PRIVACY POLICY

Last updated August 05, 2024

This privacy notice for Inflack Limited ("we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

- Download and use our mobile application (Smart School (STAHS)), or any other application of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@inflack.com.

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us.

Do we process any sensitive personal information? We do not process sensitive personal information.

Do we collect any information from third parties? We do not collect any information from third parties.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply withaw. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information.

How do we keep your information safe? We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights.

How do you exercise your rights? The easiest way to exercise your rights is by submitting a data subject access request (https://app.termly.io/notify/e6be4cbc-1ad7-4be6-9a23-3343180ada07), or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the privacy notice in full.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express aninterest in obtaining information about us or our products and Services, when you participatein activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- usernames
- passwords
- contact or authentication data
- mailing addresses
- job titles

Sensitive Information. We do not process sensitive information.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how youinteract with our Services, including:

To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.

- **Inventory Management:** Efficiently track and manage polytechnic inventory, ensuring all supplies and equipment are accounted for and properly distributed. This module helps in maintaining optimal stock levels and facilitates easy audits and reporting.
- Parent and Guardian Portal: Facilitate communication between the institute and parents/guardians, providing updates on student progress, attendance, and events. This portal enhances engagement and keeps parents informed about their child's academic journey.
- **Card Management:** Oversee the issuance and management of student and staff ID cards. This system ensures secure and efficient identification within the institute, integrating with access control systems and attendance tracking.
- Academic Management: Plan and manage academic schedules, course curricula, practical sessions, and student
 assessments. This module supports educators in organizing their teaching plans and monitoring student performance
 effectively.
- Homework Management: Streamline the assignment and submission of homework. This feature allows teachers to
 assign homework digitally, and students can submit their work online, making the process more efficient and reducing
 paperwork.
- Bulk SMS and Email: Communicate important information quickly and efficiently to students, parents, and staff
 through bulk SMS and email notifications. This feature is crucial for disseminating urgent updates, event reminders,
 and announcements.
- **Student Accounting:** Manage student fee payments, generate invoices, and track outstanding balances. This module ensures financial transparency and simplifies the process of fee collection and reconciliation.
- Office Accounting: Handle the financial operations of the institute, including budgeting, expense tracking, and financial reporting. This comprehensive accounting system supports the administrative staff in maintaining accurate financial records.
- Attendance Management: Automate the tracking of student and staff attendance. This system supports biometric and RFID-based attendance, ensuring accurate and timely recording of attendance data.
- **Reception Management:** Manage visitor logs and reception duties seamlessly, ensuring smooth operation for front desk staff. This module enhances security and visitor management within the institute.
- **Admission Process:** Simplify the student admission process with automated workflows, document verification, and status tracking. This system supports both online and offline admissions, making the process efficient and user-friendly.

- Dashboard for All Branches and Departments: Provide a consolidated view of operations across multiple branches and departments, enabling centralized management. This dashboard offers real-time insights and analytics, supporting informed decision-making.
- **Pre-launch Reports and App Stability** We are committed to providing a seamless user experience. To ensure our app meets the highest standards of functionality:
 - We will fix all broken experiences within our app, addressing any non-responsive icons or buttons.
 - We will use pre-launch reports provided by tools like the Google Play Console to check for app stability, identifying and resolving any issues that may cause the app to crash, freeze, or otherwise function abnormally.

Our app does not install correctly, loads successfully, and is fully responsive, ensuring a reliable and efficient user experience. We continuously monitor and update our app to comply with the Broken Functionality policy and maintain high performance standards.

3. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

4. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

5. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services at your own risk. You should only access the Services within a secure environment.

6. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.

<u>Withdrawing your consent:</u> If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable

law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account Information

If you would at any timelike to review or change the information in your account or terminate your account, you can:

Contact us using the contactinformation provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

If you have questions or comments about your privacy rights, you may email us at info@inflack.com.

7. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

8. DO OTHER REGIONS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: You may have additional rights based on the country you reside in.

Australia

We collect and process your personal information under the obligations and conditions set by Australia's Privacy Act 1988 (Privacy Act).

This privacy notice satisfies the notice requirements defined in the Privacy Act, in particular: what personal information we collect from you, from which sources, for which purposes, and other recipients of your personal information.

If you do not wish to provide the personal information necessary to fulfill their applicable purpose, it may affect our ability to provide our services, in particular:

offer you the products or services that you want

- respond to or help with your requests
- manage your account with us
- confirm your identity and protect your account

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?"

If you believe we are unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the Office of the Australian Information Commissioner (https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us).

9. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date at the top of this privacy notice. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

10. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at info@inflack.com or contact us by post at:

Inflack Limited
Gulshan, Notunbazar, Dhaka
Dhaka, Dhaka 1212
Bangladesh

11. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please fill out and submit a data subject access request (https://app.termly.io/notify/e6be4cbc-1ad7-4be6-9a23-3343180ada07).