

# **Privacy Policy**

At Winning Leap, we are committed to safeguard and protect the privacy and personal information of the users of our website/application/products/service.

Winning Leap Education Pvt. Ltd a company incorporated under the Indian Companies Act, 2013 (operating under the brand name as LearnQoch), is a leading EdTech company, incorporated in India. This Privacy Policy is a demonstration of our commitment about adopting ethical practices towards the users of our website.

This privacy policy explains our practices regarding the sensitive personal information voluntarily provided/disclosed by the user while accessing website/application/other online-platforms hereinafter refereed as Portal, the manner of collection, purpose of use, storage, security and other legal aspects of such information.

## PERSONAL INFORMATION

Personal Information means "Sensitive personal data or information" as mentioned under Rule 3 of Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011.

#### INFORMATION WE COLLECT

We obtain personal information when you use our Portal like register on the portal, avail the services, fill any form on the portal, place an inquiry, subscribe to emails, attend events, respond to a survey, etc. In addition, when you visit our websites, use our apps, or interact with our products, we may collect certain information.

#### AUTOMATICALLY COLLECTED INFORMATION

The portal may collect certain information by automated means i.e. by way of sending cookies and web beacons. Winning Leap sends cookies to the visitor's device. Cookies are used to uniquely identify visitor's browser and to store information or settings in the browser. The information collected by sending cookies is used to improve quality of the content posted on the portal.

Such information includes IP address, operating system, type of mobile device, unique device ID, type of internet browser, etc. of the device from which the portal was accessed by the user, user's behavioural pattern, preferences, trends of accessing or using the portal, etc.

The user is free to accept or refuse the cookies.

## USE AND SHARING OF THE PERSONAL INFORMATION

Winning Leap shall ask the user of the Portal to provide Personal Information which is necessary to lawfully render services connected with the portal.

Winning Leap may collect and use personal information of the user:

- to authenticate user's identity for easy access to portal services

- to provide personalize services as per individual needs, to analyse behavioural trends

- to inform the user and improve user's experience about various schemes, offers, upcoming events,

tailored services as per explicit requests of the user, content quality of the portal, etc.

- to facilitate completing the transactions such as registrations, enrolments, surveys, sales and purchases associated with the services of the portal.

- to track user's details w.r.t. Ed-Tech courses offered on portal, analyse user's learning patterns and monitor user's performance

- to administer the content of the portal

- to resolve disputes and troubleshoot concerns

- to facilitate Knowledge Partners and other stakeholders involved in rendering services for the portal



- to evaluate the performance of set business policy and track the progress in achieving business targets, to provide statistics, reports, surveys, schemes, etc.

Winning Leap does not sell, trade, rent, share or otherwise transfer user's personal information to outside parties without express consent of user.

Winning Leap may use services of third-parties to analyse the information provided by users and share user's information to outside parties to improve the content of the portal and provide better experience to user while using the portal. Such third parties are legally bound by this Privacy policy to keep such information confidential.

Winning Leap may also release user's information when we believe such release is appropriate to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

#### SECURITY

Winning Leap adopts appropriate administrative, electronic, technical, physical and procedural safeguard measures to protect the personal information it processes. Once your information is in our possession, we adhere to strict security guidelines, protecting it against unauthorized access.

Access to the personal Information is limited to authorized employees and outside agencies who need to know such information in order to facilitate functioning of the portal.

Kindly note that Winning Leap strives at providing stringent security measures for safeguarding personal information of users collected through the portal but no security system can prevent all potential security breaches. Therefore, security breaches beyond the control of standard security procedures adopted by Winning Leap are at the risk of user.

User agrees to maintain confidentiality of account, username, e-mail address and password as well as activities related thereto.

User agrees not to use account, username, email address or password of another User.

User agrees to notify Winning Leap immediately in case of suspicious unauthorised access to user's account, email, password or other personal information.

When the user communicates with customer service via email or chat on our online portal, these communications may not be encrypted. For that reason, it is advised not to share sensitive information via these communication channels.

## YOUR CHOICES

Winning Leap may contact via e-mail or other online and offline modes of communication for promoting its services, products, etc.

If you receive email communications from us and want to opt out of receiving such communications in the future, you can click the "Unsubscribe" link at the bottom of such email.

If you do not want us to collect your device's geographic location, you can disable or opt out of that function when you first use our portal on your device settings.



## THIRD PARTY LINKS/ EXTERNAL LINKS

This website may contain links to other web sites, content or resources. Such links can be tracked and such information can be used to improve content of the portal. Such linked websites may collect personal information of the user. The linked web sites or portals may have separate and independent privacy policies. Be aware that the Winning Leap is not responsible for the content or privacy practices of such other linked sources. Users are encouraged to read the privacy statements of such linked websites that collects personally identifiable information.

Winning Leap is obliged to protect the integrity of our EdTech Portal. This Privacy Policy applies solely to information collected through our online portal. Feedback about such linked sources can be communicated to Winning Leap.

As per this policy, the user acknowledges and agrees that Winning Leap and any other app, website/ domain owned, operated and controlled by it is not responsible for the availability of any such external sites or resources, and does not endorse any advertising, products or other materials on or available from such websites or resources and not liable for any loss or damage caused to the user due to those external linked sites or resources.

## COMPLIANCE

Winning Leap values privacy of its users hence we have taken the due precautions to be in compliance with local privacy law.

Use of Winning Leap App platform in any electronic form or device shall be legally bound by the terms and conditions of this privacy policy. The processing of the user's personal information in any way, including, but not limited to collecting, handling, storing, disclosing, deleting, using, combining, sharing and transferring information, all such activities will take place in India.

The information of the user outside India will be treated in accordance with the applicable data protection laws of India.

## CONSENT

It is advised to read the terms of this privacy policy carefully along with Terms of Use provided on the platform before using the Application, Website, its services and products so that the user can provide an informed consent.

Use of any Website, Application, products or services provided by the company on electronic or other platform of Winning Leap signifies acceptance of the user to this privacy policy and wilful and free consent of the user for collection and using personal information provided by user as per terms of this Privacy Policy.

The user signifies express consent to Winning Leap to share personal information disclosed by user on App with the third parties for the purposes of providing Winning Leap services.

In case of disagreement with the terms of privacy policy the user can refrain from using the Application and revoke the access to the Application by deleting the App from the device in which case the user will not be able to avail services provided by the App. The consent provided by a minor user is deemed as the consent of the minor's legal guardian. The user may contact Winning Leap to avail further assistance.

## CONFIDENTIALITY AND DISCLOSURE OF YOUR INFORMATION

Winning Leap does not share, disclose, sell, rent or trade the personal information provided by the user, except provided as per the terms of Privacy Policy and terms of use.

Winning Leap will not disclose your personal information to any other user of the App or to the public at large. Your information is safe with us.



We will not disclose your personal information to any other user of the App or to the public at large without your consent as per this Privacy Policy.

By using this interface and login and accessing the database system, the user expressly gives the company consent to use & disclose your personal information in accordance with this Privacy Policy.

The Government authorities may have an access to the information gathered through website/App for the purpose of implementing law and order. Your information is safe with us.

Winning Leap may disclose personal information provided by user when required by and to co-operate with the Government and law enforcement agencies. The Government authorities may have an access to the personal information of users gathered through website/App for the purpose of implementing law and order.

Winning Leap may disclose such information in following ways:

- a. Disclosure to the Third-party: Winning Leap uses third party service providers to facilitate the services or perform the services on our behalf. These third parties may have access to personal information of the user information. Such third parties are legally bound by this privacy policy not to disclose or use personal information of the user for any other purpose but to facilitate Winning Leap in providing their services.
- b. Disclosure of Personal Information of a Minor: Winning Leap is an EdTech application. The personal information of the minor users may be disclosed to respected legal guardians/parents in good faith.
- c. Security Reasons: to protect the terms and conditions for use of this Portal or to protect the safety and rights of the person or property or security of Winning Leap or public at large.
- d. Promotional Schemes: Winning Leap may announce some schemes offering benefits or discounts as a business strategy. Participation in such schemes signifies agreement to the rules that governing that Scheme. Winning Leap may disclose personal information of the participants as per such rules.
- e. Business Transfer: Winning Leap reserves the right to disclose and share such personal information with our oversight body, subsidiaries, affiliates, subsequent owner, co-owner or operator of the services for internal reasons.
- f. E-commerce related: Winning Leap uses the online banking portals, debit card, credit card, e-wallets for processing bill payment by the user for availing goods and services from the portal. These are outside agencies and Winning Leap do not share user's personal information except for processing e-payment of such bills.
- g. Research Purposes: Winning Leap may publish and share information reports with its oversight body with general statistical information about users of its database, such as of students' names, number of students, training centres, training partners, test performance, performances of schemes, ------- etc.( information required)

## CHANGES TO THE TERMS OF PRIVACY POLICY

Privacy Policy is subject to change to incorporate new situations and comply with relevant statutory regulations. The changes to terms of this privacy policy if any, will be updated time to time on this page. The user is advised to read the terms of the Privacy Policy regularly to know any changes as continued use signifies acceptance to all such changes to terms of privacy policy. You can terminate the use of the platform in case of dis-agreement with any of the changes/amendments/ modifications, etc.

#### COOKIES

A "cookie" is a small piece of information stored by a web server on a web browser, so it can be later read back from that browser. This Portal uses cookie and tracking technology depending on the features offered. No personal information will be collected via cookies and other tracking technology however, if you previously provided personally identifiable information, cookies may be tied to such information. Aggregate cookie and tracking information may be shared with third parties.



## LOG INFORMATION

Please note that when the user accesses our portal, its servers automatically record information about the browser.

#### DISCLAIMER

Winning Leap maintains the information for aggregation purposes only. All information in any form available on the portal the sole property of Winning Leap. Except provided as expressly by Winning Leap, no part of the content on portal may be copied, reproduced, republished, uploaded, posted, publicly displayed, encoded, modified, translated, transmitted or distributed in any way (including "mirroring") to any other computer, server, Website or other medium for publication or distribution or for any commercial purposes/usages, without express prior written consent of Winning Leap. Winning Leap shall have right to initiate appropriate legal proceedings in case of such violation.

Even though every effort is taken to provide accurate and up to date information, whenever there is any doubt regarding the correctness of the information contained therein for any information posted on this website, visitors are advised to get in touch with NSDC Office.

Winning Leap shall not be liable for any indirect, incidental, special, consequential, or punitive damages, or any loss of profits or revenues, whether incurred directly or indirectly, or any loss of data, use, goodwill, or other intangible losses, resulting from user's use or inability to use the services or any conduct or content of any party other than the applicable party, including without limitation, any defamatory, offensive, or illegal conduct or unauthorized access, use, or alteration of your content or information.

Winning Leap is not responsible or liable for the portal being temporarily unavailable due to technical issues beyond our control.

User's access to the portal may be suspended or restricted for portal maintenance at any time without prior notice. We will try to limit the frequency and duration of any such suspension or restriction.

Some services may not function properly if your cookies are disabled Content of external links provided on Winning Leap portal is subject to separate policies, terms of use, and fees. Winning Leap is not responsible for such content of the third parties.

Winning Leap expressly disclaim all responsibility and liability towards any actions or inactions of, breach of conditions, representations or warranties by such third parties.

Winning Leap shall not provide any dispute resolution in case of disagreement between user and such third party.

User acknowledges and agrees that terms of the Privacy policy in this document are reasonable and fair allocation of risk between the user and Winning Leap.

## GOVERNING LAW

These Terms shall be governed by the laws of India. Use of our platform in any electronic form or device shall be legally bound by the terms and conditions of this privacy policy. The processing of the user's personal information in any way, including, but not limited to collecting, handling, storing, disclosing, deleting, using, combining, sharing and transferring information, all such activities will take place in India. The information of the user outside India will be treated in accordance with the applicable data protection laws of India.

## GRIEVANCE MECHANISM/CONTACT US

Kindly contact our Grievance Officer for your questions and concerns about this Privacy Policy at: Email: <u>info@learnqoch.com</u> Mobile: +91 84519 01079 Address: 2403 Tropical Lagoon Dahlia Kavesar G B Road Thane West 400615