

# PRIVACY POLICY FOR SIGNBOARD

1st May 2020

## 1 IN GENERAL

Ajay Jyotheendar Nayar, residing at address 52 Eagler Ridge Gated Layout, Bangalore, India ("Company", "we" or "us"), provides the platform Signboard Tuitions ("Service") through the address: <https://signboardtuitions.com/> ("Website").

This document ("Privacy Policy") is meant to help you understand what information we collect, why we collect it and your rights. Following the Information Technology Act (2000) ("IT Act") Section 43A and Section 72A, which give a right to compensation for improper disclosure of personal information, we are responsible as data controllers for the processing of personal data when we determine the purpose and means of such data. Information that directly or indirectly can be connected to an identifiable living natural person is defined herein as "Personal data".

## 2 WHAT PERSONAL DATA WE PROCESS

We will process the following Personal data, as and when the need arises, when you use the Service,:

1. Name (first name and/or family name);
2. email address;
3. school, group, class or organization;
4. subject(s);
5. IP address; and
6. telephone number
7. answers/texts connected to exams

The following Personal data will be collected automatically when you use the Service;

1. Information about your use of the Service;
2. contents that you publish, upload or create by using the Service; and
3. technical data, including the URL you are accessing the Website from, IP address, unique device ID, information about network- and computer capacity, type of browser, language and information about identification and OS.

Please note that we cannot provide the Service to you unless you provide us with the abovementioned Personal data. The processing of your Personal data is necessary for us to provide the Service to you and to maintain our contractual relation.

### **3 FOR WHAT REASON WE PROCESS PERSONAL DATA**

We process your Personal data for the following purposes:

1. To administer your account, provide and make the Service accessible and personalized to you and to improve your user experience and to further make sure we deliver on our obligations to you as a user;
2. to send you notices and messages through email or in other ways;
3. to inform you on updates of the Service, the Privacy policy or other contractual agreements;
4. to improve and develop the Service or new services, and to analyze your use of the Service;
5. Maintain security in the technical functions of the Service and prevent misuse of the Service;
6. to fulfill any contractual agreements, including protecting our rights, our property and security; and
7. to fulfil requirements in mandatory applicable law.

### **4 LEGAL GROUNDS**

We process Personal data based on the following legal grounds:

1. Fulfilment of contract. We process your Personal data to provide you with the Service in accordance with the agreement entered into between you and us, or to take necessary steps based on the requests of a user prior to entering into an agreement regarding the Service.
2. Legitimate Interest. The processing of your Personal data can also be based on our legitimate interest to operate, administrate, maintain and improve our Website and our Services to you, including responding to requests from you. This also includes sending information connected to our Services to you, based on our customer relation with you. You have the right to object to the processing of Personal data based on a legitimate interest. If we receive your objection, we will inform you on the basis on which we have balanced our legitimate interest against yours as an individual.

### **5 DISCLOSURE OF PERSONAL DATA**

The website, [www.signboardtuitions](http://www.signboardtuitions) is built on a technical platform supplied by a well known company called WIX.

We will not share, sell or in any other way disclose your Personal data to a third party, other than in the situations listed below:

- We may employ service providers to perform tasks on our behalf in order to provide the Service to you. Such third parties do not have any right to use your Personal data for other reasons than what is necessary to perform the tasks requested by us. You can acquire further information regarding disclosures by contacting us at [info@signboardtuitions.com](mailto:info@signboardtuitions.com).

## **6 LEGAL REQUESTS AND PREVENTING HARM**

We may be required to disclose Personal data in response to a lawful request by a public authority. We reserve the right to access, read, retain, and disclose Personal data as necessary to comply with any law or court order; to enforce or apply our terms of use and other agreements; or to protect the rights, property or safety of Signboard, users of the Service, or others.

## **7 COOKIES, BEACONS AND OTHER TECHNOLOGY**

We collect information using technology like cookies, beacons and local storage (e.g. on your web browser or your device). For information on how we use this type of technology, please refer to our cookie policy.

## **8 DATA RETENTION**

When you are a registered user (student/parent), we retain your Personal data for 6 months (180 days) counting from the date of registration. After that, your account and your Personal data will be deleted. Personal data may still be stored in back up files for 30 days after the deletion, whereafter it is permanently erased and cannot be re-created.

## **9 CHILDREN**

The Services are not directed to persons under the age of thirteen (13). If you are a parent or guardian of a person under the age of thirteen (13) and you become aware of that the child has provided Personal data to us without your consent, please contact [info@signboardtuitions.com](mailto:info@signboardtuitions.com) to exercise your access, rectification, erasure, limiting of processing and objection rights.

## **10 YOUR RIGHTS**

The rights in this section refer to the Personal data processed by Company as data controller. You have an absolute right to object to the processing of your personal data for direct marketing. You also have the right to withdraw your prior given consent, if applicable. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal, and we may continue processing your personal data based on other legal grounds, except for direct marketing. You have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to you free of charge once (1) every calendar year. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs. If the processing is based on the legal grounds consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controllers.

## **11 CONTACT INFORMATION**

To enforce your rights as described in section 10, or if you have any questions about our Personal data processing, please contact us by sending an email to [info@signboardtuitions.com](mailto:info@signboardtuitions.com). To ensure quick handling of your request, please state your full name and the e-mail address that your account is connected to.

## **12 CHANGE OF CONTROL**

If there is a change of control in our business, we may transfer your Personal data to the new owners for them to continue to provide the Services.

## **13 CHANGES TO THIS PRIVACY POLICY**

Signboard reserves the right to, at its own discretion, make changes to this Privacy policy. If we do so, we will inform you on the Website, or by email if changes are extensive. If the changes require your consent, we will give you further notice about this in a way that is suitable under the circumstances and ask for your consent.

\*\*\*\*\*