

GYANDHAN-PRIVACY POLICY

1. DEFINITIONS

For the purpose of this Privacy Policy (hereinafter referred to as the “Policy”), wherever the context so requires,

- a) the term ‘Company’ shall mean ‘Senbonzakura Consultancy Private Limited’ a Private Limited Company limited by shares and registered under the Companies Act, 2013 and having its registered office at E-43/1, Okhla Phase II, Okhla Industrial Area, Pocket D, Okhla Phase II, Okhla Industrial Area, New Delhi, Delhi 110020
- b) the term ‘website’ shall mean www.gyandhan.com or any application;
- c) the term ‘You’ & ‘User’ shall mean any legal person or entity accessing or using the services provided on this GyanDhan, who is competent to enter into binding contracts, as per the provisions of the Indian Contract Act, 1872;
- d) The terms ‘We’, ‘Us’ & ‘Our’ shall mean the Website and/or the Company, as the context so requires.

2. GENERAL

- a) We are committed to safeguarding your privacy and ensuring that you continue to trust us with your personal data. When you interact with us you may share personal information with us which allows identification of you as an individual. This is known as personal data.
- b) This document is an electronic record in terms of Information Technology Act, 2000 and rules there under as applicable and the amended provisions pertaining to electronic records in various statutes as amended by the Information Technology Act, 2000. This electronic record is generated by a computer system and does not require any physical or digital signatures.
- c) This document is published in accordance with the provisions of Rule 3 (1) of the Information Technology (Intermediaries guidelines) Rules, 2011 that require publishing the rules and regulations,

privacy policy and Terms of Use for access or usage of Gyandhan.com

- d) This website is owned and operated by the Company.

3. SCOPE AND ACCEPTANCE OF THIS PRIVACY POLICY

- a) This Policy applies to the personal data that we collect about you for the purposes of providing you with our services.
- b) By using 'GyanDhan' or by giving us your personal data, you accept the practices described in this Policy. If you do not agree to this Privacy Policy, please do not use this website or the mobile application or give us any personal data.
- c) We reserve the right to change this Policy without prior notice. We encourage you to regularly review this policy to ensure that you are aware of any changes and how your personal data may be used.

4. DATA COLLECTED BY US

We may collect data about you from a variety of sources, including through:

- a) Online and electronic interactions with us, including via the website, mobile applications, text messaging programs or through our pages on third party social networks.
- b) Your interaction with online targeted content (such as advertisements) that we or service providers on our behalf provide to you via third party websites and/or applications.

4.1 DATA THAT YOU PROVIDE US DIRECTLY

This is data that you provide us with your consent for a specified purpose including:

- a) Personal contact information, including any information allowing us to contact you in person (e.g. name, home or (e) mail address and phone number and content);
- b) Demographic information, including date of birth, age, gender, location
- c) Payment information, including any information used to make purchases (e.g. credit card number, expiration date, billing address)

- d) Account login information including any information that is required for you to establish a user account with us. (e.g. login ID/email, user name, password and security question/answer);
- e) Consumer feedback, including information that you share with us about your experience in using our services (e.g. your comments and suggestions, testimonials and other feedback)

4.2 DATA WE COLLECT WHEN YOU VISIT OUR WEBSITE

We use cookies and other tracking technology which collect certain kinds of information when you interact with the website. We use cookies that store your preferences and give us data about your browsing behaviour, such as the pages you visited on the website, the amount of time you spend on the website etc. This information helps us understand the interests of our customers and also helps us improve our offerings. We also collect and store personal information provided by you or information from the device you are using to access information which can help us provide a better experience including:

- a.) To provide seamless execution of services opted for you;
- b.) To allow you to receive superior customer service;
- c.) To communicate information to you on a timely basis; and
- d.) To provide you a tailored suite of services meeting your requirements

5. DIVULGING/SHARING OF PERSONAL INFORMATION

- a) We may share your personal information with other corporate entities and affiliates to help detect and prevent identity theft, fraud and other potentially illegal acts; correlate related or multiple accounts to prevent abuse of our services; and to facilitate joint or co-branded services, where such services are provided by more than one corporate entity.
- b) We may disclose personal information if required to do so by law or if we in good faith believe that such disclosure is reasonably

necessary to respond to subpoenas, court-orders, or other legal processes. We may also disclose your personal information to law enforcement offices, third party rights owners, or other third parties if we believe that such disclosure is reasonably necessary to enforce the 'Terms of Use' or Policy; respond to claims that an advertisement, posting or other content violates the rights of a third party; or protect the rights, property or personal safety of its users, or the general public.

- c) We and our affiliates may share / sell some or all of the your personal information with other business entities in the event that we merge or are acquired by such

business entity, or in the event of re-organization, amalgamation, or restructuring of the our business. Such business entity or new entity will continue to be bound be the Terms and Policy, as may be amended from time to time.

6. USE OF PERSONAL INFORMATION

We and our affiliated partners may use the personal information submitted by you to contact you in relation to the services offered.

This shall override any calling preferences, which you may have registered in the NDNC.

7. SECURITY

Transactions done on the website are secure and protected. Any information entered by the User when transacting on the Website is encrypted to protect the User against unintentional disclosure to third parties. The User's credit and debit card information is not received, stored by or retained by the Company / Website in any manner. This information is supplied by the User directly to the relevant payment gateway which is authorized to handle the information provided, and is compliant with the regulations and requirements of various banks and institutions and payment franchisees that it is associated with.

8. THIRD PARTY ADVERTISEMENTS / PROMOTIONS

We use third-party advertising companies to serve ads to the users of the website.

These companies may use information relating to the User's visits to the GyanDhan and other websites in order to provide customised advertisements to the User. Furthermore, the Website may contain links to other websites that may collect personally identifiable information about the User. The Company/Website is not responsible for the privacy practices or the content of any of the aforementioned linked websites, and the User expressly acknowledges the same and agrees that any and all risks associated will be borne entirely by the User.

9. GRIEVANCE OFFICER

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below:

Jainesh Sinha

Email: jainesh.sinha@gyandhan.com

Mobile: +91-7739005465

10. DATA SECURITY & RETENTION

10.1 DATA SECURITY

In order to keep your personal data secure, we have implemented a number of security measures including:

- a) We store your data in secure operating environments accessible only to our employees, agents and affiliates on a need to know basis.
- b) We use 256-bit encryption to provide protection for sensitive financial information, such as credit card information sent over the Internet.
- c) Prior authentication for account access - We require our registered users to verify their identity (e.g. login ID and password) before they can access or make changes to their account. This is aimed to prevent unauthorized accesses.
- c) Please note that these protections do not apply to personal data you choose to share in public areas such as on community websites.

10.2 RETENTION

- a) We will only retain your personal data for as long as it is necessary for the stated purpose, taking into account also our need to answer queries or resolve problems, provide improved and new services, and comply with legal requirements under applicable laws. This means that we may retain your personal data for a reasonable

period after your last interaction with us. When the personal data that we collect is no longer required in this way, we destroy or delete it in a secure manner.

11. APPLICABLE LAWS & DISPUTE RESOLUTION

Any controversy or claim arising out of or relating to this policy shall be decided by Arbitration in accordance with laws of India. The Arbitral Tribunal shall consist of one arbitrator who will be appointed by the Company. Any such controversy or claim shall be arbitrated on an individual basis, and shall not be consolidated in any arbitration with any claim or controversy of any other party. Any other dispute or disagreement of a legal nature will also be decided in accordance with the laws of India, and the Courts at New Delhi shall have exclusive jurisdiction in all such cases.
