

PRIVACY POLICY: SIMPLE EDUCATION FOUNDATION

Privacy Policy

We, at Simple Education Foundation (hereinafter, the "Foundation"), value your privacy and treat all information regarding any transaction you engage in with the Foundation as highly confidential. Our collection, retention and usage of information that the users provide on our website available at the domain <http://simpleeducationfoundation.org/> ("Website") and our application ("Application") is completely ethical.

The policy ("Privacy Policy") will elaborate on the personal data or information that the Foundation collects and the usage and sharing of such data when you visit the Website, use the Application, or use the services of the Foundation. This Privacy Policy will also elaborate on the measures that we take to protect the security of the data collected.

The options which you have with respect to our usage of information or data shared by you on the Website or Application will also be described. Reach out to us at connect@simpleeducationfoundation.org for purposes of updating your contact information, removing your name from our mailing lists, or for general enquiries related to our privacy practices.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalised have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- Account means a unique account created for You to access our Service or parts of our Service.
- Affiliate means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- Application refers to any software application provided by the Foundation.
- Company (referred to as either "the Foundation", "We", "Us" or "Our" in this Policy) refers to Simple Education Foundation.
- Device means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- Personal Data is any information that relates to an identified or identifiable individual.
- Service refers to the Website and/or the Application.
- Service Provider means any natural or legal person who processes the data on behalf of the Foundation. It refers to third-party companies or individuals employed by the Foundation to facilitate the Service, to provide the Service on behalf of the Foundation, to perform services related to the Service or to assist the Foundation in analysing how the Service is used.

- Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- You mean the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Information We Collect and How We Use It

We will not use or disclose (share, sell or divulge) any of your personal information to third parties unless we have been authorised by you, or are required or authorised to do so by law.

We may use your personal information:

- a) for purposes related to our research, planning, program development and management;
- b) for purposes connected with the operation, administration, development or enhancement of our services, the Website, and the Application; and
- c) where we suspect that fraud or unlawful activity has been, is being or may be engaged in.

Types of Data Collected

Personal Data: While using our Service, we may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to: email address, first name and last name, and phone number.

Usage Data: Usage Data is collected automatically when using the Service. Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data. When You access the Service through a mobile device, We may collect certain information automatically, including the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, and other diagnostic data.

Information Collected while Using the Application

While using Our Application, in order to provide features of Our Application, We may collect, with Your prior permission:

- Information regarding your location

We use this information to provide features of Our Service, and to improve and customise Our Service. The information may be uploaded to the Foundation's servers and/or a Service Provider's server or it may be simply stored on Your device. You can enable or disable access to this information at any time, through Your Device settings.

Donations

When you make a donation through our Website, we may ask you to submit certain personal information that is necessary for us to process the transaction ("Donor Data"). We will not make any other use of Donor Data other than as prescribed hereinbelow.

Donor Data may be used for the following purposes:

- a) Distributing receipts and thanking donors for donations

- b) Informing donors about upcoming fundraising and other activities of our organization
- c) Internal analysis, such as research and analytics
- d) Record keeping
- e) Reporting to applicable governmental agencies as required by law
- f) Surveys, metrics, and other analytical purposes
- g) Other purposes related to the fundraising operations

Cookies and Web Beacons

We use cookies and other tracking mechanisms to track information about your use of our Website. We may combine this information with other personal information we collect from you. Cookies are pieces of electronic information which will be sent by the Foundation to the user for record-keeping purposes when you log onto our Website. These will be placed in your computer's hard disk and enable us to recognise you as a user when you next visit. Some cookies allow us to make it easier for you to navigate our Website, while others are used to enable a faster login process or to allow us to track your activities on our Website.

Third Party Cookies

We use cookies and other tracking mechanisms to track information about your use of our Site or Services. We may combine this information with other personal information we collect from you. Cookies are pieces of electronic information which will be sent by the Foundation for record-keeping purposes when you log onto our web site. These will be placed in your computer's hard disk and enable us to recognise you as a user when you next visit. Some cookies allow us to make it easier for you to navigate our Site and Services, while others are used to enable a faster login process or to allow us to track your activities at our Site and Service.

Disabling Cookies

Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie or how to disable cookies altogether. Visitors to our Website who disable cookies will be able to browse certain areas of the Website, but some features may not function.

Information We Share

The Foundation does not sell, rent, trade or otherwise disclose personal information about our Website visitors (nor our offline donors), except as described herein. We share information provided by our Website visitors with service providers that we have retained to perform services on our behalf — for example, to process donations, send direct mails, emailers, greeting cards, making phone calls, and others. We may share your information like phone numbers, email address, etc. with these agencies so that they can perform these activities efficiently. These service providers are not authorised by us to use or disclose the information except as necessary to perform services on our behalf or to comply with legal requirements.

We may also share Your personal information in the following situations:

- With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include Our parent

organisation and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

- For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Foundation assets, financing, or acquisition of all or a portion of Our operations to another organisation. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information in a manner consistent with this Privacy Policy, and we will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

However, since we do not have complete control over third-party service providers, their usage of your data shall be governed by the terms of their own privacy policy, over which the Foundation has no control.

Retention of Your Personal Data

The Foundation will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Foundation will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Foundation's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer. The Foundation will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy. No transfer of Your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of Your data and other personal information.

Delete Your Personal Data

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You.

Our Service may give You the ability to delete certain information about You from within the Service. You may update, amend, or delete Your information at any time by signing in to Your Account, if you have one, and visiting the account settings section that allows you to manage Your personal information. You may also contact Us to request access to, correct, or delete any personal information that You have provided to Us.

Please note, however, that we may need to retain certain information when we have a legal obligation or lawful basis to do so.

Other Disclosures

In addition, we may disclose information about you (i) if we are required to do so by law; (ii) in response to a request from law enforcement authorities or other government officials; (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; (iv) as needed to protect our rights, interests, privacy, safety, property, donors, or users; or (v) to our affiliates or subsidiaries.

Children's Privacy

The Foundation works directly with students in government schools, including children below the age of 13, as part of its core educational assessment and program evaluation activities. We are committed to handling student data responsibly and in accordance with applicable law.

Routine Assessment Data: Where the Foundation collects student data solely for the purposes of educational assessment and program monitoring, this data consists of records already held by the school or education department. Such collection is conducted under a formal Data Sharing Agreement or Memorandum of Understanding with the relevant government education authority, which acts as the institutional custodian of student records. No new personal data is independently solicited from students in this context.

Impact Evaluation and Research: Where the Foundation collects additional personal data from students for impact evaluation purposes, we obtain prior informed consent from the student's parent or guardian before such collection takes place.

Data Handling and Anonymisation: Personal identifiers are stripped from all student data prior to any analysis or reporting. A secure linking key is retained by the Foundation solely for the purposes of longitudinal tracking across assessment cycles, and is accessible only to designated Foundation staff. No personal identifiers are used at the analysis stage, and all findings are reported in aggregated form only. Student data is collected solely for educational and programmatic purposes and is never used for profiling, marketing, or any commercial purpose.

Parents or guardians may contact us at connect@simpleeducationfoundation.org to request access to or correction of their child's personal data, subject to our obligations under the applicable Data Sharing Agreement.

Security

The security of Your Personal Data is important to Us. We are committed to protecting Donor Data and other personal information from unauthorised access, alteration, disclosure, or destruction. Amongst other things, we undertake a range of security practices, including measures to help secure web access to sensitive data and undertake efforts to address security vulnerabilities for various tools and databases. The Foundation has the necessary security mechanisms in place and only designated employees have access to your personal information. We maintain administrative, technical and physical safeguards to protect against unauthorised disclosure, use, alteration or destruction of the personal information in our possession. All online transactions are done on a secure server. You will know that you are in a secure area of our Website when a "lock" icon appears on your screen and the "http" portion of our URL address changes to "https".

Please remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

Changes to this Privacy Policy

Version 1.2

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page. We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective, and update the version number and date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.
