

PRIVACY POLICY

We know you care about how your personal information is used and shared, and we take your privacy seriously. We have therefore created this Privacy Policy in order to clearly communicate our commitment to your privacy. Please read the following to learn more about our Privacy Policy. By using or accessing the Site and the services provided by us in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the manner specified in this Privacy Policy.

Remember that your use of the Site is at all times subject to the Terms of Use which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms. The general provisions as outlined in the Terms shall be applicable to this Privacy Policy as well.

HOW WE COLLECT PERSONAL AND OTHER INFORMATION

When you visit the Site, you can browse without submitting any personal information about yourself. We will, however, receive and store some non-personally identifiable information about your visit, as described below. In order to participate in certain functionalities, you may be asked to provide personally identifiable information. Personally identifiable information is information that can identify you, including, for example your name or email address. It will always be your choice, or the choice of anyone acting for you, to provide personally identifiable information.

We are extremely transparent about the information we collect from our Users and we allow all our Users to choose what information they wish to provide us. When you access or use the Site and the services, we collect various types of information about you through different means as described below.

Information provided to the Company: When you register with us or create an account on the Site to access or use our services ("**Account**"), we collect information

that you provide voluntarily during your registration or creation and use of your Account. This information may include the following:

- Name (first, middle and last names);
- Profile Name;
- Username;
- Email;
- Gender;
- Mobile Number;
- Password.

Information provided or collected from access or use of the Site: When you access or use our Site, we collect information about how you have used our Site and our services. When you access the Site, certain information is stored in our servers automatically. The information captured automatically includes, but is not limited to, the following: data about the pages you access within the Site, user's choices and behaviour, your internet protocol ("IP") address, device identity or unique identifier, device type, geo-location information (on obtaining consent), device and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, and standard web log data and other information. We also collect anonymous information through our use of cookies and web beacons. We may collect and store any information you provide us when you use our services, including when you: (i) add information on a web form; (ii) add, edit or update your Account information; (iii) contact us for support or other offerings; (iv) participate in community discussions, chats, etc.; (v) send any messages to us or correspond with us regarding the Site or our services; (vi) respond to a survey conducted by us; (vii) register for a promotion provided by us; (viii) request certain features (e.g., newsletters, updates, etc.); and/or (ix) submit feedback to us. We also collect the content that you create, upload, or post, on the Site.

Cookies and Related Tracking Technologies: The Site uses persistent and session cookies and other similar technologies to offer you a personalised experience and to remember your browsing preferences, including your log in details and choice of language. Cookies are stored primarily to ensure that in the event you return to the Site, it shall personalise your browsing, including, enabling you to be logged on the Site automatically. This information may, where permitted by applicable law, also be combined with other information we hold about you. The

cookies are uniquely assigned to you and can only be accessed by your web page server in our domain. You can disable our cookies or all cookies through your browser settings. Upon the beginning of each of your visits to the Site, the Site also provides the choice to turn off all cookies which are not strictly necessary for the provision of our services. Please be advised that disabling cookies through either method may impact many of the Site's features. In addition to cookies, we and/or our third-party advertising partners may use technologies that help us better manage and analyse content.

Buttons, Tools & Content from Other Companies: The Site may include buttons, tools, or content that link to other companies' services, such as Facebook, Twitter, Instagram, and LinkedIn. We may collect information about your use of these features. In addition, when you see or interact with these buttons, tools, or content, or view a web page on the Site, some information from your browser may automatically be sent to the other company, in accordance with the terms and conditions of such other company.

Contacting the Company: We may also collect information about you from other sources, such as through your contact with us, including our customer support and/or social media team, and your interactions with other users. Additionally, for quality and training purposes or for our own protection, we may monitor or record telephone conversations with you or anyone acting on your behalf. By communicating with us, you acknowledge that your communication may be overheard, monitored, or recorded without further notice or warning.

HOW WE USE PERSONAL AND OTHER INFORMATION

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customised experience. We may use your information:

- to verify your identity;
- to enable you to access the Site and use our services;
- to provide you with necessary details pertaining to your Account and your licence to use the Site and our services, including, sending notifications for termination of contract;

- to send transactional communications, including responses to your comments, questions and requests;
- to contact you, through voice call, text messages, or emails, as authorised by you, under the Terms;
- for business management, accounting and auditing purposes;
- to do such activities for which you have explicitly given us consent;
- to comply with applicable laws, as updated from time to time;
- to inform you about our new products and/or services;
- to respond to your queries or service requests and for resolution of the same;
- to send you technical notices, updates, security alerts, and support and administrative messages;
- to advertise, promote, or market our products and services and to undertake all other types of business development activities;
- to comply with applicable security standards;
- to detect, prevent or remedy any breach of the Terms;
- to perform research, business and/or operational analysis;
- to protect your (or someone else's) interest;
- to deal with legal disputes, if any;
- to provide, maintain or improve our products and services;
- to ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution;
- to conduct data analytics studies to review and better understand customer satisfaction and needs;
- to generate internal reports about our user base and service usage patterns, analyse the accuracy, effectiveness and popularity of the Site and our services;
- to track user activity and behaviour pattern on the Site; and/or
- to protect the public interest or for official purposes, if formally requested by any investigative or other governmental authority.

We may also use your information to generate charts, presentations, reports, logs, or other documents about, *inter alia*, our user base, service usage patterns, analysis of the accuracy, effectiveness, and popularity of the Site and our services for marketing, or other external purposes.

However, in case of such external use, we shall ensure to anonymise the personal information provided by you. You hereby give your express consent to us for using your personal information for this purpose.

HOW WE SHARE PERSONAL AND OTHER INFORMATION

User Content: If you submit content to any interactive portion of the Site, including, but not limited to, your Account profile page or user discussion sections of the Site, your content will be made publicly available to anyone who visits that area of the Site. Other users or the general public may access, or use content that you make publicly available through the Site. Even if you remove or delete your content, copies may remain in cached or archived areas of the Site.

Processing of Services: We share information, including personal information, with our officers, employees, consultants, agents, representatives, sub-contractors, service providers and business partners to enable them to undertake, perform and deliver our services to you.

Third Party Service Providers We share information, including personal information, with our third-party service providers that we use to: (i) to host and maintain the Site, (ii) for application development, back-up, storage, processing, analytics, marketing and front or back-end development and support; and (iii) for audits, web analysis and other services required to enable seamless provision of the Site and our services. These third-party service providers may have access to or process your personal information for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us. We forbid the third-party service providers from using your personal data for their marketing purposes or for any purposes other than for the provision of services to us. Please note that third party service providers have their own privacy policies, and we are not responsible for their actions, including their information protection practices.

Compliance with laws & protection of our rights We may also share your personal information and data with third parties where we believe in good faith that such disclosure is necessary to comply with any applicable law or to comply with legal processes and to respond to requests from public and government authorities, including public and government authorities outside your country of residence, to

prevent imminent physical harm or financial loss, to enforce our Terms, including to meet national security or law enforcement requirements. We may disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms, or as otherwise required by law. We may also share your information in situations involving potential threats to the physical safety of any person, violations of this Privacy Policy or to respond to the claims of violation of the rights of third parties and/or to protect our rights, property and safety of our employees, users, vendors, partners or the public and obtaining your consent is difficult. We, at our sole discretion, shall have the right to disclose your personal information to third parties, in the event we believe it to be necessary or appropriate in connection with an investigation of fraud, intellectual property infringement, piracy, or any other unlawful activity.

Insolvency and business transitions: If we should ever file for bankruptcy or engage in a business transition such as a merger with another entity, or if we purchase, sell, or reorganise all or part of our business or assets, we may disclose your information, including personal information, to prospective or actual purchasers in connection with one of these transactions.

Consent: We may share your information in any other circumstances where we have your express consent.

Affiliates: We may share your information among our affiliates and group entities so that we can better provide better services that are relevant to you as well as generally to provide the services as applicable.

Disclaimer: We cannot ensure that all of your information will never be disclosed in ways not otherwise described in this Privacy Policy. For example, a third party may unlawfully intercept or access transmissions or private communications, or other users of the Site may abuse or misuse your personal information. No transmission of data over the internet can be 100% secure.

HOW WE SHARE PERSONAL AND OTHER INFORMATION

Keeping your information secure is of great concern to us. We exercise care in facilitating the transmission of information between your device or computer and our servers (or the third-party servers that operate and store information for the Site). Your personal and all other information is maintained by us in electronic form on our equipment, and on the equipment of our employees, consultants, sub-contractors, vendors, service providers, agents, and representatives. Such information may also be converted to physical form from time to time. Personally identifiable information collected by the Site is stored in operating environments with restricted access and are not available to the public. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised manner. In addition, we have limited the access to your personal information to those who have a need to know. While we have mechanisms in place to safeguard your personal information after we receive it, no transmission of data over the internet can be guaranteed to be 100% secure.

It is necessary for the users to keep their personal information and their password confidential. The users must not share their usernames and passwords with anyone to prevent unauthorised use of their personal information. You shall, at all times, be responsible for the protection of and the disclosure of your username and password. We shall, in no way, be liable for disclosure of your username and/or password, or your personal information, in the event of any unauthorised access of your Account. In the event of such unauthorised usage, you shall notify us immediately

RETENTION OF INFORMATION

The term for which we shall be retaining your personal information depends solely on the nature of the information. We shall retain your personal information only for such a period of time as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We may, at any time, delete your information, including but not limited to, your personal information, without any prior notice to you. Upon the expiry of your license

to access the Site and use our services or deactivation and/or termination of your Account, we shall have the right to, immediately and permanently, delete all stored messages, emails, contents, and all other records of your Account without any notice.

Except to the extent provided herein, we will destroy your personal information upon the fulfillment of its purpose. We may, however, retain your personal information for: (i) accounting purposes for such time period as is prescribed under applicable law; and (ii) for legal purposes till the completion of statutory limitation for bringing any suit, if any. We will also retain your information for the purposes and for such time periods as may be prescribed under applicable laws.

Under certain circumstances, we alter the personal information collected from users to render it anonymous so that it could no longer be personally identifiable. In the event of such anonymization of data, we shall have the right to retain such data for as long as we require and use such data without intimating you of such use and for any lawful purposes of whatsoever nature, whether mentioned in this Privacy Policy or not.

Retention of your personal information, including your sensitive personal information by a third party, or another user shall be governed by their privacy policies and we are neither responsible nor could be held liable for any breach or non-compliance from such party's part.

Please note that certain of your public content and information can exist elsewhere even after you removed or deleted it from the Site, including with third parties which may retain content and information.

If you have violated our Terms and Site usage policies as a consequence of which we have terminated or suspended your account, we may indefinitely keep certain identifying data that you used to create your Account, including email address and phone number to prevent you from offending again, including by creating new accounts.

ACCESSING, UPDATING, OR DELETING YOUR PERSONAL INFORMATION

If personal information that you have submitted to us changes or if you would like to remove your personal information, please contact us at connect@winningskills.me. We will make good faith efforts to resolve requests to remove information or correct inaccurate information except where the request is unreasonable, requires disproportionate technical effort or expense, jeopardises the privacy of others, or would be impractical.

THIRD PARTY WEBSITES

The Site may contain links to third-party websites. Your use of these features may result in the collection, processing, use, storage or sharing of information about you, including your personal information, by these websites, depending on the feature. Please be aware that we are not responsible for the content or privacy practices of other websites or services that may be linked on our Site. We do not endorse or make any representations about third-party websites or services. The information you choose to provide to or that is collected by these third parties is not covered by our Privacy Policy. We shall, at no time, be liable for any unauthorised use of your personal information by these third-party websites. We strongly encourage you to read such third parties' privacy policies.

CHILDREN'S AND MINOR'S PRIVACY

Our primary audience are adults and young adults. We do not intend to and will not knowingly collect any personal information from children under the age of **10**; children under the age of **10** are prohibited from using the Site without parent/guardian supervision. Minors who may access the Site may not be able to provide valid consent to our collection, use, disclosure, storage, or other handling of their personal information. Parents and guardians of children/minors are personally responsible for monitoring their child's/minor's access to, and use of, our Site and our services and for providing valid approvals for their child's/minor's access to the Site and to the services provided by us. If you are under the age of 18 (eighteen) years, it is mandatory that your parent or guardian has read and accepted this Privacy Policy on your behalf, and it is assumed that you have ensured that the use of the Site and the Services by you is under the guidance and control of your parents

or guardian. If you are a child or young adult under the age of 18 (eighteen) years, you must ask your parent or legal guardian to approve your provision of personal information before you submit your personal details to us. If your parent or guardian has not read and agreed to this policy, you will not have permission to use the Site and the Services. If we learn that we have collected information from a child under the age of 13, we will remove that information immediately and delete it from our servers (subject to applicable law and this Privacy Policy).

We strongly encourage parents and guardians to supervise the online activities of their minors to help provide a child-friendly online environment and prevent minors from disclosing their name, address, and other personally identifiable information online without parental permission. Although the Site and our services are not intended for use by minors, we respect the privacy of minors who may inadvertently use the internet.

DISCLAIMER

We shall not be liable for disclosure of your passwords and you shall be solely responsible for protecting your username and passwords, at all times. You shall be solely liable for any unauthorised use of the Site through your Account. In the event of such unauthorised usage, you shall notify us immediately and reset your password accordingly.

While we give utmost importance to protecting user data and information, we cannot ensure that all your personal information (including sensitive information) will never be disclosed in ways not otherwise described in this Privacy Policy. Therefore, although we are committed to protecting your privacy, we do not promise, and you should not expect, that your personal information will always remain private. As a user of the Site, you understand and agree that you assume all responsibility and risk for your use of the Site, the internet generally, and the information or content you post or access and for your conduct on and off the Site.

CHANGES TO PRIVACY POLICY

We reserve the right to update this Privacy Policy at any time, and from time to time, with or without advance notice. In the event there are significant changes in the way we treat user's personal information, or in the Privacy Policy itself, we will display a notice on the Site or send users an email, so that you may review the changed terms prior to continuing to use the Site. Please check this page periodically for changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is used. Please review the changes carefully. Your continued access to the Site or use of our services following the posting of changes to this Privacy Policy will mean you consent to and accept those changes. As always, if you object to any of the changes to our terms, and you no longer wish to use our services, you may stop browsing through the Site, deactivate your Account and/or contact us at connect@winningskills.me

CONTACT INFORMATION AND PRIVACY QUESTIONS

Should you have questions about this Privacy Policy or our information collection, use and disclosure practices or grievance with respect to our use of your information, you may contact our grievance officer identified below We will use reasonable efforts to respond promptly to any requests, questions, or concerns, which you may have regarding our use of your personal information.

Name: **Winning Skills Hub**

Registered Address: **India**

Email: connect@winningskills.me