PRIVACY POLICY

Effective Date: Immediate (From the date on which the updated Policy is uploaded on the App from time to time.)

Lighthouse Learning Private Limited is a Private Limited Company, registered under the Companies Act, 2013. "**The Company/We/Us**", is engaged in providing parenting solutions services as described in the <u>Terms of Use</u> ("**Services**") through its web/mobile application branded under the name 'SuperParent' or any other name as may be opted by the Company from time to time ("**Platform/Application**").

Any person who accesses or uses the Application, including but not limited to parents, children, health practitioners or any other third-party is regulated and governed by the terms of this Privacy Policy. Any user of the Application, shall be referred to as a "**User**"/**You/Yours**".

You acknowledge and agree that You have read and understood the terms of this privacy policy and are providing a free, informed voluntary consent to the Privacy Policy, after understanding in full and agreeing to the specific purpose for which Your data may be collected. You understand and agree that You have the option to separately consent, in the event, any sensitive data that is not covered by this Privacy Policy is collected by Us.

You may withdraw Your consent from this Privacy Policy, at any time provided that the decision to not provide consent / withdrawal of the consent once given is intimated to us in writing at developer@lighthouse-learning.com. In case you withdraw your consent, we reserve the right to withdraw some or all of our Services.

In the pursuance of our legal commitments, we have drafted and displayed this Privacy Policy and You agree that any information You share with us, is only after voluntarily consenting to this Privacy Policy.

If You do not agree with this Privacy Policy, then please do not access or use the Application.

This Privacy Policy governs the privacy practices adopted and implemented by the Company.

The Privacy Policy and the Terms of Use, as displayed on the Application, are to be read together and constitute a legally binding agreement between You and the Company.

What Personal Data May Be Collected

In the course of providing Services, the Company may have to collect, receive, store, possess, deal, handle or use certain Personal Information and Sensitive Personal Information (as defined below) from You. This information would, *inter alia*, include the following:

- 1. **Personal Details:** The Company may collect personal details including but not limited to your name, age, and contact details, name, date of birth and age of your child, your professional details.
- 2. **Health-related information:** The Company may collect Your medical information such as medical reports and/or information regarding Your physical attributes including but not limited to height, weight and general health condition including mental health details such as such as prominent feelings and emotional state.
- 3. **Information to provide the Services:** The Company may collect information regarding the queries You may have or the solutions You require, in order to deliver You seamless Services.
- 4. **Other information:** Some information such as Your internet protocol address, browser information and search history may be automatically collected.

You agree and voluntarily consent to provide accurate and error-free Personal Information. We shall not be liable for any errors or incorrectness in the Personal Information provided by You or any direct or indirect consequences arising from such incorrect Personal Information. If we find out, either on our own or through any other means that You have provided false Personal Information, we shall be at liberty to restrict Your access to the Application and our Services.

Please note that We collect the Personal Information solely for the purposes outlined under this Privacy Policy.

How does the Company collect the Personal Information

Some of the ways in which we collect your Personal Information are:

- a) <u>Personal Information provided to the Company</u>
 You willingly consent to provide the Company Your Personal Information on the Application.
- b) <u>Personal Information collected automatically</u>
 Some data such as Your browser type, internet protocol address used, Your usage patterns may be automatically collected by the Company using cookies. Cookies are tiny

pieces of information which an application sends to Your computer. Cookies help us personalize your experience. You can change Your browser settings and choose to disable sharing of information through cookies. Sometimes, tracking pixels including but not limited to browser HTML pixels may be used to collect information about user behaviour on the Platform. Pixels are tiny units which measure the digital images and graphics You see on an application. You agree that Cookies and Pixels are used to improve Your experience as an end-user and consent to the use of the same.

c) Personal Information shared through the usage of the Services: You willingly consent to and provide certain Personal Information in the course of accessing or using the Services/Application. Such Personal Information may include but not be limited to Your preferences, interactions with other users and information regarding Your health.

How is the Personal Information Collected being used?

The Company may use the data collected from You for many purposes including:

- Verification of Your identity: Your identity may be verified by using the contact details collected. You hereby give your consent that for the Company to run the Application smoothly and comply with its legal and other obligations, such verification is important.
- To Provide You Services smoothly and effectively.
- In order to contact You and communicate with You.
- To Enable a Customized experience for You on the platform: The Company makes use of the Personal Information collected to personalize Your experience and provide You a better and more efficient Service.
- To improve the Platform's design and style.
- To develop new products, features, services and functionality.
- To inform about ongoing and upcoming offers and promotions.

You agree and give Your informed consent that the aforementioned purposes are valid and that Your Personal Information can be collected for these purposes or such purposes as the Company may deem fit for the provision of Services.

How long will the Personal Information collected be retained by the Company?

In case You discontinue the use of the Application or withdraw Your consent with respect to any information provided to Us the Company may choose to retain Your Personal Information to fulfill the purposes as outlined under this Privacy Policy and the terms and conditions or as mandated by law.

If you have elected to receive marketing/promotional communications from us, we retain information about your marketing preferences until you opt out of receiving these communications and in accordance with our policies. We provide the Users with the opportunity to opt-out of receiving promotional/ marketing-related communications from Us after setting up an account on the Platform. If a User wants to remove his/her contact information from the Platform, please send us an email at <u>developer@lighthouse-learning.com</u>.

Processing of the Personal Information collected by the Platform

All Personal Information that is shared by you on the Application may be processed by the Company or any third-party on behalf of the Company which may be based within or outside India, solely for the purposes of providing You Services. You can choose at any point of time to withdraw your consent for the processing of the Personal Information shared by You on the Application, by sending an email to <u>developer@lighthouse-learning.com</u>.

We use some of the third party service providers (currently as listed below and we reserve out right to modify them from time to time based on the requirement) for collecting, receiving, storing, processing, dealing with, handling, analyzing or using certain data, and their respective Privacy Policies are provided herein below:

Zoho - <u>https://www.zoho.com/privacy.html</u> Gupshup - <u>https://www.gupshup.io/privacy-policy</u> Google Play Services - <u>https://policies.google.com/privacy</u> Google Analytics for Firebase - <u>https://firebase.google.com/policies/analytics</u> Firebase Crashlytics - <u>https://firebase.google.com/support/privacy/</u>

However, We do not control what and how these and other third parties collect personal data or how they use it. We do not control and are not responsible for the privacy and business practices of these third parties.

Whom does the Company share Your Personal Information with?

The Company may share Your Personal Information, with:

- a) Group entities of the Company
- b) **Employees/Consultants/Vendors**: The Company may share your Personal Information with its employees consultants and third-party vendors for the provision of Services.

- c) **Other Users:** The Company may enable the sharing of Your Personal Information with other Users to enable You get a better and improved experience of Our Services.
- d) **Counsellors/experts:** The Company may share Your Personal Information with the counsellors/experts available on the Platform to provide counselling or expert help to you.
- e) **Compliance with law**: The Company can share Your Personal Information when compelled by a government agency, law, regulation, a court or other legal process:
 - To enforce our Terms of Use or any other agreements we may have with you;
 - In order to investigate, respond to or resolve problems or inquiries; or
 - defend our interests and when you otherwise consent.

"Sensitive Personal Information" includes but is not limited to health data, financial data and sexual orientation and any other form of information categorized as "Sensitive Personal Data or Information" under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

<u>Rights of the User</u>

You shall have the following rights under this Privacy Policy:

- a) Right to Request access to Your Personal Information: You may, at any point of time, after You have consented to the collection of Your Personal Information, request the access to the same, by sending an email to <u>developer@lighthouse-learning.com</u>.
- b) Right to Request correction of Your Personal Information: You may, during anytime, after You have consented to the collection of Your Personal Information, request us to correct or update the same, by sending an email to <u>developer@lighthouse-learning.com</u>. You shall be solely responsible for the failure to get Your Personal Information corrected or updated.
- c) You may request us to delete Your Personal Information (Right to be forgotten) by sending us an e-mail on <u>developer@lighthouse-learning.com</u>.
- d) You may request us to restrict the processing of Your Personal Information or raise objections related to the processing of Your Personal Information.

Please note that We shall practicably adhere to any request raised, within a minimum of 30 working days of receiving such request. We may, subject to applicable laws, charge a

fee for adhering to Your request. We reserve Our right to refuse with reasons in writing, any request so raised by You.

How is your Personal Information protected by us?

We employ the following measures to protect Your Personal Information:

- a. To protect Your Personal Information, various physical and technical security measures are put in place by us.
- b. this Privacy Policy is published in accordance with the provisions of the Indian Information Technology Act, 2000 and the rules made thereunder, specifically, The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal data or information) Rules, 2011.
- c. The Company enters into a confidentiality agreement with a third-party prior to sharing your Personal Information, to prevent unauthorized disclosure of Your Personal Information.

You acknowledge and agree, that an absolute protection against loss of Personal Information cannot possibly be guaranteed by the Company. Owing to the susceptibility to unpredicted security issues that come along with internet, an absolute guarantee to protect Your Personal Information cannot be given but we shall make reasonable efforts to protect Your Personal Information. In the event, Your Personal Information is unauthorizedly disclosed on account of improper use or disclosure, unauthorized modification and unlawful destruction, or accidental loss of Personal Information, or any security breach which is beyond the reasonable control of the Company, the Company shall not be liable. You disclaim the right to raise any claim against the Company in such circumstances.

No Protection from links to Third Party Websites/Applications

Links to third-party websites/applications may be present as part of the content on the Application. Our terms of use and privacy policy would not be applicable as and when you are redirected to the third-party website/application on clicking the link. You must read the privacy policy of such third-party application before You share any Personal Information on such website/application. In case of loss of Personal Information through the third-party website/application, We shall not be responsible.

Children's Information

Please note that minors/children are not by themselves eligible to register and/or use the Platform. If You are below the age of 18 ("**Child User**") then as per applicable law, Your use of the

Platform must be with the consent of/enabled by, and under the supervision of, a parent or legal guardian ("**Parent**"). If you are a Parent, by allowing Your child to access/use the Platform, You are deemed to have accepted this Privacy Policy so as to form a legally binding and enforceable contract between you and the Company.

It is the parents' sole responsibility to not permit their children to access and use the Platform through their own account. Any child opening an account by providing false or fake information regarding their age shall not be the Platform's liability. All responsibility of monitoring and supervising the access and usage of the Platform by a Child User is on the parents and the Platform shall not be held liable for the same.

Reporting of Data Breach

In the event, we come to know that there is any data breach, We will take endeavors to inform the relevant authorities of such data breach, if required by applicable law. We will do the intimation to the relevant authorities within the time prescribed by law or within a reasonable time of occurrence of the incident or of being informed of such incident having occurred, as the case may be. If requested, we will also provide the relevant authorities with such assistance as well as other information pertaining to the breach as may be requested by them. Please note that data breaches are not restricted to Personal Information but also covers non-Personal Information within its ambit.

Terms and Conditions of Service May Be Modified

This Privacy Policy may at any time be modified by us without issuing any prior notification to you. The latest updated version of the Privacy Policy can be accessed at any time on the Application. You are advised to regularly review the Privacy Policy. If You do not agree with the modifications, You may choose to discontinue using Our Services and the Platform/Application. However, Your continued usage of the Application/Platform shall be deemed consent on Your part to the changes made in the Privacy Policy.

Governing Law and Jurisdiction

This Privacy Policy shall be construed in accordance with the applicable laws of India. The Courts at Mumbai shall have exclusive jurisdiction in any proceedings arising out of this Privacy Policy.

Redressal of Grievances

If you have any queries regarding Our Application/Platform or find any discrepancies in relation to the collection, possession, storing, handling, transferring or processing of Personal Information

under this Privacy Policy, you may contact us at: <u>developer@lighthouse-learning.com</u> and for the escalation of any grievances, write to the Grievance Officer, the details of which are provided below:

Name – Mr. Rakesh Bhat Email – <u>rakesh.bhat@lighthouse-learning.com</u>, with 'cc' to <u>legal@lighthouse-learning.com</u>. Phone – 9819283336 Address - Windsor, 801, Off, Manipada Rd, Kalina, Santacruz East, Mumbai, Maharashtra 400098.

We shall attempt to redress Your queries and concerns within a reasonable period of time or within a period as mandated by law.