

## **PRIVACY AND DATA PROTECTION POLICY**

Clapingo Education Private Limited (hereinafter, referred to as “we,” “our,” “us”, “Clapingo”) takes data privacy seriously. We recognise and value the trust that our clients, vendors, suppliers and individuals place in us when providing us with personal data and we are committed to safeguarding the privacy and security of personal data we may collect from our clients, vendors, suppliers and individuals / other entities to whom we provide our services.

This Privacy and Data Protection Policy aims to help you understand our personal data collection, usage and disclosure practices by explaining:

1. Who we are and what we do
2. What personal data we collect about you
3. How we obtain the personal data about you
4. How we use your personal data
5. Disclosure of your personal data
6. How do we transfer your personal data
7. How long we keep your personal data
8. How we protect your personal data
9. What rights you have in relation to your personal data
10. How we use cookies and similar technologies
11. How you can contact us / grievance officer
12. How will we update this Privacy and Data Protection Policy

By providing your personal data to us (whether via one of our websites, by email, in person or over the phone), you agree to the processing of your personal data as set out in this Privacy and Data Protection Policy. Further notices highlighting certain uses we wish to make of your personal data together with the ability to opt in or out of selected uses may also be provided to you when we collect personal data from you.

1. Who we are and what we do

We are a one-of-a-kind platform where you get to learn English and practise your speaking skills through one on one sessions with our tutors. We have customised classes to suit each person’s individual pace and ability to learn.

2. What personal data we collect about you

We may collect and process different types of personal data of our prospective clients, clients, vendors and suppliers in the course of operating our business and providing our services. These include:

- Basic personal details such as your name, gender, age, location;
- Contact data such as your telephone number and postal or email address;
- Financial data such as payment related information or bank account details;
- Website usage and other technical data such as details of your visits to our website(s);

- Any other personal data relating to you that you may provide.

In addition, we also collect recruitment related data of our tutors such as his/her curriculum vitae, education and employment history, details of professional memberships and other information relevant to potential recruitment with Clapingo.

### 3. How we obtain the personal data about you

We may collect or receive your personal data in a number of different ways:

- Where you provide it to us directly, for example by corresponding with us by email, or via other direct interactions with us such as completing a form on our website or registering for our updates and newsletters;
- Where we monitor use of, or interactions with, our websites, any updates or newsletters we may send to you, or other email communications sent from or received by us;
- Where we receive information about you during the course of our engagement with you while providing our services; or
- Publicly available sources - we may, for example, use publicly available sources to help us keep the contact details we already hold for you accurate and up to date or for professional networking purposes, e.g. LinkedIn or social media like Facebook and Twitter.

### 4. How we use your personal data

We will only use your personal data where we are permitted to do so by applicable law and after obtaining your consent to use such personal data.

**Consent:** where you have consented to our use of your personal data and information (by visiting our website and / or signing up for our services you have consented to the collection, use, processing and storage of the data and personal information provided to us by you. Further, you may choose to withdraw your consent, at any time, by writing to us at the contact information provided in section 11 (hereinbelow).

We may use your personal data in the following ways. In each case, we note the grounds that we rely on to use your personal data.

- **To provide our services to you and to conduct our business** – to administer and perform our services including to register you for an account, enable tutoring sessions, and process transactions as well as to respond to your questions, requests or inquiries, including to provide support and troubleshooting assistance;

**Legal grounds:** legitimate interests (to enable us to perform our obligations and provide our services to you).

- **To communicate with you**, including to communicate with you about your account, inquiries, our company, and related news, as well as to send you promotional emails, surveys, newsletters, or notifications.

**Legal grounds:** legitimate interests (to enable us to perform our obligations and provide our services to you).

- **To facilitate use of our websites and to ensure content is relevant** – to manage and remember your preferences and customize the services, to analyze and improve the services or any other products and services we provide, to administer surveys, sweepstakes, promotions, or contests; to improve our advertising and marketing, such as to provide you with recommendations for products or services that may interest you and to ensure that content from our websites is presented in the most effective manner for you and for your device;

**Legal grounds:** legitimate interests (to allow us to provide you with the content and services on the websites).

- **For recruitment purposes** – to enable us to process applications for employment with us and to assess your suitability for any position for which you may apply at Clapingo;

**Legal grounds:** legitimate interests (to ensure that we can make the most appropriate recruitment decisions for Clapingo).

- **To ensure that we are paid** – to recover any payments due to us or taking other legal action (including the commencement and carrying out of legal and court proceedings for recovery of such payments);

**Legal grounds:** legal claims, legitimate interests (to ensure that we are paid for our services).

- **To inform you of changes** – to notify you about changes to our services, website, or this Privacy and Data Protection Policy;

**Legal grounds:** legitimate interests (to ensure we can notify you about changes to our service, website, etc.).

- **To reorganise or make changes to our business** - In the event that we undergo a re-organisation (for example if we collaborate with a third party), we may need to transfer some or all of your personal data to the relevant third party (or its advisors) as part of any due diligence process or transfer to that re-organised entity or third party your personal data for the same purposes as set out in this Privacy and Data Protection Policy or for the purpose of analysing any proposed re-organisation;

**Legal grounds:** legitimate interests (in order to allow us to re-organise / change our business).

## 5. Disclosure of your personal data

We may also disclose your personal data with our professional advisors (e.g. legal, financial, business, risk management or other advisors), bankers and auditors. We shall share such information only after obtaining your consent to do so or where the disclosure is necessary for compliance of a legal obligation.

We may also process your personal data to comply with our regulatory requirements or in the course of dialogue with the regulators as applicable, which may include disclosing your personal data to government, regulatory or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted,

or unless to do so would prejudice the prevention or detection of a crime, we will direct any such request to you or notify you before responding / sharing your personal data with any regulator.

6. How do we transfer your personal data

We impose strict data protection safeguards and implement appropriate measures to ensure that your personal data is protected in accordance with applicable data protection laws.

7. How long we keep your personal data

We will retain your personal data for as long as is necessary to fulfil the purpose for which this data was collected and any other permitted linked purpose. If your personal data is used for two purposes we will retain it until the purpose with the latest period expires; but we will stop using it for the purpose with a shorter period once that period expires. Our retention periods are also based on our business needs and good practice.

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.

8. How we protect your personal data

We recognise that information security is an integral element of data privacy. While no data transmission (including over the Internet or any website) can be guaranteed to be secure from intrusion, we implement a range of commercially reasonable physical, technical and procedural measures to help protect personal data from unauthorised access, use, disclosure, alteration or destruction in accordance with data protection law requirements.

9. What rights you have in relation to your personal data

If you have any questions about our use of your personal data, you should first contact us via the details provided in section 11 hereinbelow. Under certain circumstances and in accordance with applicable data protection laws, you may have the right to require us to:

- provide you with further details on the use we make of your information;
- provide you with a copy of the personal information that we hold about you;
- update any inaccuracies in the personal data we hold;
- delete any personal data that we no longer have a lawful ground to use;
- to withdraw your consent at any time (as applicable) so that we stop the use of your personal data with immediate effect; and
- restrict how we use your information whilst a complaint (if any) is being investigated.

We take reasonable steps to ensure that your personal data remains secure and accurate in our records. In order to assist us with this, please let us know of any changes to the personal data that you have provided to us by contacting us at [info@clpaingo.com](mailto:info@clpaingo.com)



10. How we use cookies and similar technologies

When you visit our websites we may send a cookie to your computer. This is a small data file stored by your computer to help improve functionality or tailor information to provide visitors with more relevant pages. We may also analyse website traffic to identify what visitors find most interesting so we can tailor our websites accordingly.

11. How you can contact us

If you have any questions about this Privacy and Data Protection Policy or how we process your personal data or any other grievance, please contact us by sending an email to: [info@clapingo.com](mailto:info@clapingo.com)

You may choose to withdraw your consent or have your data deleted or updated / rectified at any time by writing to us at the above address.

12. How we may update this Privacy and Data Protection Policy

We may change the content of our Privacy and Data Protection Policy, our websites and how we use cookies without notice in the future. Further, we shall periodically update and revise this Privacy and Data Protection Policy as and when the need arises or when there is a change in applicable law.

This Privacy and Data Protection Policy was last updated in **Dec 2021**.