

PRIVACY POLICY

INTRODUCTION

Your privacy is important to us and Aditya Birla Education Academy (ABEA) an initiative of Aditya Birla Education Trust ('ABEA' or 'Trust') is committed to protect the same. We have adopted the following Privacy Policy, which is applicable to all personally identifiable information ('PII') that you provide to ABEA through <https://www.abea.in/> (the "Website"). You must also review and accept our Website Terms of Use as it is also applicable and govern your use of the Website.

This Privacy Policy does not apply to any PII that you may provide to third parties (including the Aditya Birla Group Entities and other initiatives of Aditya Birla Education Trust), such as through other sites linked to the Website.

Please be aware that if you choose to visit such third-party sites, you should contact such third parties directly to determine their respective privacy policies because that third party's privacy policy and not our Website's will govern your activities and any PII you disclose while visiting the third-party site.

This privacy policy explains the purposes for which ABEA processes your PII through its Website.

PURPOSE OF COLLECTION AND PROCESSING

We may collect your title, name, gender, date of birth, email address, mobile number, location and other personally identifiable information that you submit on the Website ("Personally Identifiable Information") to provide you:

- a. to protect our vital interest
- b. a smooth, efficient and customized experience;
- c. to enable ABEA to reach out to you to provide services;
- d. to enable us to improve products & services,
- e. to process your requests (such as replying to your queries or complaints);
- f. to drive marketing campaign, promotional communications for which you have consented;

The PII collected for the aforesaid purposes will not be posted in areas of the Website viewable by the public or users of the site. We are committed to protecting your privacy and ensuring that your PII is handled in a safe and responsible manner. This Privacy Policy explains how we collect, use, disclose, and safeguard your information in accordance with the Digital Personal Data Protection Act (DPDP Act) and other applicable laws in India when you visit our website and use our services. Aditya Birla Education Trust is the Data Fiduciary as per the Digital Personal Data Protection Act, 2023.

HOW WE COLLECT YOUR PERSONAL DATA:

We collect Data in the following ways:

- A. PII is given to us by you; and
- B. PII is collected automatically pursuant to your visit to the Website.

A. DATA SHARED BY YOU

ABEA may collect your PII in several ways from your use of this Website, for instance:

- a. when you contact us through the Website (through any form vis. e-mail address, hyperlink or social media address posted therein);
- b. when you register with us.
- c. when you elect to receive any communications (including any newsletter, promotional offers) from us and
- d. information as may be voluntarily provided by you

B. DATA THAT IS COLLECTED AUTOMATICALLY

We automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation and includes your IP address and the way you use and interact with its content, namely:

- a. Our web servers or affiliates who provide analytics and performance enhancement services collect IP address, operating system details, browsing details, device details and language settings. This information is aggregated to measure the number of visits, average time spent on the site, pages viewed and similar information. ABEA uses this information to measure the site usage, improve content and to ensure safety and security, as well enhance performance of the Website.
- b. We may collect your PII automatically via Cookies, in line with the cookie settings on your browser. For more information about Cookies, please see the section below, titled “Cookies”.

USE OF COOKIES

This website uses cookies to enhance user experience, analyse site traffic, and serve personalized content. In accordance with the Digital Personal Data Protection Act, 2023, and the Information Technology Act, 2000, we only process personal data through cookies after obtaining your free, informed, and explicit consent except for essential cookies required for basic site functionality. You have the right to manage your cookie preferences at any time, including the ability to withdraw consent.

By continuing to use our site or accepting cookies, you agree to our collection and use of data as outlined in our Privacy and Cookie Policy, which includes details on the types of cookies we use, their purpose, data sharing practices, and duration.

We use cookies and similar tracking technologies (including session or local storage variables) to enhance your experience on our website and mobile applications. These may collect data such as IP addresses, browser types, access times, and user interactions to improve functionality and personalize content, including interest-based advertising. In compliance with the Digital Personal Data Protection Act, 2023 (DPDP Act), we seek your explicit consent for non-essential cookies, provide clear options to manage cookie preferences, and ensure that all data collected is processed lawfully, for specific purposes, and retained only as necessary.

You have the right to access, correct, or delete your personal data collected through cookies, and may withdraw consent at any time by adjusting your browser or app settings. For any concerns, our Grievance Officer may be contacted on the given abet.ithelpdesk@abet.co.in, this entire policy shall be periodically reviewed to reflect legal and technological updates.

THIRD PARTY LINKS

You may be linked to our website from our advertisers, network partners or any other third party. We hereby declare that we hold no liability or responsibility for the ‘Privacy Policies’ and ‘Terms & Conditions’ of these web sites. Please read their policies carefully before sharing any of your details.

TRANSFER OF PERSONALLY IDENTIFIABLE INFORMATION

The PII that we collect from you may be transferred to and stored at locations that may or not be in India. It may also be processed by staff operating outside the territory of India, who work for or are engaged by ABEA.

PARTNER

To enable us to provide you enhanced and secured user experience, we may enter into contract with various third party vendors from time to time. Such engagement may involve sharing of your PII. To the extent a third party has access to your PII, we will ask them to treat it at least as protectively as they treat personally identifiable information they obtain from their other authorized sources.

We do not market or sell your personal data to any third party.

DATA RETENTION POLICY

We will retain data for a reasonable time and/or as may be statutorily required to be maintained as per applicable law/ or arising out of legitimate purposes. We shall take reasonable steps to destroy or permanently de-identify PII that is no longer needed, including that processed by third party vendors engaged by ABEA from time to time.

CHANGING YOUR PERSONALLY IDENTIFIABLE INFORMATION

ABEA gives you the ability to edit your PII at any time, You may request corrections or updates to your information by contacting us at the given email ID abet.ithelpdesk@abet.co.in. We will, however, retain in our files and databases PII you have requested to remove in order to use it in some circumstances, such as to resolve disputes, troubleshoot problems, and enforce our Terms and Conditions of Use. Further, such prior PII is never completely removed from our databases due to technical and legal constraints, including stored "back up" systems. Therefore, you should not expect that all of your PII will be completely removed from our databases in response to your requests.

REGULATORY OBLIGATIONS

Due to the existing regulatory environment, we cannot ensure that all of your Personal Information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (without limiting the foregoing), we may be required to disclose your PII to the government, law enforcement agencies, etc.

CHILDREN'S POLICY

Our website is primarily intended for users who are 18 years or older. We do not knowingly collect personal information from children under the age of 18 without verifiable parental consent. If you believe that a child has provided us with personal information, please contact us immediately, and we will take steps to remove such information from our records. In case you discover that the personal information has been collected from a child, you may request its deletion.

DATA SECURITY

To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access. We are committed to protecting your PII in our custody and have taken reasonable steps to ensure appropriate physical, technical and managerial safeguards are in place to protect your Personal Data from unauthorized access, alteration, transmission and deletion. We use encryption at relevant points to protect your data. We have a process for regularly testing the effectiveness of our technical and organisational measures for ensuring the security of the processing.

DISCLAIMER

To protect your privacy, as stated above, we will take best efforts and adopt best Industry Standards Information Practice, however you understand that 100% security does not exist over internet. You are responsible for protecting your PII and you should not share your login credentials and/or leave your personal devices unattended while you are accessing the Website, etc. ABEA does not guarantee and you should not expect in the event of malware attack or negligence on your part that your Personal Information will remain private. If there is a data breach, we will notify affected users in accordance with the provisions of the DPDP Act. ABET is not liable for any unauthorized access that occurs due to user's own negligence or misuse of the platform/website.

YOUR CONSENT

By accepting this Privacy Policy and our Terms, you expressly consent to our use and disclosure of your Personal Information in the manner prescribed in this Privacy Policy. By accessing or using the website or by otherwise giving us your information, you confirm that you have the capacity to enter into a legally binding contract under Indian law, in particular, the Indian Contract Act, 1872, and have read, understood and agreed to the practices and policies outlined in this privacy policy and agree to be bound by the privacy policy.

In the event that you are a minor using the website, it is assumed that you have obtained the consent of your legal guardian or parents and such use is made available by your legal guardian or parents. we will not be responsible for any consequence that arises as a result of misuse of any kind of our platforms or any of our services or products that may occur by virtue of any person including a minor registering for the services/products provided. By using

the services, you warrant that all the data provided by you is accurate and complete and that student using the platforms has obtained the consent of parent/legal guardian (in case of minors).

RIGHTS UNDER APPLICABLE LAWS:

We are processing your personal data basis the consent you have provided by accepting this Privacy Policy. We acknowledge your right to access, rectification, erasure, restriction of the processing, data portability and object to the processing of your personal data. However, these rights are not absolute in nature and are subjected to contract, applicable legislation, record keeping requirement under applicable statutes, ongoing disputes or potential disputes ABEA may foresee. To exercise these rights with respect to your personal data you may contact abet.ithelpdesk@abet.co.in

In the event of any misconduct/fraud/cybercrime, etc. on your part, ABEA shall be at liberty to use your PII as evidence in the Court of law and shall also be entitled to carry out investigations/inquiries as it deems fit with the help of private agencies or authorities as it deems fit. By you consenting to this Notice, you agree to sharing of your PII for the aforesaid purposes and understand that exercise of your rights to that extent shall be restricted. Under the Prevailing DPDP act, 2023 You have the right to:

- Access, correct, or update your personal information.
- Request deletion of your personal information, subject to legal and operational limitations.
- Object to or restrict the processing of your data.
- Withdraw consent for marketing communications at any time.

To exercise these rights, please contact us at abet.ithelpdesk@abet.co.in

QUESTIONS AND GRIEVANCES/ RIGHT TO LODGE A COMPLAINT

In the event, you are of the view that your personal data is not processed in accordance with the purposes as disclosed in this Privacy Policy or if you have any query related to your privacy of information or in relation to your rights under applicable law, please feel free to contact us at: abet.ithelpdesk@abet.co.in

INTERNATIONAL DATA TRANSFERS

If you are accessing our website from outside India, your personal information may be transferred to, stored, and processed in India. We take appropriate measures to ensure that these transfers comply with the DPDP Act and your data is protected in accordance with the Privacy Policy

NOTIFICATION OF CHANGES

ABEA expressly reserves at its sole discretion the right to change this Privacy Policy periodically in the future without prior notice to the Users. User shall review our Privacy Policy regularly to be sure you are fully updated with our practices and procedures in this area.

GOVERNING LAW

The terms of this Privacy Policy shall be governed and construed in accordance with the laws of India. Any dispute regarding or arising out of this Privacy Policy shall be subject to the exclusive jurisdiction of the courts in Mumbai, Maharashtra, India

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Last updated on: [Date]