



## □ Privacy Policy – WinQuest Online

### 1. Introduction

Welcome to WinQuest Online (“WinQuest,” “we,” “us,” or “our”). We are committed to protecting your privacy and handling your personal data in a transparent and secure manner. This Privacy Policy explains how WinQuest Online collects, uses, processes, discloses, and protects your personal data when you use our website (<https://www.winqestonline.com>), mobile applications, learning platforms, and all related services, content, tools, and features (collectively, the “Services”).

By using our Services, you agree to the collection and use of information in accordance with this Privacy Policy. If you do not agree with the terms of this policy, please do not use our Services.

### 2. Definitions

- **Account:** A unique account created for you to access our Service or parts of our Service.
- **Company:** Refers to WinQuest Online.
- **Cookies:** Small files placed on your device by a website, containing details of your browsing history and other information.
- **Device:** Any device that can access the Service such as a computer, a cell phone, or a digital tablet.
- **Personal Data:** Any information that relates to an identified or identifiable individual.
- **Service:** Refers to the online educational platform provided by WinQuest Online.
- **Service Provider:** Any natural or legal person who processes data on behalf of the Company. This includes third-party companies or individuals employed by WinQuest Online to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service, or to assist the Company in analyzing how the Service is used.

- **Usage Data:** Data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (e.g., duration of a page visit).
- **Website:** Refers to WinQuest Online, accessible at <https://www.winquestonline.com>.
- **You:** Refers to the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.
- **Child (for COPPA purposes):** An individual under the age of 13 years.
- **Parent/Guardian:** The parent or legal guardian of a Child.

### 3. Information We Collect

We collect various types of information, including Personal Data, to provide and improve our Services to you.

#### 3.1 Personal Data You Provide Directly to Us:

- **Identity Data:** Name, date of birth, gender, educational background.
- **Contact Data:** Email address, postal address, telephone numbers.
- **Account Data:** Username, password, preferences, feedback.
- **Payment Data:** Billing address, payment card details (processed securely by third parties, we do not store full card numbers).
- **Communication Data:** Your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Educational Data:** Information about your learning progress, course selections, assessment results, teacher feedback, and tutoring session details.
- **Children's Data:** For users under 16, and specifically under 13 for COPPA compliance, we collect limited personal information (e.g., name, age, email) *only with verifiable parental/guardian consent*. For children under 13, data collection is minimized and primarily for the purpose of providing the educational service.

#### 3.2 Data Collected Automatically (Usage Data and Cookies):

- **Technical Data:** Internet Protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Services.

- **Usage Data:** Information about how you use our Website, products, and Services, including pages visited, features used, time spent on pages, clickstream data, access times and dates, and referrer URLs.
- **Tracking Technologies and Cookies:** We use Cookies and similar tracking technologies (web beacons, pixels, tags) to track the activity on our Service and store certain information. For more details, please refer to our separate [Link to Cookie Policy].

### 3.3 Information We Receive from Third Parties:

- **Payment Processors:** Information related to successful payment transactions from our secure third-party payment providers (e.g., transaction ID, amount, payment status), but not sensitive card details.
- **Analytics Providers:** Aggregated and anonymized data about user behavior and website performance from analytics services.
- **Social Media Platforms:** If you access our Services through a third-party connection or log-in (e.g., through a social network), you may allow us to access certain information from your social network profile.

## 4. How We Collect Your Information

We use different methods to collect data from and about you, including:

- **Direct Interactions:** You provide your Personal Data when you register for an account, subscribe to our Services, make a purchase, participate in a survey, contact customer support, or interact with our tutors.
- **Automated Technologies or Interactions:** As you interact with our Services, we automatically collect Technical Data and Usage Data using Cookies, server logs, and other similar technologies.
- **Third Parties or Publicly Available Sources:** We may receive Personal Data about you from various third parties such as analytics providers (e.g., Google Analytics), advertising networks, and payment service providers.

## 5. How We Use Your Information

We use your Personal Data for the following purposes:

- **To Provide and Maintain Our Service:** To allow you to register for an Account, access courses, connect with tutors, deliver educational content, and operate our Services.
- **To Manage Your Account:** To manage your registration as a user of the Service. The Personal Data you provide can give you access to

different functionalities of the Service that are available to you as a registered user.

- **For the Performance of a Contract:** To fulfill the purchase contract for the products, items, or services you have purchased or for any other contract with us through the Service.
- **To Contact You:** To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication regarding updates or informative communications related to the functionalities, products, or contracted services, including security updates, when necessary or reasonable for their implementation.
- **To Provide You with News and Offers:** To provide you with news, special offers, and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To Improve Our Services:** To analyze usage trends, understand how you and others use our Services, and identify areas for improvement and development.
- **For Customer Support:** To attend and manage your requests to us.
- **For Business Transfers:** To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us about our Service users is among the assets transferred.
- **For Security and Fraud Prevention:** To protect our Services, users, and the public from fraud, security breaches, and illegal activities.
- **For Legal Compliance:** To comply with applicable laws, regulations, legal processes, and governmental requests.

## 6. Legal Basis for Processing Personal Data

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- **Performance of a Contract:** Where we need to perform the contract we are about to enter into or have entered into with you (e.g., to deliver educational services).
- **Legitimate Interests:** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (e.g., for improving our Services, marketing, security).

- **Consent:** Where you have given your explicit consent for us to process your Personal Data for a specific purpose (e.g., for certain marketing activities, or for children’s data under COPPA). You have the right to withdraw consent at any time.
- **Legal Obligation:** Where we need to comply with a legal or regulatory obligation (e.g., tax, audit, anti-fraud, age verification).

Certainly — here is a cleaner redraft of **Section 7. Sharing Your Personal Data**, with **employees and group employees** included in a legally appropriate way:

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## 7. Sharing Your Personal Data

We may share your Personal Data with the following categories of recipients for the purposes described below:

### Service Providers

We may engage third-party companies and individuals to support, operate, and improve our Services or to provide services on our behalf. These may include payment processors, cloud hosting providers, hosting and infrastructure providers, analytics providers, email delivery services, customer support platforms, IT support providers, and other similar vendors.

These Service Providers are contractually bound to protect your Personal Data and may use it only to the extent necessary to perform the services they provide to us.

### Employees and Group Employees

We may share your Personal Data with our employees, officers, staff, consultants, and personnel of our affiliated companies, group companies, holding companies, subsidiaries, or other entities under common control, to the extent necessary for business operations, administration, support, service delivery, compliance, internal reporting, customer assistance, and other legitimate business purposes.

All such employees and group employees are required to access and use your Personal Data only on a need-to-know basis and in accordance with applicable confidentiality obligations and this Privacy Policy.

## **Tutors / Instructors**

Where applicable, we may share relevant educational data and necessary contact information, such as the student's name, with independent tutors, instructors, or education professionals directly involved in delivering learning services, so as to facilitate effective teaching, communication, and support.

## **Affiliates**

We may share your Personal Data with our affiliates, and where we do so, we require those affiliates to handle such data in accordance with this Privacy Policy and applicable law.

## **Business Transfers**

We may share or transfer your Personal Data in connection with, or during negotiations of, any merger, sale of company assets, financing, restructuring, or acquisition of all or part of our business by another company.

## **Legal Obligations**

We may disclose your Personal Data when required to do so by law or in response to valid requests from public authorities, including courts or government agencies. We may also disclose your Personal Data where we believe in good faith that such action is necessary to:

- comply with a legal obligation;
- protect and defend the rights, property, or safety of WinQuest Online;
- prevent or investigate possible wrongdoing in connection with the Services;
- protect the personal safety of Users of the Services or the public; or
- protect against legal liability.

## **With Your Consent**

We may disclose your Personal Data for any other purpose with your consent.

## 8. International Data Transfers

As WinQuest Online operates globally and uses cloud-based services, your Personal Data may be transferred to, stored in, and processed in countries outside of your own, including India (where WinQuest Online is based) and other locations where our Service Providers operate.

When we transfer your Personal Data internationally, we implement appropriate safeguards to ensure that your data remains protected in accordance with this Privacy Policy and applicable data protection laws. These safeguards may include:

- Transferring data to countries deemed by relevant authorities (e.g., European Commission, UK ICO) to provide an adequate level of protection for Personal Data.
- Using standard contractual clauses (SCCs) or other legally approved mechanisms for data transfers.
- Implementing supplementary technical and organizational measures to protect data.
- Obtaining explicit consent for transfers where required.

## 9. Data Security

The security of your Personal Data is important to us. We implement robust technical and organizational measures designed to protect your Personal Data from unauthorized access, use, alteration, or disclosure. These measures include:

- **Encryption:** Using encryption technologies (e.g., SSL/TLS) to secure data in transit.
- **Access Controls:** Restricting access to Personal Data to authorized personnel only on a "need-to-know" basis.
- **Data Minimization:** Collecting only the data necessary for the stated purposes.
- **Regular Security Audits:** Conducting regular assessments of our systems for vulnerabilities.
- **PCI-DSS Compliance:** Ensuring third-party payment processors adhere to PCI-DSS standards for payment card data.

However, 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 Data, we cannot guarantee its absolute security.

## 10. Data Retention

We retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymize it, or, if this is not possible (for example, because your Personal Data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.

## 11. Your Data Protection Rights

Depending on your location and applicable data protection laws, you may have the following rights regarding your Personal Data:

- **Right to Access (GDPR, DPDP Act, CCPA/CPRA, PIPEDA):** The right to request copies of your Personal Data.
- **Right to Rectification/Correction (GDPR, DPDP Act, CCPA/CPRA, PIPEDA):** The right to request that we correct any information you believe is inaccurate or complete information you believe is incomplete.
- **Right to Erasure/Deletion (GDPR, DPDP Act, CCPA/CPRA):** The right to request that we erase your Personal Data, under certain conditions.
- **Right to Restrict Processing (GDPR, DPDP Act):** The right to request that we restrict the processing of your Personal Data, under certain conditions.
- **Right to Object to Processing (GDPR, DPDP Act, CCPA/CPRA):** The right to object to our processing of your Personal Data, under certain conditions (e.g., for direct marketing).

- **Right to Data Portability (GDPR, DPDP Act, CCPA/CPRA):** The right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- **Right to Withdraw Consent (GDPR, DPDP Act, COPPA):** If we are relying on your consent to process your Personal Data, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing before the withdrawal.
- **Right to Non-Discrimination (CCPA/CPRA):** The right not to receive discriminatory treatment for the exercise of your privacy rights.

To exercise any of these rights, please contact us at [Insert Email for Privacy/Data Protection Officer] or [contact@winquestonline.com]. We may need to verify your identity before fulfilling your request. We will respond to your request within the timeframe required by applicable law.

## **11. Your Data Protection Rights under the California Privacy Protection Act (CalOPPA) and California Consumer Privacy Act (CCPA/CPRA)**

### **11.1. CalOPPA Compliance:**

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy.

According to CalOPPA we agree to the following:

- Users can visit our site anonymously.
- Our Privacy Policy link includes the word "Privacy", and can easily be found on the home page of our website.
- Users will be notified of any privacy policy changes on our Privacy Policy Page.
- Users are able to change their personal information by emailing us at contact@WinQuestOnline.com.

Our Policy on "Do Not Track" Signals:

We honor Do Not Track signals and do not track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place. Do Not

Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## 11.2. CCPA/CPRA Rights for California Residents:

If you are a California resident, you are entitled to learn what data we collect about you, ask to delete your data, and not to sell (share) it. To exercise your data protection rights, you can make certain requests and ask us:

- **What Personal Information We Have About You:** If you make this request, we will return to you:
  - The categories of personal information we have collected about you.
  - The categories of sources from which we collect your personal information.
  - The business or commercial purpose for collecting or selling your personal information.
  - The categories of third parties with whom we share personal information.
  - The specific pieces of personal information we have collected about you.
  - A list of categories of personal information that we have sold (or "shared" under CPRA for cross-context behavioral advertising), along with the category of any other company we sold/shared it to. If we have not sold/shared your personal information, we will inform you of that fact.
  - A list of categories of personal information that we have disclosed for a business purpose, along with the category of any other company we shared it with.

Please note, you are entitled to ask us to provide you with this information up to two times in a rolling twelve-month period. When you make this request, the information provided may be limited to the personal information we collected about you in the previous 12 months.
- **To Delete Your Personal Information:** If you make this request, we will delete the personal information we hold about you as of the date of your request from our records and direct any service providers to do the same, subject to certain exceptions. In some cases, deletion may be accomplished through de-identification of the information. If you choose

to delete your personal information, you may not be able to use certain functions that require your personal information to operate.

- To Opt-Out of Selling or Sharing Your Personal Information: We don't sell or rent your personal information to any third parties for monetary consideration. However, under some circumstances, a transfer of personal information to a third party, or within our family of companies, without monetary consideration may be considered a "sale" or "sharing" (for cross-context behavioral advertising) under California law. You are the only owner of your Personal Data and can request disclosure or deletion at any time.

If you submit a request to stop selling or sharing your personal information, we will cease making such transfers.

Please note, if you ask us to delete or stop selling/sharing your data, it may impact your experience with us, and you may not be able to participate in certain programs or membership services which require the usage of your personal information to function. But in no circumstances, we will discriminate against you for exercising your rights.

To exercise your California data protection rights described above, please send your request(s) by email: **contact@WinQuestOnline.com** or **privacy@WinQuestOnline.com**.

## 12. Service Providers

We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), provide Service on our behalf, perform Service-related services, or assist us in analyzing how our Service is used. These include:

- Cloud hosting providers
- Payment processors
- Analytics providers
- Customer support platforms
- Email and communication services
- Marketing and advertising partners
- CI/CD tools (for automating development processes)

These third parties have access to your Personal Data only to perform these tasks on our behalf and are contractually obligated not to disclose or use it for any other purpose. We ensure that our Service Providers comply with appropriate data protection standards.

### 13. Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service. These providers may collect data about your interactions with our Service to generate reports on activities and trends, which helps us improve our Service.

### 14. Behavioural Remarketing

We may use remarketing services to advertise on third-party websites to you after you visited our Service. We and our third-party vendors use cookies and similar technologies to inform, optimize, and serve ads based on your past visits to our Service. This helps us present relevant advertisements to you on other websites and platforms. You can often opt-out of such personalized advertising through ad settings on various platforms or industry-standard opt-out tools.

### 15. Payments

We may provide paid products and/or services within our Service. In that case, we use third-party services for payment processing (e.g., payment processors like PayPal, Wise, Western Union, Remitly, UPI, etc.).

**We will not store or collect your payment card details.** That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS (Payment Card Industry Data Security Standard) as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express, and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

### 16. Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services. For example, some of the previous policy language included a reference to PolicyMaker.io; such references to specific tools are best removed unless they are direct links to your own, specific, generated policy document hosted by them.

## 17. Children's Privacy

WinQuest Online recognizes the need to provide additional privacy protections for children.

- **Users under 16:** Our Services are not intended for individuals under 16 years of age without verifiable parental consent. If you are under 16, a parent or legal guardian must register an account on your behalf and provide explicit consent to these Terms of Service and this Privacy Policy.
- **Children under 13 (COPPA Compliance):** For users in the United States under the age of 13, our practices are specifically designed to comply with the Children's Online Privacy Protection Act (COPPA).
  - **Verifiable Parental Consent:** We do not knowingly collect Personal Data from children under 13 without first obtaining verifiable parental consent.
  - **Limited Data Collection:** When a Parent/Guardian registers a Child under 13, we only collect limited Personal Data from the Child necessary for the educational service (e.g., name, age, email for communication about classes).
  - **Parental Rights:** Parents/Guardians have the right to:
    - Review the Personal Data collected from their Child.
    - Request the deletion of their Child's Personal Data.
    - Refuse further collection or use of their Child's Personal Data.
    - Consent to the collection and use of their Child's Personal Data without consenting to its disclosure to third parties (unless disclosure is integral to the service).
  - To exercise these parental rights, please contact us at [Insert Email for Privacy/Data Protection Officer] or [contact@winquestonline.com].

If you believe that we may have inadvertently collected Personal Data from a child under 16 (or under 13 for COPPA) without proper consent, please contact us immediately, and we will take steps to investigate and remove such information.

## 18. Third-Party Websites

Our Service may contain links to third-party websites or services that are not operated by us. This Privacy Policy applies only to our Services. If you click on

a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

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

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "Last Updated" date at the top of this policy.

We will also notify you via email and/or a prominent notice on our Service, prior to the change becoming effective, for significant changes.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **20. Contact Us**

If you have any questions about this Privacy Policy, your Personal Data, or your data protection rights, please contact us:

- WinQuest Online
- Website: <https://www.winqestonline.com>
- Email for Privacy/Data Protection Officer: [contact@winqestonline.com](mailto:contact@winqestonline.com)
- General Email: [support@winqestonline.com](mailto:support@winqestonline.com)
- Phone: +91 93308 11581

