

This Privacy Policy outlines SAIGOL ED LTD approach to privacy to fulfil its obligations under the applicable privacy laws.

Throughout this document, the terms “we”, “us”, “our” & “ours” refer to SAIGOL ED LTD (including its affiliate, SAIGOL ED LTD). And the terms “you”, “your” “yours” & “you and/or your child” refer to YOU (as the User).

This Privacy Policy applies to all your PERSONAL DATA processed by us, whether in physical or electronic mode. This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information and shall be read with the Terms and Conditions.

Please note that this Privacy Policy is applicable to all instances where we play the role of a DATA CONTROLLER of your Personal Data, when we collect and process personal data about you for offering our products or services.

We are committed to keeping your and your child's Personal Data private and secure. We process any Personal Data we collect from you and your child in accordance with the applicable laws and regulations and the provisions of this Privacy Policy. Please read the following carefully to understand our practices regarding your and your child's Personal Data and how we treat it.

By choosing to visit and/or avail any Services provided by us, you agree to this Privacy Policy (as may be amended from time to time). Please read the following information carefully. You must be at least 18 years old to register on our site. If you are under 18 years old, you are not permitted to register unless such registration is completed by a parent or legal guardian. By your continued access or use of the Platform, you signify your agreement to be legally bound by Privacy Policy set forth herein. If you do not agree to the Privacy Policy of this agreement, promptly exit this page and stop accessing the Services.

Personal Data

‘Personal Data’ means any information that may be used to identify an individual, directly or indirectly, in particular by reference to an identifier, including not limited to, a first and last name, physical address, email address, online identifier or other contact information and/or identity proof documents.

Children’s Privacy

We need to collect your and your child's Personal Data to provide our services to you and your child. We are committed to protecting the privacy of children who use our sites and applications. Whenever we refer to a “child” in this privacy policy, we mean a child under the age of 13 for US users, and under the age of 16 for EU users.

If you are a parent or guardian and you believe that your child has provided us with Personal Data without your consent, please contact us as at hello@saigoled.com. We will dispose of that data in accordance with applicable laws and regulations.

Parents can always refuse to permit us to collect further Personal Data, request to review their child's Personal Data, or request that we delete from our records the

personal data collected from or about their child. Please keep in mind that a request to delete records may lead to a termination of an account, membership, or other service, as the nature of our services requires collection of Personal Data. To exercise any of these options, please contact us at hello@saigoled.com. Please be aware that to protect children's privacy and security, we will take reasonable steps to verify a parent or legal guardian's identity before granting access to any personal data.

EU Child Users

If your child is a resident of a Member State of the European Union, we will treat their Personal Data as a child's Personal Data if they are under 16 years of age, and receive consent of the holder of parental responsibility as required for the processing of Personal Data. All residents of the European Union further have specific rights granted by the General Data Protection Regulation ("GDPR"). See Annexure to this privacy policy.

What Personal Data do we Collect & Process?

Categories of Personal Data that we collect and process are as follows:

- Demographic & Identity Data of you/ or your child (name, email address, contact number, photograph, location), gender, school name, birth date and year of the child to validate age)
- Financial Data (for e.g. account, payment details, invoice details)
- Online Identifiers and other Technical Data (for e.g. IP address, transaction logs, device details)
- Online training sessions are recorded and used for quality audits and teacher training
- Projects, quizzes, activities, apps developed, performance completed as part of our programs.
- Your child may also choose to provide Personal Data about themselves in the content they post on our website. However, as outlined above, we require and have safeguards in place to ensure that you first consent to our collection and use of this Personal Data.

Where do we obtain your Personal Data from?

Most of the Personal Data we process is provided by you directly to us when you register to use our products and/or services including the registration for a free trial. This also includes the Personal Data collected automatically and in the background by us when you use our website and application(s). Certain information might be collected automatically as you or the child navigate through the Platform (which may include usage details, IP address, device ID and type, your browser type and language, the operating system used by the device, access times, and information collected through cookies, web beacons and other tracking technologies). Note that we do not collect Personal Data from children for the purposes of behavioural advertising. We do not allow third-party behavioural trackers in areas intended to be used by children.

When you sign into your social media account or otherwise connect to your social media account with the Platform, you consent to our collection, storage and use, in accordance with this Privacy Policy, of the information that you make available to us through the social media interface. This includes, without limitation, any information

that you have made public through your social media account, information that the social media service shares with us or information that is disclosed during the sign-up and sign-in processes.

In furtherance of your usage of our Platform, we require the parents to create a G-mail account on behalf of the Child in accordance with Google's terms and conditions. This account is created in order to enable the Child to sign into and access other various coding programs available across the internet as listed on the Platform. We shall collect information from this G-mail account that you use to connect with or use our Services and access other coding programs made available through our Platform. When you sign in with this G-mail account, you consent to our collection, storage, and use, in accordance with this Privacy Policy, of the information that you make available to us through the internet.

We may also receive Personal Data about you from third parties and publicly available sources of information.

How do we use your Personal Data?

- To verify your identity
- To deliver our products and services
- To improve our products and services
- To perform quality audits and teacher training
- To communicate with you regarding existing products and services availed by you, including notifications of any alerts or updates or surveys
- To evaluate, develop and improve our products and services
- For market and product analysis and market research
- To send you information about our other products or services which may be of interest to you (you may always opt out of this ongoing marketing communications by clicking an "Unsubscribe" link in the footer of each email)
- To handle enquiries and complaints
- To enable you to avail of our Services, and ensure efficient customer care experience and develop new features
- To comply with legal or regulatory requirements
- To investigate, prevent, or take action regarding illegal activities, suspected fraud and situations involving potential threats to the safety of any person
- To furnish your information to service partners and providers only to the extent necessary for delivering the relevant services (e.g. scheduling service and maintenance, providing emergency assistance);
- With the necessary consent, to publicize, post and display the projects and/or apps created by your child on our website or related pages or any other social media platforms along with your personal information in accordance with applicable laws

Lawful Bases of processing your Personal Data

We process your Personal Data by relying on one or more of the following lawful bases:

- You have explicitly agreed to/consented to us processing your Personal Data for a specific reason. This includes, without limitation, any information that you

have made public through your social media account, information that the social media service shares with us or information that is disclosed during the sign-up and sign-in processes.

- The processing is necessary for the performance of the contract we have with you or to take steps to enter into a contract with you
- The processing is necessary for compliance with a legal obligation we have

Where the processing is based on your consent, you have the right to withdraw your consent at any point in time. Please note that should the withdrawal of consent result in us not being able to continue offering our products and services to you, we reserve the right to withdraw or cease our products and services to you upon your consent withdrawal. You may withdraw consent by contacting us with a written request to the contact details specified below in the 'Contact Us' section. Upon receipt of your request to withdraw your consent, the consequences of withdrawal may be communicated to you. Upon your agreement to the same, your request for withdrawal will be processed.

For information on how we obtain verifiable parental consent for the processing of US child users' Personal Data, see section US Child Users above.

When do we share your Personal Data with third parties?

We may use third parties in the provision of our products and services to you. We may share your Personal Data with such third parties. We have appropriate contracts in place with all such third parties. This means that they are not permitted to do anything with your Personal Data which is outside of the scope specified by us. They are committed to hold your Personal Data securely and retain it only for the period specified in our contracts with them

1. Reasons for sharing your Personal Data with third parties: We may disclose your Personal Data to third parties only where it is lawful to do so. This includes instances where we or they:
 - need to provide you with products or services
 - have asked you for your consent to share it, and you have agreed
 - have a legal obligation to do so. For e.g., to assist with detecting and preventing fraud
 - have a requirement in connection with regulatory reporting, litigation or asserting or defending legal rights and interests
2. We may also disclose your Personal Data to appropriate authorities if we believe that it is reasonably necessary to comply with a law, regulation, legal process; protect the safety of any person; address fraud, security, or technical issues; or protect our rights or the rights of those who use our products & services.
3. With whom your Personal Data may be shared:

We may disclose your Personal Data to the following third parties:

- Who work for us or provide services or products to us
- Law enforcement authorities, government authorities, courts, dispute resolution bodies, regulators, auditors and any party appointed or requested by applicable regulators to carry out investigations or audits of our activities

- Statutory and regulatory bodies, authorities (including the government) investigating agencies and entities or persons, to whom or before whom it is mandatory to disclose Personal Data as per the applicable law, courts, judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunals.
- Online training sessions are recorded and used for quality audits and teacher training. We maintain complete confidentiality of the recordings and under no circumstances they will be accessible to or shared with any third party.

Use of Cookies and other Tracking Mechanisms

We may use cookies and other tracking mechanisms on our website and other digital properties to collect data about you.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information about your actions to the owners of the website.

Most web browsers allow you some control of cookies through browser settings. We offer certain features that are only available using a cookie.

Outlined below are the categories of cookies along with a description of what they are used for.

- **Strictly Necessary Cookies** - These cookies are needed to run our website, to keep it secure and to comply with regulations that apply to us.
- **Functional Cookies** – We may use functional cookies on our website. These cookies allow us to remember information you enter or choices you make (such as your username, language, or your region) and provide you with enhanced, more personalised features.
- **Performance/Analytics Cookies** – We may use performance/analytics cookies on our website. These cookies collect information about how visitors use our website and services, including which pages visitors go to most often and if they receive error messages from certain pages. It is used to improve how our website functions and performs.
- **Marketing Cookies** – We may use marketing cookies on our website. These cookies help us decide which of our products, services and offers may be relevant for you. We may use this data to tailor the marketing and ads you see on our own and other websites and mobile apps, including social media. For instance, you may see our ads on other sites after you have been to our website. We do not use behavioural advertising cookies in areas that are intended to be used by child users.

How do we secure your and your child's Personal Data?

We are committed to protecting your and your child's Personal Data in our custody. We take reasonable steps to ensure appropriate physical, technical and managerial safeguards are in place to protect Personal Data from unauthorized access, alteration, transmission and deletion. We ensure that the third parties who provide services to us

under appropriate contracts take appropriate security measures to protect Personal Data in line with our policies.

How long do we keep your and your child's Personal Data?

We keep the Personal Data we collect about you and your child for as long as it is required for the purposes set out in this Privacy Notice and for legal or regulatory reasons. We may take reasonable steps to delete or permanently de-identify your Personal Data that is no longer needed.

No Sale of Personal Data

We shall not sell any Personal Data of yours and/ or the children for the purpose of marketing, advertising, or any other third-party use, except in accordance with express consent obtained from you.

Data Security

We always strive to keep your and your child's Personal Data safe.

The security of your and your child's Personal Data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

- Safety in the operating environment: we store your and your child's Personal Data in a safe operating environment and it can only be accessed by employees, representatives and service providers on a need-to-use basis. We comply with industry standards and the law to protect your and your child's Personal Data
- The payment information: we adhere to confidentiality and security according to industry standards.

Links to other Websites

Our website may contain links to websites of other organizations. This privacy notice does not cover how those organizations process your Personal Data. We encourage you to read the privacy notices on the other websites you visit.

During and as part of the classes or curriculum the child might be required to access, visit, browse and make use of third-party websites and content, the use of which is governed by terms and conditions of such third parties. The information the third-party site or platform collects is subject to the third-party site or platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our applications. We encourage you to be aware when you leave our sites or applications and to read the privacy policies of other sites that may collect your personal data.

Your Rights

You have the following rights regarding Personal Data that we process about you:

- Access: You have a right to know what personal data we hold about you and to obtain a copy.

- Data portability: Subject to law, you have a right to obtain in machine readable format the personal data you have provided to us.
- Rectification and erasure: You have a right to have incomplete, incorrect, unnecessary or outdated personal data about you deleted or updated.
- Withdraw your consent: You have a right to withdraw your consent to process your and your child's personal data.
- The right to object. You have the right to object to our processing of your Personal Data.
- The right of restriction. You have the right to request that we restrict the processing of your Personal Data.

You may exercise your rights by managing your account and choices through our products and services or, if that is not possible, by contacting us. In some cases, if you withdraw your consent or wish us to delete or stop processing your personal data, we may not be able to continue to provide the services to you.

If you are not satisfied with what we provide when you exercise your rights, you can let us know by contacting us.

Additional Rights Applicable to EU Residents

Additional rights are applicable to EU residents, which are provided ANNEXURE.

Contact Us

For any further queries and complaints related to privacy, or exercising your rights, you could reach us at:

Contact Email Address: hello@saigoled.com

Organization's Name: SAIGOL ED LTD

Notification of changes

We regularly review and update our Privacy Notice to ensure it is up-to-date and accurate. Any changes we may make to this Privacy Notice will be in effect immediately after being posted on this page. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If a change in our privacy practices materially affects how we collect, process, use, or disclose US child user's data, we will solicit and obtain parental consent as required under COPPA.

ANNEXURE

The below rights are available to you if you are an EU resident:

Right of Access

Upon request, you have the right to get confirmation as to whether or not We are processing Your Personal Data, a copy of Your Personal Data and any other additional information as specified by General Data Protection Regulation (EU-GDPR).

Right to Rectification

Upon request, you have the right to get Your inaccurate Personal Data rectified and Your incomplete Personal Data completed.

Right to Erasure

Upon request, you have the right to obtain erasure or deletion of Your Personal Data on the grounds specified by EU-GDPR unless there is any exception specified by EU-GDPR is preventing Us to execute Your right.

Right to Restriction of Processing

Upon request, you have the right to request restriction of processing of Your Personal Data on the grounds specified by EU-GDPR.

Right to Data Portability

Upon request, you have right to receive and/or transmitted to any other organization, Your Personal Data which you have provided to Us in a structured, commonly used and machine-readable format on the grounds specified by EU-GDPR unless there is any exception specified by EU-GDPR is preventing Us to execute Your right.

Right to Object

Upon request, you have the right to object to the processing of Your Personal Data on the grounds specified by EU-GDPR.

Right to not be subject to Automated decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects concerning You.

Right to lodge a complaint with the Supervisory Authority

You have the right to lodge a complaint with a supervisory authority, specifically in the Member State of Your habitual residence, place of work or place of an alleged infringement of the General Data Protection Regulation.