

## **PRIVACY POLICY**

### **1. Introduction**

We (collectively referred to as “Learnnet Group” or “we” or “us”) are committed to respect your privacy and recognize the need for appropriate protection of the personal information you share with us. This privacy policy describes how your personal data is collected, used, and processed during your visit to our physical centres, offices and websites, <https://www.Learnetskills.com> (including mobile application, if any) when signing up for interest in Learnnet Group’s services through its physical outreach centres and above websites (collectively referred to as “Learnnet Touchpoints”). This privacy policy applies to those who visit, use or register with /on the Learnnet Touchpoints (including the workers, students and teachers) and the representatives of the recruiters seeking to hire or engage workers for the Learnnet Touchpoints (“Users” or “you” or “your”), as the case may be. By signing up for or accessing the Learnnet Touchpoints or using our services, you expressly give us your consent to use and disclose your personal information in accordance with this policy. If you do not agree with the terms of this policy, please do not use our services or access the Learnnet Touchpoints.

### **2. Collection of Personal Information during visit to Learnnet Touchpoints**

**‘Personal Information’** means and include all information concerning the User and which is capable of identifying such User such as the name, address, e-mail address, phone number, location of the concerned User or the User behaviour. The categories of Personal Information which we collect and the ways of collecting such information have been provided below:

- (i) **User-generated content:** When a User solely visit our Learnnet Touchpoints for information purposes, i.e. if the User does not fill in our application form or registers on our Learnnet Touchpoints or otherwise provide information to us, we only collect the Personal Information that the browser of User transmits to our server. When a User views / accesses / visits our Learnnet Touchpoints, we collect the following data, which are technically required to display our website and to ensure stability and security: IP address, date and time of the request, time zone difference to Greenwich Mean Time (GMT), content of the request (specific page), access status/HTTP status code, data volume transmitted, website where the request originated, browser, operating system and user interface, browser language and version.

- (ii) **User registration:** When a User intends to access / join our Learnet Touchpoints, we ask the User to provide certain information about the User. If such User is a worker we ask information such as name, age, gender, educational qualification, work experience, past remuneration or salary, contact details and location and in case if the User is an employer or representative of the employer we ask such User details such as name, employer's identification number (CIN, GSTIN etc.), address, service industry, authorized signatory, name and contacts details (phone number and email address) of the representative of the employers. In case the User is a student, we ask information about name, age, gender, education level/qualification, work experience, if any, contact details and location.
- (iii) **E-communication:** When a User contact us via WhatsApp or e-mail or through other modes of e-communication, we store the data that a User submits, in order to respond to User's enquiry. Communication of these details is voluntary and with the consent of the User. Where these are details concerning communication channels (such as an e-mail address or telephone number), a User also consents to being contacted by us via these channels to respond to User's enquiry. A User can revoke his consent for the future at any time.
- (iv) **Information related to third party integration:** We may collect information about the User from third parties to improve our service, or for security and support reasons. If you choose to use some of the optional integrations, then we may collect certain information about the User available on these third-party platforms, including but not limited to Facebook, Twitter, Instapage, Survey Gizmo, LinkedIn, Google etc.
- (v) **Other information:** We may request or receive other information such as feedback, questions, comments, suggestions, or ideas to provide you with other benefits or to improve our services.

### 3. Purpose of Collection and usage of information provided

We will only use User's Personal Information in a fair and reasonable manner, and where we have a lawful reason to do so. We will use the User's information to understand what type of students, teachers, workers and recruiters/employers are interested in our services being offered through the Learnet Touchpoints so that we can better design our services, to contact the User for further market research and to provide it to third party such as bank, financial institutions, insurance companies for verification purposes under a valid contract. We may process your Personal Information for the following purposes:

- (i) providing our services to Users including to send you information about the courses offered, job alerts etc.;
- (ii) to give User relevant search results and recommended jobs and/or candidates (as the case maybe);
- (iii) To give User relevant information regarding learning solutions recommended;
- (iv) To give User information regarding educational content and updates;
- (v) facilitate communication as part of the job search, application and interview process;
- (vi) match the profile of the workers with the relevant employers;
- (vii) protecting our Users and providing Users with customer support;
- (vii) give User relevant search results and job recommendations / candidates;
- (ix) to communicate with the User;
- (x) using information collected from cookies and other technologies, to improve User's experience and the overall quality of our services;
- (xi) preventing, detecting, investigating and taking action against crimes, any other illegal activities, suspected fraud in any jurisdiction.

#### 4. Information Sharing and Disclosure

Your Personal Information is collected and processed by Learnet only for the purposes for which it is collected. Your Personal Information may be processed by Learnet, to the extent that such processing is necessary to allow Learnet to comply with a legal obligation. An example of this would be if Learnet is required to disclose your Personal Information to respond to a court order or if Learnet is required to retain specific records for a fixed period to comply with requirements under any applicable law or internal policies.

Learnet does not disclose, transfer or share Personal Information of the User with others except with:

- (i) our affiliates and group companies to the extent required for our internal business and/or administrative purposes and/or general corporate operations and for provision of services;
- (ii) potential recruiters/employers if we determine that the worker's biodata matches a particular job description/ vacancy available with such recruiter/employer;
- (iii) third party service providers (including the persons providing third party verification services) and marketing partners (such as Authbridge, Amazon web services (AWS), Google Analytics, Looker, Hubspot) that Pravasi engages to:
  - a) provide services through the Learnnet Touchpoints on Learnnet's behalf;
  - b) maintain the Learnnet Touchpoints and mailing lists including undertaking technical and content-related tasks in the provision of our website; or
  - c) communicate with User on Learnnet's behalf about offers relating to its products and/or services. We will take reasonable steps to ensure that these third-party service providers are obligated to protect your Personal Information and are also subject to appropriate confidentiality/non-disclosure obligations and they comply with the applicable provisions of the data protection laws; and
- (iv) third party service providers such as banks, financial institutions, insurance companies etc. approaching us for verification of the records of a User under a valid contract.

Please note that Personal Information of a User may be processed outside the country where the User is located. By using and providing information to us, you agree and consent to the disclosure, transfer, storage, and processing of your Personal Information in other countries. While our primary motive is to protect the disclosure of your personal information (except in accordance with the provisions of this policy), you may note that countries where your information may be stored, may not have data protection laws similar to the countries where you are located.

## 5. Third Party Content

Please be aware that the websites as part of the Learnnet Touchpoints sometimes contains links to other sites that are not governed by this privacy policy. Users may be directed to

third-party sites for more information, such as advertisers, blogs, content sponsorships, vendor services, social networks, etc.

Learnet makes no representations or warranties regarding how your information is stored or used on third-party servers. We recommend that you review the applicable privacy statements and policies of each third-party site linked from the Learnet Touchpoints to determine their use of your Personal Information.

## 6. Rights of User

A User has the following rights regarding our handling of its Personal Information or data, subject to the limitation as per the applicable data protection laws:

### (i) Access request

If you wish to make (a) an access request for access to a copy of the Personal Information which we hold about you or information about the ways in which we use or disclose your Personal Information, or (b) a correction request to correct or update any of your Personal Information which we hold you, you may submit its request in writing or via email to our data protection officer.

### (ii) Accuracy of Personal Information

We generally rely on Personal Information provided by you (or your authorised representative). Learnet provides you the ability to keep your Personal Information accurate and up-to-date. In order to ensure that your Personal Information is current, complete and accurate, please update us if there are changes to your Personal Information by informing our data protection officer in writing or via email.

### (iii) Revocation of consent

You can revoke your consent to the processing of its Personal Information at any time with effect for the future. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose Personal Information where such collection, use and disclose without consent is permitted or required under applicable laws.

## 8. Retention of Personal Information

The Personal Information of the User will not be retained by Learnnet any longer than it is necessary for the purposes for which the Personal Information is processed and/or in accordance with legal, regulatory, contractual or statutory obligations as applicable or Learnnet's internal policies and procedures.

At the expiry of such periods, the Personal Information of the User will be deleted or archived in compliance with applicable laws.

## 9. Confidentiality

The security and confidentiality of your Personal Information is important to us and we have invested significant resources to protect the safekeeping and confidentiality of your Personal Information. We have taken extensive technical safety measures in our company to protect your Personal Information from accidental or intentional manipulation, loss, destruction or from access by unauthorised parties. Our security measures are regularly reviewed and updated to reflect technological developments. Regardless of where your Personal Information is transferred or stored, we take all steps reasonably necessary to ensure that Personal Information is kept secure, however, please understand that no transmission of data over the internet or any other public network can be guaranteed to be 100% (one hundred percent) secure.

We seek to ensure compliance with the requirements of the applicable data protection laws to ensure the protection and preservation of the User's privacy and Personal Information. We have physical, electronic, and procedural safeguards that comply with the laws prevalent in specific jurisdiction to protect User's Personal Information. By accepting the terms of this privacy policy, you agree that the standards and practices being implemented by us, are reasonable and sufficient for the protection of your Personal Information.

We will contact you regarding any breach of the security, confidentiality, or integrity of your unencrypted electronically stored Personal Information to you via email or conspicuous posting on our Learnnet Touchpoints in the most expedient time possible and without unreasonable delay, insofar as consistent with the legitimate needs of law enforcement and will undertake all measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

## 10. Changes to this privacy policy

Learnet reserves the right to update, change or modify this privacy policy at any time. The privacy policy shall come to effect from the date of publication of such update, change or modification.

## 11. Data Protection Officer/ Grievance Officer

In case you have any complaints and/or grievances in relation to the processing of your Personal Information you can contact the grievance officer via e-mail to: [shailesh.karve@schoolnetindia.com](mailto:shailesh.karve@schoolnetindia.com).

## 12. Cookies and website analysis / marketing

“Cookies” are text-only pieces of information that a website transfers to User’s hard drive or other website-browsing equipment for record-keeping purposes. Cookies allow the Learnet Touchpoints to remember important information that will make User’s use of the Learnet Touchpoints more convenient. Learnet uses cookies, tags and other technologies when a User uses the Learnet Touchpoints. Cookies also help us to keep User’s account safe. By continuing to visit or use our Learnet Touchpoints, you are agreeing to the use of cookies and similar technologies for the purposes we describe in this privacy policy. If you prefer not to receive cookies or web beacons, then you should stop using our Learnet Touchpoints, or consult your browsing and third party cookie settings. We use cookies and other technologies for analysing and optimising our websites as well as for marketing purposes, which are described below.

Cookies helps us to improve our offers and make them more user-friendly. In addition, it enables us to display ads based on the User’s interests and measure the effectiveness of our advertising efforts. The information collected in the process is not used to identify individual Users personally. Anonymous or at most pseudonymous data is collected. We use analytics data in concert with data about our online ads that have been shown using the Google Display Network, Facebook for advertisers, or other online advertising networks. By doing so, we can understand how anonymous users interacted with our website after seeing our ads.

### 13. Disclaimer

In case any Personal Information is shared by you with us, which is not requested by us during registration, (whether mandatorily or optionally), we will not be liable for any information security breach or disclosure in relation to such information. If you have any questions regarding this privacy policy or the protection of your Personal Information, please contact the grievance officer.