

PRIVACY POLICY

Whitehat Education Technology Private Limited (“**Company**” or “**We**” and their connotations) operates a website- (URL: <https://www.whitehatjr.com/>) (together called as “**Platform**”) which is engaged in the service of online tutoring to users.

Our Platform is primarily for children below the age of 18 years (“**Child**”) and it is assumed that the Child has parental consent to use the Platform. The parents of the Child or users above 18 years age hereinafter are referred to as You. The term “Users” for the purposes of these Terms shall be read as You and/or the Child.

Our User’s privacy is extremely important to us. We recognize the privacy concerns of the Users and the visitors and hence as a commitment to provide safe and secure experience on our Platform, we have formulated this privacy policy to help Users make an informed decision.

This Privacy Policy (“**Privacy Policy**”) is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information and shall be read with the Terms and Conditions found on (URL: <https://dash.whitehatjr.com/pages/privacy-policy>). We provide online tutoring computer science to children on the Platform (hereinafter referred to as “**Services**”).

If you do not agree with this Privacy Policy, do not use our Services or provide herewith your personal data.

1. Information We Collect

In order to provide Services, we require certain user information and may obtain the same through user-provided data or automatic data collection.

- a. By choosing to visit and/or avail any Services provided by Company, you agree to this Privacy Policy (as may be amended from time to time). Please read the following information carefully. If you are a parent or guardian and you provide your consent to your Child's use of the Platform, you agree to be bound by these Privacy Policy in respect to their use of the Platform. By your continued access or use of the Platform, you signify your agreement to be legally bound by Privacy Policy set forth herein. If you do not agree to the Privacy Policy of this agreement, promptly exit this page and stop accessing the Services.
- b. We collect information that may be used to identify you or your Child (“Personal Information”) including, but not limited to, (i) name, e-mail ID, photograph, location and other contact information (ii) gender and other demographics (iii) birth date and year of the Child to validate their age.
- c. We also collect certain information either when you provide it using the Platform or Services and/or automatically as you or the Child navigate through the

Platform (which may include usage details, IP address, device ID and type, your browser type and language, the operating system used by the device, access times, and information collected through cookies, web beacons and other tracking technologies). You agree that we may use such information to do internal research on our Users' demographics to better understand, protect and serve our Users.

- d. We also collect information from your user ID associated with any social media account (such as your Facebook and Google account) that users use to sign into the Platform or connect with or use of our Services. When you sign in with your social media account information, or otherwise connect to your social media account with the Platform, you consent to our collection, storage, and use, in accordance with this Privacy Policy, of the information that you make available to us through the social media interface. This includes, without limitation, any information that you have made public through your social media account, information that the social media service shares with us or information that is disclosed during the sign-up and sign-in processes.
- e. If any of the Users allows us to collect information from his or her device phonebook—and you or the Child's are one of that User's contacts—we may combine the information we collect from that User's phonebook with other information we have collected about you. We may also obtain information from other sources and combine that with the information we collect through the Platform.
- f. We use data collection devices such as "cookies" on certain pages of the Platform to help analyse our web page flow, measure promotional effectiveness, and promote trust and safety. Cookies are small files placed on your hard drive that assist us in providing our Services. We offer certain features that are only available using a cookie. Cookies can also help us provide information that is targeted to your interests.
- g. Users shall grant the Company a non-exclusive, transferable, sub-licensable, royalty-free, worldwide license for content that is covered by intellectual property rights, like photos and videos (IP License). This IP License shall end when you delete your IP content or your account unless your content has been shared with others, and they have not deleted it. When you delete IP content, it is deleted in a manner similar to emptying the recycle bin on a computer. However, you understand that removed content may persist in backup copies for a reasonable period (but will not be available to others).

2. Use of Information

We collect and store information provided by you from time to time. This allows us to provide Services and features that most likely meet your needs, and:

- a. To create and maintain account;
- b. To enable you to avail of our Services, and ensure efficient customer care experience and develop new features;
- c. To determine the current age of the Child;
- d. To send surveys or marketing communications to inform you of new products or Services or other information that may be of interest;
- e. To dispatch transaction-related communications such as welcome letters, billing reminders, and purchase confirmations;
- f. To notify the necessary information related to the Platform and Services and your or the Child's account on the Platform from time to time;
- g. To maintain records and provide you and the Child with an efficient, safe and customized experience while using the Platform;
- h. To analyse overall trends to helps us improve the Platform and Services;
- i. To furnish your information to service partners and providers only to the extent necessary for delivering the relevant services (e.g. scheduling repair and maintenance, providing emergency assistance);
- j. Verify your identity and prevent fraud or other unauthorized or illegal activity;
- k. To comply with applicable laws, rules, and regulations; and
- l. In any other way consistent with this Privacy Policy.

Additionally,

- m. We may use your email address to seek parental consent of Child for registration of and to explain what information we are collecting, how we plan to use it, and how the parent can revoke consent or request at any time that we remove the account and delete any Personal Information collected from the Child (including the parental contact information).
- n. We reserve the right to use or disclose your Personal Information in response to summons, court orders, warrants, or legal process, or to otherwise establish or exercise our legal rights or defend against legal claims or in the event you violate or breach an agreement with us. We will use and disclose your Personal

Information if we believe you will harm the property or rights of the Platform, its owners, or those of the Platform's other users. Finally, we will use or disclose yours or the Child's Personal Information if we believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person or property, violations of the Platform's other policies, or as otherwise required by law when responding to subpoenas, court orders and other legal processes.

- o. If we believe that disclosure is necessary or appropriate to protect our rights, property, or safety, our Users or others, we may in good faith share information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- p. You agree that we may use Personal Information about you to improve our marketing and promotional efforts, to analyse site usage, improve the Platform's content and Service offerings, and customize the Platform's content, layout, and Services. These uses improve the Platform and better tailor it to meet your needs, so as to provide you with an efficient, safe and customized experience while using the Platform.

3. Review & Alteration of Information

We strive to accurately record all information provided on the Platform from time to time.

- a. We encourage you to review, correct, update, and/or change your or your Child's account information or Personal Information at any time.
- b. You may also delete yours or your Child's information at any time on the Platform. However, we may retain certain information as required by law or for reasonable business purposes.
- c. You have a right to review, update, correct, and delete your information; subject to our records retention policies and applicable law, including any statutory retention requirements.
- d. We reserve the right to delete your account if we find that the Personal Information about you that is inaccurate, incomplete, or irrelevant for legitimate purposes, or are being processed in a way that infringes any applicable legal requirement.

- e. You may at any time access or change the Personal Information that we have collected from your Child. The guardian or parent may provide a request via email to the Grievance Officer for us to amend, or to make no further use of, or delete, the Personal Information we have collected from their children, in which case, the Child's account will be deleted. For Child's protection, we may need to verify the identity of parent or guardian before implementing the request. We will try to comply with your request as soon as reasonably practicable.

4. Viewable Information of the Child on Platform

We strictly limit the Personal Information that is publicly viewable about a User who is known by us to be a Child. When a Child posts a review or comment on the Platform, only the Child's age and name is posted, along with the content of the Child's posting. Although the Child may create a profile for his or her account, no portion of the Child's profile other than the Child's age and name is publicly viewable.

5. Third-Party Services

Our Platform may contain links to other websites. Please note that when you click on one of these links, you are entering another website over which we have no control and for which we will bear no responsibility. Often these websites require you to enter your Personal Information. We encourage you to read the privacy policies of all such websites as their policies may differ from our Privacy Policy. You agree that we shall not be liable for any breach of your privacy of Personal Information or loss incurred by your use of such websites or services.

6. Confidentiality

We treat your use of the Platform with the utmost respect for your privacy. Except for anything not disclosed above, we keep your information disclosed to the listed professional confidential, keeping only non-decimated "file" copies for reference in case of legal dispute. We shall use commercially reasonable efforts to protect and secure the same. However, we shall not be liable for any damage/loss/ exposure caused to the information collected by us.

7. Compliance with Data Protection Regulations

The information we obtain from or about you may be processed and stored in India and our other various servers located across the globe, which may provide for different data protection rules than the country in which you reside. We comply with generally accepted industry standard regulations regarding the collection, use, and retention of data under the Information Technology Act, 2000. By using the Platform and/or Services, you consent to the collection, transfer, use, storage and disclosure of your

information as described in this Privacy Policy, including to the transfer of your information outside of your country of residence

8. Measures taken to Protect Your Information

We have implemented appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access to your information and to maintain data security. These safeguards consider the sensitivity of the information that we collect, process and store and the current state of technology. We store and process your information on reputed web service cloud servers. We impose contractual obligation if in any case, we outsource the task of data processing. We follow generally accepted industry standards to protect your information submitted to us, both during transmission and once received, including the use of vault and tokenization services from third-party service providers.

While we strive to use commercially acceptable means to protect your information, we cannot guarantee its absolute security and thereby usage in a manner that is inconsistent with this Privacy Policy.

We neither accept nor assume any liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third-party access, or other causes beyond we control. We do not, under any circumstances, represent that our platform is completely void of malware including but not limited to viruses, spyware, cancelbots, Trojans, time bombs and any such application, which may be placed on our platform without our knowledge. However, we shall take all the necessary and reasonable steps to ensure that our platform is free from the above-mentioned malware.

You also play a key role in keeping your and your Child's information secure. Using unsecured Wi-Fi or other unprotected networks to submit messages through the Platform is never recommended. You or your Child should not share your username, password, or other security information for your account or the device through which you access our Platform and/or Services (as the case may be) with anyone. If we receive any instructions through an account or device or any other medium bearing your information, we will consider that you have authorized the instructions. Please remember that if Personal Information posted in public areas of the Platform such as in online forums or chat rooms, or in the Platform's searchable database, or share such information with anybody else, such information may be collected and used by others over whom we have no control. We are not responsible for the use made by third parties of information you post or otherwise make available in public areas of Platform or share with any other person.

9. In the Event of Change of Control

In the event of the change of control of the Company due to the merger with a third party, acquisition, bankruptcy or other change of control, we reserve the right to transfer or assign the information we have collected from our users as part of such merger, acquisition, sale, or other change of control. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your Personal Information is treated, transferred, or used.

10. Changes to this Privacy Policy

We reserve the right to update, change or modify this Privacy Policy at any time to reflect any (including but not limited to) changes in the law, the data collection, and practices, the features of the Platform or Services, or advances in technology. The amendment to this Privacy Policy shall come to effect from the time of such update, change or modification and the same will be published here.

You are requested to review the Privacy Policy carefully from time to time. Use of information collected is subject to the Privacy Policy in effect at the time such information is used. The changes to this Privacy Policy shall be treated as read, recognized, understood, consented and accepted if you continue to use the Platform or Services post such changes.

11. Governing Laws and Dispute Resolution

This Privacy Policy shall be governed by and construed in accordance with the Arbitration and Conciliation Act 1996, or such similar laws of India which are not in conflict with each other. Such shall be subjected to the exclusive jurisdiction of the competent courts of Mumbai, India.

12. Contact Details

Please contact us by email or postal mail on the following address of the Grievance Officer:

Name: Whitehat Education Technology Private Limited

Name: Mr. Karan Bajaj

E-mail id: karan@whitehatjr.com

Address: 2A101, WeWork Raheja Platinum, Sag Baug Road, off Andheri Kurla Road, Marol, Andheri East – 400 059.