

Privacy Policy | thinkingSouls

ThinkingSouls Privacy Statement, effective as of 4th August 2025

At ThinkingSouls, trust is our #1 value. This Privacy Statement describes how ThinkingSouls collects, uses, shares or otherwise processes information relating to individuals ("Personal Data") and the rights associated with that processing.

ThinkingSouls (hereafter referred to as "we," "us," or "our") and/or its affiliated entities is committed to protecting the privacy and personal information of individuals who visit our website. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information when you use our website.

This Privacy Statement does not apply to the extent we process Personal Data in the role of a processor or service provider on behalf of our consumers / student, their parents (or their affiliates), including where we offer to our consumers / student, their parents (or their affiliates) various products and services through which our consumers / student, their parents (or their affiliates): (i) create their own websites and applications running on our platforms; (ii) sell or offer their own products and services; (iii) send electronic communications to others; or (iv) otherwise collect, use, share or process Personal Data via our products and services.

ThinkingSouls (ThinkingSouls or 'we' or 'us') recognises the importance of maintaining your privacy. This privacy policy is a legally binding document between you and ThinkingSouls.

This privacy policy applies to the collection, use, storage, disclosure, transfer or processing of personal information or sensitive personal information by us through your use of the Website and related application, products and services.

This privacy policy is subject to the Terms & Conditions of Use of ThinkingSouls. This policy is effective from the date and time a user registers with or visits the Website and/or by filling up the Registration form.

By accessing or using the Website or any services, you consent to the information collection, disclosure and use practices described in this Privacy Policy. The date at the top of this page indicates when this Privacy Policy were last updated. Please also review our Terms & Conditions of Use, which governs your use of the service. Terms capitalised but not defined herein shall have the meaning ascribed to them in the Terms & Conditions of Use.

1. Information that we Collect

At ThinkingSouls, we collect data to operate effectively and provide you with the best experience when using our services. You may provide some of this data directly, while we collect other information in various ways.

ThinkingSouls collects data to ensure the efficient operation of our services and to provide you with the best possible experience. We gather some of this data directly, such as when you register for our email communications, sign up for an Admission Test, or enrol in our programs through our Website or Landing pages.

In addition to direct data collection, we may obtain information through various other means, which include:

1. **Data You Provide Directly:** You provide us with certain data directly when you engage with our services, such as:
 1. **Registration Information:** When you sign up for our email communications, register for an Admission Test, or enrol in one of our programs through our Website or Landing pages, we collect personal information, which may include your name, contact details (such as email address, phone number, and mailing address), date of birth, and other relevant information required for registration / enrolment.
2. **Data We Collect Indirectly:** In addition to the information you provide directly, we may collect data through various other means, including:
 1. **Social Media Channels:** We may collect information from our social media channels when you interact with our content or participate in discussions. Please review the privacy settings of your social media profiles to control the information you share.
 2. **In-Person Communication:** During in-person interactions, such as seminars, workshops, or events, we may collect information related to your attendance or participation.
 3. **Pre-Counseling Process:** When you engage in our pre-counselling process, we may contact you for additional clarification regarding your profile or to organise one-to-one meetings. The information collected during these interactions helps us understand your educational needs and preferences.
3. **Automatically Collected Data:** We also collect certain information automatically as you interact with our website, such as:
 1. **Usage Data:** We gather data about your interaction with our website, including pages visited, time spent on pages, clickstream data, and other web analytics information. This data helps us analyse website usage and enhance your user experience.
4. **Cookies and Similar Technologies:** We use cookies and similar technologies to collect information about your browsing behaviour on

our website. For more information about how we use cookies and how you can manage your cookie preferences, please refer to our [Cookie Policy](#).

5. **Consent and Data Usage:** By providing your data to ThinkingSouls, you consent to the collection, processing, and use of your information as described in this Privacy Policy. We use this data to provide you with our educational services, improve our offerings, and keep you informed about relevant updates and opportunities.
6. **Data Protection:** We take data protection seriously and have implemented security measures to safeguard your information from unauthorised access, disclosure, alteration, and destruction. However, it's important to note that no data transmission or storage method is entirely secure, and we cannot guarantee the security of your data. We also obtain data from third parties. We protect data obtained from third parties according to the practices described in this policy, plus any additional restrictions imposed by the source of the data. These third-party sources vary over time, but have included:
7. **Publicly-Available Sources:** We may access information from publicly-available sources, such as open government databases or other data within the public domain, to enrich our understanding of relevant information. It's essential to underscore that when we receive data from third-party database providers, the responsibility for obtaining the necessary consent to share your personal information rests with these providers. Your trust and privacy are paramount, and we are committed to handling your data with care and in compliance with applicable privacy laws and regulations.
8. **Data from Trusted Sources:** We may obtain data from trusted database providers. It is important to note that these providers are responsible for ensuring they have obtained the necessary consent from you to share your personal information.
9. **Partnerships:** In collaboration with partners, we may offer co-branded services or engage in joint marketing activities. In such cases, we may collect data to enhance our services and provide you with relevant opportunities.

At ThinkingSouls, we respect your choices regarding the data we collect. When we request personal data, you have the option to decline. However, it's important to note that if you choose not to provide certain data that is necessary to deliver a specific service, you may be unable to use that particular

service effectively. We want to ensure you have the best experience with our offerings, and providing essential data is integral to achieving this goal.

The data we collect depends on the context of your interactions with ThinkingSouls. This may include the following categories of information:

1. **Name and Contact Data:** We collect your first and last name, email address, postal address, phone number, and other similar contact details to ensure effective communication.
2. **Credentials:** When you create a personal account on our websites, we collect your username and password to secure your access to our services.
3. **Demographic Data:** We may gather demographic data such as your date of birth, parents/guardian names, photographs, address, age, gender, country of residence, blood group, citizenship status, and preferred language.
4. **Educational and Professional Background:** Information about your educational and professional history, including standardized test scores, may be collected to help us tailor our educational services to your needs.
5. **Videos and Pictures:** During our physical events, photographs or video recordings may be taken. We may use these visual or video captures featuring your person on our websites or in promotional materials with your consent.
6. **Other Information:** Any additional information you choose to provide to us, such as through feedback forms or the 'Contact Us' feature on our websites, is also collected to assist us in addressing your inquiries and improving our services.
7. **Information Collected by Automated Means:** When you visit our websites, we may automatically collect certain information using technologies such as cookies, web beacons, and web server logs. This information may include:
 - IP address
 - Unique device identifier
 - Browser characteristics
 - Device characteristics
 - Operating system
 - Language preferences
 - Referring URLs
 - Details of actions taken on our websites
 - Dates and times of visits to our sites
 - Other usage statistics
 - Location data

We collect this data to enhance your user experience, analyse website usage patterns, and provide relevant content and services. Please refer to our Cookie

Policy for more information on how we use cookies and how you can manage your cookie preferences.

We may process sensitive personal information, which may include:

- **Passwords:** For your account security.
- **Financial Information:** Such as bank account details or payment instruments, but only to the extent you voluntarily provide them.
- **Aadhaar Details:** You have the option to provide your Aadhaar details for identification purposes. It's important to note that providing Aadhaar details is not mandatory, and you may choose to provide other identification documents like a passport or driver's license.

We handle sensitive personal information and Aadhaar details with the utmost care and in strict accordance with your consent. Your consent is obtained when you click on ["I agree"] at the time of accessing our Website or through other means. This consent covers the collection, storage, use, processing, sharing, and, if applicable, the transfer of such information, all in compliance with the provisions outlined in this Privacy Policy.

Legal Basis for Processing Personal Information for European Economic Area (EEA) Users:

The collection and processing of personal information, as described above, is carried out on the following legal grounds, depending on the nature of the personal information and the specific context of its collection:

- **Consent:** We may collect and process your personal information if you have provided explicit consent for such processing.
- **Contractual Necessity:** In cases where the processing of your personal information is necessary for the performance of a contract between you and ThinkingSouls, we will collect and process this information to fulfil our contractual obligations.
- **Legal Obligation:** If processing your personal information is required to comply with a legal obligation, we will collect and process the data in accordance with applicable laws and regulations.
- **Protection of Vital Interests:** We may process your personal information when it is necessary to protect your vital interests or the vital interests of another natural person.
- **Public Interest:** Processing your personal information may be necessary for us to perform a task in the public interest.
- **Legitimate Interests:** We may process personal information based on our legitimate interests, such as ensuring network and information security, conducting direct marketing, preventing fraud or criminal acts, provided that such interests are not overridden by your data protection interests or fundamental rights and freedoms.

If you have any questions or require further information regarding the legal basis for collecting and using your personal information for any specific processing activity, please do not hesitate to contact our grievance officer

using the contact details provided below.

1.1 Cookies and Other Tracking Technologies

We employ various tracking technologies, including cookies, web beacons, analytics/webmaster tools, and similar methods, to collect specific information. You have the choice to accept or decline these technologies and can configure your browser to notify you when a cookie is being sent to your computer. However, please be aware that if you choose to reject our cookies, certain portions of our service may not be accessible. Additionally, third-party entities may be employed to display targeted advertisements, provide specific functionalities (such as maps), or employ their own cookies and tracking technologies to gather, track, and analyse user usage and statistical data. We do not assume responsibility for the data collection practices of these third parties.

1. **Cookies:** Cookies are files that websites transmit to a visitor's computer or other internet-connected device to uniquely identify the visitor's browser or to store information or settings within the browser.
2. **Web Beacons:** Also known as Internet tags, pixel tags, or clear GIFs, web beacons connect webpages to web servers and their associated cookies. They are employed to transmit information collected through cookies back to a web server.

Through these automated collection methods, we may acquire "clickstream data," which comprises a log of the links and other content clicked by a visitor while navigating a website. As visitors click through the website, a record of their actions may be collected and stored. We link specific data elements collected through automated means, such as browser information, with other information we possess about you. This linkage allows us to determine, for example, whether you have opened an email that we sent to you. Your browser can provide instructions on how to receive notifications when certain types of cookies are received or how to limit or disable specific types of cookies. However, it's important to note that without cookies, you may not have access to all of our website's features. To the extent mandated by applicable law, we will seek your consent before collecting personal information using cookies or similar automated methods.

Third-party applications, tools, widgets, and plugins on our website, including social media sharing tools, may also employ automated methods to collect information concerning your interactions with these features. This information is directly collected by the providers of these features and is subject to their respective privacy policies or notices. We also collect certain information through the use of cookies, web beacons, analytics/ webmaster tools and/ or similar tracking technologies. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some portions of our

Service. We may also use third parties to display and target ads, provide certain functionality (such as maps) or to place their own cookies and other tracking technologies to collect, track and analyse usage and statistical information from users. We are not responsible for the information collection practices of any third parties.

1.2 Payment Information

When you subscribe to ThinkingSouls, we may collect your billing name, billing address, and payment method. It's important to emphasise that we do not gather or retain sensitive payment details, such as Credit/Debit Card numbers, PIN, CVV/CVC, Expiry Date, OTP, or any other payment-related information. Instead, we securely redirect you to the respective payment gateway page, where you can directly input and process your payment details.

2. How Do We Use Your Information

2.1 General

At ThinkingSouls, we take your privacy and security seriously. We may use your information to safeguard ThinkingSouls, our students, or our website. This may involve disclosing personal information when required by law (e.g., in response to a lawful subpoena, warrant, or court order). We may also disclose information to enforce our policies and agreements, bill and collect amounts owed to us, protect the rights, property, or safety of ThinkingSouls and our users, or prevent fraudulent, abusive, or unlawful use of our services. In situations where there's an immediate risk of death or serious physical injury, we may disclose personal information. Additionally, if a government agency or investigatory body requests information, we may share it during fraud investigations or legal compliance activities.

2.2 Personal Information

We use personal information to facilitate our services, process your requests or transactions, provide you with relevant information, products, and services, and manage our business operations. This includes sending you news and offers tailored to your preferences, which may be our own or third-party offers that we believe align with your interests. We may also send you advertisements and promotional material from third parties.

2.3 Legal Use

We adhere to all legal requirements and use information in compliance with applicable laws and regulations.

2.4 Third-Party Service Providers

In cases where we engage third-party service providers to assist with our services, we may share personal information with them when necessary for

their work on our behalf. For example, we might use credit card processing or verification companies to ensure secure transactions and verify your identity. We only share personal information with third parties under specific circumstances, such as when you've expressed interest in receiving information from them, provided consent, or in response to a legitimate request for information.

2.5 Transactional Communications

We use the information you provide to contact you and confirm our educational services. This may include sending emails, SMS messages, WhatsApp messages, making phone calls, or inviting you to events, whether online or offline, especially if you are a subscribed user. We respect your preferences and offer you the opportunity to opt out of non-essential communications, such as promotional or marketing-related messages. To opt out of receiving promotional SMS messages, you can register your phone number with the Do Not Disturb (DND) process, following our Terms & Conditions of Use. Your privacy matters to us, and we strive to ensure your communication preferences are respected.

3. Disclosures and Transfer

At ThinkingSouls, we prioritise the security and privacy of your sensitive personal information. We disclose or transfer such information under specific circumstances and only to entities and individuals who maintain security standards equal to our own. This ensures the continued security, integrity, and privacy of your sensitive personal information. Below, we outline the scenarios and entities/individuals involved:

Disclosures to Affiliates/Group Companies: We may share sensitive personal information with our affiliates and group companies for several purposes, including research and development related to the relevant product or service, marketing and advertising of the product or service to you, customizing product or service offerings for your benefit, and conducting analytics to improve our services, as well as those offered by our affiliates, to enhance your overall experience.

Mandatory Disclosures or Transfers: We may disclose or transfer information when required by applicable laws or as part of any judicial or governmental proceedings.

Disclosures or Transfers to Service Providers: We may share information with third parties who provide services on our behalf or when offering third-party services to you, as described in paragraph 2.3 above.

Corporate Changes: Information may be disclosed in connection with the sale

of our business or assets, or during an acquisition of our business by a third party, or any other merger and acquisition (M&A) transaction involving us.

Transfer from the EEA (European Economic Area)

Personal information of individuals from the EEA is transferred outside the EEA to jurisdictions that meet the European Commission's criteria for having an "adequate level of protection." In cases where personal information is transferred to other jurisdictions, such as India, we ensure compliance with lawful measures, including contracts that incorporate EU standard contractual clauses. This ensures that your personal information remains protected and secure during international transfers.

4. Data Retention

Retention of Personal Information, Including Aadhaar Details

All personal information, including Aadhaar details, collected by us, will be retained only for the duration necessary to fulfil the purposes for which it was collected. The determination of this retention period takes into account several factors, including:

1. **Quantum, Sensitivity, and Nature:** We consider the amount, sensitivity, and nature of the personal information when deciding on the retention period.
2. **Purposes of Processing:** We assess the purposes for which the personal information was collected and whether there are alternative means to achieve these purposes.
3. **Potential Risk of Harm:** We evaluate the potential risk of harm that may arise from unauthorised use or disclosure of the personal information.
4. **Legal Requirements:** We ensure compliance with any legal requirements related to the retention and disposal of personal information.

Our commitment is to retain personal information only for as long as necessary while maintaining the security and integrity of your data.

5. Personal Information of Minors

Our services and Website are not intended for individuals under the age of 16, and we do not knowingly collect personal or sensitive personal information from individuals under the age of 16. If we collect personal information from individuals between the ages of 16 and 18, we assume that such collection has been authorised by their legal guardian or parents. In cases where you believe that your child has provided us with their personal information without your consent, please contact our grievance officer using the contact details

provided below. We will promptly take appropriate measures to address the situation. Your child's privacy and data security are important to us.

6. YOUR RIGHTS

Your Rights Under This Privacy Policy

You have the following rights in relation to your personal information under this Privacy Policy:

1. **Right of Access and Modification:** You can access your personal information at any time to review the information you have provided. If you find any inaccuracies or incompleteness in the information, you have the right to modify it.
2. **Right to Withdraw Consent:** You have the right to withdraw your consent for the processing of any sensitive personal information you have provided to us. To exercise this right, please contact our grievance officer using the contact details provided below. It's important to note that withdrawing your consent may impact our ability to provide certain services, and we may, at our sole discretion, discontinue services for which this information was being used. We will inform you of any consequences of withdrawing your consent.

6(A) Additional Rights of EEA Users

As an EEA (European Economic Area) user, you have additional rights concerning your personal information:

Right to Erasure: You have the right to request the erasure of your personal information under the following circumstances:

- You believe that the personal information is no longer necessary for the purposes for which it was collected or processed.
- You withdraw your previously given consent, and there are no other legal grounds for the processing.
- You object to the processing of your personal information in accordance with applicable laws, and there are no overriding legitimate reasons for the processing.
- You believe your personal information has been unlawfully processed.

Please note that we may refuse your request for the right to erasure in certain circumstances, as permitted by applicable laws.

Right to Withdraw Consent: If we have collected and processed your personal information based on your consent, you can withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of any processing conducted prior to your withdrawal or processing based on other legal grounds mentioned above.

Other Rights: In accordance with applicable laws, you also have the right to:

- Object to the processing of your personal information.
- Request that we restrict the processing of your personal information.
- Request the portability of your personal information.

You can exercise these rights by contacting our grievance officer, whose contact details are provided below.

If you believe that we are using your personal information in a manner inconsistent with this Privacy Policy or if you wish to make a complaint, you have the right to contact your local data protection authority.

7. Disclaimer

Subscribed Users are solely responsible for maintaining the confidentiality of their passcode and user identification. All activities and transactions performed through the user identification are the responsibility of the Subscribed Users. ThinkingSouls assumes no responsibility or liability for the improper use of credit cards or debit cards used online or offline by Subscribed Users. All disclaimers mentioned in the Terms & Conditions of Use of the Website shall apply.

8. Security

We are committed to ensuring the security, integrity, confidentiality, and privacy of your information. We implement physical, electronic, and procedural safeguards to protect the information we process and maintain. These security practices are in accordance with the standards required by applicable laws. Access to this information is limited to authorised employees who require it for operating, developing, or improving our application, services, products, and website. While we strive to provide reasonable security, please be aware that no security system can prevent all potential security breaches.

9. Jurisdiction

By choosing to visit the Website and/or application, your visit and any privacy-related disputes are subject to this Policy and the Terms & Conditions of Use. In addition, any disputes arising under this Policy shall be governed by the laws of India, and the courts at Delhi / New Delhi shall have exclusive jurisdiction over such disputes.

10. Miscellaneous

This Privacy Policy constitutes an electronic contract formed under The Information Technology Act, 2000, and the rules made thereunder, along with

the amended provisions pertaining to electronic documents/records in various statutes, as amended by The Information Technology Act, 2000.

We may update our Privacy Policy periodically. We advise you to review this page regularly for any changes. While we will make an effort to notify you of changes by posting the new Privacy Policy on this page, please note that we may not be able to separately inform you of revisions each time they occur. These changes will be effective immediately upon posting on this page. We will not be responsible for your failure to stay informed about such changes. However, when required under applicable law, we will obtain additional consent from you for such changes.

Grievance Officer

If you have any questions, concerns, or requests related to this Privacy Policy, please contact us at: info@ThinkingSouls.com

Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for legal reasons. We will post the revised policy on our website, and the revised version will be effective immediately upon posting.