

# Privacy Policy

Last Updated January 7, 2018

Your privacy is important to us. To better protect your privacy we provide this notice explaining our online information practices. Please read this privacy statement closely. You accept the terms of this private statement by continuing to use Smartway Study products and services. A detailed explanation of how we may store or otherwise use personal information about you and/or your organization is explained in this Privacy Policy. We collect and may use the information to provide, maintain, protect, improve our services, develop new solutions and also protect the rights or property of Smartway Study, our clients and our partners.

## WHAT THIS PRIVACY POLICY COVERS

Smartway Study is fully owned and operated by Smartway Media Pvt. Ltd. (referred to as “we”, “us” or “our” in this privacy policy).

This Privacy Policy provides information **on the collection, use, sharing and processing of personal information** by Smartway Study, products and services.

This Privacy Policy does not apply to third party websites, services, products, applications or social networks that you may link to or connect with when interacting on Smartway Study products and services.

Third party Service processing your personal information on their own way and Smartway Study does not have any control over third party products and services and you should review the privacy policies of these parties before using the Third Party Services.

### In this Privacy Policy:

- ) “you” is a reference to any person, including a natural person, a company, a organization, a body corporate, an association, a joint venture, a partnership, a trust, who visit and/or use Smartway Study websites or social media pages, attendees at Smartway Study events, customers and prospective customers and their representatives, suppliers and channel partners and their representatives and Smartway Study’s employees;
- ) “personal information” means information that relates to an identified or identifiable person such as a name, identification number, location data or online identifier;
- ) “process” means any operation or set of operations that is performed on personal information, including the use of, recording, copying, compiling, collecting, collating, structuring, processing, mining, storing, erasing, altering, disclosing by transmission, disseminating and/or transferring such personal information;

## CONSENT

If you do not agree with this Privacy Policy, please do not access or use Smartway Study or interact with any other aspect of Smartway Study’s business.

Smartway Study may change this Privacy Policy from time to time. If there is an important change, Smartway Study will inform you about such change in an appropriate way, such as a pop-up notice or a statement of the changes on this website. Your continued interaction with and use of Smartway Study offerings will constitute your consent to the current version of this Privacy Policy.

## WHAT INFORMATION WE COLLECTS ABOUT YOU

### **Smartway Study may collect information directly from you, including:**

your name, physical address, email address, uid, telephone numbers and/or your identification number and, in the case of a natural person, your company's name, your company's identification number, your job title, your business telephone number and/or email address, such as when you submit an enquiry to Smartway Study, when you contract with Smartway Study for our services or when you create an online account or profile to access Smartway Study services;

Your payment information if you purchase or subscribe for Smartway Study products and services that or if Smartway Study needs to process a payment to you. We might collect your billing name, billing address and payment method when you make a purchase on our website. We NEVER collect your credit card number or credit card expiry date or other details pertaining to your credit card on our website.

We collect information you post in a public space on our website or on a third-party social media site belonging to Smartway study

Your financial information for vetting purposes if you apply to become a channel partner and, if you are a channel partner, for purposes of assessing your performance and determining your grading and benefits;

Your logo for display on Smartway Study websites as recognition of the relationship that exists between you and Smartway Study, whether as a customer, a channel partner or a supplier;

the passwords and log-in details that you have created to access your account with Smartway Study in respect of the Smartway Study offerings; and/or

### **Smartway Study may also collect other information through your interaction with and use of Smartway Study offerings, including:**

- ) Internet Protocol address ("IP address") and information derived from your IP address, such as your geographic location, your company or when you access Smartway Study websites;
- ) information about the device that you use to access Smartway Study websites, such as device type and version, mobile device identifier, browser type, operating system, the presence or use of applications or information about your preferred language;
- ) from our third party joint initiative partners;
- ) that is publicly available from sources such as social media websites; and
- ) From third parties that provide us with marketing leads.

## WE COLLECT INFORMATION IN DIFFERENT WAYS

Smartway Study, its affiliates and its third party service providers may collect information from a variety of sources including:

### **We collect information directly from you**

We collect information directly from you when you make a purchase on Smartway Study, register for an event or subscribe to free trial period. We also collect information if you post a comment on our websites or ask us a question through phone or email. When you provide the information to Smartway Study or its third party service providers either directly or through Smartway Study websites;

### **We collect information from you passively**

We may use other tracking tools like Google, web analytics, LinkedIn, browser cookies or other external websites for collecting information about your usage of our products and services.

We use temporary and permanent cookies to enhance your experience of our services. Temporary cookies will be removed from your computer each time you close your browser. By selecting 'keep me signed-in' option in Smartway Study services, a permanent cookie will be stored in your computer and you will not be required to sign-in by providing complete login information each time you return to our website. If you have turned cookies off, you may not be able to use registered areas of the websites.

### **We get information about you from third parties**

For example, if you use an integrated social media feature on our website. The third-party social media site will give us certain information about you. This could include your name and email address. Other data you may have made publicly available, such as social media posts or when you 'like' Smartway Study, share content or follow Smartway Study on Twitter or data provided by third party sources, such as professional networking sites or information service providers.

## USE OF YOUR PERSONAL INFORMATION

- ) To communicate with you and respond to your requests or enquiries which Smartway Study may have received by you submitting contact forms on Smartway Study websites, attending Smartway Study events, sending an email to Smartway Study or by visiting social media platforms;
- ) To interact with you on third party social networks, or other web services where this information is matched against their databases to display more relevant information to you;
- ) If you choose to register with Smartway Study, such as to become a channel partner or as a customer or to receive Smartway Study services, to create and manage an account for you;
- ) To engage in transactions with you and to process your transactions, such as activating your subscription to a service or sending you invoices;
- ) To perform in terms of an agreement that you or your company have entered into with Smartway Study, such as providing you with the relevant Smartway Study offering, verifying your identity, taking payments and sending you necessary communications;

- ) To process activities necessary to perform or provide the Smartway Study services, such as testing and applying new products, patches and updates and resolving errors and other issues that you have reported to Smartway Study;
- ) To track or record your use of Smartway Study services, such as the version of Smartway Study software or app you are using or the webinars you have attended;
- ) To communicate with you about any matters or information relating to Smartway Study services, such as new product releases and service developments, updates, events, special offers, promotions or requirements and benefits applicable to channel partners. This information may apply specifically to you or generally to all parties using those or related Smartway Study services. This may occasionally include information from other business partners about their products and services that can add value to Smartway Study services;
- ) To send you newsletters and notify you about blogs published on Smartway Study websites
- ) Smartway Study websites may permit you to participate in interactive discussions, post content and engage in networking activities. Certain of your personal information, such as your name, may be visible to other participants. Smartway Study does not control the content that users post to these forums. You should carefully consider whether you wish to submit personal information to these forums.
- ) To help create and personalize content for you on Smartway Study websites and to facilitate and improve your use of the Smartway Study websites;
- ) To diagnose problems in respect of Smartway Study websites, to administer Smartway Study websites, to keep Smartway Study websites secure and to gather demographic information about the users of Smartway Study websites;
- ) To conduct surveys and market research in respect of various topics, such as Smartway Study's customers or channel partners or their experience of Smartway Study services or the effectiveness of Smartway Study's marketing campaigns or learning courses, to evaluate and improve the use, function and performance of Smartway Study services, marketing and sales campaigns and Smartway Study's customer, channel partner and supplier relationships;
- ) To investigate and prevent potential fraud or illegal activities involving Smartway Study's systems and networks, to administer Smartway Study's back-up and disaster recovery plans and policies and to confirm compliance with licensing and other terms of use applicable to Smartway Study services;
- ) As Smartway Study believes to be necessary or appropriate to protect you, Smartway Study's employees and affiliates and other users of Smartway Study services, Smartway Study's physical and online operations, Smartway Study's property, Smartway Study's rights and Smartway Study's privacy and/or that of Smartway Study's affiliates, you or others; and/or carry out any other purpose described to you at the time the information was collected from you.

Some of the personal information uses specified above are not mandatory and may be controlled by you by setting use preferences or electing to opt-out, however your decision to do so may affect your use of Smartway Study services and/or Smartway Study's ability to transact with you.

## WHEN AND HOW SMARTWAY STUDY SHARES YOUR INFORMATION

With third parties who provide services to Smartway Study such as analytics, hosting websites, payment processing, marketing and promotions, event/campaign management, website management, information technology and related infrastructure provision, customer service, e-mail delivery, auditing, legal and other similar services;

- ) With third parties who provide products to Smartway Study which are incorporated into or used with Smartway Study offerings
- ) We share information with vendors who help us manage our online registration process or payment processors or transactional message processors. Some vendors may be located outside of India.
- ) With your consent, such as displaying your testimonial as a satisfied customer or partner on a Smartway Study website
- ) We share your information with event organizers and other parties responsible for organising events, demo sessions for you. The event organizers and other parties may use the information we give them as described in their privacy policies
- ) When Smartway Study shares personal information with third parties, Smartway Study requires that your personal information is processed only to the extent that such processing is necessary and subject to terms consistent with this Privacy Policy
- ) Smartway Study does not sell or rent your personal information to third parties for any purpose
- ) Smartway Study may use, transfer and disclose other information, which is not personal information, that Smartway Study collects for any purpose, such as statistical information about visitors to Smartway Study websites.

## HOW SMARTWAY STUDY SECURES YOUR PERSONAL INFORMATION

Smartway Study uses reasonable technical and organisational safeguards that are designed to protect your personal information from unauthorised or unlawful processing, accidental loss, misuse, unauthorised access, disclosure, alteration and destruction.

All transmission of data to and from Smartway Study's servers is encrypted using Secure Sockets Layer (SSL) technology.

However, despite Smartway Study's efforts, no security controls are 100% effective and Smartway Study cannot guarantee the security of your personal information. It is important for you to protect against unauthorised access to your account password and to your devices.

## LINKS TO OTHER SITES

Smartway Study websites may contain links to websites of other parties. Smartway Study is not responsible for the privacy practices or the content of such other websites. Therefore, you must carefully read the privacy statements of such websites.

## Where do you host?

We currently host with online.net whose servers/data centers are located in Paris, France.

## What about backups?

On the cloud, we maintain regular SQL backups of your account. A backup is taken every 24 hours.

These backups are stored on Amazon's AWS service. You can refer to its compliance information.

We recommend that you also maintain your own copy. To download them manually by going to Setup > Download Backups.

## Who can access my account?

We also have an access to your account for administrative purposes. This includes access for support and update purposes.

If anyone in our team has to access your data for support, then you will get an email mentioning that one of our engineers have accessed your data along with a reason. Your passwords are not accessible to our engineers and are generated via a program. If they need to access the account, they must go via this route. All our employees have signed a Non-Disclosure of Data agreement with us and they are fully aware of the consequences and risks involved with access of customer data.

## How do I check all the changes you have made as an Administrator?

We will report to you what changes (if any) we have done. At the bottom of each form (or doctypes as we call them) you will see who has made the recent changes. Additionally, you can view the Activity Log Report to track the activities of users in your account.

## Email Opt-Out

You can opt out of receiving or Unsubscribe our marketing emails. To stop receiving our promotional emails, please email [help@smartwaystudy.com](mailto:help@smartwaystudy.com). It may take about ten days to process your request. Even if you opt out of getting marketing messages, we will still be sending you transactional messages through email and SMS about your purchases.

## Incorrect/Incomplete Information

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at [help@smartwaystudy.com](mailto:help@smartwaystudy.com). We will promptly correct any information found to be incorrect.

## Contact Details

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below. If you have any questions about this Policy or other privacy concerns, please do connect with us.

Our full details are:

**Full name of legal entity:** Smartway Media Private Limited

**Grievance Officer:** Mr. Kanwal Preet Singh

**Email address:** [help@smartwaystudy.com](mailto:help@smartwaystudy.com)

**Postal address:**

85, 1st Floor, Sunil Park

Barewal, Ludhiana

Punjab (141012)

Helpine : +91 90237 90237

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at Email address:

[help@smartwaystudy.com](mailto:help@smartwaystudy.com)

**Privacy Policy Revisions and Updates**

This Privacy Policy is subject to revision, and if we make any substantial changes in the way we collect, use, or disclose your Personal Information, we will post a notice on this page. If you object to any such changes, you must cease using our website. Continued use of our website following notice of any such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

### **Jurisdiction**

If you choose to visit the website, your visit and any dispute over privacy is subject to this Policy and the website's terms of use. In addition to the foregoing, any disputes arising under this Policy shall be governed by the laws of India.

### **Have more questions?**

If you have any questions or concerns regarding Policies or you wish to cease receiving further communications from us, or if you any special requests etc.

Please Drop an email to [help@smartwaystudy.com](mailto:help@smartwaystudy.com)