

EDUTOG Privacy Policy

We care about your privacy and are committed to protecting your personal data. This privacy statement will inform you how we handle your personal data, your privacy rights and how the law protects you. Please read this privacy statement carefully before using our Services.

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1. Who Are We?

EDUTOG PRIVATE LIMITED, is a company that is incorporated in India under the Companies Act, 2013. It has its registered office at Shajarath, Chempazhanchy P. O, Trivandrum, Kerala(hereinafter referred to as “EDUTOG”).

2. What do we collect about You?

2.1.1 Data provided through direct interactions Registration and other account information
When you register to use our Services, we may collect the following information about you.

- If you register using your Google account: first name, last name and email address.
- If you register using your Facebook account: we collect first name and last name as appeared on your Facebook account, Facebook IDs and the URL to your Facebook profile picture. In the event you have provided permission to Facebook through their in-app privacy option (which appears just before you register on our Platform), we

may collect your gender, age or email id depending on the permissions granted by you.

- If you register using your mobile number we collect your mobile number.
- If you register using your Apple ID: your first and last name and email address; you can decide whether to share your email address with us when you sign in your Apple account.

Depending on the choices you make during the log-in to our Services or during the process of engaging our Services, you may opt to give the following additional personal data.

- Your name.
- E-mail address.
- Mobile number.
- Your credit card/debit card details in case you choose to purchase our paid services as defined in our Terms of Use using your credit/debit card.
- Copy of your identity proof (driving license, passport or other card, whichever is convenient for you) and real time image of your face, in case you have opted for the KYC verification as available on the platform. Please note that the KYC verification is currently available to a limited number of users.

Validation of your EDUTOG account.

We validate the accounts of EDUTOG users by using SMS verification to ensure that each account is associated with a real and unique user. This validation process is initiated once you proceed with posting your first ad listing on our Services. In order to validate your EDUTOG account before posting your ad listing, we will send you an SMS on a valid mobile number provided by you. This process is entirely free of charge. If you do not agree to validate your account, then your account will remain active and you will be able to use our Services with limited functionality. This limited functionality of an account implies that you cannot publish new ad listings or edit, update, promote, extend, reactivate, deactivate or delete existing ad listings until your account is verified by SMS. You will also not be able to receive or reply to any messages from other users.

In case you create several EDUTOG accounts using the same mobile number and validate all those accounts via SMS verification, all such accounts will have a limited functionality and you will be asked to choose one of them. The account chosen by you will return to full functionality, and the rest of the accounts will remain to have limited functionality.

Every user can request a maximum of 5 SMS messages with verification codes, within 24 hours. Account validation is done only once for each account, until it is successfully verified via SMS by the user. Once you have validated your EDUTOG account, it will remain

associated with the mobile number used for the SMS verification. If you wish to change the mobile number associated with your EDUTOG account, you will need to contact our Customer Support team.

Communication through the chat feature on our Platform.

When you use our chat feature to communicate with other users, we collect information that you choose to provide to other users through this feature.

Taking part in our user surveys.

We will occasionally provide you with our user surveys in order to measure your overall satisfaction with the quality of our Services. For this purpose, we will only use a session log (this is a random identifier assigned to you when you are downloading our mobile app or visit our website). Furthermore, you may choose to provide us with your contact details such as your email and your mobile number upon our request to contact you and invite you to attend one of our user experience (UX) tests or an interview with our team. Please be aware that the information you give us in relation to our survey questions may occasionally contain personal data as voluntarily provided by you in your answers.

2.1.2 Data we collect automatically when you use of our Services.

When you interact with our Services, we automatically collect the following information about you:

Device Information.

- We collect device-specific information such as operating system version, unique identifiers. For example, the name of the mobile network that you are using. We associate the device identifiers with your EDUTOG account.

Location information.

- Depending on your device permissions, if you post an item on our Platform, we automatically collect and process information about your actual location. We use various technologies to determine location, including IP address, GPS, Wi-Fi access points and mobile towers. Your location data allows you to see user items near you and helps you in

posting items within your location. In case we need your location data, we will first show you a pop-up which will ask you to choose to allow or not to allow us to access your location data. If you do not allow us to have access to your location data, you will still be able to use our Services but with limited functionality. If you do allow us to access your location data you can always change this later by going to the settings on our Website or App our Platform and disable the permissions related to location sharing.

Client and Log data.

- Technical details, including the Internet Protocol (IP) address of your device, time zone and operating system. We will also store your login information (registration date, date of last password change, date of the last successful login), type and version of your browser.

Clickstream data.

- We collect information about your activity on our Platform, which includes the sites from which you accessed our Platform, date and time stamp of each visit, searches you have performed, listings or advertisement banners you clicked, your interaction with such advertisements or listings, duration of your visit and the order in which you visit the content on our Platform.

Cookies and Similar Technologies.

- We use cookies to manage our users' sessions, to store your preference language selection and deliver relevant advertisements. "Cookies" are small text files transferred from a web server to the hard drive of your device. Cookies may be used to collect the date and time of your visit, your browsing history, your preferences, and your username. You can set your browser to refuse all or some cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Services/Platform may become inaccessible or not function properly. For more information on the cookies we use, please see our Policy on Cookies and Similar Technologies.

Credit Information.

- We check/obtain your credit information from third-party sources.

Call Recording.

- If our representative calls you on the telephone or if you call us on the telephone to discuss your educational institution, we will record such call for training and internal quality purposes.

3. Why do we process your personal information?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances.

- Where we need to perform the contract we are about to enter into or have entered into with you, or where you have expressly requested us to contact you.
- Where it is necessary for our legitimate interests to improve our Services and to provide you a safe and secure Platform.
- Where we need to comply with a legal or regulatory obligation.

We have set out below a description of the reasons for which we use your personal data, [and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate].

3.1 For providing access and delivering Services through our Platform.

1. If you log in using your mobile number or email id, we use your first name and last name, mobile number and/or e-mail address to identify you as a user and provide access to our Platform.
2. If you log in using your Facebook account or Google account or your Apple ID, we use your first name and last name and your email address of such account, as well as the URL to your profile picture (except for Apple ID) we use your first name and last name from your Facebook profile and the Facebook e-mail address to identify you as a user on our Platform and to provide you access to our Platform.
3. We may share your data with select partners in the course of our business, who have agreed to respect and protect your privacy in the same manner we do. These select partners may use your information (being your contact information, details of the car to be sold or bought) to deliver services tailored to your preferences and interests. We only collaborate with other legally compliant entities that use your

data solely for the purpose of providing you with relevant offers and services. We recommend you evaluate their Privacy Policy for further information how your data would be used by such entities. You retain the option to opt out of receiving such tailored services by contacting our customer support team/Grievance Officer. By continuing to use our services, you consent to the sharing of your data with our select partners for the purpose of receiving such personalized communications. We continuously strive to ensure that your personal information is handled responsibly and in line with your expectations.

4. We use third party payment service providers to process any payment you make to our Services. Depending on the method of payment, you may be requested to provide us with your payment and credit card details which we will then provide to the payment service provider in order to process your payment. We do not store your credit card information, unless you choose the option to save such information in order to make recurring payments easier without having to re-enter your details each time. In such cases, we only store your card holder name, the card expiry date, your card type and the last four digits of the card number. We do not store any credit card code verification values and merely forward such values and your credit card number in an encrypted manner for the purpose of processing your payment by our payment service provider.

We process the above information for adequate performance of our contract with you.

3.2 For improving your experience on the Platform and developing new functionalities of the Platform.

1. We use clickstream data to:

- Offer you tailored content, such as giving you more relevant search results when using our Services.
- To determine how much time you spend on our Platform and in what manner you navigate through our Platform in order to understand your interests and to improve our Services based on this data. For example, we may provide you with suggestions on content that you can visit based on the contents you have clicked.
- To monitor and report the effectiveness of the campaign delivery to our business partners and internal business analysis.

2. If you choose to provide us with your location data, we use your location data for following purposes:

- To compile anonymous and aggregated information about the characteristics and behavior of EDUTOG users, including for the purposes of business analysis, segmentation and development of anonymous profiles.
 - To enhance the performance of our Services and to personalize the content we direct towards you. For example – with the help of location data we display ad listings which are in your vicinity to improve your buying experience. For this purpose, Google Maps is integrated into our Platform. This means that both Google and we are responsible for the processing of your location data in the context of Google Maps. In any case, we will not process your location data for any other purposes but those explained in this Privacy Statement. However, Google might process such location data for their own purposes as explained in the Google Privacy Policy which can be reviewed Your use of Google Maps through our Platform is subject to Google Maps' Terms of Service.
 - To measure and monitor your interaction with the third-party advertisement banners, we place on our Platform.
3. With the help of your account information, which includes your email ID and phone number, we map the different devices (such as desktop, mobile, tablets) used by you to access our Platform. This allows us to associate your activity on our Platform across devices and helps us in providing you a seamless experience no matter which device you use.
4. We use the images you upload, the descriptions and prices you provide in your ad listings to train machine learning models to personalize search results in relation to ad ranking and user interest, to improve the identification and presentation of ad listings, to improve the search function and to increase the likelihood of a successful sale. This helps us to improve our Services and to provide you with a better user experience.

5. To show and recommend ad listings on our Services that may be of interest to you, we make use of algorithms that use information related to your browsing behavior, items you bought, clickstream data, your user ID and your location data if you have given us permission to use this. We use this form of automated decision-making on the basis of our legitimate interest in improving our Services and provide a better user experience by offering you more relevant ad listings.

6. We access and analyze your chat messages with other users conducted through the chat function on our Platform, for product enhancement and to provide you with a better user experience (e.g. to identify sold items and to provide you with active listings only). Therefore, we develop and train machine learning models and algorithms to automatically analyze your chat content. To build and train our machine learning models our machine learning specialists may review exemplary chat content manually. In these circumstances highly restricted access rights apply to selected machine learning specialists analyzing the chat content. During this analyzation process, we are de-identifying chat content as much as possible by applying a scanning filter to detect and hide personal data such as names, phone numbers, e-mail addresses. However, there may still be cases beyond our control in which the chat content may show certain personal data that you have chosen to provide.

7. In case you agree to opt for KYC verification as available on our Services, depending on the device camera permission, we will request you to click in real time an image of your face and an image of your identity proof in quick succession in order to verify your identity. Upon completion of the KYC process, in case the image on the identity proof matches with the image of the face captured, your account will be considered as verified. Such verification will help you to build trust among other users and receive better responses to your listings.

We process the above information for adequate performance of our contract with you and on the basis of our legitimate interest to improve your experience of our Services.

3.3 To take your feedback, promote and offer you Services that may be of your interest.

1. We use your mobile number, log data and unique device identifiers to administer and protect our Platform (including troubleshooting, data analysis, testing, fraud prevention, system maintenance, support, reporting and hosting of data).

2. We access and analyze your chat messages with other users conducted through the chat function on our Services for customer satisfaction, safety and for fraud prevention purposes (e.g. to block spam or abusive messages that may have been sent to you by other users). Therefore, we develop and train machine learning models and algorithms helping us to automatically detect and prevent inappropriate and fraudulent user behavior. During the analyzation and training process, we are de-identifying chat content as much as possible by anonymizing the unique identification values assigned to users. However, there may still be cases beyond our control in which the chat content may show certain personal data that you have chosen to provide. Only in limited cases and circumstances, our customer safety and security specialists review chat content manually, for example, if we have strong indications leading to the urgent suspicion of fraudulent activities. In these circumstances highly restrictive access rights apply to selected customer safety and security specialists analyzing the chat content.

3. To prevent and detect fraud on our Services, we make use of algorithms that recognize suspicious or fraudulent user behavior based on certain information such as user activity and posted content, which may lead to us banning certain user accounts. Automated banning happens when there is a very high degree of certainty that an account or action is fraudulent. Otherwise human review takes place by selecting customer safety and security specialists on the basis of highly restrictive access rights. We use this form of automated decision-making on the basis of our legitimate interest to detect and prevent fraud and to keep our Services safe and secure for our users. If you think that your account was wrongfully banned, you can contact our Customer Support team, in which case our team will review the decision to ban your account.

4. We collect certain information from and in relation to the electronic device from which you are accessing our Services on the basis of our legitimate interest in preventing fraud on our Services. The information we collect includes your user ID (depending on whether you are logged in), , IP address, device language settings,

device brand and type, device operating system and version, browser type and version, and device specific software information such as fonts, system and browser Time zone, available video and audio formats. The device related information is used to determine whether the same device is being used when users interact with our Services. We associate such information with a user fraud score on the basis of which we may ban certain users. For more information on this, please be referred to our Policy for Cookies and Similar Technologies. If you think that your account was wrongfully banned, you can contact us through our customer support helpline in which case our team will review the decision to ban your account.

3.4 To take your feedback, promote and offer you Services that may be of your interest.

1. We may contact you through your registered mobile number or email id in order to take feedback from you about our Services.
2. We use your email address and mobile number (by SMS) to make suggestions and recommendations to you about our Services that may be of interest to you.
3. We use clickstream data to monitor and report the effectiveness of the campaign delivery to our business partners and internal business analysis.
4. If you choose to provide us with your location data, we may use your location data to measure and monitor your interaction with the third-party advertisement banners we place on our Services.

We process the above information based on our legitimate interest in undertaking marketing activities to offer you Services that may be of your interest. Specifically, you may receive certain marketing communications from us:

- By any preferred means of communication if you have requested such information from us.
- By email or phone, regarding similar products and services, if you already use our Services or acquired some of our products.
- By phone or email, if you provided us with your details when you entered a competition.
- By phone or email if you registered for a promotion.

- By phone or email, if you have provided your feedback for our Services through our Platform, social media, or any other means.

Being a registered user on our Platform, please note that if you have registered yourself on DND/DNC/NCPR services, you will still receive the above communications.

You can ask us to stop sending you such marketing communication at any time by clicking on the opt-out link in the email sent to you or by changing your notification settings in your account or by stating our calling agent that you do not wish to be contacted for the above marketing communications.

4.How will we inform you about changes in our privacy statement?

We may amend and update this privacy statement from time to time. We will notify you of material changes to this privacy statement as appropriate under the circumstances and as required by applicable laws, e.g. by placing a prominent notice within our Services or by sending you a message via our Services or by sending you an email. If you do not agree with the way we are processing your personal data and the choices we are providing to you, you may close your account at any time by going into your account settings and select delete account.

5.Communication.

We will communicate with you by email, SMS or in the app notification in connection with our Services/Platform to confirm your registration, to inform you in case your ad listing has become live/expired and other transactional messages in relation to our Services. As it is imperative for us to provide you such transactional messages you may not be able to opt - out of such messages.

6.Who do we share your data with?

We may have to share your personal data with the parties set out below for the purposes set out in section 3 above.

Corporate affiliates: We may share your data with our group companies which help us in providing business operation services such as product enhancements, customer support and fraud detection mechanism.

Select Partners: We may share your personal information which includes name, phone number and email address with select partners in the course of our business, who have agreed to respect and protect your privacy in the same manner we do. These partners may utilize your information to deliver services tailored to your preferences and interests. You may contact our Grievance Officer if you do not wish to receive such services.

Third Party Service Providers: We use third party service providers to help us deliver certain aspect of our Services for example, cloud storage facilities.

We conduct checks on our third-party service providers and require them to respect the security of your personal data and to treat it in accordance with the law. We do not allow them to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Advertising and analytics providers: In order to improve our Services, we will sometimes share your non-identifiable information with analytics providers that help us analyze how people are using our Platform/Service. We, share your information with them in non-identifiable form for monitoring and reporting the effectiveness of the campaign delivery to our business partners and for internal business analysis. For further details about our advertisers and analytics providers, please refer to our <Policy for Cookies and similar Technologies>.

Law enforcement authorities, regulators and others: We may disclose your personal data to law enforcement authorities, regulators, governmental or public bodies and other relevant third parties comply with any legal or regulatory requirements.

We may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our

business, then the new owners may use your personal data in the same way as set out in this privacy statement.

Publicly available information: When you post an item for sale using our Services, you may choose to make certain personal information visible to other EDUTOG users. This may include your first name, last name, your email address, your location and your contact number. Please note, any information you provide to other users can always be shared by them with others so please exercise discretion in this respect.

7. Where do we store your data and for how long?

The data we collect about you will be stored and processed in secure servers in order to provide the best possible user experience. For example – for fast website or mobile application build up.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 unauthorized 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.

8. Your rights - data deletion requests.

To exercise your privacy rights and choices, if you do not want us to process your data, then you can use the Data Deletion Requests feature to issue a request for its removal. The option to request data deletion is visible under Account > Settings> “Deactivate account and delete my data”

There may be situations where we cannot grant your request — for example, if you ask us to delete your transaction data and EDUTOG is legally obligated to keep a record of that transaction to comply with law.

9. Technical and organizational measures and processing security.

All the information we receive about you are stored on secure servers and we have implemented technical and organizational measures that are suitable and necessary to protect your personal data. EDUTOG continually evaluates the security of its network and adequacy of its internal information security program, which is designed to (a) help secure your data against accidental or unlawful loss, access or disclosure, (b) identify reasonably foreseeable risks to the security of the EDUTOG network, and (c) minimize security risks, including through risk assessment and regular testing. In addition, we ensure that all payment data are encrypted using SSL technology.

Please note, despite the measures we have implemented to protect your data, the transfer of data through the Internet or other open networks is never completely secure and there is a risk that your personal data may be accessed by unauthorized third parties.

10. Links to third-party websites.

Our Platform may contain links to third party websites or apps. If you click on one of these links, please note that each one will have its own privacy policy. We do not control these websites/apps and are not responsible for those policies. When you leave our Platform, we encourage you to read the privacy notice of every website you visit.

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