

Privacy Policy: Growatpace.com and MentorCircle Mobile Apps

1. INTRODUCTION

MentorCircle Mobile App and growatpace.com (“we/ our/ us/ Company”) is committed to protecting the privacy of its learners and users (“User/ Learners/ User/ you/ your”) and ensures complete confidentiality and security of personal information that resides with us.

This Privacy Policy (“**Policy**”) describes how we protect your personal information provided to us on our website i.e. www.growatpace.com as well as our mobile apps MentorCircle (“**Platform**”) and how we use that information in connection with the service offered through the platform and must be read in conjunction with our Terms of Use.

Unless we link to a different policy or state otherwise, this Privacy Policy applies when you visit or use the Website, mobile applications, APIs or related services (the “**Services**”). It also applies to prospective customers of our business and enterprise products.

By using the Services, you agree to the terms of this Privacy Policy. You shouldn’t use the Services if you don’t agree with this Privacy Policy or any other agreement that governs your use of the Services.

We wish to assure you that the Company is strongly committed to protect the privacy of its users and has taken all necessary and reasonable measures in line with the best industry practice to protect the confidentiality of your personal information and its transmission through our Website.

You understand and acknowledge that this policy is effective from the date and time a user registers with the site (“**Effective Date**”) and accept the terms and conditions laid out on the site.

We may alter this Privacy Policy as needed for certain products and services and to abide by local laws or regulations around the world, such as by providing supplemental information in certain countries.

2. INFORMATION COLLECTED FROM YOU

We collect certain data from you directly, like information you enter yourself, data about your consumption of content, and data from third-party platforms you connect.

We also collect some data automatically, like information about your device and what parts of our Services you interact with or spend time using.

We may also maintain a record of your product interest and acquire information about you for our present and/or future affiliates. If you choose to post messages or query or leave feedback for other users, we may retain this information.

This information includes, but is not limited to demographic data, navigation data, additional contact data and additional data about you from other sources, such as public authorities, to the extent permitted by law.

All the aforesaid information is service-dependent and we may use the above said user information to, maintain, protect, and improve services (including advertising services) and/or for developing new services. Users can always refuse to supply personally-identifiable or any other information, with the condition that it may prevent them from engaging in certain website-related activities and functionalities.

You acknowledge that our third-party services providers may need to collect certain additional information, e.g.- your credit or debit card number and expiration date, bank routing and account number. We may also aggregate non-personal information about you and other learners who visit our Website.

3. INFORMATION COLLECTED ABOUT INDIVIDUALS WHO DO NOT INTERACT WITH US DIRECTLY

We may receive personal data about individuals who do not interact with us directly. For example, our clients, service providers, and partners may provide us with information about individuals other than themselves when using our products or services.

Information about the personnel of our clients, service providers, or partners, such as the business contact information that our clients, service providers, or partners provide to us in the context of our contractual relationships with them.

Information obtained when processing transactions, such as information about payment transactions

4. INFORMATION COLLECTED FROM PRIVATE AND PUBLICLY ACCESSIBLE SOURCES

We may collect information about individuals that is publicly available, including by searching publicly accessible government lists of restricted or sanctioned persons (such as the Specially Designated Nationals And Blocked Persons List), public records databases (such as company registries and regulatory filings), and by searching media and the internet. We and or our third-party verification providers may also collect information from private or commercially available sources, such as by requesting reports or information from credit reference and fraud prevention agencies, to the extent permitted under applicable law.

We may also maintain pages for our company and our products and services on a variety of third-party platforms, such as LinkedIn, Facebook, X , YouTube, Instagram, and other social networking services. When you interact with our pages on those third-party platforms, the third-party's privacy policy will govern your interactions on the relevant platform. If the third-party platform provides us with information about our pages on those platforms or your interactions with them, we will treat that information in accordance with this Privacy Policy.

5. INFORMATION COLLECTED VIA AUTOMATED MEANS

When you access our websites or use our mobile applications, we, our service providers, and our partners may automatically collect information about you, your computer or mobile device, and activity on our websites or mobile applications. Typically, this information includes your computer or mobile device operating system type and version number, manufacturer and model, device identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, the website you visited before browsing to our website, general location information such as city, state or geographic area; and information about your use of and actions on or in our websites or mobile applications, such as pages or screens you accessed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access.

Our service providers and business partners may collect this type of information over time and across third-party websites. This information is collected via various mechanisms, such as via cookies, web beacons, embedded scripts, through our mobile applications, and similar technologies.

6. SENSITIVE PERSONAL DATA

In limited circumstances and when permitted by law.

Outside of these contexts or otherwise as we specifically request, we ask that you not provide us with any sensitive personal data (meaning information revealing racial or

ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, genetic, health, or biometric information, information about sex life or sexual orientation, or criminal convictions or offenses) through our websites or mobile applications, or otherwise to us.

7. USAGE OF INFORMATION COLLECTED FROM YOU

The information collected from you may be used to operate, provide, develop and improve our services. Data like demographic and identity data, online identifiers, personal data and other technical data is used to manage orders, provide services, deliver products, process payments and communicate with you and to improvise on all our services.

These purposes include:-

- send you technical notices, updates, security alerts and support and administrative messages;
- provide you access to our Services and learners Support by means of e-mail or telephone;
- facilitate seamless purchase experience while making a transaction by pre-populating the OTP received by you;
- respond to your comments, questions and requests and provide Learners service;
- communicate with you about products, services, offers, promotions, rewards and events, if any, offered by us and others and provide news and information we think will be of interest to you;
- monitor and analyze trends, usage and activities in connection with our services;
- revise, modify, and update existing services and develop new services;
- detect, investigate and prevent fraudulent transactions and other illegal activities and protect our rights and property and others;
- trace computer resources or any person who may have contravened, or is suspected of having or being likely to contravene, any provision of law including the Cyber Security Act, 2018 that is likely to have an adverse impact on the services provided on the Website;

- personalize the services and present you with advertising, content or features that we believe will be of interest or useful to you;
- facilitate contests, sweepstakes and promotions and process and deliver entries and rewards;
- link or combine with information we get from others to help understand your needs and provide you with better service; and
- carry out any other purpose described to you at the time the information was collected.

8. STORING YOUR PERSONAL DATA

We retain your information only for as long as is necessary for the purposes for which we process the information as set out in this policy. However, we may retain your Personal Data for a longer period of time where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

9. SHARING YOUR PERSONAL DATA

We do retain the right to share your personal information with our other corporate entities and affiliates to facilitate joint or co-branded services that you request where such services are provided by more than one entity. We may disclose personal information to law enforcement offices, third party rights owners, or others in the good faith belief that such disclosure is reasonably necessary to enforce our Terms of Use or Privacy Policy or protect the rights, property or personal safety of our users or the general public. We will share some or all of your personal information with another business entity should we plan to merge with, or be acquired by a business entity.

10. USE OF COOKIES, WEB BEACONS AND OTHER TRACKERS

We use temporary and permanent cookies, tags, scripts, and other similar technologies to identify users of our services and to enhance user experience and to identify visitors, track website navigation, gather demographic information about visitors and users, understand email campaign effectiveness and for targeted visitor and user engagement by tracking your activities on our websites. We use third-party tracking services like google analytics and google tag manager to understand the behavior of our website visitors and serve them better.

You can set your browser to refuse all cookies or to indicate when a cookie is being sent to your computer. However, this may prevent our site or services from working

properly. You can also set your browser to delete cookies every time you finish browsing.

11.LINKS TO THIRD PARTY WEBSITES

WE HEREBY DISCLAIM LIABILITY FOR, ANY INFORMATION, MATERIALS, PRODUCTS, OR SERVICES POSTED OR OFFERED AT ANY OF THE THIRD PARTY SITES LINKED TO THIS WEBSITE. BY CREATING A LINK TO A THIRD PARTY WEB SITE, WE DO NOT ENDORSE OR RECOMMEND ANY PRODUCTS OR SERVICES OFFERED OR INFORMATION CONTAINED AT THAT WEBSITE, NOR ARE WE LIABLE FOR ANY FAILURE OF PRODUCTS OR SERVICES OFFERED OR ADVERTISED AT THOSE SITES. SUCH THIRD PARTY MAY HAVE A PRIVACY POLICY DIFFERENT FROM THAT OF OURS AND THE THIRD PARTY WEBSITE MAY PROVIDE LESS SECURITY THAN THIS SITE.

12.SAFETY OF YOUR DATA

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instruction and they are subject to a duty of confidentiality.

13.YOUR RIGHTS AND CHOICES

In this section, we describe the rights and choices available to all users.

- You can ask us to stop sending you marketing messages at any time by contacting us or clicking on the opt-out link included in each marketing message. You may continue to receive service-related and other non-marketing messages.
- Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above. If you choose to opt-out of targeted advertisements, you will still see advertisements online, but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.
- Where we request personal data directly from you, you do not have to provide it to us. If you decide not to provide the requested information, in some

circumstances we, or our clients, may be unable to provide products or services to you. For example, we may be unable to process your transaction.

- In some jurisdictions, applicable law may provide a right for individuals to access, modify, or delete their personal data in some. You may contact us directly to request access to, modify or delete your information. We may not be able to provide access to, modify, or delete your information in all circumstances.

14. HOW LONG IS YOUR DATA USED

We will use your personal data for as long as necessary based on why we collected it and what we use it for. This may include our need to satisfy a legal, regulatory, accounting, or reporting requirement.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In general terms, we will retain your personal data for the duration of your involvement/engagement with us and for as long as reasonably necessary afterwards; however, we may maintain different retention periods for different products and services. There are also certain types of information which are required to be retained for a certain period by law.

15. YOUR INDIVIDUAL LEGAL RIGHTS

Under certain circumstances, individuals in Europe have rights under data protection laws in relation to their personal data. If you are located in Europe, you may ask us to take the following actions regarding personal data that we hold:

Access. You are entitled to ask us if we are processing your personal data and, if so, for a copy of the personal data we hold about you, as well as obtain certain other information about our processing activities.

Correction. If any personal data we hold about you is incomplete or inaccurate, you can require us to correct it, though we may need to verify the accuracy of the new data you provide to us.

Erase. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

Object. Where our reason for processing your personal data is legitimate interest you may object to processing as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

Restriction. You may ask us to suspend our use of your personal data in the following scenarios: if you want us to establish the data's accuracy; where our use of your personal data is unlawful but you do not want us to erase it; where you need us to hold your data for a longer period than we usually would, because you need it to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Transfer. Where it is possible, we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to personal data provided by you which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent. Where our reason for processing is based on your consent, you may withdraw that consent at any time. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

There may be legal or other reasons why we cannot, or are not obliged to, fulfil a request to exercise your rights. We will use available lawful exemptions to your individual rights to the extent appropriate. If we decline your request, we will tell you why, subject to legal restrictions.

You will not have to pay a fee to exercise any of your rights relating to your personal data. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

16.COMPLAINTS

If you have a complaint about our handling of your personal data, you may contact our support team using the contact information below by email. We request that a complaint be made in writing. Please provide details about your concern or complaint so that our data protection officer can investigate it. We will take appropriate action in response to your complaint, which may include conducting internal discussions with relevant business representatives. We may contact you for additional details or clarification about your concern or complaint. We will contact you to inform you of our response to your complaint. You also may have a right to file a complaint with a national or local regulatory agency.

17.MODIFICATIONS TO THE POLICY

We may update this Privacy Policy and information security procedures from time to time. If these privacy and/or information security procedures materially change at any time in the future, we will post the new changes conspicuously on the Website to notify you.

Please note that we may attempt to notify you when changes are made to this Privacy Policy, you are responsible for periodically reviewing any changes which may be made to the Policy. We may, in our sole discretion, modify or revise the Policy at any time, and you agree to be bound by the same.

Your continued use of our website and service/s, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

18.CONTACT US

In case you have any questions about this Privacy Policy, our practices relating to the website, or your dealings with us, please contact our support team at info@growatpace.com