

# Privacy Policy

## INTRODUCTION

Learning Bytes (PVT) (in this policy, referred to as “Learning Bytes”), recognizes the importance of confidentiality and the protection of personal information.

This Privacy Policy explains how we use and protect the personal information we hold, whether it relates to our students, parents, tutors, potential tutors, its staff, consultants and third party service providers in connection with our business.

Learning Bytes may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy, and in some cases, we may provide you with additional notice (such as adding a statement to the homepage of our website or sending you an email notification). We encourage you to review the Privacy Policy whenever you interact with us to stay informed about our information practices and the ways you can help protect your privacy.

## WHAT IS PERSONAL INFORMATION

Personal information means information about an identifiable individual or information that permits an individual to be identified. It does not include business contact information, such as name, title, business address and business telephone number when used for business communications.

## OUR COMMITMENT

Learning Bytes takes responsibility for maintaining and protecting any of your personal information under our control. We have appointed a Chief Privacy Officer, who is responsible for our day-to-day compliance, and can be contacted directly by the public. We review this policy and our personal data protection practices regularly to ensure that we are in compliance with applicable legislation and current best practices. We do not knowingly collect any personal information from children under the age of 13 and the services offered by Learning Bytes are not intended for use by children.

## HOW WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

We only collect personal information as required to meet the purposes that we have identified. We do not indiscriminately collect or retain personal information.

Learning Bytes typically collects personal information that is voluntarily provided by the individual in question. At times, however, personal information is obtained from other sources, such as government bodies or third parties such as employers, references and service providers, as permitted by law. Where the purpose for the collection of personal information is unclear, you can ask the Learning Bytes representative, with whom you are dealing, to provide an explanation of the purpose for the data collection.

Our reason for collecting personal information about tutors, students, parents, staff and consultants is to establish and maintain our contractual or other business relationship with that individual.

The purpose for collecting personal information about tutors and students is primarily to facilitate the provision of educational tutoring services online, including to allow students to quickly and easily assess the professional and educational background of tutors, as well as to allow us to communicate effectively.

with our tutors, students and parents and to maintain mailing lists. We may also use your personal information to:

- Respond to your comments, questions and requests, and provide customer service;
- Communicate with you about services, offers and promotions, and provide news and information we think will be of interest to you;
- Manage your account and send you technical notices, updates, security alerts, support and administrative messages;
- Monitor and analyze trends, usage and activities;
- Link or combine with information we get from others to help understand your needs and provide you with better service; and
- Carry out any other purpose for which the information was collected.

Wherever appropriate, Learning Bytes will ask for specific consent to collect, use and disclose personal information, including for the purposes of completing or arranging for the completion of background checks and other searches. Such a request, and your consent to such a request, may be given in writing or orally. In some cases, consent can be implied through an individual relationship or conduct with us, depending on the sensitivity of the information.

We may share your personal information, as follows:

With consultants and other service providers who need access to such information to carry out work on our behalf, including our legal advisors;

In response to a request for information from a court, law enforcement agency or other government agency or department if we believe disclosure is in accordance with any applicable law, or as otherwise required by any applicable law;

- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of us or any third party;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or transfer of all or a portion of our business to another entity; and
- Otherwise, with your consent or at your direction.
- We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

Personal information supplied to us is confidential and we do not disclose the information to any third party except with actual or implied consent, or as permitted or required by law. We do not exchange or sell personal information.

Learning Bytes may use third party service providers from time to time to carry out certain functions for us such as printing, storage, shredding or document scanning. Where we use such outside service providers, we require those third parties to protect personal information in the same manner in which we protect it and to not use or disclose it for any purposes except as directed by Learning Bytes.

## **PROTECTING YOUR PERSONAL INFORMATION**

We strive to maintain personal information in as accurate, complete and up-to-date a form as necessary to fulfill the purposes for which it was collected. We protect personal information by security safeguards appropriate to the sensitivity of the personal information, regardless of the format. Our security safeguards include premises security and restricted access to files containing personal information. Depending upon the information under our control, we also use technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access, internal passwords and security policies.

## **INFORMATION WE COLLECT AUTOMATICALLY**

We automatically collect certain information about you when you access or use our website or transact business with us, including:

- **Log Information:** We collect information about your use of our websites, such as the type of browser you use, access times, pages viewed, your IP address and the referring link through which you accessed our websites.
- **Transaction Information:** When you engage in a tutoring session, we collect information about the transaction, such as details regarding the type or nature of tutoring being provided and the date and time of the tutoring session.
- Our website uses cookies, which are identifying technologies that your computer receives when you visit certain websites. We do not match or correlate this information with any personal information that you submit to Learning Bytes. Most browsers can be set to reject all cookies but features of our website may not work as intended if that option is chosen. We use permanent cookies to analyze website usage. We use temporary (session based) cookies to improve performance and to determine web trends. Temporary cookies disappear when you close your browser window. We use your IP address to help diagnose problems with our server, and to administer our web site. Your IP address is used to help identify you for the purposes of gathering broad demographic information.

## **EXTERNAL LINKS**

To the extent that our website contains links to third party web sites, Learning Bytes is not responsible for the privacy practices or the content of such websites nor does Learning Bytes warrant the quality, accuracy or completeness of information contained on these sites.

## **ACCESSING YOUR PERSONAL INFORMATION**

You may write to our Chief Privacy Officer to request access to personal information about you. Learning Bytes will generally inform you if we are holding personal information about you, as well as details about the personal information. We reserve the right to confirm your identity before complying with any access request. In responding to an access request, we may charge a reasonable copying or retrieval fee, the amount of which we will provide in advance. Access to personal information may be denied if required or authorized by law. If a request for access is denied, Learning Bytes will provide an explanation of the reasons for the refusal.

If you choose to withdraw your consent to continued collection, use or retention of your personal information, we will explain the consequences of such withdrawal. You may also challenge the accuracy of personal information about you in our custody and Learning Bytes will amend personal information where appropriate.

## **HOW TO CONTACT US**

If you wish to request access to personal information about you, request a correction to information about you, or have questions about our Privacy Policy, you may contact our Privacy Officer as follows:

**Address:** SNC Building, Third Floor, Fazal-Ul-Haq Road, Blue Area, Islamabad, Pakistan  
**Email:** [privacy@learningbytes.online](mailto:privacy@learningbytes.online)

## **RECOURSE**

If you have a concern about the personal information handling practices of Learning Bytes, a complaint, in writing, may be directed to our Privacy Officer. Upon verification of your identity, we will act promptly to investigate the complaint and respond within 60 days.

Where our Privacy Officer makes a determination that a complaint is well founded, we will take the necessary steps to correct the offending information handling practice and/or revise the privacy policies and procedures of Learning Bytes. Where our Privacy Officer determines that a complaint is not well founded, the individual will be notified in writing of such determination.

