

PRIVACY POLICY of MYPAL LEARNING and ASSESSMENT

ANDROID APP

[MOBILE APP] Last
updated 20-04-2020

ARIVU LEARNING PVT LTD [CREATOR and OWNER OF MYPAL LEARNING and ASSESSMENT APP] (“we” or “us” or “our”) respects the privacy of our users (“user” or “you”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our mobile application (the “Application”). Please read this Privacy Policy carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE APPLICATION.

ARIVU LEARNING PVT LTD (operating under the brand name MYPAL), is a leading edtech company, incorporated in India, for imparting learning.

This privacy policy governs your use of the application ‘MyPAL -The Learning and Assessment Apps’ (“Application”) and the other associated/ancillary applications, products, websites and services managed by the Company, Arivu Learning Private Limited.

Please read this privacy policy (“**Policy**”) carefully before using the Application, Website, its services and products, along with the Terms of Use (“**ToU**”) provided on the Application and on the Website. Your use of the Website, Application, or services in connection with the Application, Website or products (“**Services**”), or registrations with us through any mode or use of any products including that of SD cards, tablets or other storage/transmitting device shall signify your acceptance of this Policy and your agreement to be legally bound by the same. For the sake of brevity your use of ‘MyPAL -The Learning and Assessment Apps’ in any electronic form or device shall be bound by the terms and conditions enumerated and agreed upon hereunder with wilful and free consent.

If you wish not to agree with any of the terms and conditions of this Policy, kindly refrain from using the Website, Application or its products or until satisfaction for you to use the same by its Sales/Marketing/Technical/Legal Team, avail any of these services.

User Provided Information

The Application/Website/Services/products records the information you provide when you download

and register for the Application or Services or products. When you register with us, you generally provide (a) your name, age, email address, phone number, password and your ward's educational interests; (b) transaction-related information, such as when you make purchases, respond to any offers, or download or use applications from us; (c) information you provide us when you contact us for help; (d) information you enter into its system when using the Application/Services/products, such as while asking doubts, participating in discussions and taking tests. The said information collected from the users could be categorized as "**Personal Information**", "**Sensitive Personal Information**" and "**Associated Information**". Personal Information, Sensitive Personal Information and Associated Information (each as individually defined under this Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 (the "**Data Protection Rules**")) shall collectively be referred to as "**Information**" in this Policy.

Arivu Learning may use this Information to contact you from time to time, to provide you with the Services, important information, required notices and marketing promotions. Arivu Learning will request you when it need more information that personally identifies you (personal information) or allows us to contact you.

Arivu Learning will not differentiate between who is using the device to access the Application, Website or Services or products, so long as the log in/access credentials match with yours. In order to make the best use of the Application/Website/Services/products and enable your Information to be captured accurately on the Application/Website/Services/products, it is essential that you have logged in using your own credentials.

Arivu Learning will, at all times, provide the option to you, not to provide the Personal Information or Sensitive Personal Information, which it seeks from you. Further, you can, at any time while using the Application/Services/products, also have an option to withdraw your consent given earlier to it, to use such Personal Information or Sensitive Personal Information. Withdrawal of the consent by you is required to be sent in writing to us at the contact details provided in this Policy below. In any such event, Arivu Learning or the Company fully reserves the right to withdraw further usage of the Application/Website or provide any further Services/products thereunder to you.

Automatically Collected Information

In addition, the Application/products/Services may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use the Application/Services/products. As is true for most Mobile applications, Arivu Learning also collects other relevant information as per the permissions that you provide.

MyPAL uses an outside credit card processing company to bill you for the goods and services availed by you. These companies do not retain, share, store or use personally identifiable information of you for any other purpose.

Use of your Personal Information

Arivu Learning uses the collected Information to analyse trends, to conduct research, to administer the Application/Services and products, to learn about each user's learning patterns and movements around the Application/Services and products and to gather demographic information and usage behaviour about its user base as a whole. Aggregated and individual, anonymized and non-anonymized data may periodically be transmitted to external service providers to help us improve the Application, products and its Services. Arivu Learning will share your information with third parties only in the ways that are described below in this Policy.

Arivu Learning may use the individual data and behavior patterns combined with personal information to provide you with personalized content, and better your learning objectives/experience. Third parties provide certain services which we may use to analyze the data and information you provide to personalize, drive insights and help it better your experience or reach out to you with more value added applications, products, information and services. However, these third party companies do not have any independent right to share this information. Arivu Learning does not sell, trade or rent your Information to any third party unless, we have been expressly authorized by you either in writing or electronically to do so. Arivu Learning may at times provide aggregate statistics about its customers, traffic patterns, and related site information to reputable third parties, however this information when disclosed will be in an aggregate form and does not contain any of your Personally Identifiable Information.

Arivu Learning will occasionally send email notices or contact you to communicate about its Services, products and benefits, as they are considered an essential part of the Services/products you have chosen.

ARIVU may disclose Information:

- as required by law, such as to comply with a subpoena, or similar legal process;
- to enforce applicable ToU, including investigation of potential violations thereof;
- when it believes in good faith (doctrine of uberrima fides) that the disclosure is necessary to protect its rights, protect your safety or the safety of others, investigate fraud, address security or technical issues or respond to a government request;
- with its trusted services providers who work on its behalf, do not have an independent use of the information Arivu Learning discloses to them, and have agreed to and adhered to the rules set forth in this Policy;
- to protect against imminent harm to the rights, property or safety of the Application/Website/ Arivu Learning Private Limited or its users or the public as required or permitted by law;
- with third party service providers in order to personalize the

Application/Website/Services/products for a better user experience and to perform behavioural analysis;

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 myPAL Apps.

Access to your Personal Information

Arivu Learning will provide you with the means to ensure that your Personal Information is correct and current. If you have filled out a user profile, it will provide an obvious way for you to access and change your profile from its Application/Services/Website/products. Arivu Learning adopts stringent security measures to protect your password from being exposed or disclosed to anyone. Only upon you forgetting the password for its Application/Website or Services, Arivu Learning will have a right to reset the same to you with your prior approval as per standard web practices.

Cookies

Arivu Learning send cookies (small files containing a string of characters) to your computer, thereby uniquely identifying your browser. Cookies are used to track your preferences, help you login faster, and aggregated to determine user trends. This data is used to improve its offerings, such as providing more content in areas of greater interest to a majority of users.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent.

Disclaimer:

Some of Arivu Learning features and services may not function properly if your cookies are disabled.

Links

Arivu Learning may present links in a format that enables us to keep track of whether these links have been followed. Arivu Learning uses this information to improve its customized content. Clicking on links may take you to sites outside its domain. Arivu Learning are not responsible for the privacy practices of other web sites. Arivu Learning encourage its users to be aware when they leave its site to read the EULA/T&Cs of each and every web site that collects personally identifiable information. This Privacy Policy applies solely to information collected by its Website.

Alerts

Arivu Learning may alert you by email or phone (through sms/call) to inform you about new service offerings or other information which it perceives might be useful for you.

Public Forums

When you use certain features on its website like the discussion forums and you post or share your personal information such as comments, messages, files, photos, 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 its forums this information may become publicly available.

Security

Arivu Learning are concerned about safeguarding the confidentiality of your Information. Arivu Learning's MyPAL Apps provide physical, electronic, and procedural safeguards to protect Information it processes and maintain. An illustration being, Arivu Learning limits access to this Information to authorized employees only who need to know that information in order to operate, develop or improve its Application/Services/products/Website. Please be aware that, although Arivu Learning endeavour is to provide stringent security, for information it possesses and maintains, no security system can prevent all potential security breaches.

How long does Arivu Learning retain user data?

Currently, Arivu Learning retains user data while an account is active and for at least three years afterwards. It may alter this practice according to legal and business requirements. For example, it may lengthen the retention period for some data if needed to comply with law or voluntary codes of conduct. Unless otherwise prohibited, it may shorten the retention period for some types of data if needed to free up storage space.

Log information

When you access Arivu Learning,s MyPAL App and Website, its servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your web request, internet protocol address, browser type, browser language,

the date and time of your request and one or more cookies that may uniquely identify your browser.

User communications

When you send an email or other communication to Arivu Learning, it may retain those communications in order to process your inquiries, respond to your requests and improve our Services.

Changes to this Statement

As the Company (Arivu Learning Private Limited) evolves, its privacy policy will need to evolve as well to cover new situations. You are advised to review this Policy regularly for any changes, as continued use is deemed approval of all changes.

Your Consent

Arivu Learning believes that, every user of our Application/Services/Products/Website must be in a position to provide an informed consent prior to providing any Information required for the use of the Application/Services/Products/Website. By registering with it, you are expressly consenting to its collection, processing, storing, disclosing and handling of your information as set forth in this Policy now and as amended by us. Processing, your information in any way, including, but not limited to, collecting, storing, deleting, using, combining, sharing, transferring and disclosing information, all of which activities will take place in India. If you reside outside India your information will be transferred, processed and stored in accordance with the applicable data protection laws of India.

Contact Information

You may contact us at:

#368, 19TH Main Road, 1st Block, Rajaji Nagar, BANGALORE KARNTATAKA 560010

Reach out to us on mypalsupport@arivulearn.com, in case of any queries.