Please read YouExcel's privacy policy.

This Privacy Policy explains how YouExcel collects, uses, discloses, and retains personal information, including information collected through websites, blogs, apps (including but not limited to messaging services), and our correspondence with you and when providing you with our training courses, services or other products etc.

## 1. Your Consent

By giving consent to the privacy policy YouExcel, it shell be construed that you have fully comprehended the privacy policy and agree to abide by all the condition mentioned therein. You may withdraw your consent at any time, subject to legal or contractual restrictions and on reasonable notice to YouExcel, but then you might not be able to proceed with your intended interactions or transactions with YouExcel or receive the full benefits of YouExcel's training programs, service and other products etc.

# 2.Data Controller

For purposes of the General Data Protection Regulation (the "GDPR"), YouExcel shall be the data controller under the data protection law in respect of your personal information collected and used through your use of the website, products, and services.

## 3.Personal Information Defined

In this Privacy Policy, "**personal information**" means information about you and which identifies you, such as your name and email address, but does not include (to the extent permitted by law) information that is publicly available in a telephone directory or the business contact information that enables an individual to be contacted at a place of business.

4. Personal Information YouExcel	Description
Collects We collect newconal information	
We collect personal information	
about you in the course of providing	
our services, training programs and other products through the websites,	
blogs, apps (including but not limited	
to messaging services), training	
programs, and our correspondence	
with you. The information may	
include the following: Category	
Personal contact information	Name, personal address, personal email address, and
1 ersonar contact information	personal telephone number
<b>Business contact information</b>	Name, business address, business email address, and
Business contact information	business telephone number
Account information	Username and account preferences
Payment information	Payment card number (credit or debit card), bank
	account number, billing address, or other financial
	account numbers and account details
Financial aid application information	Contact information, link to social media profile,
The state of the s	education and employment information, annual
	income, country of residence, aid preferences, answers
	to questions about your financial situation, and
	is quiestion, and

	academic or professional achievements
Course and enrolment information	Online registration information, record of attendance,
	and assessments
Social Media	Information relating to your social media profiles,
	including (but not limited to) LinkedIn
Other information you provide to us	For example, if you write a review of our programs,
	submit a "Contact Us" form, or provide other
	information to us in the course of your use of our
	websites, products, or services

# 5. How YouExcel Collects Information

## (a) Information You Provide

You may be asked to voluntarily give your personal information to YouExcel when you interact with YouExcel. This information may be provided:

- 1. in the course of communications between you and us (including by phone, email, chat, in person, via social media, website, or otherwise);
- 2. when you register for an account;
- 3. when you request information about or use a programme or service provided by us;
- 4. when you subscribe to a newsletter;
- 5. when you attend alumni programs or the events organized or participated by YouExcel;
- 6. when you report a problem with our websites, products our services.

In certain circumstances, you can choose not to provide certain requested personal information, but then you might not be able to proceed with your intended interaction or transaction with YouExcel or otherwise receive the full benefit of the desired programme or service.

If you give YouExcel the personal information of another individual, then you are solely responsible for complying with all applicable laws, including obtaining the individual's valid consent regarding your collection and disclosure of the personal information to YouExcel and to YouExcel's use, disclosure, and retention of the personal information.

## (b) Automated Collection

YouExcel may automatically collect certain information regarding your use of YouExcel's websites, such as the dates and times that you use the websites, the browsers, operating systems, software and devices that you use to access the websites, and details of your use of the websites.

YouExcel's websites, email messages, and advertisements may use technologies (e.g. cookies, web beacons, tokens, pixels, or tags) to collect information that assists YouExcel to improve its programs, products, services, communications, and advertising and to prevent fraud. YouExcel may use information collected through technological means to recognize you as a user of YouExcel's websites, to facilitate and improve your use of YouExcel's websites, to confirm that messages have been delivered to and opened by you, and to provide you with targeted advertisements. You may choose to decline or disable cookies in your web browser or device permits, but doing so may affect your ability to access or use certain features of a website. More information about cookies used for interest-based advertising is set out in section 5(c) below.

Some of the information automatically collected by technological means is non-personal information (because the information does not identify you), and YouExcel will deal with that non-personal

information as explained below in this Privacy Policy unless applicable law requires otherwise.

# (c) Cookies

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the website's or service provider's systems to recognize your browser and capture and remember certain information. This enables us to provide you with improved services and future courses. We may also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. You can find out more about how to manage cookies here:

www.allaboutcookies.org/manage-cookies

You may choose to decline or disable cookies if your web browser permits, but doing so may affect your ability to access or use certain features of YouExcel's websites. However, you will still be able to apply for any course, training programme or service.

# (d)Internet-Based Advertising

YouExcel may use internet-based advertising services (sometimes called "remarketing" or "retargeting") provided by third-party vendors (such as Google, Bing, LinkedIn, and Facebook) to display advertisements on third-party websites and social media sites visited by users of a YouExcel website. Advertising vendors (such as Google, Bing, LinkedIn and Facebook) use cookies, pixels or tokens – unique identifiers of a web browser on a specific computer that are installed on the computer when it accesses YouExcel websites – to display ads based on the computer's past access to YouExcel websites. You can opt out of Google's use of cookies by visiting Google's Ads Settings. You can also opt out of a remarketing use of cookies by visiting the Network Advertising Initiative's consumer opt-out page. For more information, including details of how to block these cookies specifically, please see <a href="https://support.google.com/analytics/answer/181881">https://support.google.com/analytics/answer/181881</a>

# (e) Information from Other Sources

YouExcel may collect personal information from various publicly available sources and other third parties that are lawfully entitled to share your personal information with YouExcel.

If YouExcel refers you to an independent business then YouExcel may collect from that independent business, your personal / business information to update your confidential profile.

YouExcel may combine your personal information collected through various sources.

## 6. How YouExcel Uses Personal Information

## (a) General

Under data protection law, we can only use your personal information if we have a proper reason for doing so, for example:

- to comply with our legal and regulatory obligations;
- for our legitimate interests (see below) or those of a third party;
- for the performance of our contract with you or your commitments to take steps at your request before entering into a contract.

# (b) Purpose

YouExcel may use your personal information collected by YouExcel for purposes relating to or arising from your relationship and transactions with YouExcel and as otherwise set out in this

Privacy Policy or permitted by applicable law.

## 7. How YouExcel Discloses and Shares Personal Information

## (a)General

YouExcel discloses your personal information for purposes relating to or arising from your relationship and transactions with YouExcel and as otherwise set out in this Privacy Policy or permitted by applicable law.

# (b)Specific Consents

YouExcel may disclose your personal information in accordance with express or implied consent that you give during your interactions and transactions with YouExcel.

# (c) Affiliates

YouExcel and its affiliates may share your personal information with each other and use it in connection with our relationship with you for the provision of our programs, products and services.

### (d) Referred Transactions

If YouExcel refers you to an independent business for a proposed transaction, then YouExcel may disclose your personal information to the independent business to facilitate the proposed transaction, and in those circumstances, YouExcel has no control over, or responsibility or liability for the use, disclosure or retention of your personal information by the independent business, and the use, disclosure and retention of the disclosed information by the independent business is <u>not</u> subject to this Privacy Policy.

# (e) Suppliers and Service Providers

YouExcel may disclose your personal information to its suppliers and third-party service providers to assist YouExcel in the provision of information, products, and services to you; to provide services to YouExcel; to assist YouExcel to use your personal information as set out in this Privacy Policy; and as otherwise permitted by applicable law.

### (f)ProfessionalAdvisers

YouExcel may disclose your personal information to our professional advisers including accountants, lawyers, and other professional advisers that assist us in carrying out our business activities.

## (g)Law Enforcement/Legal Disclosures

YouExcel may disclose your personal information as required or authorized by applicable law, including to comply with a summon, warrant, or court or arbitral order or litigation disclosure obligation. YouExcel may disclose your personal information to law enforcement agencies or other independent organizations if YouExcel reasonably believes the disclosure is necessary or appropriate in connection with national security, law enforcement, or other issues of public importance, or if YouExcel reasonably believes the disclosure is necessary or appropriate to protect and enforce YouExcel's legal rights, interests and remedies or to protect the rights, interests, business, operations or customers of YouExcel or other persons (including to detect and prevent fraud and other illegal activities, to enforce any of the terms of use, terms of service or other agreements that govern access to or use of any of YouExcel's products or services). YouExcel has no control over, or responsibility or liability for, the use, disclosure or retention of your personal information by the agencies, independent organizations or other persons to whom YouExcel discloses the information in the foregoing circumstances, and the use, disclosure and retention of the disclosed information by those

agencies, independent organizations or other persons is not subject to this Privacy Policy.

## (h) Business Transactions

YouExcel may disclose your personal information in connection with a proposed or actual business transaction in which YouExcel is involved (e.g. a corporate amalgamation, reorganization, merger or acquisition, or the sale or transfer of some or all of YouExcel's business or assets), but YouExcel will require the information recipient to agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy and applicable law.

### 8. Location and Transfer of Personal Information

YouExcel and its service providers may process, store, and use your personal information at facilities in Karachi, Pakistan and at such other place(s) where YouExcel has, or will create it's business interest.

For further information on the steps taken relating to such transfers and the safeguards in place, please contact our Chief Executive Officer using the details listed at the end of this Privacy Policy.

## 9. Retention of Personal Information

We will retain your personal information for the period reasonably necessary for the purposes set out and to comply with YouExcel's legal obligations or enforce or protect YouExcel's legal rights, or a period required or permitted by applicable law. YouExcel will delete or dispose of your personal information, or depersonalize the information when YouExcel is no longer reasonably required to retain the information for the purposes set out in this Privacy Policy.

Please note that all of the above retention periods may be extended where we need to preserve and use personal information for the purposes of bringing or defending a legal claim. In such cases, we will continue to hold and process your personal information for as long as it is necessary to deal with the legal proceedings.

For further information as to our retention periods, please contact our Chief Executive Officer using the contact details as set out at the end of this Privacy Policy.

## 10. Do Not Track Signals; Tracking Across Third Party Websites

Certain mechanisms may allow you to send web browser signals known as "Do Not Track" ("DNT") signals, indicating your choice to disable tracking on our website. We do not respond to browser and do not track signals at this time. We may not be aware of or able to honor and respond to every such mechanism. More information about "do not track" is available at <a href="www.allaboutdnt.org">www.allaboutdnt.org</a>

Third parties, such as our website analytics provider), do not have authorization from us to track which websites you visited prior to and after visiting our website. That said, we cannot control third-party tracking and there may be some third party tracking that occurs without our knowledge or consent.

## 11. Protection of Personal Information

YouExcel uses reasonable safeguards – including administrative, physical, and technical security and safeguarding measures – appropriate to the sensitivity of the personal information in YouExcel's possession or under YouExcel's control to help protect the information from unauthorized access, collection, use, disclosure, deletion or similar risks. Nevertheless, security risks cannot be eliminated and YouExcel cannot guarantee that your personal information will not be accessed, used, disclosed,

or deleted in ways not otherwise described in this Privacy Policy.

# 12. Accuracy and Access to Personal Information

YouExcel will rely on you to ensure that the personal information that you provide to YouExcel is as accurate, complete and up to date as necessary for the purposes for which YouExcel uses the personal information. You will promptly notify YouExcel of any changes to the personal information that you provide to YouExcel using the procedures made available for that purpose by YouExcel or by contacting YouExcel's Chief Executive Officer using the contact information noted below.

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights using the contact details at the end of this Privacy Policy.

Right	Summary of your rights
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information:	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defense of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	You have the right to obtain personal information that you have provided to us in a structured, commonly used, and machine-readable format and for it to be transferred to you or another organization, where it is technically feasible. The right only applies where the use of the personal information you provided was with your consent or for the performance of a contract with you, and when the use of your personal information is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our

	legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.
Right to withdraw	You have the right to withdraw your consent at any time where we rely
consent	on consent to use your personal information.
Right to complain to	You have the right to complain to the relevant data protection authority
the relevant data	where you think we have not used your personal information in
protection authority	accordance with data protection law.

# 13. Non-Personal Information

YouExcel may use personal information to create and collect non-personal information (information that is not about an identifiable individual), including personal information that has been aggregated or otherwise depersonalized so that the information no longer relates to an identifiable individual. YouExcel may use, disclose, transfer, and retain non-personal information for any purpose and in any manner whatsoever. If non-personal information is combined with personal information, then YouExcel will treat the combined non-personal information as personal information for the purposes of this Privacy Policy for as long as the non-personal information is combined with your personal information.

### 14. Other Websites and Businesses

YouExcel's websites and correspondence (including emails and messages) may include advertisements for programs, products and services offered by independent businesses or links to websites operated by independent businesses. YouExcel has no responsibility or liability for, or control over, those other websites, online services, or businesses, their products or services, or their collection, use, disclosure, or retention of your personal information. This Privacy Policy does <u>not</u> apply to the collection, use, disclosure, and retention of your personal information by those websites, online services, and independent businesses. If you have questions about how those websites, online services, or independent businesses collect, use, disclose or retain personal information, please contact the owner or operator of the website, service, or business.

# 15. Social Networking and Similar Situations

When you use certain aspects of YouExcel's websites or other services, or post information to other social networking sites (e.g. there may be links to YouExcel's Facebook, Instagram, YouTube or LinkedIn pages or you may be able to "like" a product on your Facebook account), the personal information that you post or share in connection with these third-party sites is visible to other persons and can be read, collected, used and disclosed by other persons, including to send unsolicited messages. As will be evident, in such a case, you will be leaving a YouExcel website and going to the third party's website. Any information provided to such third party social networking sites and other sites is governed by their own privacy policies, which you may read on the applicable site. You are solely responsible for the personal information that you choose to post or share in those situations. YouExcel has no control over, or responsibility or liability for, the use, disclosure, and retention of the personal information that you disclose in those situations, and the use, disclosure, and retention of the disclosed information is not subject to this Privacy Policy.

#### 16. Video Control

For the purpose of protecting its property and increasing security for learners and staff, YouExcel has equipped selected areas of the YouExcel office with video surveillance cameras. Video surveillance is used in the public areas, such as entrance areas, corridors as well as in areas and rooms which, due to their purpose and equipment, have a special need for protection and

surveillance; these include admin office.

The collected data may be processed based on the legitimate interests pursued by YouExcel for the prevention and investigation of criminal offenses committed in YouExcel's publicly accessible office. Video recordings are only analyzed in the event of a police report or other suspicion of a criminal offense. If necessary, analysis results and/or data exports may be transmitted as evidence to respective authorities or courts. The collected data is stored for up to 120 hours. Any relevant analysis results and/or data exports will be stored for as long as it is necessary to enforce legal claims or protect legitimate interests.

# 17. Alumni Community

The contact data provided in the context of the YouExcel Alumni community membership (e.g. title, name, and email address) will be processed and used for providing you with information and news about YouExcel and its events such as alumni meetups, webinars, etc.

Your data will, however, only be processed once we have received your express consent to do so. This consent can be withdrawn at any time by sending an email to the address provided in the info mail and invitation (farhang@youexceltraining.com)

# 18. Other Matters

- (a) Disclaimers, Liability Exclusions/Limitations, and Disputes: The agreements (including any website terms of use) that you accept when you apply, register for, order, or use YouExcel's programs, products and services contain important provisions, including provisions disclaiming, limiting or excluding the liability of YouExcel L and other persons (including service providers) and provisions determining the applicable law and jurisdiction for the resolution of disputes. To the extent permitted by applicable law, each of those provisions applies to any dispute that may arise in relation to this Privacy Policy or YouExcel's collection, use, disclosure, and retention of your personal information, and are of the same force and effect as if they were reproduced directly in this Privacy Policy. Nothing in this Privacy Policy amends any of those other agreements.
- (b) Changes to this Policy: YouExcel may change this Privacy Policy as it applies to YouExcel from time to time by posting a new version of this Privacy Policy on YouExcel's websites. YouExcel's collection, use, disclosure, and retention of your personal information will be governed by the version of this Privacy Policy in effect at that time. Your continued dealings with YouExcel after any change to this Privacy Policy will signify your consent to the collection, use, disclosure, and retention of your personal information by YouExcel as set out in the changed Privacy Policy which is updated on the website.
- (c) English Language: You and YouExcel have each expressly requested and required that this Privacy Policy and all other related documents be drawn up in the English language.
- (d) Contacting YouExcel's Chief Executive Offcer: If you have any comments or questions about this Privacy Policy or how YouExcel deals with your personal information, please contact YouExcel's Chief Executive Officer by email at: <a href="mailto:farhanq@youexceltraining.com">farhanq@youexceltraining.com</a>