

# Privacy Policy – Blocklogy Edutech Private Limited.

Blocklogy Edutech Private Limited will always remain committed to making the platform secure, trusted, and compliant with applicable laws. We will continue to enforce our commitment to secure your data by complying with the Indian Information Technology Act, 2000 and General Data Protection Regulation (“GDPR”) of European Union (“EU”) through our new Privacy Policy, which reflects the new requirements. We encourage you to review them.

To help comply with the Information Technology Act consent requirements, we need to confirm that you would like to continue to receive important updates from us. If you would like to continue hearing from us please update your subscription settings below or reach out to us at [info@blocklogy.org](mailto:info@blocklogy.org)

You can always unsubscribe at the bottom of the email. We are so grateful for our wonderful community!

Last updated: 1<sup>st</sup> July 2019

## A. HOW BLOCKLOGY COLLECTS INFORMATION ABOUT YOU?

When you use the Services, we collect information sent to us through your registration from Blocklogy app. BLOCKLOGY does not target its websites, mobile app, API, or any of the Services at children. BLOCKLOGY does not intentionally collect information from children. If we become aware that we have inadvertently received personal data from a user under the age of 18 (or any lower age pursuant to applicable law), we will delete such information from our records.

What information we collect: If you create an account or use the BLOCKLOGY website and/or application, we require your consent to collect the following information:

**Account Information** – your email address & user name

**Contact Information** – your name, birth of date, address, phone number.

**Technical information** – IP, login information, browser information, time zone setting, operating system and platform.

**Information about geo-location** – real-time location based information from your device at any time while you download or use our services. We may use this information to optimize your experience;

**Cookies** - Like many web sites, we use “cookies.” Cookies are small programs that we transfer to your hard drive that allow us to recognize you and to provide you with a customized

experience. If you do not want us to use cookies, you can easily disable them by going to the toolbar of your web browser, and clicking on the “help” button. Follow the

instructions that will prevent the browser from accepting cookies, or set the browser to inform you when you receive a new cookie. In addition, you may visit this and other websites anonymously through the use of utilities provided by other private companies.

**Other Information:** Every computer has an IP (Internet Protocol) address. IP addresses of computers used to visit this site are noted. In addition, we automatically collect other information such as email addresses, browser types, operating systems, and the URL addresses of sites clicked to and from this site.

## **B. HOW BLOCKLOGY PROTECTS AND STORES PERSONAL DATA?**

Throughout this Privacy Policy, we use the term “personal data” to describe the aforementioned data that we collect. We store your personal data in encrypted form securely throughout the life of your BLOCKLOGY account, unless you ask us to permanently delete it.

Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purposed product or service requested by the customer.

We implement a variety of advanced security measures to maintain the safety of your personal information when you access your personal information

## **C. HOW BLOCKLOGY USES THE PERSONAL DATA WE COLLECT?**

1. Any of the information we collect from you may be used only to personalize your experience. Having your information will help us better respond to your individual needs.

2. Additionally, we may use your information to:

Help improve our website, and make it a better overall user experience.

For communication purposes to send periodic email to the e-mail address you provide us, such as our newsletter, any company updates or related product and service information. (You can always unsubscribe if you don't wish to be contacted by us.)

Troubleshoot any problems

Customize, measure, and improve BLOCKLOGY Services and the content and layout of our website and applications

3. We process your personal data on one or more of the following legal bases in accordance with applicable rules and regulations:

With the consent from you, and/or for our legitimate business purposes.

4. We will never use your personal data for any purpose other than what we have disclosed to you. You can revoke your consent to share your data with us at any time, however we may not be able to continue offering you our services should you choose to do this.

5. BLOCKLOGY does not engage in any automated decision-making.

6. We will never sell or rent your personal data to any third parties.

7. Any communications we send to you will either be related to your account or will be related to BLOCKLOGY services or products.

8. In the event BLOCKLOGY sends any communication to you, which is not related specifically to your account, BLOCKLOGY will provide you with an “unsubscribe” mechanism through which you may opt out of receiving other similar messages in the future.

#### **D. HOW BLOCKLOGY SHARES PERSONAL INFORMATION WITH OTHER PARTIES?**

The only time we will share your data with another party is if it is required by law and are compelled to do court order, or a similar legal procedure.

#### **E. HOW YOU CAN CONTACT US ABOUT PRIVACY QUESTIONS AND EXERCISE YOUR DATA SUBJECT RIGHTS?**

If you have questions or concerns regarding this policy, or if you have a complaint, you should first contact us on our support page by emailing [info@blocklogy.org](mailto:info@blocklogy.org)

##### **E-mails**

If you choose to register for our products and services, we will send you certain promotional emails. Promotional emails advertise our products and services and/or the products and services of our Users and Affiliates. If you do not want to receive promotional emails from us, you may elect to opt-out of receiving promotional emails at any time after registering by e-Mailing us at [info@blocklogy.org](mailto:info@blocklogy.org) or by writing to us at the address contained herein, or by hitting the "unsubscribe" button at the bottom of any of our e-mails.

#### **RESIDENT OF EUROPEAN UNION**

From the 25th of May, 2018, the processing of Personal Information of ‘users based in the European Union (“EU”) is subject to the EU General Data Protection Regulation (“GDPR”). This section provides information as relates to EU users’ rights, and our responsibilities, under this regulation.

##### **(A)DATA TRANSFERS**

Currently we are the company is based in India and might have service provider or partners across world. As such, we and our service providers may transfer your Personal Information to store or access it, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it. If you are in the EU, we provide adequate protection for the transfer of Personal Information to countries outside of the EU through a series of intercompany agreements based on the standard contractual clauses authorized under EU law. You are entitled to obtain a copy of these agreements by contacting us as described below

## **(B)ACCESS TO PERSONAL INFORMATION**

We rely on consent in connection with Personal Information collections or uses that are necessary to enhance the user experience, to enable optional services or features, or to communicate with you.

### **Withdrawal of consent**

We believe that we are only entitled to access or use your Personal Information as long as we have your consent to do so. Whenever we rely on your consent, you will always be able to withdraw that consent.

### **Erasure**

We will also erase all your Personal Information that we hold, upon your request to us to do so. Provided that we may decline to process your request if we believe that doing so could impede the right of freedom of expression and information of others or when doing so is contrary to the local applicable laws.

### **Access to personal information**

We are committed to be completely transparent vis-à-vis the Personal Information that we hold. You can ask us to share with you all the Personal Information that we hold of yours, and we will do so.

### **Rectification**

In case you feel that your Personal Information with us is inaccurate, we allow you to have it rectified by placing a request with us in that regard.

We may decline to process requests that are frivolous/ vexatious, can jeopardize the privacy of others, and processing which would be highly impractical. For placing a request to exercise any of these rights, you can get in touch with us or our data protection officer – using the details set out below.

Additionally, our website allows you to edit your personal information by accessing the “my account,” “my profile,” or a similar feature. Similarly, you can delete other files or information you have stored by logging in and using the available functions to delete.

## **(C)OBJECTIONS AND COMPLAINTS**

Users from and in the EU have the right to object to our processing of Personal Information. Users in the EU also have the right to file a complaint relating to our handling of your Personal Information.

To file a complaint or objection, reach us at [info@blocklogy.org](mailto:info@blocklogy.org)

## **(D)GROUNDS OF PROCESSING**

When we process your Personal Information, we will only do so in the following situations: We need to use your Personal Information to perform our responsibilities in relation to Services provided to you.

We have a legitimate interest in processing your Personal Information. For example, we have a legitimate interest in processing your Personal Information to provide, secure, and improve our Services, in communicating with you about changes to our Services, and in informing you about new services or products.

The processing is necessary to fulfill Company's legal obligations. Company is subject to legal requirements in the jurisdictions in which it operates that require us to collect, process, disclose and retain your Personal Information. Company may also share information with law enforcement, or requests by third parties pursuant to legal processes.

#### **(E) SECURITY REQUIREMENT**

We are well placed to meet the security requirements of the GDPR and Information Technology Act, 2000. Our services are backed by robust, state-of-the-art technical and organizational safeguards, dedicated security and privacy teams.

#### **(F) TRANSFER OF PERSONAL INFORMATION TO THIRD COUNTRIES**

We will ensure that transfer of Personal Information of users of the EU shall only take place where the EU Commission has decided that the third country, a territory or one or more

specified sectors within that third country, or the international organization in question ensures an adequate level of protection. Albeit, it shall be done without any specific authorization.

#### **Legal Disclaimer**

We reserve the right to disclose your Personal Information as required by law and when we believe that disclosure doing so in the Company's interest to protect its property or other legal rights or the rights or property of others.

#### **Governing Law and Dispute Resolution**

This Policy shall be governed by and construed in accordance with the laws of the Republic of India. Subject to arbitration, the courts at Maharashtra shall have exclusive jurisdiction in relation to any disputes arising out of or in connection with this Policy.

If any dispute arises between the Company and You in connection with or arising out of the validity, interpretation, implementation or alleged breach of any provision of the Policy, such dispute shall be referred to arbitration in accordance with the Indian Arbitration and Conciliation Act, 1996 for the time being in force. Arbitration shall be conducted by one (1) arbitrator mutually appointed by the Company and You. The seat of arbitration shall be Navi Mumbai, Maharashtra. The language of the arbitration proceedings and of all written decisions and correspondence relating to the arbitration shall be English.

#### **International Users**

This Site is operated in the India. If you are visiting from other regions with laws governing data collection and use that may differ from Indian law, please note that you are transferring your

personal data to India, which does not have the same data protection laws and by providing your personal data you consent to:

- The use of your personal data for the uses identified above in accordance with this Privacy Policy; and
- The transfer of your personal data to the India as indicated above.

The Company is also not making any representation that the content contained on the Product is appropriate or to be used or accessed outside of the Republic of India and your use or access of the Site from outside the Republic of India, is at your own risk and you are responsible for compliance with the laws of such jurisdiction.

### **Merger, Sale or Insolvency**

If the Company should ever file for bankruptcy or have its assets sold to or merge with another entity, information the Company receives from you from this Site is a Company asset that may be transferred in connection with these types of corporate events.

### **Change in this Privacy Policy**

We may occasionally update this Privacy Policy. When we do, we will also revise the "last updated" date on the Privacy Policy. For changes to this Privacy Policy that may be materially less restrictive on our use or disclosure of personal information you have provided to us, we will attempt to obtain your consent before implementing the change. We encourage you to periodically review this Privacy Policy to stay informed about how we are protecting the

Personal information we collect. Your continued use of this Site constitutes your agreement to this Privacy Policy and any updates.

### **Contact Us**

If you have questions or concerns regarding this Policy, please contact us by emailing [info@blocklogy.org](mailto:info@blocklogy.org)

Or you can visit on the following address.

#### **Address**

Blocklogy Edutech Private Limited  
L&T Seawoods Grand Central,  
Tower 2, Office No. E 511, 5th Floor, Plot No.  
R-1, Sector 40,  
Seawoods Station. Navi Mumbai. 400 706.