

## **Privacy Policy**

We value your trust. In order to honour that trust, EXAM LADDER PRIVATE LIMITED'S adheres to ethical standards in gathering, using, and safeguarding any information you provide. Think and Learn Private Limited (operating under the brandname EXAM LADDER PRIVATE LIMITED'S), is a leading edtech company, incorporated in India, for imparting learning. This privacy policy governs your use of the application 'EXAM LADDER PRIVATE LIMITED's - The Learning App' ('Application'), [www.ExamLadderPrivateLimited's.com](http://www.ExamLadderPrivateLimited's.com) ('Website') and the other associated applications, products, websites and services managed by the Company. Please read this privacy policy ('Policy') carefully before using the Application, Website, our services and products, along with the Terms of Use ('ToU') provided on the Application and 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 modes or usage of any products including through 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. If you do not agree with the terms of this Policy, do not use the Website, Application our products or avail any of our Services.

### **User Provided Information**

The Application/Website/Services/products obtains 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, location, 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 our 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. We may use the Information to contact you from time to time, to provide you with the Services, important information, required notices and marketing promotions. We will ask you when we need more information that personally identifies you (personal information) or allows us to contact you. We 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. We will, at all times, provide the option to you to not provide the Personal Information or Sensitive Personal Information, which we seek from you. Further, you shall, at any time while using the Application/Services/products, also have an option to withdraw your consent given earlier to us to use such Personal Information or Sensitive Personal Information. Such withdrawal of the consent is required to be sent in writing to us at the contact details provided in this Policy below. In such event, however, the Company fully reserves the right not to allow further usage of the Application or provide any 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 of most Mobile applications, we also collect other

relevant information as per the permissions that you provide. We use an outside credit card processing company to bill you for goods and services. These companies do not retain, share, store or use personally identifiable information for any other purpose.

### **Access**

User are allowed to access the Platform, register for courses and avail services available with EXAM LADDER PRIVATE LIMITED as a guest and without creating an account on the Platform or providing any Personal Information, EXAM LADDER PRIVATE LIMITED takes no responsibility or validate the information provided by the guest, except as otherwise required under any law, regulation or an order of competent authority. In order to have access to all the features and benefits on our Platform, a User is required to first create an account on our Platform. To create an account, a User is required to provide Personal Information as may be required during the time of registration. Other information requested on the registration page, including the ability to receive promotional offers from EXAM LADDER PRIVATE LIMITED, is optional. EXAM LADDER PRIVATE LIMITED may, in future, include other optional requests for information from the User to help EXAM LADDER PRIVATE LIMITED to customize the Platform to deliver personalized information to the User. Without User's agreement, EXAM LADDER PRIVATE LIMITED will not share, rent or sell any Personal Information with third parties in any way other than what is disclosed in this Policy. EXAM LADDER PRIVATE LIMITED may keep records of telephone calls received and made for making enquiries, registered courses, feedback or other purposes for the purpose of rendering services effectively and efficiently.

### **Personal Information**

“Personal Information” shall mean the information which identifies the User, name, identification number, email address, age, gender, or phone number provided to EXAM LADDER PRIVATE LIMITED at the time of registration or any time thereafter. Personal information may include “sensitive personal information or data” as defined under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and in this context, includes passwords or any financial account information provided by You during registration.

We request You to not provide us with any Personal Information unless specifically requested by us. In such events, we bear no liability to such Personal Information provided by You.

### **Automatic Information Collection**

Our system collects information that is sent over the internet without Your control. Some examples of the information we collect and analyse include the Internet protocol (IP) address used to connect Your computer to the internet; login; email; password; computer and connection information such as browser type and version, operating system, and platform; course enrolled history, which we sometimes aggregate with similar information from other users to create features, reports such as popular courses, most used features etc; the full Uniform Resource Locator (URL) click stream to, and from our Platform, including date and time; cookie number; courses or videos You viewed or searched for; the email id You used to call our customer service. During some visits we may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain page,

course and videos, page interaction information (such as scrolling, clicks and mouse overs), and methods used to browse away from the page.

### **Information Security**

To protect the security of Your Personal information during transmission, we use Secure Sockets Layer (SSL) software, which encrypts information You input. To prevent unauthorized access to sensitive information, it is important for You to monitor those who have access to Your password and to Your computer, laptop or any other device through which Your account can be accessed. Be sure to sign off when finished while using a shared computer.

However, please do note that given the nature of internet transactions, EXAM LADDER PRIVATE LIMITED does not take any responsibility for the transmission of information including Personal Information shared by You other than as set forth in this Policy. Any transmission of information on the internet is done at Your risk and shall not be responsible for the circumvention of the privacy settings or security measures either by You or any third-party.

### **Use of your personal information**

While availing our services You will provide access to EXAM LADDER PRIVATE LIMITED with Your Personal Information. If that information is wrong, You can request us to modify or delete the same. EXAM LADDER PRIVATE LIMITED will take all reasonable measures to ensure that the Personal Information is modified and used for rendering services to You and as otherwise in compliance with laws. When editing or deleting Personal Information, we may ask You to verify Your identity before we can act on Your request. EXAM LADDER PRIVATE LIMITED may at its discretion reject any request that is contrary to law, requires un-reasonable technical efforts. We do not assure that we will delete all residual copies and archives made by any third party without our knowledge and consent. We never retain Your Personal Information longer than it is required for the purposes of providing services through the Platform or as required by applicable Indian law. At times, we may also require to transfer Your Personal Information to third-party service providers, for instance to authorize transactions we may share Your financial data with such third-party providers. You hereby consent to Your transfer of Personal Information in all such instances. EXAM LADDER PRIVATE LIMITED carries out all such transfers strictly in accordance with law.

EXAM LADDER PRIVATE LIMITED shall use Your Personal Information to ensure services with respect to the Platform are presented to You in the most effective manner, to secure the Platform and make improvements, to carry out our obligations to You, and to communicate with You. The said communication can either be by calls, text or emails and for purposes which include transactional, service, or promotional calls or messages.

### **Exceptions**

Your Personal Information may be shared with third parties who have a need or authority to receive such information, if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to comply with (i) in response to any authority having to receive such information under law (ii) any order of court (iii) detect, prevent, or otherwise address fraud, security or technical issues (iv) protect against harm to the rights, property or safety of EXAM LADDER PRIVATE LIMITED, our users or the public as required or permitted by law.

**User choices with regard to access of information**

EXAM LADDER PRIVATE LIMITED does not make any unsolicited calls or otherwise market any products or services, except for in relation to the purpose for which such information has been provided or taking any feedback, addressing any complaints, informing You about new features or free/paid courses. User shall not disclose their Personal Information to any third parties that is not authorised by EXAM LADDER PRIVATE LIMITED and verify the identity of such person who seek information. EXAM LADDER PRIVATE LIMITED will communicate with the Users through call, SMS, email or notices posted on the Platform or through any other means available, which shall include but not be limited to text, other forms of messaging, calls etc.

All the information provided to EXAM LADDER PRIVATE LIMITED by You, You as a User confirms that the same including sensitive Personal Information, is true, accurate and voluntary. User has the right to withdraw information at any time, in accordance with the terms of this Policy and the Terms of Service.

**Report, Analysis & Confidentiality**

EXAM LADDER PRIVATE LIMITED may have to use Personal Information without reference to any persona or identity for research, statistical analysis improving the Platform of functionalities offered thereon and business intelligence purpose and may transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates.

All EXAM LADDER PRIVATE LIMITED employees and data processors, who have access to, and are associated with the processing of sensitive personal data or information, are obliged to respect the confidentiality of every User's sensitive personal data and information.

**Sharing of Information**

EXAM LADDER PRIVATE LIMITED may also disclose or transfer User's personal and other information which a User provides, to another third party as part of reorganization or a sale of the assets of EXAM LADDER PRIVATE LIMITED corporation division or company. Any third party to which EXAM LADDER PRIVATE LIMITED transfers or sells its assets will have the right to continue to use the personal and other information that a User provide to us.

To the extent necessary to provide Users with the services on the Platform, EXAM LADDER PRIVATE LIMITED may provide User's Personal Information to third party contractors who work on behalf of or with EXAM LADDER PRIVATE LIMITED to provide Users with such services, to help EXAM LADDER PRIVATE LIMITED communicate with Users or to maintain the Platform. Generally, these contractors do not have any independent right to share this information, however certain contractors who provide services on the Platform, including the providers of online communications services, online payment gateway services, will have rights to use and disclose the Personal Information collected in connection with the provision of these services in accordance with their own privacy policies.

Furthermore, please note that we cannot control the actions of other Users of the Platform with whom You may choose to share Your Personal Information, and any such actions on Your behalf shall be solely Your responsibility.

## **Interest-Based Ads**

On unaffiliated sites, EXAM LADDER PRIVATE LIMITED may display interest-based advertising using information You make available to us when You interact with our Platform, content, or services. Interest-based ads, also sometimes referred to as personalised or targeted ads, are displayed to You based on information from activities such as subscription on our Platform, visiting sites that contain EXAM LADDER PRIVATE LIMITED content or ads. In providing interest-based ads, we follow applicable Indian laws, as well as the Code for Self-Regulation in Advertising by the Advertising Standards Council of India and the Self-Regulatory Principles for Online Behavioral Advertising developed by the Digital Advertising Alliance (a coalition of marketing, online advertising, and consumer advocacy organizations).

Like other online ad networks, we use cookies, web beacons (also known as action tags or single-pixel gifs), and other technologies (collectively, “cookies”). Cookies enable us to learn about what ads You see, what ads You click, and other actions You take on our sites and other sites. This allows us to provide You with more useful and relevant ads. For example, if we know what ads You are shown we can be careful not to show You the same ones repeatedly. We do not associate Your interaction with unaffiliated sites with Your identity in providing You with interest-based ads.

We do not provide any personal information to advertisers or to third party sites that display our interest-based ads. However, advertisers and other third-parties (including the ad networks, ad-serving companies, and other service providers they may use) may assume that users who interact with or click on a personalised ad or content are part of the group that the ad or content is directed towards (for example, users in eastern India who bought or browsed for literature books). Also, some third-parties may provide us information about You (such as the sites where You have been shown ads or demographic information) from offline and online sources that we may use to provide You more relevant and useful advertising.

Advertisers or ad companies working on their behalf sometimes use technology to serve the ads that appear on our sites directly to Your browser. They automatically receive Your IP address when this happens. They may also use cookies to measure the effectiveness of their ads and to personalise ad content. We do not have access to or control over cookies or other features that advertisers and third party sites may use, and the information practices of these advertisers and third party websites are not covered by our Policy. Please contact them directly for more information about their privacy practices.

## **Revision of terms & Grievance reporting**

EXAM LADDER PRIVATE LIMITED may update or amend this Policy at any time, with or without advance notice. In the event there are significant changes in the way EXAM LADDER PRIVATE LIMITED treats User's personally identifiable information, EXAM LADDER PRIVATE LIMITED will display a notice on the Platform or send Users an email. EXAM LADDER PRIVATE LIMITED's current Policy to all information that EXAM LADDER PRIVATE LIMITED has about Users and their account.