

PRIVACY POLICY

INCASSABLE TECHNOLOGIES PVT. LTD, a Private Limited Company incorporated under the Companies Act, 2013, having its registered office at Plot No. 101,Block AC, Near Chotu Ram Chowk,Gurgaon-122017, Haryana, India hereinafter referred to as the “Company” (where such expression shall, unless repugnant to the context thereof, be deemed to include its representatives, administrators, permitted successors and assigns.)The creator of this Privacy Policy ensures a steady commitment to your privacy with regard to the protection of your invaluable information.

This privacy policy contains information about the Website and mobile application for IOS and Android <https://swiflearn.com/> and it’s (hereinafter collectively referred to as the (“**Website/Platform**”).

In order to provide you with our uninterrupted use of services, we may collect and, in some circumstances, disclose information about you with your permission. To ensure better protection of your privacy, we provide this notice explaining our information collection and disclosure policies, and the choices you make about the way your information is collected and used.

This Privacy Policy shall be in compliance with the General Data Protection Regulation (GDPR) in effect from May 25th, 2018 and any and all provisions that may read to the contrary shall be deemed to be void and unenforceable as of that date. If you do not agree with the terms and conditions of our Privacy Policy, including in relation to the manner of collection or use of your information, please do not use or access the Site. If you have any questions or concerns regarding this Privacy Policy, you should contact our Customer Support Desk through the contact section on the Platform.

ANY CAPITALIZED WORDS USED HENCEFORTH SHALL HAVE THE MEANING ACCORDED TO THEM UNDER THIS AGREEMENT. FURTHER, ALL HEADING USED HEREIN ARE ONLY FOR THE PURPOSE OF ARRANGING THE VARIOUS PROVISIONS OF THE AGREEMENT IN ANY

MANNER. NEITHER THE USER NOR THE CREATORS OF THIS PRIVACY POLICY MAY USE THE HEADING TO INTERPRET THE PROVISIONS CONTAINED WITHIN IT IN ANY MANNER.

1. DEFINITIONS:

- a. “We”, “Our”, and “Us” shall mean and refer to the Website or the Company, as the context so requires.
- b. “User/Learners/students” shall mean and refer to natural and legal individuals who use the Website and who intend to seek information, contact or obtain the services of the teachers who shall be conducting classes through live video sessions/video conferencing on the Platform or enrol for the tutorials on the Platform. They must be competent to enter into binding contracts, as per Indian laws.
- c. “Professional User/Tutor” shall mean a professional teacher, who shall conduct classes on the Platform through video conferencing.
- d. “Services” refer to providing a Platform where professional teachers can conduct tutorial or classes through video conferencing aimed at school students for a specific age group, which can be subscribed to by the Users.
- e. The term “Platform” refers to the Website which enables the Users to subscribe to classes by professional teachers on any one or various subjects, which will be conducted through video conferencing.
- f. “Personal Information” shall mean and refer to any personally identifiable information that We may collect from You such as Name, Email Id, contact details etc., which have been set out in detail in the said policy

2. INFORMATION WE COLLECT

We are committed to respecting your online privacy. We further recognize your need for appropriate protection and management of any Personal

Information You share with us. We may collect the following information:

- a. Personal data such as, but not limited to name, email address and contact details parent's name, email address, contact number, student's name, School name, Class details, Board, City , Address, Grade and any other information as the Company may deem necessary from time to time;
- b. Tracking Information such as, but not limited to the IP address of your device and Device ID when connected to the Internet. This information may include the URL that you just came from (whether this URL is on the Website or not), which URL you next go to (whether this URL is on the Website or not), your computer browser information, and other information associated with your interaction with the Website.
- c. We use your contact information to send you information based on your interests and prior activity. The Company may also use contact information internally to direct its efforts for service improvement but shall immediately delete all such information upon withdrawal of your consent for the same through the '**unsubscribe**' button or through an email to be sent to support@swiflearn.com
- d. Details of Website usage for analytics: This privacy policy also applies to data we collect from users who are registered as members of this site, including, but not limited to, browsing behaviour, pages viewed, etc. We also collect and store personal information provided by you from time to time on the Site. We only collect and use such information from you that we consider necessary for achieving a seamless, efficient and safe experience, customized to your needs including:
 - i. To enable the provision of services opted for by you;
 - ii. To allow you to receive quality customer care services and data

- ii. For providing Information
 - iii. For enhancing the Services provided.
- b. For more details about the nature of such communications, please refer to our [Terms of Service](#). Further, your personal data such as Name, email Id and any other Sensitive Personal data may be collected and stored by us for internal record.
- c. We may track information such as IP addresses, and or Device ID to help identify you and to gather broad demographic information and make further services available to you.
- d. We will not sell, license or trade your personal information. We will not share your personal information with others unless they are acting under our instructions or we are required to do so by law.
- e. Information collected via our server logs includes users' IP addresses and the pages visited; this will be used to manage the web system and troubleshoot problems. We also use third-party analytics, tracking, optimization, and targeting tools to understand how users engage with our Platform so that we can improve it and cater personalized content/ads according to their preferences.
- f. The information that is shared through the platform by you with other users in the form of messages is strictly private and encrypted, hence no third party including us shall have any access to it.

4. HOW INFORMATION IS COLLECTED

- a. Before or at the time of collecting personal information, we will identify the purposes for which information is being collected. If the same is not identified to you, you have the right to request the Company to elucidate the purpose of collection of said personal information, pending the fulfillment of which you shall not be

mandated to disclose any information whatsoever.

- b. We will collect and use your personal information solely with the objective of fulfilling those purposes specified by us, within the scope of the consent of the individual concerned or as required by law. We will only retain personal information as long as necessary for the fulfillment of those purposes. We will collect personal information by lawful and fair means and with the knowledge and consent of the individual concerned.
- c. Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, should be accurate, complete, and up-to-date.

5. GOOGLE ANALYTICS

- a. We use Google Analytics to help us to understand how you make use of our content and work out how we can make things better. These cookies follow your progress through the anonymous data collected by us on where you have come from, which pages you visit, and how long you spend on the site. This data is then stored by Google in order to create reports. These cookies do not store your personal data.
- b. The Google website contains further information about Analytics and a copy of Google's privacy policy pages.

6. COOKIES

We use data collection devices such as “cookies” on certain pages of our Websites. “Cookies” are small files sited on your hard drive that assist us in providing customized services. We also offer certain features that are only available through the use of a “cookie”. Cookies can also help us provide information which is targeted to your interests. Cookies may be used to identify logged in or registered users. Our Website uses session cookies to ensure that you have a good experience. These cookies contain a unique

number, your 'session ID', which allows our server to recognize your computer and 'remember' what you've done on the site. The benefits of this are:

- a. You only need to log in once if you're navigating secure areas of the site
- b. Our server can distinguish between your computer and other users, so you can see the information that you have requested.

You can choose to accept or decline cookies by modifying your browser settings if you prefer. This may prevent you from taking full advantage of the Website. We also use various third-party cookies for usage, behavioral, analytics and preferences data. The following are the different types of Cookies used on the Website:

- a. **Authentication cookies:** To identify the user and share the content that he or she requested for.
- b. **Functionality cookies:** For the customized user experience and resuming past course progress.
- c. **Tracking, optimization, and targeting cookies:** To capture usage metric on the device, operating system, browser, etc. To capture behavioral metrics for better content delivery. To cater and suggest most suited products and services.

7. **GOOGLE ADSENSE**

Google AdSense is a tool that allows website publishers to deliver advertisements to site visitors in exchange for revenue calculated on a per-click or per-impression basis. To do this, Google **uses cookies and tracking technology** to deliver ads personalized to a website user/visitor. In this regard the following terms are specified to the Users:

- a. Third party vendors, including Google, use cookies to serve ads based on your prior visits to our website or other websites.

- b. Google's use of advertising cookies enables us and our partners to serve advertisements to you based on their visit to our Platform and/or other websites on the Internet.
- c. You may opt out of personalized advertising by visiting [Ads Settings](#).
- d. All advertisements of third parties on our Platform are for informative purposes only and the neither the Platform nor the Company guarantees or bears liability for the authenticity of the advertisements.
- e. At no point will the Company permit its Competitors to advertise on the Platform
- f. You may visit the links in the advertisements at your own risk or choose to not accept the cookies permitting third parties to display their advertisements.

8. EXTERNAL LINKS ON THE WEBSITE

The Website may include advertisements, hyperlinks to other websites, Websites, content or resources. We have no control over any websites or resources, which are provided by companies or persons other than us. You acknowledge and agree that we are not responsible for the availability of any such external sites or resources, and do not endorse any advertising, services/products or other materials on or available from such platform or resources. You acknowledge and agree that We are not liable for any loss or damage which may be incurred by you as a result of the availability of those external sites or resources, or as a result of any reliance placed by you on the completeness, accuracy or existence of any advertising, products or other materials on, or available from, such websites or resources. These external websites and resource providers may have their own privacy policies governing the collection, storage, retention and disclosure of Your Personal Information that You may be subject to. We recommend that you enter the external Website and review their privacy policy.

9. YOUR RIGHTS

- a. We provide the services through our Platform, which enables professional teachers to conduct classes through video conferencing and students to subscribe for the same.
- b. As a User you have to register on the Platform to be able to avail the the demo classes or subscribe to the services available on the Platform.
- c. You can leave feedback on the services provided by the Company, but at all times you are required to be civil and maintain decorum.

10. CONFIDENTIALITY

You further acknowledge that the Platform may contain information which is designated confidential by us and that you shall not disclose such information without our prior written consent. Your information is regarded as confidential and therefore will not be divulged to any third party, unless legally required to do so to the appropriate authorities. We will not sell, share, or rent your personal information to any third party or use your email address for unsolicited mail. Any emails sent by us will only be in connection with the provision of agreed services, and you retain sole discretion to seek for discontinuation of such communications at any point of time.

11. LIABILITY

Except as otherwise expressly included in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties, whether they are on our Platform or on other sites throughout the Internet, different rules may apply to their use or disclosure of the information you disclose to them. To the extent that we use third party advertisers, they adhere to their own privacy policies. Since we do not control the privacy policies of the third parties, you are

subject to ask questions before you disclose your personal information to others. With regard to third party payment gateways on the Platform, we have taken caution to only tie up with approved and authorised gateways, but you are advised to exercise reasonable caution.

12. **SECURITY**

- a. We treat data as an asset that must be protected against loss and unauthorized access. We employ many different security techniques to protect such data from unauthorized access by members inside and outside the Company. We follow generally accepted industry standards to protect the Personal Information submitted to us and information that we have accessed. We are using Cloud Service from Digital Ocean platform currently, the same may be changed at any time in future. We follow generally accepted industry standards to protect the Personal Information submitted to us and information that we have accessed. We are using SSL certificates to guarantee the safer transmission of data on our website. SSL Certificates are small data files that digitally bind a cryptographic key to an organization's details. When installed on a web server, it activates the padlock and the https protocol and allows secure connections from a web server to a browser. We also use reverse proxy servers before our actual servers. A **reverse proxy server** is a type of **proxy server** that is situated behind the firewall in a private network and directs client requests to the appropriate backend **server**. A **reverse proxy** provides an additional level of abstraction and control to ensure the smooth flow of network traffic between clients and **servers**.
- b. However, as effective as encryption technology is, no security system is impenetrable. Our Company cannot guarantee the security of our database, nor can we guarantee that information you provide won't be intercepted while being transmitted to the Company over the Internet.

13. **SEVERABILITY**

Each paragraph of this privacy policy shall be and remain separate from

and independent of and severable from all and any other paragraphs herein except where otherwise expressly indicated or indicated by the context of the agreement. The decision or declaration that one or more of the paragraphs are null and void shall have no effect on the remaining paragraphs of this privacy policy.

14. **AMENDMENT**

Our Privacy Policy may change from time to time. The most current version of the policy will govern our use of your information and will always be at the Platform. We have the right to amend and change the policy at our sole discretion.

15. **CONSENT WITHDRAWAL, DATA DOWNLOAD & DATA REMOVAL REQUESTS**

To withdraw your consent, or to request the download or delete your data with us for any or all our services at any time, please communicate the same on the support@swiflearn.com

16. **CONTACT US**

If you have any questions or concerns regarding this privacy policy, you should contact us on support@swiflearn.com