

## Our Privacy Policy

*Effective date:* 01-01-2024

*Entity:* **Vidya Sethu Education Enablers India Pvt Ltd (V4C Education)**, a company incorporated in India with its registered office at [ADDRESS] ("**Company**", "**we**", "**us**", "**our**").

### 1) Scope & who this covers

This Privacy Policy explains how we collect, use, share, store, and protect personal data of:

- **Schools** (administrators and staff using our platform),
- **Teachers**, and
- **Parents/guardians** (and, where applicable, their children's data processed through our services).

It applies to our websites, mobile/desktop apps, learning portals, support channels, and any other digital means we operate (together, the "**Services**").

### 2) Our role under Indian law

For most processing described here, **we act as a "Data Fiduciary"** under the **Digital Personal Data Protection Act, 2023 (DPDP Act)**. In some cases (e.g., where a school instructs us under a contract), we act as a "**Data Processor**" on the school's behalf. Terms used here have the meanings given in the DPDP Act.

We also maintain a grievance mechanism as required under the **IT (Intermediary Guidelines & Digital Media Ethics Code) Rules, 2021**.

### 3) What data we collect

Depending on how you use the Services, we may collect:

#### A. School/administrator data

Names, official email/phone numbers, role/designation, school affiliation, billing/contract data, communication records, login credentials, usage logs.

#### B. Teacher data

Name, contact details, subject/class associations, qualifications (if provided), timetable data, content uploads, classroom activity, device/app telemetry, IP address, cookies and similar identifiers.

#### C. Parent/guardian data

Name, contact details, child's school and class, communications, consent records, payment details (tokenized by our payment gateway), support tickets.

#### D. Student/child data (processed via schools/parents)

Name, age/date of birth, class, roll number, learning activity, assignments, assessment scores, attendance, content interactions, profile photo (if uploaded), device/app telemetry. **We treat all child data with heightened safeguards and require verifiable parental/guardian consent where applicable.**

#### E. Technical data

Device identifiers, app version, OS/browser, IP/MAC address, language, crash/diagnostics, and server logs (which we retain per security directions).

## F. Cookies & similar tech

We use essential cookies (for login/session), analytics (usage and performance), and preference cookies. You can control non-essential cookies in our cookie banner/settings.

### 4) Why we process data (lawful bases)

We process personal data only for lawful purposes under the DPDP Act, including:

- **To deliver the Services & fulfil contracts** with schools/teachers/parents (creating accounts, classes, assignments, reports, support).
- **With consent**, e.g., sending product updates/marketing (you can withdraw at any time).
- **For legitimate educational uses requested by a school** (when we act as processor).
- **To comply with law**, enforce agreements, prevent fraud/security incidents, and respond to lawful requests from authorities.

### 5) Children's data (under 18)

- We **do not** offer targeted advertising, behavioural monitoring, or tracking designed to harm children's privacy.
- We **obtain and record verifiable consent from a parent/guardian** before processing a child's personal data where required, and we provide clear notices suitable for parents.
- Parents/guardians can **review, correct, and request erasure** of their child's data that we control.

These safeguards reflect the DPDP Act's special protection for children's data.

### 6) Consent management & your choices

Where we rely on consent, you can **give, manage, or withdraw** consent in-app or by contacting us at [PRIVACY EMAIL]. Withdrawing consent won't affect prior processing but may limit features requiring that data. Under the DPDP Act, **Data Principals** may:

- request **access** to a summary of personal data processed,
- request **correction/completion** of inaccurate data,
- request **erasure** when no longer necessary or upon consent withdrawal, and
- make a **grievance** or **appeal** per law.

We respond within statutory timelines.

### 7) Sharing & disclosures

We share data only as needed and under contracts that require confidentiality, security, and DPDP compliance:

- **Service providers/processors** (hosting, analytics, SMS/e-mail, payment gateways, customer support, device management).
- **Schools** (where they onboard you and we act on their instructions—e.g., teacher/parent rosters, reports).

- **Legal/Compliance:** courts, law enforcement, or regulators where required by law or to protect rights/safety.
- **Business transfers:** if we restructure, merge, or sell assets, data may transfer under similar safeguards.

We do **not** sell personal data.

## 8) International transfers

We may process or store data in or outside India using trusted providers. Cross-border transfers are **permitted except to any countries that the Government may restrict by notification**; we will comply with such notifications, if any, and ensure comparable safeguards via contracts and technical controls.

## 9) Security

We use administrative, technical, and organisational measures to protect data, including encryption in transit, access controls, role-based permissions, employee training, and periodic audits. We maintain **security logs for at least 180 days** and cooperate with **CERT-In** as required in the event of applicable cyber incidents.

## 10) Data retention & deletion

We keep personal data **only for as long as needed** for the purposes stated or as required by law/contract, and then delete or irreversibly de-identify it. For student records, we follow **school/board retention policies** where we act as processor. Parents/guardians can request deletion of their child's data that we control, subject to legal holds and school requirements. (This aligns with purpose/retention limits reflected in global ed-tech standards and India's emerging DPDP ruleset.)

## 11) Your rights & how to exercise them

Submit requests to: **[PRIVACY EMAIL]** or in-app **Privacy/Support**.

- **Access/summary** of data processed,
  - **Correction/Completion**,
  - **Erasure**,
  - **Consent withdrawal**,
  - **Grievance**.
- If you are unsatisfied with our response, you may escalate to the **Data Protection Board of India (DPB)** as per the DPDP Act once fully operational.

## 12) Grievance redressal (IT Rules)

Our **Grievance Officer** (as per IT Rules, 2021) is:

Name: **V. Ajit Sobhan Kiran**

Address: **H No:17-1-388/P/86, Road No 13, Poornodaya Colony, Saidabad, Hyderabad - 500059**

E-mail: **info@v4ceducation.com** | Phone: **9885562242**

We will acknowledge complaints within **24 hours** and resolve them within the timelines prescribed by law/policy.

## 13) Schools as independent Data Fiduciaries

When a **school** signs up classes/teachers/parents, the school is typically the **independent Data Fiduciary** for that deployment and the Company acts as **Data Processor** on the school's documented instructions. Schools must provide their own notices/consents where required and ensure lawful sharing of rosters and student data with us. (We provide data processing addenda and Indian-law SCCs/clauses on request.)

#### **14) Marketing & communications**

We may send product updates, training tips, and promotions to school admins/teachers/parents who consent (or as otherwise permitted). You can opt out through the message footer or account settings.

#### **15) Third-party links**

Our Services may link to third-party sites/apps. Their privacy practices are not governed by this policy. Please review their policies before using those services.

#### **16) Changes to this policy**

We may update this Privacy Policy to reflect legal, technical, or business changes. We will post the updated version with a new **"Effective date"** and, where required, notify you and seek consent again for material changes.

#### **17) Contact us**

For questions or concerns about privacy:

**Email:** [info@v4ceducation.com](mailto:info@v4ceducation.com)

**Postal:** H No:17-1-388/P/86, Road No 13, Poornodaya Colony, Saidabad, Hyderabad – 500059.