UPES PRIVACY POLICY

I. INTRODUCTION

1. University of Petroleum and Energy Studies ("UPES") 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 UPES may collect directly from you or your authorized representative, or may be collected from a third party such as a representative authorized by UPES to provide services to you or the information that you may provide when you use UPES's website, services, and application (collectively "Services"). UPES 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 UPES's Services.

3. UPES 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 UPES services require you to register on upes.ac.in and/or other online forms shared to you. UPES 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. UPES 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 UPES policies and practices regarding your information and how UPES will treat it. If you do not agree with UPES policies and practices, your choice is not to use UPES Services. By accessing or using UPES 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: UPES 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

- Information UPES Collect About You: UPES collects several types of information. Such information is utilized in providing an efficient and effective experience to all users. When UPES provides the Services to you, your data is stored on UPES 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. UPES collects the following information:
 - 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 UPES ("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 UPES Services ("Non-Personal Information");
 - 3. Collectively, Personal Information and Non-Personal Information shall be referred to as "Information."
- Method of Collecting Information: UPES collects Information in two ways: (1) Information you provide directly; and (2) Information UPES receive from your use of UPES Services.
 - 1. Information is collected when you:
 - 1. Send UPES any electronic communication (including via email or any other application);
 - 2. Enter contests run by us from time-to-time;
 - 3. Create a user account;

- 4. Connect other online accounts with your UPES account, such as Facebook or LinkedIn;
- 5. Submit online applications and forms to UPES; and
- 6. Subscribe to newsletters.

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

- 3. Information Automatically Collected: When you use UPES Services, UPES may collect certain information as described below to improve UPES 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 UPES website via a link from another webpage, UPES may receive aggregate or otherwise anonymous statistical information about your visit to UPES site. UPES monitor customer traffic patterns and site usage to help us develop the design of the site, and to improve the content of UPES website to better match the interests of UPES website users. UPES may combine this automatically collected and other Non-Personal Information with Personal Information, in which case UPES will treat the combined information as Personal Information under this Privacy Policy.
- 4. How UPES May Use YOUR Information: UPES may use Information collected about you or that you provide to us, including any Personal Information, to:
 - Operate and improve UPES website and Services;
 - Provide Services to you;
 - Track and analyze your use of UPES Services;
 - Provide customer support, including support to UPES vendors or business partners;
 - Communicate and provide additional information that may be of interest to you about UPES, 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 UPES;
 - Manage UPES 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 UPES Terms of Service; and

• Aggregate anonymous data from UPES Services used to benchmark, analyze, and improve the Services.

If you do not want to be on UPES mailing list, you can opt out anytime by sending an email to <u>dpo@upes.ac.in</u> or clicking on the "unsubscribe" button on UPES respective communications. From time to time, UPES may use your Personal Information to send important notices to you regarding material changes to UPES terms, conditions, and policies or purchased services which you may not opt out of receiving.

- 5. **Disclosure of YOUR Information:** UPES may disclose Personal Information that UPES collect or you provide as described in this Policy:
 - To UPES service providers, which provide services for UPES including but • not limited to sending emails on UPES behalf, processing payments, providing analytics services and helping UPES provide services as requested by users. UPES 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 UPES service agreements with them. UPES do NOT share, sell, rent, or trade Personal Information with third parties for their own promotional purposes, and UPES 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. UPES 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.
 - UPES 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 UPES Terms of Services and other agreements, including for billing and collection purposes; and (3) If UPES believe disclosure is necessary or appropriate to protect the rights, property, or safety of UPES, UPES customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- 6. Accessing and Correcting YOUR Information: You have the right to know whether your Personal Information has been stored and can consult with UPES 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 <u>dpo@upes.ac.in</u> will retain your information as long as your account is active or as needed to provide you the desired Services, conduct UPES 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 UPES legal obligations, resolve disputes, and enforce UPES agreements.

- 7. **Data Security**: The security of your Personal Information is important to UPES. UPES 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, UPES cannot guarantee the security of information transmitted to UPES Services. Any transmission of Personal Information shall be at your own risk.
- 8. Children's Personal Information: UPES 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 UPES learns that UPES has collected Information from a child under age 16, UPES 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 <u>dpo@upes.ac.in</u>
- 9. Changes to UPES Privacy Policy: UPES reserves the right to update this Policy from time to time. UPES 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 UPES's Services. You are encouraged to periodically review this Policy to stay informed of updates. YOUR continued use of UPES'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 UPES privacy practices, contact us at:

dpo@upes.ac.on