

# Privacy Policy

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Privacy is a fundamental right, and at B4brain Labs LLP (hereinafter referred to as “**We**”, “**Us**”, “**B4brain**”, “**Company**” or “**Our**” which expression shall mean and include its affiliates, successors and permitted assigns) , it is treated as such. The Company owns and operates a platform, *B4brain*, which is a sells developmental toys and courses for the enhanced development of a baby(as defined hereinafter) (“**Services**”). Our website “<https://theb4brain.com>“, “<https://parenting.b4brain.com>” (hereinafter collectively referred to as the “**Website**“) which are owned and operated by Us to provide the Services. The Website is hereinafter collectively referred to as the “**Platform**“ . This privacy policy governs Your access to and use of every content, functionality and/or Services offered on or through Platform.

By your (“**You**“ or “**Your**“) accessing, browsing and/or use of the Platform or subscribing to our program, You accept and agree to comply with and be bound by the terms and conditions (“**Terms of Use**“) (accessible at <https://www.parenting.b4brain.com/terms-of-use>), and Our privacy policy (“**Privacy Policy**“) (the Terms of Use and Privacy Policy shall together be referred to as “**Agreements**“). By accessing our Platform, You agree and acknowledge that You are bound by the terms contained in the Agreements. Please read the Privacy Policy carefully before proceeding. You declare Your willingness to abide and be bound by the terms of this Privacy Policy throughout Your use of the Platform. If You do not agree with the Privacy Policy, please do not use the Platform. The Privacy Policy (which may be updated at the sole discretion of the Company without intimation) will be effective immediately upon Your acceptance of Our terms and conditions, Your use of the Platform being indicative of such acceptance. These Agreements shall be enforceable against You in the same manner as any other written agreement.

This Privacy Policy is a legally binding document between You and Us. The terms of this Privacy Policy will be effective upon the access and/or use of the Platform in any manner. Please note that Your data may be collected by

Our affiliates outside of the Platform and/or Services through in-person meetings, participation in conferences and other forums, including but not limited to, through forums, responses to promotional and other materials. In order to expand Our prospects and range, We may have built in data technologies into Our Platform which may use additional sources to collect data. Please note that the data collected by Us is secured to the best of Our ability.

Please read this Privacy Policy document along with the Terms of Use carefully before You access Our Platform to fully understand what We do. If You do not agree or fully understand the Terms of Use and/or Our Privacy Policy, please do not use the Platform. You hereby provide Your unconditional consent or agreement to Us to collect, retain and process Personal Information (defined under Paragraph 1 hereunder) as provided under section 43A and section 72A of Information Technology Act, 2000.

### **1. Personal Information**

While accessing and/or using Our Platform, We may ask You to provide Us with certain information which may be generic or personally identifiable information that can be used to contact or identify You, which shall include the various types of data as classified hereunder (“**Personal Information**“). Wherever possible, We may indicate which fields are required and which fields are optional. We use Your Personal Information for the conduct of legitimate interests in order to further Our prospects. Please note by using/accessing this Platform, You consent to the terms of disclosure of information, including Personal Information as per the Privacy Policy. By signing up with us, you consent to receive updates related to your account and program (such as, sign up confirmation, updated terms of service, account expiry, program details, webinar details etc) on WhatsApp.

The Company does not take any responsibility of the genuineness and/or veracity of the information provided by any third party or other users of the Platform.

Personal Information may include, but is not limited to Your name, Your address, Your telephone number, Your email address and/or contact information, date of birth or gender or any other items that are enumerated in Rule 3 of Information Technology (Reasonable Practices and Procedures

and Sensitive Personal Data of Information) Rules, 2011. We use Your information to carry out Our Services, process payments, communicate with You, update Our records and generally maintain Your transaction history with Us. We also use this information to improve the Platform, prevent or detect fraud or abuses and enable third parties to carry out technical, logistical or other functions on Our behalf. To give You a greater insight into the type of information We collect, We have tried to classify the information We gather. Please note that this is an inclusive list:

- **Contact Information:** We receive and store any information You enter on the Platform and/or Services or give Us in any other manner. You can choose not to provide certain information based on Your preferences. Your general contact information, including Your name, photograph, address, telephone number, date of birth, gender, e-mail address, contacts, etc. maybe some of the information We collect.
- **Personalized Information:** Depending on Your engagement with Us, We may receive and request You to provide information relating to Your experience on the Platform and use of the Services. This may include sharing such information on social media, third party sites and with entities that provide services to Us.
- **Transaction and Technical Information:** We receive and store certain types of information whenever You interact with Us. This can be through any means, via e-mails, a visit to the Platform or via telephonic communication. We may also receive/store information about Your location, address, browser type, browser version, the pages of Our Site that You visit, the time and date of Your visit, the time spent on those pages and other statistics including but not limited to the internet protocol address of Your device and Your transaction history. We may use this information for internal analysis and to provide You with location based services or for services which are more personalized.
- **Third-Party Data:** We might receive information about You from other sources and add it to Our user database. By using or continuing to use of the Platform, You agree to Our use of Your information (including sensitive personal information) in accordance with this Privacy Policy, as may be amended from time to time by the Company in its sole discretion. You also agree and consent to Us collecting,

storing, processing, transferring and sharing information (including sensitive personal information) related to You with third parties or service providers for the purposes as set out in this Privacy Policy.

- **Other Data:** Depending on Your engagement with Us, We may request You to provide Us with applicable information that We may require in order to render Our Service from time to time.

We may be required to share the aforesaid information with government authorities and agencies for the purposes of verification of identity or for prevention, detection or investigation, including of cyber incidents, prosecution and punishment of offences. You agree and consent for B4brain to disclose Your information, if so required, under applicable law.

Information about Your hardware and software may be automatically collected by Us. This information can include usage information that includes Your interactions with Services, device information, such as unique device identifiers, operating system information, internet service provider, IP address, screen resolution, language, the date and time of each of Your log-ins and requests. This information is used for the operation of Services, to maintain quality of the Service, and to provide general statistics regarding use of Services. This information we otherwise receive.

You agree that B4brain will have the right, both during and after the term of these Privacy Policy, to use, store, transmit, distribute, modify, copy, display, sublicense, and create derivative works of Personal Information.

You acknowledge and agree that We use this information to provide the Services We offer. In order to do so, We may display and share certain information on the Platform for public viewing and to third parties respectively. You may specifically request Us not to do so by choosing to contact Us on Our help line number or e-mail address or can contact the grievance officer, the details of whom are set forth in Paragraph 7 below. You may peruse the Platform in detail in order to get a better insight into the use of such information.

However, We do not collect any special category of personal data including details about Your race, religion, ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union memberships, information

nor do We collect any information about any criminal offences or convictions.

Please note that by not providing Us with complete information or by restricting the information to be displayed, might hamper Your access to the Platform and Our Services.

When You use the Platform and/or avail Our Services like the discussion forums and You post and/or share Your information such as comments, messages, files, photos etc., such information may be made available to the public in general, and may be in the public domain. All such sharing of information is done solely at Your own risk. Please keep this in mind before You disclose personal information.

In the event that Personal Information is disclosed to or accessed by an unauthorized party, B4brain will promptly notify You and use reasonable efforts to cooperate with Your investigation of the incident. B4brain will not be responsible for any backup, recovery or other steps required to ensure that Personal Information is recoverable in the case of data loss. You are solely responsible for backing up Your Personal Information on a regular basis, and taking appropriate steps to safeguard and ensure the integrity of Your Personal Information.

As part of the Services, We may collect certain Personal Information (including but not limited to phone number and email address), and let You interact with other users of the Platform via ‘*WhatsApp*’ or other social media or other third party service platform. You acknowledge that We do not control what users do with the information they obtain from ‘*WhatsApp*’ or other social media or other third party service platform. You acknowledge that We are not responsible or liable for interactions involved between users/third parties. We are not liable for disputes, claims, losses, injuries or damage of any kind that arise out of or relate to the conduct of users of the Platform and/or any third party.

Just as other users may have access to Your Personal Information, You too may have access to their Personal Information. You agree that You shall only use the Personal Information in relation to the use of the Services and shall not misuse such personal information for any unsolicited communication,

marketing or spam. Your breach of these terms will be viewed seriously and may result in an immediate suspension or termination of Your account and Your access to the Services.

## 2. **Third Party Activities**

The Platform acts as a platform to facilitate education technology Services. In order to better Our Services and improve the quality of the Platform, We may onboard third-party service providers at Our sole discretion from time to time.

However, the Platform may contain links to other websites owned and operated by any third parties who are not related to the Platform or the Company in any manner (**Linked Website**). The Company provides these links to You as a convenience only and the inclusion of any link does not imply any endorsement of the Linked Website by Us. Your link to any such Linked Website is entirely at Your own risk. The Company is not a party to any transaction between You and a Linked Website. Your use of a Linked Website is subject to the terms and conditions of that site.

B4brain is not responsible for any form of transmission, whatsoever, received by You from any third party websites. Accordingly, B4brain does not make any representations concerning the privacy practices or policies of such third parties or terms of use of such third party websites, nor does B4brain control or guarantee the accuracy, integrity, or quality of the information, data, text, software, music, sound, photographs, graphics, videos, messages or other materials available on such third party websites. The inclusion or exclusion does not imply any endorsement by B4brain of the third party websites, the website's provider, or the information on the website. The information provided by You to such third party websites shall be governed in accordance with the privacy policies of such third party websites and it is recommended that You review the privacy policy of such third party websites prior to using such websites.

The Platform may also contain third party advertisements, if any. The display of such advertisements does not in any way imply an endorsement and/or recommendation of the relevant advertiser, its products and/or services. You are referred to the relevant advertiser for all information regarding the advertisement and its products and/or services. The Company accepts no

responsibility for any interaction between You and the relevant third party and is released from any liability arising out of or in any way connected with such interaction.

We acquire, maintain and process Personal Information where it is necessary for the legitimate pursuit of Our business interests. Legitimate interests include establishing and maintaining relationships, servicing their anticipated and actual needs, and for administrative purposes. Towards that end, We may use various contact management, analytics and processing software and other tools and techniques, including marketing by use of electronic means.

We may share personal data, including stored cookies (detailed in Paragraph 3) with entities that provide services to Us, including companies that provide web analytics, advertising, email distribution and other services. The use of personal data by such companies is limited to the purpose of rendering the contracted Services. Please note that in order to facilitate Our Services, We may share Personal Information to third parties to the extent required by it to comply with its obligations under applicable law.

We may share Personal Information with one or more of Our group companies (if applicable) for performance of business functions and for internal analytics. Some of Our group companies or service providers may be located in jurisdictions that are outside of the jurisdiction of the personal data subject, or in jurisdictions that offer a lower level of privacy or data protection. In such circumstances, We have put in place appropriate safeguards in accordance with applicable law and in line with this policy.

We may also process Personal Information where it is necessary for entering into and/or performing under a contract. Finally, in certain circumstances, We may process Personal Information on the basis of consent of the data subject for specific purposes.

Unaffiliated third parties are providers of avenues, content, functionality and services for Our web and social media sites.

We do not control what and how these and other third parties collect personal data or how they use it. We do know, however, that in addition to using sophisticated technologies such as cookies and web beacons on web and

social media sites, including sites such as Ours, third parties routinely employ new and innovative tools, techniques and practices to collect, receive, process, buy and sell Personal Information over extended durations, build sophisticated user profiles and commercially exploit it. We do not control and are not responsible for the privacy and business practices of these third parties. Note here that certain activities can potentially be managed by users themselves, as for instance, through internet browser and handheld app controls.

### **3. Cookies**

When You use the Platform, We try to make that experience simple and meaningful. In order to do so, We use Cookies which are small pieces of information that are issued to Your computer or mobile device when You visit a website or access or use a mobile application, and that stores and sometimes tracks information about Your use of the Platform. These files contain a small amount of data, which may include an anonymous unique identifier. In general, cookies are sent to Your browser from a web site and stored on Your computer's hard drive. We use them to recognize Your browser and to provide a more personalized experience for You which includes personalized advertisements on other websites and storage of items in Your Cart between visits thereby ensuring that Your experience with Us is simplified. When You visit Our Platform and/or use Our Services, Our web server sends a cookie to Your computer or mobile device.

Please note that some of the cookies used by the Platform are set by Us, and some are set by third parties who are delivering services on Our behalf.

We use cookies for other reasons as well. Like many sites, We too use cookies to collect information. We also use Cookies to allow You to enter Your password less frequently during a session. 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 use some portions of the Platform and/or Services. If You do leave cookies turned on, be sure to sign off when You finish using a shared computer.

The help menu on the menu bar of most browsers will tell You how to prevent Your browser from accepting new cookies, how to have the browser notify You when You receive a new cookie and how to disable cookies



altogether. Additionally, You can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the website of its manufacturer.

However, because cookies allow You to take advantage of some of the Platform essential features, We recommend that You leave them turned on.

#### **4. Data Retention**

We will only retain Your personal data for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, We consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of Your personal data, the purposes for which We process Your personal data and whether We can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances We may anonymize Your personal data (so that it can no longer be associated with You) for research or statistical purposes in which case We may use this information indefinitely without further notice to You.

#### **5. Right to unsubscribe**

You always have the option to not provide information by choosing not to use the Platform or a particular feature/Service thereof (where such feature is available for opt-out). We may automatically use Our available technology to retain Your preferences.

When You update information, We usually keep a copy of the previous version for Our records. If You do not want to receive updates from Us, please update Your preferences or write to us at [info@b4brain.com](mailto:info@b4brain.com). However, opting out of updates still governs Your use of the Platform and Services under the Terms of Use and Privacy Policy.

#### **6. Persons allowed to Use the Platform**

Use of the Platform is available only to individuals who can form a legally binding contract under the Indian Contract Act, 1872. If You are a minor i.e.

under the age of 18 (eighteen) years, You may use the Platform only with the consent and involvement of a parent or guardian. We do not knowingly collect or store personal data of a minor unless permitted by the parent or legal guardian of such minor. Please note that in the event such persons utilize the Platform and/or the Services, it is assumed that he/she/the legal guardian or parent who has enrolled/ given access to the Platform/ Services has authorized the person for such use and thereby accorded their consent for the terms of the Privacy Policy.

## **7. Grievances**

B4brain strives to give redress to any of Your concerns expeditiously. You may report any concern to the grievance officer who shall redress the grievances as soon as possible.

Please find below the details of the grievance officer:

Name: Junaid Ahammed

Email: junaid@b4brain.com

Address: Mobile 10x building, Government Cyberpark, Nellikode P.O, Palazhi, Kozhikode, Pantheeramkavu, Kerala 673016

## **8. Changes to This Privacy Policy**

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 and the Platform 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 We make any material changes to this Privacy Policy, We will notify You either by placing a prominent notice on the Platform and/or Services.