

## **Privacy Policy**

This privacy policy explains how Hash Education Pvt. Ltd. ("HashLearn") (collectively, "we") collect, use, share and protect information obtained from the services, websites, and applications offered by HashLearn (the "Services"), in accordance with the Information Technology Act, 2000 and the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 ("**Indian Data Protection Law**"). Further, we recognize that we may have customers/users from the Member States of the European Union therefore, this Policy is designed to ensure that we collect, process and save your personal information in accordance with the applicable provisions of the General Data Protection Regulation ("**GDPR**").

By registering with us or by using our Services, you are expressly consenting to our collection, processing, using, storing, disclosing and handling of your information as set forth in this Policy now and as amended by us.

If you do not agree with the terms of this Policy, please do not use this Website/Application or the avail the Services provided by this Website/Application.

### **Information We Collect**

We collect information that you voluntarily provide to us, including personally identifying information such as your name, age, e-mail address, image, mailing address, phone number, your ward's educational/edutainment interests and credit/debit card information ("Personal Data"). We collect information from you in various ways, including when you register with the Site, application and/or submit content to the Services and answer questions. When you log-on to our websites, we automatically receive information from your computer and browser, including your IP address, details of the computer, type of mobile device you use, your mobile devices unique device ID, your operating system, the type of internet browsers you use, and information about the way you use the website, application and/or Services. HashLearn may use cookies and web beacons.

The aforesaid information collected from you could be categorized as "Personal Data" and "Sensitive Personal Information", as defined under the Indian Data Protection Law and GDPR.

### **Use of Your Information**

We may collect, use and process your Personal Data or information in the following ways:

- to identify as the author of content you submit to the site;
- to fulfill your requests for products and services;
- to administer, support, improve and develop our business;
- to administer a contest, promotion, survey or other site feature;
- to send you information about HashLearn;
- to conduct research, analyze trends and gather usage behavior and learning patterns of users;
- to personalise the Services for a better user experience; and
- to maintain records and comply with our legal obligations.

### **Disclosure of Your Information**

We do not sell, trade, or otherwise transfer to outside parties your Personal Data. This does not include partners, service providers and trusted third parties who act as 'controller' or 'processor' on our behalf and/or who assist us in operating the Service, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may release your information when we believe that the release is: (i) required to perform the contract we are about to enter into or have entered into with you, if any; (ii) necessary for conducting marketing activities, for our Services or services of third parties, and to conduct other research to improve our Services and marketing activities; (iii) required to allow you to participate in interactive features of our Service, when you choose to do so; (v) appropriate to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety, enforcing our

agreements, policies, and terms of use. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses. We may at times provide aggregate statistics about our customers, traffic patterns, and related site information to third parties, however this information when disclosed will be in an aggregate form and does not contain any of your personally identifiable information. We may share Personal Data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets or shares. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.

We may share information with those who need it to do work for us. We may also share your information with our qualified specialists to improve your user experience of the Services. We may make some content, products and Services available through the Website through co-operative relationships with third party providers. We may share with such partner any information that you provide, or that is collected, in the course of visiting any pages that are made available in co-operation with our partner.

The information provided by you may be shared by us with any third party for record keeping purposes, internal procedures or for any other purposes and by using this Website/Application you expressly consent to such sharing of the information. Please note that, it is entirely up to your discretion to provide this information.

### **Retention of Your Information**

You may deactivate your HashLearn account by mailing us at [info@hashlearn.com](mailto:info@hashlearn.com), in which case we will remove public access to certain profile information such as your bio and profile picture. In such event, however, we fully reserve the right not to allow further usage of the applications or provide any Services/products thereunder to you. But any content that you previously submitted would still remain available through the Service and you would continue to be identified by name as the author of such content.

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, the same 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.

### **Usage by Children**

Any portion of the information containing personal data relating to minors provided by you shall be deemed to be given with the consent of the minor's legal guardian. Such consent is deemed to be provided by your registration with us. Please note that the term “minor” under this clause would include any child who is below the age of 18 years.

### **Transfer of Data Outside of Your Home Country**

Your information may be stored, processed and accessed in countries where we have facilities or where you are located. You consent to the transfer of your information outside your country.

Please note that our Policy and our practices are designed to provide a globally consistent level of protection for the use, storage, process and transfer of your information all over the world. This means that even in countries whose laws provide for less protection for your information, we will still handle your information in the manner described herein i.e., in accordance with the security measures prescribed under the Indian Data Protection Laws and/or the GDPR, as may be applicable.

### **Links to third party sites**

The Website may contain links to other websites. The linked sites are not under our control and hence, we are not responsible for the content of any linked site, or any changes and updates to a linked site. We are providing these links to you only as a

convenience, and the inclusion of any link does not entail endorsement by us of the site or any association with its operators or owners

You are requested to carefully review the privacy statements or policies on any other sites that you visit since their privacy statements or policies will be different from our policy.

## **Your Rights**

Subject to certain reasonable restrictions under applicable laws, you have the following rights under this Policy:

- i. **Right to confirmation and access:** You have the right to be provided full information about whether your information is being processed or has been processed, a brief summary of such information which is being processed or has been processed including a brief summary of the processing activities performed by us.
- ii. **Right to correction:** You have the right to require us to (a) correct any inaccurate or misleading Personal Data; (b) complete any incomplete Personal Data; and/or (c) update any Personal Data.
- iii. **Right to data portability:** You have the right to receive your information/Personal Data in a structured and commonly used machine-readable format including the right to have such information be transferred to any other entity/data fiduciary in the format mentioned herein.
- iv. **Right to be forgotten:** You have the right to restrict or prevent us from continuing disclosure of your information where such disclosure: (a) has served the purpose for which it was made or is no longer necessary; (b) was made on the basis of consent received from you and such consent has been

duly withdrawn by you; or (c) was made contrary to the provisions of applicable law or any other law made by Parliament or any State Legislature. In this regard, you also have the right to require us to delete/erase your information.

- v. **Right to object:** You have the right to object the use/process of your information by us, at any point in time including the right to opt-in and opt-out of any Services, offers or advertisements made by us.
- vi. **Right to Choice/Opt-out:** If you no longer wish to receive updates or notifications, you may choose not to, by selecting the appropriate options in the user profile under “Account Settings”.

### **Deletion of your information**

If you wish to have the information that you have provided to us deleted, you can do so by writing to us at [·]. Please note that deletion of certain information may lead to deletion of your account with the website and your access to certain features of the website. You understand that under certain circumstances, the request for the deletion of information can be denied.

### **Security & Information Retention**

In case of breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, information transmitted, stored or otherwise processed, we will promptly notify you as well as prescribed supervisory authority within the time frame prescribed, as per applicable laws.

Please note that the notification provided by us shall include the following for your information:

- i. The description and nature of Personal Data which is the subject matter of the breach;
- ii. The number of data principals/subjects affected by the breach;
- iii. The possible consequences of the breach;
- iv. Name of the data protection officer/grievance officer and
- v. The measures being taken by us to remedy such breach.

Please note that, we employ security measures to protect your information both online and offline from access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage. HashLearn may update its Privacy Policy from time to time, so you should review this Policy periodically. Changes to this Privacy Policy are effective when they are posted on this page. If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this website, please contact us using the information given here under and our 'Grievance Officer', shall undertake all reasonable efforts to address your grievances at the earliest possible opportunity.

By mail:

Grievance Officer  
Hash Education Pvt. Ltd.  
205  
2nd Floor  
Brigade Business Suites  
Jayanagar 2nd Block  
Bangalore - 560011  
By email: [info@hashlearn.com](mailto:info@hashlearn.com)

Currently, we plan to retain user data while an account is active and for at least three years afterward. We may alter this practice according to legal and business requirements.

While, we strive to work towards the security, integrity and privacy of your information, we shall not be held responsible for any loss, damage or misuse of your information, if such loss, damage or misuse takes place as a result of a Force Majeure Event (*as defined below*).

A "**Force Majeure Event**" shall mean any event that is beyond our reasonable control and shall include, without limitation, fire, flood, explosion, acts of God, civil commotion,

strikes, insurrection, war, acts of government, computer hacking, software failure and storage device, computer crashes etc.

• *I agree to have read the terms and conditions of this Policy.*

This privacy policy was last updated on Oct 01, 2020.