

Sept 1, 2020

## PRIVACY POLICY

### 1. Consent

ProgramFox Edutech Private Limited ("Company" or "We" and their connotations) operates a website - (URL: <https://www.debugsbunny.com/>) (together called as "Platform") which is engaged in the service of online tutoring to users.

Our Platform is primarily for teachers who are enlisted on our Platform and children below the age of 18 years ("Child"). By registering on the platform the parent gives their consent for the use of the platform by the child. The teachers, parents of the Child or users above 18 years age hereinafter are referred to as You. The term "Users" for the purposes of these Terms shall be read as You and/or the Child.

Our User's privacy is extremely important to us. We recognize the privacy concerns of the Users and the visitors and hence as a commitment to provide safe and secure experience on our Platform, we have formulated this privacy policy to help Users make an informed decision. This Privacy Policy ("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 found on (URL: [https://www.debugsbunny.com/static/media/Privacy\\_Policy\\_v1.1f921646.pdf](https://www.debugsbunny.com/static/media/Privacy_Policy_v1.1f921646.pdf)). We provide online tutoring computer science to children on the Platform (hereinafter referred to as "Services").

We reserve the right to amend and supplement to complete this Privacy Policy at any time. We encourage you to regularly review this Privacy Policy to get the latest updates to ensure you know and exercise the right to manage your Personal Information.

### 2. Information We Collect and use

In order to provide Services, we require certain user information and may obtain the same through user-provided data or automatic data collection.

- By choosing to visit and/or avail any Services provided by Company, you agree to this Privacy Policy (as may be amended from time to time). Please read the following information carefully. If you are a parent or guardian and you provide your consent to your Child's use of the Platform, you agree to be bound by this Privacy Policy in respect to their

use of the Platform. 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.

- We collect information that may be used to identify you or your Child ("Personal Information") including, but not limited to, (i) name, e-mail ID, photograph, location and other contact information (ii) gender and other demographics (iii) birth date and year of the Child to validate their age.
- We also collect certain information either when you provide it using the Platform or Services and/or 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). You agree that we may use such information to do internal research on our Users' demographics to better understand, protect and serve our Users.
- We also collect information from your user ID associated with any social media account (such as your Facebook and Google account) that users use to sign into the Platform or connect with or use of our Services. When you sign in with your social media account information, 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. 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.
- If any of the Users allows us to collect information from his or her device phonebook—and you or the Child's are one of that User's contacts—we may combine the information we collect from that User's phonebook with other information we have collected about you. We may also obtain information from other sources and combine that with the information we collect through the Platform.
- We use data collection devices such as "cookies" on certain pages of the Platform to help analyse our web page flow, measure promotional effectiveness, and promote trust and safety. Cookies are small files placed on your hard drive that assist us in providing our



Services. We offer certain features that are only available using a cookie. Cookies can also help us provide information that is targeted to your interests.

- Online training sessions are recorded and used for quality audits and teacher training.
- Users shall grant the Company a non-exclusive, transferable, sub-licensable, royalty-free, worldwide license for content that is covered by intellectual property rights, like photos and videos (IP License). This IP License shall end when you delete your IP content or your account unless your content has been shared with others, and they have not deleted it. When you delete IP content, it is deleted in a manner similar to emptying the recycle bin on a computer. However, you understand that removed content may persist in backup copies for a reasonable period (but will not be available to others).

### 3. Purpose of Collection

We collect personal information only necessary for the following purposes:

- To create and maintain an account;
- To enable you to avail of our Services, and ensure efficient customer care experience and develop new features;
- To determine the current age of the Child;
- To send surveys or marketing communications to inform you of new products or Services or other information that may be of interest;
- To dispatch transaction-related communications such as welcome letters, billing reminders, and purchase confirmations;
- To notify the necessary information related to the Platform and Services and your or the Child's account on the Platform from time to time;
- To maintain records and provide you and the Child with an efficient, safe and customized experience while using the Platform;
- To analyze overall trends to help us improve the Platform and Services;
- To perform quality audits and teacher training;
- 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);
- Verify your identity and prevent fraud or other unauthorized or illegal activity;
- To comply with applicable laws, rules, and regulations;
- And In any other way consistent with this Privacy Policy.

Additionally,

- We may use your email address to seek parental consent of Child for registration of and to explain what information we are collecting, how we plan to use it, and how the parent can





revoke consent or request at any time that we remove the account and delete any Personal Information collected from the Child (including the parental contact information).

- We reserve the right to use or disclose your Personal Information in response to any statutory or legal requirements. We will use and disclose your Personal Information if we believe you will harm the property or rights of the Platform, its owners, or those of the Platform's other users. Finally, we will use or disclose yours or the Child's Personal Information if we believe it is necessary to share information in order to investigate,
- prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person or property, violations of the Platform's other policies, or as otherwise required by law when responding to subpoenas, court orders and other legal processes.
- If we believe that disclosure is necessary or appropriate to protect our rights, property, or safety, our Users or others, we may in good faith share information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- You agree that we may use Personal Information about you to improve our marketing and promotional efforts, to analyse site usage, improve the Platform's content and Service offerings, and customize the Platform's content, layout, and Services. These uses improve the Platform and better tailor it to meet your needs, so as to provide you with an efficient, safe and customized experience while using the Platform.

#### 4. Data Security

We always strive to keep your Personal Information safe, we have been taking many safety measures, including:

- The security of your Personal Information 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 Information, we cannot guarantee its absolute security.
- Safety in the operating environment: we store your Personal Information 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 Personal Information.
- The payment information: confidentiality according to industry standards.
- We strictly limit the Personal Information that is publicly viewable about a User who is known by us to be a Child. When a Child posts a review or comment on the Platform, only the Child's age & name is posted, along with the content of the Child's posting. Although the Child may create a profile for his/her account, no portion of the Child's profile other than the Child's age and name is publicly viewable. For posting the child accomplishments (project work) on social media a separate parental consent is sought. The posting includes Name, Age, School, City, Picture and key project details.

#### 5. Links to other Sites





Our Platform may contain links to other websites. Please note that when you click on one of these links, you are entering another website over which we have no control and for which we will bear no responsibility. Often these websites require you to enter your Personal Information. We encourage you to read the privacy policies of all such websites as their policies may differ from our Privacy Policy. You agree that we shall not be liable for any breach of your privacy of Personal Information or loss incurred by your use of such websites or services.

### 6. Compliance with Data Protection Regulations

The information we obtain from or about you may be processed and stored in India and our other various servers located across the globe, which may provide for different data protection rules than the country in which you reside. We comply with generally accepted industry standard regulations regarding the collection, use, and retention of data under the Information Technology Act, 2000. By using the Platform and/or Services, you consent to the collection, transfer, use, storage and disclosure of your information as described in this Privacy Policy, including to the transfer of your information outside of your country of residence.

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. ProgramFox EduTech Private Limited aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us on the details as given below.

### 7. Rights of the Data Subject

You have the following data protection rights.

- The right to access, update or delete the information we have on you whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- 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 information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where ProgramFox EduTech Private Limited relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.





You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

### 8. Sharing of Personal Information

- We may share your personal information with third party service providers (called 'processors') to perform certain processing activities on our behalf, such as Parties involved in hosting and enabling our Services. Please note that we will not share your Personal Information with third parties allowing them to use this information for their own purposes unless you have given explicit consent thereto. Categories of third party processors are:

Categories	Legal Requirement
Usage Analytics	We may use third-party Service Providers to monitor and analyze the use of our Service
Online and Behavioral Marketing	We use remarketing services to advertise on third party websites to you after you visit our Service. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Service
Payment Processing and Discounting	We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors)..
Collaboration and Location Service Providers	We collaborate with location service providers to send out emails, SMS's and OTP's to our customers, enable online live video classes for students and teachers and to also enable telephony across our students, teachers and support team.

### 9. Rights to Your Personal Information

- You have the right to provide Personal Information to us and may change that decision at any time.
- You have the right to check, update and adjust your Personal Information by logging into your account and editing personal information or asking us to do this.





- You may also delete yours or your Child's information at any time on the Platform. However, we may retain certain information as required by law or for reasonable business purposes
- To sum up, you have the right to access, update, delete, rectify, object or restrict the Personal Information we have on you.

### 10. Changes to this Privacy Policy

This Privacy Policy will remain in effect except with respect to any changes in its provisions in the future, which 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 we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website

### 11. Contact Details

Please contact us by email or postal mail on the following address of the Grievance Officer:

Name: ProgramFox EduTech Private Limited Name: Mr. Sumit Singare

E-mail ID: [contact@debugsbunny.com](mailto:contact@debugsbunny.com)

Address : BHAU Institute, College of Engineering Pune, Shivajinagar, Pune 411005

