You cannot access or update Your information Yourself, You can always contact Us for assistance or update such information by sending an e-mail to: [grievance@leverageedu.com](mailto:grievance@leverageedu.com).

You have choices about the collection and use of Your information. The Website includes settings that provide You with options as to how Your information is being used. You can choose not to provide certain information, but then You might not be able to take advantage of certain features of the Website.

- **Account Information**: If You want to add, update, or delete information related to Your account, please go to the dashboard of the Platforms; if You are unable to do so, please email Us at [grievance@leverageedu.com](mailto:grievance@leverageedu.com). When You update or delete any information, We usually keep a copy of the prior version for Our records.
- **Opt-out**: If You do not want to receive messages from Us, please unsubscribe or adjust Your communication preferences in the dashboard of the Website or drop an email to Us at [grievance@leverageedu.com](mailto:grievance@leverageedu.com). If You do not want to receive in-app notifications, promotional or marketing-related communications from Us, please adjust Your notification settings in the Website or Your device.
- **Browser and Devices**: The help feature on most browsers and devices will tell You how to prevent Your browser or device from accepting new cookies, how to have the browser notify You when You receive a new cookie, or how to disable cookies altogether.

### **General Provisions**

Unless stated otherwise, this Privacy Policy applies to all information that We have about You and Your account. By using this Website and the services provided on the it, You agree and acknowledge that Your Personal Information and SPDI collected through the Website may be transferred across national boundaries and stored and processed anywhere around the world, even with third parties in accordance with the terms of this Privacy Policy.

Notwithstanding the above, We are not responsible for the confidentiality, security, or distribution of Your Personal Information and/or SPDI by Our partners and third parties outside the scope of Our agreement with such partners and third parties. Further, We shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond Our reasonable control including but not limited to, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of internet service or telephone service of the User, etc. Further, Our Website may contain links to third-party websites that are not owned or controlled by the Company. These links are provided for Your convenience to provide further information. We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party websites. The inclusion of any link does not imply endorsement by Us of the third-party website, its provider, or the information on the third-party website. You acknowledge and agree that We shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with the use of or reliance on any such content, goods or services available on or through any such websites. We encourage You to be aware when You leave Our Website and to read the privacy policies of each website that You visit.

Any information that You voluntarily share or post in public areas of the Website, such as discussion boards, comment sections, or other public forums, will be considered publicly available and is not protected by this Privacy Policy. Such information can be viewed, collected, and used by third parties without Our knowledge and is disclosed at Your own risk. The Company shall not be liable for any unauthorized use of such information by third parties.

The User will indemnify Us in any suit or dispute brought against Us by any third party in relation to disclosure of Personal Information and/or SPDI by the User to third parties either through Our Website or otherwise. We will not be liable for any actions of third parties in relation to the User's information including the Personal Information and/or SPDI which the User may have disclosed to such third parties.

We may make changes to this Privacy Policy, from time to time at Our sole discretion or on account of changes in law or otherwise. We may e-mail periodic reminders of the notices and conditions, unless You have instructed Us not to, but You should check the Website frequently to see recent changes. Notwithstanding the above, We shall not be required to notify You of any changes made to this Privacy Policy. The revised Privacy Policy shall be made available on the Website. Your continued use of the Website, following changes to this Privacy Policy, will constitute Your acceptance of those changes.

If You choose to visit the Website, Your visit and any dispute over privacy is subject to this Privacy Policy, and shall be governed by the laws of India.

#### **Notices and Grievance Redressal**



If You have questions, comments, concerns about Your privacy or this Privacy Policy, or wish to exercise Your rights, please contact Us with a thorough description, and We will try to resolve it. You may also contact Us at the addresses below:

In the event that You wish to report a breach of the Privacy Policy, You may contact Our designated Grievance Officer between 9:30 am to 6:30pm, Monday to Friday, except public holidays at [grievance@leverageedu.com](mailto:grievance@leverageedu.com).