

MICROQUORA

(A division of Microquora.com)

PRIVACY POLICY

How we collect, use, store and protect your personal data

Microquora.com

Registered in India

Last Updated: March 2026

1. Introduction

Microquora.com ("Microquora", "we", "us", or "our") is committed to protecting the privacy of all individuals who use our services. This Privacy Policy explains how we collect, use, store, share, and protect your personal data when you use our website at microquora.com ("Website") and our educational services ("Services").

This Privacy Policy has been drafted in compliance with the Digital Personal Data Protection Act, 2023 ("DPDPA") and the Digital Personal Data Protection Rules, 2025, the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (to the extent they remain in force), and applicable international data protection standards. Where our Services are used by individuals located in the European Economic Area ("EEA") or the United Kingdom ("UK"), we also process personal data in accordance with the General Data Protection Regulation ("GDPR") and the UK GDPR respectively.

By using our Services, you consent to the collection and processing of your personal data as described in this Privacy Policy. You have the right to withdraw your consent at any time by contacting us at the details provided below.

2. Data Controller

Microquora.com, a company registered in India, is the Data Fiduciary (as defined under the DPDPA) and Data Controller (as defined under the GDPR/UK GDPR) responsible for your personal data. Our Directors are Safaa Amed and Shruti Iyer.

3. Definitions

- **"Personal Data"** means any data about an individual who is identifiable by or in relation to such data, as defined under the DPDPA, or any information relating to an identified or identifiable natural person, as defined under the GDPR.
- **"Data Principal"** means the individual to whom the personal data relates (also referred to as "Data Subject" under the GDPR).
- **"Data Fiduciary"** means the person who determines the purpose and means of processing personal data (also referred to as "Data Controller" under the GDPR).
- **"Processing"** means any operation performed on personal data, including collection, recording, organisation, storage, adaptation, retrieval, use, disclosure, or erasure.

4. Personal Data We Collect

4.1 Information You Provide

We collect personal data that you provide directly to us, including:

- Full name, email address, and contact telephone number;
- Professional qualifications, institutional affiliation, and country of practice;
- Payment and billing information (processed through secure third-party payment gateways; we do not store complete credit or debit card details);

- Examination and assessment results, including mock examination scores and performance data;
- Communications and correspondence with us, including support queries and feedback;
- Profile information including profile photographs, if voluntarily uploaded.

4.2 Information Collected Automatically

When you access our Website, we may automatically collect:

- Device information (device type, operating system, browser type and version);
- Log data (IP address, access times, pages viewed, referring URL);
- Cookies and similar tracking technologies (see Section 10 below).

4.3 Information from Third Parties

We may receive personal data from third-party platforms through which you access our Services, such as learning management system providers or payment gateways.

5. Purposes and Legal Basis for Processing

We process your personal data for the following purposes:

5.1 Service Delivery (Consent / Contractual Necessity)

- To create and manage your Account;
- To process enrolments and deliver educational Services;
- To administer mock examinations and generate performance reports;
- To process payments and issue receipts;
- To communicate with you about your enrolment, course schedules, and Service-related updates.

5.2 Educational Quality and Improvement (Legitimate Interest)

- To analyse aggregated and anonymised examination results to improve our course content and examination materials;
- To conduct internal research and analysis to enhance the quality of our Services.

5.3 Legal Compliance (Legal Obligation)

- To comply with applicable laws, regulations, and legal processes;
- To maintain records as required under Indian tax and financial regulations.

5.4 Communication (Consent)

- To send you information about new courses, Services, and updates, where you have consented to receive such communications. You may withdraw your consent at any time.

6. Data Retention

We retain your personal data only for as long as is necessary to fulfil the purposes for which it was collected, or as required by applicable law. Specifically:

- Account and enrolment data: retained for the duration of your Account and for a period of three (3) years following Account closure or last activity;
- Examination and performance data: retained for five (5) years to support longitudinal performance tracking and quality assurance;
- Payment records: retained for the period required under applicable Indian tax and financial regulations;
- Communication records: retained for two (2) years from the date of the communication.

Upon expiry of the retention period, personal data will be securely deleted or anonymised.

7. Sharing of Personal Data

We do not sell, rent, or trade your personal data. We may share your personal data with the following categories of recipients, only to the extent necessary for the purposes described in this Policy:

- **Service Providers:** Third-party vendors who assist us in delivering the Services, such as payment processors, hosting providers, learning management system providers, and email service providers. These providers are contractually obligated to protect your data and process it only as instructed by us.
- **Legal and Regulatory Authorities:** Where required by law, regulation, legal process, or enforceable governmental request.
- **Professional Advisors:** Lawyers, accountants, and auditors in the course of the professional advice they provide to us.

We will not disclose your individual examination or performance data to any third party without your explicit consent, except where required by law.

8. Cross-Border Data Transfers

Your personal data may be transferred to and processed in countries outside India, including countries where our service providers operate. Where we transfer personal data outside India, we do so in compliance with the DPDPA and, where applicable, the GDPR, ensuring that appropriate safeguards are in place to protect your data.

The DPDPA permits cross-border data transfers to jurisdictions other than those specifically restricted by the Central Government of India. Where the GDPR applies, transfers to countries outside the EEA are made on the basis of adequacy decisions or Standard Contractual Clauses.

9. Your Rights

Under the DPDPA, GDPR, and UK GDPR (as applicable), you have the following rights:

- **Right of Access:** You may request confirmation of whether we process your personal data and, if so, obtain a copy of that data.
- **Right to Correction:** You may request correction of inaccurate or incomplete personal data.
- **Right to Erasure:** You may request deletion of your personal data, subject to any legal retention obligations.
- **Right to Withdraw Consent:** Where processing is based on consent, you may withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal.
- **Right to Grievance Redressal:** Under the DPDPA, you have the right to an effective means of grievance redressal through our Grievance Officer.
- **Right to Nominate:** Under the DPDPA, you have the right to nominate an individual to exercise your rights in the event of your death or incapacity.

For users in the EEA/UK, additional rights include the right to restrict processing, the right to data portability, and the right to object to processing.

To exercise any of these rights, please contact us at the details provided in Section 14 below.

10. Cookies and Tracking Technologies

Our Website uses cookies and similar technologies to enhance your browsing experience and analyse Website usage. Cookies are small data files stored on your device.

We use the following categories of cookies:

- **Strictly Necessary Cookies:** Essential for the Website to function properly (e.g., session management, authentication).
- **Analytics Cookies:** Help us understand how visitors interact with our Website (e.g., Google Analytics). These cookies collect anonymised data.
- **Functional Cookies:** Enable enhanced functionality and personalisation (e.g., remembering language preferences).

You may manage your cookie preferences through your browser settings. Disabling certain cookies may affect the functionality of the Website.

We do not use advertising or remarketing cookies within our educational platform. We do not use learner data for any advertising or commercial personalisation purposes.

11. Data Security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure, or destruction. These measures include:

- Encryption of data in transit (TLS/SSL) and at rest where applicable;
- Access controls to limit data access to authorised personnel;

- Regular security assessments and monitoring;
- Secure third-party payment processing (we do not store complete payment card data).

While we take all reasonable steps to protect your data, no method of electronic transmission or storage is completely secure. We cannot guarantee absolute security.

12. Data Breach Notification

In the event of a personal data breach that is likely to result in a risk to your rights, we will notify the Data Protection Board of India (once operational) and affected Data Principals without undue delay, in accordance with the DPDPA and the DPDP Rules, 2025. Where the GDPR applies, we will notify the relevant supervisory authority within 72 hours of becoming aware of the breach and will notify affected individuals where the breach is likely to result in a high risk to their rights and freedoms.

13. Children's Data

Our Services are intended for individuals aged 18 years and above. We do not knowingly collect personal data from children under the age of 18. If we become aware that we have collected personal data from a child, we will take steps to delete such data promptly. If you believe that a child has provided personal data to us, please contact us immediately.

14. Contact Information and Grievance Officer

If you have any questions, concerns, or requests regarding this Privacy Policy or your personal data, please contact us:

Data Protection Contact / Grievance Officer: [Name]

Email: [privacy email address]

Address: [Registered address in India]

The Grievance Officer shall acknowledge your request within 48 hours and endeavour to resolve it within one (1) month.

15. Amendments

Microquora reserves the right to update this Privacy Policy at any time. Any amendments will be published on the Website with an updated "Last Updated" date. Where material changes are made, we will notify registered Users via email. Continued use of the Services after publication of the amended Privacy Policy constitutes your acceptance of the revised terms.

16. Supervisory Authorities

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with the relevant supervisory authority:

- **India:** Data Protection Board of India (once established and operational under the DPDPA).
- **United Kingdom:** Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, United Kingdom.
- **European Economic Area:** The supervisory authority of the relevant EU Member State.