

PEARL ACADEMY PRIVACY POLICY

I. INTRODUCTION

1. Pearl Academy respects your privacy and is committed to protecting it through its compliance with this policy.

2. This Privacy Policy (“Policy”) describes the types of information Pearl Academy may collect directly from you or your authorized representative, or may be collected from a third party such as a representative authorized by Pearl Academy to provide services to you or the information that you may provide when you use Pearl Academy’s website, services, and application (collectively “Services”). Pearl Academy will only collect such Information by lawful and fair means. This Policy does not apply to information collected by any third party, including through any application or content (including advertising) that may link to or be accessible from or on Pearl Academy’s Services.

3. Pearl Academy may collect your personal information such as but not limited to bank details, passport details to assist for study abroad program which includes services like Letter of recommendation, student profile, student visa and application to university programs.

4. Many of Pearl Academy services require you to register on pearlacademy.com and/or other online forms shared to you. Pearl Academy will ask for personal information, such as, but not limited to your name, email address and telephone number, education background, work experience, and date of birth.

5. Pearl Academy does not collect Personal and Sensitive information unless the information is reasonably necessary for conducting our business functions/activities.

6. Please read this policy carefully to understand Pearl Academy policies and practices regarding your information and how Pearl Academy will treat it. If you do not agree with Pearl Academy policies and practices, your choice is not to use Pearl Academy Services. By accessing or using Pearl Academy Services, you agree to this Policy. This Policy may change from time to time. Any change in the Policy shall be notified, from time to time, and continuing to use the Services after receiving notice will constitute acceptance of the changes.

7. Personal information (PI): Personal Information shall mean and include any information relating to an identified or identifiable living person. In particular using a common identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person or any other piece of information as per applicable laws and regulations.

8. Processing personal information: Pearl Academy may process your Personal Information for the following purposes:

- Informing you about our college and courses

- Preventing, detecting, investigating, and prosecuting crimes (including but not limited to fraud and other financial crimes) in any jurisdiction, identity verification, government sanctions screening and due diligence checks
- Establishing, exercising, or defending legal rights in connection with legal proceedings (including any prospective legal proceedings) and seeking professional or legal advice in relation to such legal proceedings.

II. TERMS

1. Information Pearl Academy Collect About You: Pearl Academy collects several types of information. Such information is utilized in providing an efficient and effective experience to all users. When Pearl Academy provides the Services to you, your data is stored on Pearl Academy computers and servers. In some cases, the data may be accessible to people involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, as necessary, as Data Processors by us. Pearl Academy collects the following information: 1. Personal Information, which includes information through which you may be personally identified, such as name, postal addresses, email addresses, IP address, social media website user account names, telephone numbers, companies you may be associated with, education, employment history, or other addresses at which you receive communications from or on behalf of Pearl Academy ("Personal Information");

2. Non-Personal Information, which includes information that alone cannot be used to identify you or to establish any contact with you. Such Non-Personal Information may include, but is not limited to; browser information and details; operating system information; mobile device information; pages accessed; times of visit; and referring websites, applications, or services, including the relevant search queries that led you to Pearl Academy Services ("Non- Personal Information");

3. Collectively, Personal Information and Non-Personal Information shall be referred to as "Information."

4. Method of Collecting Information: Pearl Academy collects Information in two ways: (1) Information you provide directly; and (2) Information Pearl Academy receive from your use of Pearl Academy Services.

5. Information is collected when you:

- A. Send Pearl Academy any electronic communication (including via email or any other application);
- B. Enter contests run by us from time-to-time;
- C. Create a user account;
- D. Connect other online accounts with your Pearl Academy account, such as Facebook or LinkedIn;
- E. Submit online applications and forms to Pearl Academy; and
- F. Subscribe to newsletters.

If you use a social media platform or your mobile device (or other methods of communication) to interact with Pearl Academy, the communication method or application may have a specific and independent privacy policy that governs the use of Personal Information.

6. Information Automatically Collected: When you use Pearl Academy Services, Pearl Academy may collect certain information as described below to improve Pearl Academy Services, troubleshoot bugs, provide the Services, manage the Services, track usage, and provide content for referring traffic sources. Such information may include: IP address; profile information; aggregate user data; preferences; technical session information; browser type; information about your computer, hardware, software, or mobile device, including a device identifier; demographic information including zip code; and navigational data including log files, server logs, clickstream data, and language preference. User IP addresses are recorded for security and monitoring and for providing services. If you arrived at Pearl Academy website via a link from another webpage, Pearl Academy may receive aggregate or otherwise anonymous statistical information about your visit to Pearl Academy site. Pearl Academy monitor customer traffic patterns and site usage to help us develop the design of the site, and to improve the content of Pearl Academy website to better match the interests of Pearl Academy website users. Pearl Academy may combine this automatically collected and other Non-Personal Information with Personal Information, in which case Pearl Academy will treat the combined information as Personal Information under this Privacy Policy.

7. How Pearl Academy May Use YOUR Information: Pearl Academy may use Information collected about you or that you provide to us, including any Personal Information, to:

- Operate and improve Pearl Academy website and Services;
- Provide Services to you;
- Track and analyze your use of Pearl Academy Services;
- Provide customer support, including support to Pearl Academy vendors or business partners;
- Communicate and provide additional information that may be of interest to you about Pearl Academy, partner institutions, service partners and vendors;
- Send you reminders, notices, updates, security alerts, support and administrative messages, service bulletins, or marketing materials;
- Administer contests or any promotional activities or events sponsored by Pearl Academy;
- Manage Pearl Academy everyday business needs, such as website administration, fulfillment of orders, analytics, fraud detection and prevention, compliance with the law or reporting obligation, or enforcement of Pearl Academy Terms of Service; and
- Aggregate anonymous data from Pearl Academy Services used to benchmark, analyze, and improve the Services.

If you do not want to be on Pearl Academy mailing list, you can opt out anytime by sending an email to admissions@pearlacademy.com or clicking on the "unsubscribe" button on Pearl Academy respective communications. From time to time, Pearl Academy may use your Personal Information to send important notices to you regarding material changes to Pearl Academy terms, conditions, and policies or purchased services which you may not opt out of receiving.

8. Disclosure of YOUR Information: Pearl Academy may disclose Personal Information that Pearl Academy collect or you provide as described in this Policy:

• To Pearl Academy service providers, which provide services for Pearl Academy including but not limited to sending emails on Pearl Academy behalf, processing payments, providing analytics services and helping Pearl Academy provide services as requested by users. Pearl Academy service providers are bound by law or contract to protect Personal Information and are only allowed to use Personal Information in accordance with the terms of Pearl Academy service agreements with them. Pearl Academy do NOT share, sell, rent, or trade Personal Information with third parties for their own promotional purposes, and Pearl Academy will only share Personal Information as outlined herein or with your consent. However, it is explicitly understood that you are providing your express consent to receive information, including telemarketing, about products and services from us and you hereby agree and consent to our contacting you using the information you have provided to us. Pearl Academy or its trusted partners may contact you by e-mail, phone, SMS, WhatsApp and other kinds of text message, social networks or any other means of communication. • Pearl Academy may also disclose your Personal Information:

(1) To comply with any court order, law, or legal process, including to respond to any government or regulatory request;

(2) To enforce or apply Pearl Academy Terms of Services and other agreements, including for billing and collection purposes; and

(3) If Pearl Academy believe disclosure is necessary or appropriate to protect the rights, property, or safety of Pearl Academy, Pearl Academy customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

9. Accessing and Correcting YOUR Information: You have the right to know whether your Personal Information has been stored and can consult with Pearl Academy about any Personal Information to verify the accuracy of such Information and receive a copy thereof. You have the right to have the Information supplemented, erased, updated, or corrected. For its transformation into anonymous format or to block any data held in violation of the law, requests should be sent to us by email at admissions@pearlacademy.com Pearl Academy will retain your information as long as your account is active or as needed to provide you the desired Services, conduct Pearl Academy internal operations, and to maintain a record of your transactions for financial reporting purposes. All Information will also be retained and used, as necessary, to comply with Pearl Academy legal obligations, resolve disputes, and enforce Pearl Academy agreements.

10. Data Security: The security of your Personal Information is important to Pearl Academy. Pearl Academy have implemented reasonable administrative, technical, and physical security measures designed to secure and protect your Information from accidental loss and from unauthorized access, use, alteration, and disclosure. However, as the transmission of information via the internet is not completely secure, Pearl Academy cannot guarantee the security of information transmitted to Pearl Academy Services. Any transmission of Personal Information shall be at your own risk.

11. Children's Personal Information: Pearl Academy do not knowingly collect or solicit Personal Information from anyone under the age of 16. If you are under 16, please do not attempt to register for the Services or send any Information about yourself to us. Parents and legal guardians are encouraged to monitor the activities of their wards in this regard. If Pearl Academy learns that Pearl Academy has collected Information from a child under age 16, Pearl Academy will delete that Information as quickly as possible. If you believe that a child under 16 may have provided us Information, please contact us at admissions@pearlacademy.com.

12. Changes to Pearl Academy Privacy Policy: Pearl Academy reserves the right to update this Policy from time to time. Pearl Academy will notify you of any changes and/or modifications to the Policy by updating the "Last Modified" date on this Policy, sending an electronic communication detailing the changes, posting a notification on the Services, or as required by law. Any changes or modifications will be effective immediately upon posting the updated Policy on Pearl Academy's Services. You are encouraged to periodically review this Policy to stay informed of updates. YOUR continued use of Pearl Academy's Services after receipt of such revised Policy will be deemed an acceptance of the revised Policy.

II. CONTACT INFORMATION

To ask questions or comment about this Privacy Policy and Pearl Academy privacy practices, contact us at: admissions@pearlacademy.com