

## **Privacy Policy**

### **1. Purpose and Who We Are**

This Privacy Policy (“**Privacy Policy**”) sets forth policies and procedures in accordance to which information is collected and processed from visitors and users (hereinafter referred to as “**you**” or “**your**”) on our website located at bambinos.in, or the Bambinos mobile application, or Bambinos Learning Solutions Pvt. Ltd. (collectively, “**Bambinos Platform**”, “**Company**”, “**we**”, “**us**” and “**our**”), a private company established under the laws of India having its registered office at 677 1st Floor, Suite #253, 27th Main, 13th Cross, Sector - 1, HSR Layout, Karnataka – 560102. The term “**Services**” refers to any services offered by the Company whether on the Bambinos Platform or otherwise. Capitalized terms not defined in this Privacy Policy have the meaning as set forth in the Terms of Services, which can be found at [●].

### **2. Your Consent**

By accessing the Bambinos Platform, you agree and consent to the collection, transfer, use, storage, disclosure, and sharing of the Personal Information (as defined below) collected by us in accordance with the Privacy Policy. If you do not agree with the Terms, please do not use or access the Bambinos Platform.

### **3. Changes to Our Privacy Policy**

We occasionally review this Privacy Policy to make sure it complies with applicable law and conforms to changes in our business. We reserve the right to amend our security and data protection measures wherever required to take account of technological developments. In such cases, we will amend our data protection policy accordingly. Please review the current version of our Privacy Policy regularly to ensure that you are aware of its terms. Any change to this Privacy Policy will become effective when we post the revised Privacy Policy on the Site. Your continued use of our Services after an amendment to our Privacy Policy constitutes your acceptance to the revised or amended agreement.

### **4. Information We Collect**

When you interact with us through the Services, we may collect information that alone or in combination could be used to identify you (hereinafter referred to as “**Personal Data**” or “**Personal Information**”) and other information from you, as further described below:

**Personal Data That You Provide Through the Site:** We collect Personal Data from you when you voluntarily provide such information, such as when you contact us with inquiries or register for an account on the Site, to access the Services. We may collect the information from you in order to provide our Services, including but not limited to:

- Name or publicly posted name from a linked account;
- Email address;
- Phone number;
- Address, pincode or city and state you are located in;
- Credit card or other payment information;
- Your Child's first name;
- Your Child's age or birthday;
- Your Child's email address;
- Your Child's current education level, and interests;
- Video recordings of your Child during sessions;
- Your voluntarily provided profile picture or your picture linked to your account;
- Information voluntarily provided by you in your profile; and
- Information voluntarily provided through reviews.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data to us in pursuance of accessing our Services, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of Bambinos and the authorized third parties referred to herein.

**Other Information:**

When you interact with us through the Site, we receive and store certain data automatically. Bambinos may store such passively collected data itself or such information may be included in databases owned and maintained by our affiliates, agents or service providers. We may use such information and pool it with other information to track, for example, the total number of visitors to our Sites, the number of visitors to each page of our website, and the domain names of our visitors' Internet service providers.

Bambinos may incorporate technology such as cookies, web beacons and local storage, for a smooth and better operation of the Services through the Site.

**Cookies:** A cookie is a piece of information that the computer that hosts our Services gives to your browser when you access the Site. Our cookies help provide additional functionality to our Services and help us analyze the Site usage more accurately. They help you navigate between pages efficiently, help remember your preferences, and generally improve your browsing experience, along with ensuring that

the marketing you see online is more relevant to you and your interests. We place both permanent and temporary cookies in your computer's hard drive. The cookies do not contain any of your personally identifiable information. Most cookies are "session cookies," meaning that they are automatically deleted from your hard drive at the end of a session. You are always free to decline our cookies if your browser permits. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Services. We recommend that you leave cookies turned on because they allow you to take advantage of some of our Services' features.

**Web Beacons:** Web beacons are tiny graphic objects embedded in a web page or email which allow us to check that a user has viewed a page on our Site or an email. We may use web beacons alone or in conjunction with cookies to track and compile information such as email open rates, web page visits, or form submissions.

**Local Storage:** We may use local storage objects to store information and preferences on your computer.

**Aggregated Personal Data:** We may aggregate data, including Personal Data, and use such aggregated data for any purpose. This aggregate information does not identify you personally.

## **5.How We Use the Information**

We use your information to:

- provide Bambino's Services;
- process your payment for the Services;
- send you emails or newsletters that you signed up for;
- improve Bambino's Services; and
- analyse Site usage

Bambino's teachers may receive recordings of their sessions and may use the recording to improve their curriculum and sessions, they may provide the recording to parents and the participants in the session to view. Bambino and its affiliates may use your Personal Data to contact you in the future to tell you about services we believe will be of interest to you. If we do so, each promotional communication we send you will contain instructions permitting you to opt-out of receiving future promotional information. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, you can contact us at [info@bambinos.in](mailto:info@bambinos.in). Please note that we will continue to contact you via email to respond to requests and provide our Services.

## **6.Storage of Personal Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside India and choose to provide information to us, please note that we transfer the data, including Personal Data, to India and process it there.

## **7.Our Disclosure of Your Personal Data and Other Information**

We may share your Personal Data with certain third parties without further notice to you, as set forth below:

**Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your information may be transferred to a successor or affiliate alone or as part of that transaction along with other assets.

**Vendors and Service Providers:** We engage third-party vendors and service providers to perform certain functions on our behalf (such as payment processing). These third parties may have limited access to databases of user information or registered member information solely for the purpose of helping us to provide and/or improve the Services and they will be subject to contractual restrictions prohibiting them from using the information about our Users for any other purpose. Such agents or third parties do not have any rights to use Personal Data beyond what is necessary to assist us.

**Legal Requirements:** Bambinos may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Bambinos, (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (iv) protect against legal liability.

## **8.Publicly Posted Information**

You may be able to share Personal Data with third parties, including with the general public, through use of the Services.

**User Profile:** As a user of our Services, you will have a user profile (hereinafter referred to as “User Profile”). Please note that no Personal Information mentioned in your User Profile shall be made visible to other users registered on the Bambinos Platform, except your name and username.

We do not systematically monitor the content of information that is published on your user profile. Any information published in your User Profile becomes available to the public. After publishing, we have no control over how such information is used or its further dissemination. We urge you to think carefully about what, if any, Personal Data you include in your User Profile.

Our Services provide you the opportunity to share information on a variety of topics with other Bambinos Users through public forums (the “Public Forums”). Use of the Public Forums is entirely voluntary. But please be aware that any information you include in the Public Forums will become available to all Bambinos Users without restriction.

We do not systematically monitor the content of information that is published in the Public Forums. Any information published in Public Forums becomes available to the public. After publishing, we have no control over how such information is used or its further dissemination. We urge you to think carefully about what, if any, Personal Data you include in your posts on our Public Forums.

## **9.Children**

This section explains our information collection, disclosure, parental consent practices and parental choice procedures with respect to the information provided by Children under the age of 18 (“Child” or “Children”). This policy is in accordance with the current data privacy laws prevailing in India. We abide by the general obligation that Personal Data of Children is to be processed in a manner that protects the rights of the Child and which must be in the Child’s best interests.

**Collection:** Bambinos collects information about students directly from parents, who provide us with their Child’s first name, age, type of schooling, location, and additional notes for the Consultant. In addition, the Children may share information about themselves during sessions. The sessions may take place over online videos in which video images and audio of the Children are recorded. No information is collected directly from Children until they are in the course session. Children cannot post personal data publicly on the Bambinos Services.

**Use and Disclosure:** Bambinos shares the name, age, location, and any notes parents have provided about their Children to the course Consultant, in order to allow the Consultant to provide sessions. This information shall also be treated as part of the parent’s Personal Data and may be shared as described in the Disclosure section above for business transfers; to vendors and service providers; and to comply with legal requirements. Children may also share information about themselves with the Consultant and the rest of the students attending the session during the session voluntarily. While Bambinos expects Consultants and all other users to abide by our standards of conduct, please note that we cannot control

or monitor what Personal Information your Child shares with Consultants or the classmates, nor what those third parties ultimately do with that information, and disclaim all responsibility in that regard.

**Session Video Recordings:** As described above, Bambinos record videos of students and Consultants during Bambinos sessions (“Session Recordings”). The Session Recordings are made available by Bambinos to the Consultants and may be shared by the Consultant for all the students (and their parents) to view (the “Permitted Recipients”). Bambinos may also use Session Recordings to provide feedback to the Consultants, for customer support, and for compliance purposes. We utilize reasonable means to (i) limit the ability of Consultants to create copies of the Session Recordings or to share the Session Recordings with anyone aside from Permitted Recipients, and also (ii) limit the ability of Permitted Recipients to download or re-share the Session Recordings. While we expect the Consultants and Permitted Recipients to abide by our standards of conduct, please note that we cannot control or monitor what such third parties ultimately do with Session Recordings, and disclaim all responsibility in that regard.

**Parental Consent:** Bambinos obtain verifiable parental consent before collecting Personal Data from your Child. If you do not consent, then we will not collect, use or disclose any Personal Information about your child, and your child will not be allowed to use the Services in any way.

**Parental Choices and Controls:** At any time, you can refuse to permit us to collect further Personal Data from your Children in association with your account, and can request that we delete from our records the Personal Data we have collected in connection with that account. Please keep in mind that a request to delete records may lead to a termination of an account, membership, or other services. You may update your Child’s information by logging onto your account. You can contact Bambinos to request access to, change, or delete your Child’s Personal Information by sending an email to us at [info@bambinos.in](mailto:info@bambinos.in). A valid request to delete Personal Information will be accommodated within a reasonable time. In addition to the foregoing, we will exercise commercially reasonable efforts to delete Personal Information belonging to Children when it is no longer needed for the purpose for which it was collected.

## **10. Links to Other Websites**

This Privacy Policy applies only to Bambinos Services. The Services may contain links to other websites not operated or controlled by us (the “Third Party Sites”). The policies and procedures we describe here do not apply to the Third-Party Sites. The links from our Services do not imply that we endorse or have reviewed the Third-Party Sites. We suggest contacting those sites directly for information on their privacy policies.

## **11.Social Media**

The Site may include social media features such as the Facebook “Like” button, and widgets, such as the “Share this” button. These features collect various information, including your IP address, the areas of Bambinos you visit, and also may set cookies in order to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Site. However, please remember that the manner in which the third party such as Facebook, among others, uses, stores and discloses your information is governed by the policies of Facebook, and, as a result, Bambinos shall not have any liability or responsibility for the privacy practices or other actions of such third parties that may be enabled within and/or otherwise accessible through our Services.

## **12.Data Integrity, Purpose Limitation and Security**

We process Personal Information in a manner that is compatible with and relevant to the purpose for which it was collected or authorized by you. To the extent necessary for those purposes, we take reasonable steps to ensure that Personal Information is accurate, complete, current, and reliable for its intended use.

We take all necessary technical and organizational measures to ensure an appropriate level of security of your Personal Data provided via the Services from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Our security measures are constantly being improved in line with technological developments. However, the Internet cannot be guaranteed to be fully secure and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for disclosures beyond our reasonable control. You are also responsible for helping to protect the security of your account credentials. For instance, never give out your password, and safeguard your user name, password, and personal credentials when you are using the Services so that other people will not have access to your Personal Data. Furthermore, you are responsible for maintaining the security of any personal computing device on which you utilize the Services.

## **13.Your Rights**

Indian data protection laws give you certain rights regarding your Personal Information. You may ask us to take the following actions in relation to your Personal Information that we hold:

- **Right to information and access**

You have the right to access the Personal Data we hold about you in order to verify the Personal Data we have collected with respect to you and to have a general account of our uses of that information. Upon receipt of your written request, we will provide you with a copy of your Personal Data, although in certain limited circumstances we may not be able to make all relevant information available to you, such as where that information also pertains to another user. In

such circumstances, we will provide reasons for the denial to you upon request. We will endeavour to deal with all requests for access and modifications in a timely manner.

- **Right to correction and deletion**

You have the right to demand that we correct inaccurate personal data relating to you and – provided that legal requirements have been met – amend or delete it.

This does not apply to data required for billing or accounting purposes or which is subject to a legal retention period.

You can submit these requests by email to [info@bambinos.in](mailto:info@bambinos.in). We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why subject to legal restrictions.

- **Restriction of processing**

You have the right to demand – provided that legal requirements have been met – that the processing of your data be restricted or limited.

- **Data portability**

.You have the right to data portability for the information you provide to us. You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it. Please note that we may ask you to verify your identity before responding to such requests.

- **Right to object**

**Right to object based on individual situation:** If we process data on the basis of an overriding justified interest of the kind described in this data protection notice, you have the right to object, on grounds relating to your particular situation, at any time to this processing. We will no longer process your personal data unless, in accordance with legal requirements, we can demonstrate compelling and legitimate grounds for their further processing which override your interests, rights, and freedoms, or if their further processing serves to establish, exercise, or defend legal rights.

**Objection to data processing for the purposes of direct marketing:** In addition, you can object at any time to the processing of your personal data for advertising purposes. Please note that, for organizational reasons, there may be an overlap between your objection and the use of your data in a campaign that is already running.

- **Right to withdraw consent**

If you have given consent to process your personal data, you can withdraw this consent at any time.

- **Right of complaint with the supervisory authority**

You have the right to lodge an appeal with data protection supervisory authority. If you would like to submit a complaint about our use of your Personal Information or response to your requests regarding your Personal Information, you may contact us as at [info@bambinos.in](mailto:info@bambinos.in) or submit a complaint to the data protection authority in your jurisdiction.

#### **14. Other Terms and Conditions**

Your access to and use of our Services is subject to the Terms of Use.

#### **15. Contact Us**

If you have any queries relating to the processing or usage of Personal Information provided by you in connection with this privacy policy, please email us at [info@bambinos.in](mailto:info@bambinos.in) or write to our Grievance Officer at the following address:

Bambinos Grievance Officer

Ashish Gupta

Bambinos Learning Solutions Pvt Ltd

677, 1st Floor, Suite #253

27th Main, 13th Cross, Sector - 1

HSR Layout, Bangalore

Karnataka – 560102

Email: [grievance.officer@bambinos.in](mailto:grievance.officer@bambinos.in)

#### **16. International Users and Visitors**

Bambinos is hosted in India and is not intended to be subjected to the laws or jurisdiction of any state, country or territory other than that of India. Your Personal Data may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Site, you

consent to the transfer of information to countries outside of your country of residence, including India, which may have different data protection rules than those of your country.