

TURN THE BUS PRIVACY POLICY

Welcome to Turn the Bus, a platform aimed at delivering digital education solutions to underserved communities in India. This Platform is made available by Turn the Bus, a US 501 (c) (3) nonprofit organization (“**we**”, “**us**”, “**our**”). This privacy policy (“**Privacy Policy**”) describes the information we collect and explains how we collect, use, disclose, and protect such information, and your choices about the collection and use of your information.

But first, some points to note:

- The “**Section Highlights**” in each clause merely provides a highlight of the clause. Reading the highlights is not a replacement for reading the clause. In case of a conflict between the highlights and the clause, the clause will prevail.
- We may revise this Privacy Policy as well as update the Platform or Services from time to time, so please keep visiting this page regularly to take notice of any changes we make.

- This Privacy Policy applies to all users of our Platform or Services. This Privacy Policy is incorporated within and a part of our Terms of Use. Terms capitalised but not defined herein shall have the meaning assigned to them in the Terms of Use.
 - If you do not agree with the processing policies laid out in this Privacy Policy, you should not use our Platform or Services.
 - By using, visiting, or signing-up to our Services, you have agreed to this Privacy Policy.
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1. DATA COLLECTED AND USE CASES

Section Highlights: In this section, we detail the data we collect from you, how we collect it, why we collect it, and whom we share your data with. We show you how we use each data point we collect/require access to, in this table.

1.1. We have listed the data we collect from you, and the purpose for such collection, below:

What we collect	How we collect it	Why we collect it	Whom we share it with
● Name; ● Phone number; ● Photograph; and ● Address.	1. The information you provide during sign-up; and 2. From your use of the Services.	1. To create your Account; 2. For delivery of online lessons and literature to you; 3. To help other users like teachers, volunteers or students connect with you with regard to the courses and the content; and 4. Communicate with you (e.g., for customer support, grievance redressal, marketing and news, updates on the Services and any other related information).	● We share your name and contact details with other users when you choose any course or subject. This allows them to contact you for further information on the subject

		5. Our use of your personal information is necessary for complying with our legal obligations; or 6. use of your personal information is necessary for our legitimate interests or the legitimate interests of others. Our legitimate interests are to: a. operate our Site and provide our Services; b. select appropriately skilled and qualified suppliers; c. build relationships with partners and academic institutions; d. carry out research and statistical analysis;	content, feedback, etc.
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		e. carry out marketing and business development; and f. for internal administrative and auditing purposes.	
Services usage data: ● Log information; and ● Usage data such as pages viewed and time spent using the Services.	1. From your usage of the Services. Log file information is automatically reported by your browser each time you access the Services. When you use our Services, our	1. We use this to personalise your experience on the Services by drawing insights from your usage. 2. We will directly collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Services. These tools collect information sent by your browser, including the pages you visit and other information that assists us in improving the Services.	1. We will not share this information except as provided here and in Clauses 1.2, 1.3 and 1.4 (<i>Data Collected and Use Cases</i>) of this Privacy Policy.

	servers automatically record certain log file information. These server logs may include anonymous information such as your web request, Internet Protocol (“IP”) address, browser type, referring / exit pages and URLs, number of clicks and how	3. To provide customer support and run diagnostics/troubleshooting/debugging. 4. We may use the data so collected to improve our Services by using techniques such as machine learning. When we use machine learning, we either: (1) still have a human being involved in the process (and so are not fully automated); or (2) use machine learning in ways that don’t have significant privacy implications (for example, prioritising courses in our catalogue).	
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	you interact with links on the Services, domain names, landing pages, pages viewed, and other such information. 2. We may use third-party analytics providers such as Google or Facebook analytics, to process certain		
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	information under a contract in compliance with applicable law.		
Device Permissions: ● Camera; ● Location; ● Files; and ● SMS.	Permissions you grant while using the Services.	1. To provide you a seamless experience on our Services; 2. To identify your location and help you discover relevant learning centres in your area; 3. To click and upload a profile picture on your Account; and 4. To automatically read OTPs when you login to your Account.	We do not share your device permissions.
Information you provide:	This information is directly collected	1. To improve our Services;	We will not share this information

● During customer support interaction; and ● As part of customer surveys.	from your interaction with us through email, phone or other interaction.	2. To resolve disputes between users and between the users and us; and 3. To assist you with your queries and grievances.	except as provided in Clauses 1.2, 1.3 and 1.4 (<i>Data Collected and Use Cases</i>) of this Privacy Policy.
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- 1.2 We use the services of third party processors such as Amazon Web Services to host user data. Transfers of data to these third party processors are done under contract in compliance with applicable law. We do not generally transfer your personal data outside your jurisdiction of residence. In the event that we do so, we do it in compliance with applicable law.
- 1.3 We may use or share or provide access to your data (as listed above) to meet legal and compliance related requirements. We may use the data we collect to investigate or address claims or disputes relating to use of our

Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

- 1.4 While negotiating or in relation to a change of corporate control such as a restructuring, merger or sale of our assets, we may have to disclose our databases and information we have stored in our course of operations.

2. HOW WE STORE, SECURE, OR TRANSFER YOUR DATA

Section Highlights: Briefly, we use industry best practices to protect your personal data.

- 2.1. We use appropriate technical and organizational security measures to ensure a level of protection for personal data appropriate to the risk:
- We maintain a security and authorisation policy for access to our systems and update it from time to time.
 - The transfer of personal data between your end device and us is generally carried out in an encrypted form over secured HTTPS connection. You can identify an encrypted connection for example by the lock symbol in the address line of your browser.

- We maintain strict access controls to prevent unauthorized access to personal data.
- If you communicate with us by e-mail, access by third parties cannot be ruled out. In the case of confidential information, we recommend using the physical mail or encrypted e-mail communication (PGP).
- All our systems responsible for handling user data are equipped with firewalls to prevent unauthorized access and breach.

However, do note that no method of transmission over the internet, or method of electronic storage is entirely secure and reliable, and we cannot guarantee its absolute security.

- 2.2. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

3. YOUR RIGHTS

Section Highlights: Simply put, our use, access, collection, and sharing of your data, depends largely on you. We respect and abide by your preferences to extent possible, without affecting the ability to meet our legal obligations.

3.1. Data Access and Portability:

You have the right to request a copy of your personal data being processed and/or retained by us. In certain instances (mentioned below), you also have the right to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible). The instances where you may request a copy of your personal information include:

3.1.1. Where you have provided personal information to us;

3.1.2. Where processing of your personal information has been done by automated means; and

3.1.3. Where the processing was based on your consent or for the performance or a contract.

3.2. Rectification:

You have the right to ask us to correct inaccurate or incomplete personal information about you, where you cannot update it yourself within your Account.

3.3. Erasure

3.3.1. We generally retain your personal information for the reasons and time periods specified under Clause 4 (*How Long We Keep Your Data*) below.

3.3.2. You have the right to ask us to delete your personal information, subject to data retention requirements under applicable laws, and for us to meet our legal obligations. Please note that multiple legal bases for may exist for retention of data. If you ask us to delete your personal information, we will not be able to provide you some or all of our Services, depending on the nature of data requested for deletion.

3.4. Withdrawing Consent:

You can withdraw your consent at any time by sending a communication to us specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.

3.5. Restriction of Processing:

You have the right to limit the ways in which we use your personal information, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the personal information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing pursuant to Section 3.6. (*Objection to Processing*) and pending the verification whether our legitimate grounds override your own.

3.6. Objection to Processing

3.6.1. You have the right to object to the processing of your personal information based on grounds specific to your situation if such processing is for direct marketing or is for a purpose based on a legitimate interest or public interest. If you object to processing based on legitimate or public interests, we will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or where the processing is otherwise required for the establishment, exercise or defence of legal claims.

3.6.2. Where your personal information is processed for direct marketing purposes, you may, at any time ask us to cease processing your data for these direct marketing purposes by sending an e-mail to support@turnthebus.org.

3.7. Lodging Complaints:

You have the right to lodge complaints about our data processing activities by filing a complaint with our Grievance Officer as per Clause 5 (*Our Communications*).

3.8. Opting-out:

You have the right to opt-out of receiving marketing communications from us. This includes communications on offers and promotions based on your use of Services and preferences.

3.9. Do Not Track:

Finally, because there is no common understanding on what a [“Do Not Track”](#) signal is supposed to mean, we don’t respond to those signals in any particular way.

4. HOW LONG WE KEEP YOUR DATA

We retain personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include, without limitation:

- 4.1. the length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using Services);
- 4.2. whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); and/or
- 4.3. whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

5. OUR COMMUNICATIONS

- 5.1. We may from time to time send you Services-related announcements when we consider it necessary to do so (such as when we temporarily suspend the Services for maintenance, or security, privacy, or

administrative-related communications). We send these to you via SMS or email, as we deem fit. You may not opt-out of such Service-related communications.

5.2. The Platform and Services are made available by TTB

5.3. Turn The Bus, having its registered office at 21213 SE 42nd Pl. Issaquah WA 98029, USA. Our grievance officer is Ms Bratati Ghosh, accessible via email at: grievance.officer@turnthebus.org. (“**Grievance Officer**”). You can contact our data protection officer confidentially by email to enquire about the treatment of your data, including the deleting of your personal data as identified in this document.

6. CHILDREN’S DATA

6.1. Minors (individuals under the age of 18 (eighteen)) are not permitted to sign up by themselves to the Platform. We do not knowingly collect or solicit personal information from Minors. If an individual under the age of 18 has accessed the Platform or the Services without parental or guardian consent, the parent or guardian may contact us at support@turnthebus.org.

6.2. In the event that we learn that we have collected personal information from a Minor without verification of parental consent where this is required, we will delete that information as quickly as possible.

6.3. If you believe that we might have any information from or about a Minor, please contact our Grievance Officer as per Clause 5 (*Our Communications*).