

PRIVACY POLICY

Last updated on 01/04/2025

1. **Purpose and Scope**

We, Step by Step Shiksha Samiti (and associated schools) ("**SBSSS**" or "**we**" or "**our**" or "**us**"), are committed to protecting the privacy of the information provider including students, vendors, suppliers, employees/teachers and consultants of SBSSS ("**you**" / "**your**" / "**yourself**"). We consider privacy and protection of your Personal Information to be of high importance. Our practices and procedures in relation to the collection and use of your Personal Information has been set out below in this privacy policy ("**Privacy Policy**"). This Privacy Policy will familiarize you with the manner in which SBSSS may collect, use, share, transfer and disclose your Personal Information.

This Privacy Policy shall be construed to be provided in compliance with the Information Technology Act, 2000 ("**IT Act**"), as amended from time to time, and shall be read with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011 ("**SPDI Rules**"), as applicable.

Definitions

In this Privacy Policy, unless the context otherwise requires:

- i. '**Personal Information**' means any information that relates to a natural person which, either directly or indirectly, in combination with other information available or likely to be available with SBSSS, is capable of identifying such person.
- ii. '**Sensitive Personal Data or Information**' of a person means such Personal Information which consists of information relating to:
 - password;
 - financial information such as bank account or credit card or debit card or other payment instrument details;
 - physical, physiological and mental health condition;
 - sexual orientation;
 - medical records and history;
 - biometric information;
 - any detail relating to the above Clauses as provided to SBSS for providing service; and
 - any of the information received under any of the above Clauses by SBSS for processing, stored or processed under lawful contract or otherwise:

Provided that any information that is freely available or accessible in public domain or furnished under the Right to Information Act 2005 or any other law for the time being in force will not be regarded as Sensitive Personal Data or Information.

- iii. The words and expressions used in this Privacy Policy but not defined herein but defined in the IT Act or SPDI Rules will have the meanings assigned to them thereunder. Please note that usage of the term Personal Information in this Privacy Policy includes Sensitive Personal Data or Information, wherever appropriate and/or mandated under the IT Act and the SPDI Rules.

The aim of this Privacy Policy is to ensure that you understand what Personal Information we collect about you, the reasons for collection and use, and entities we share it with. By providing your consent to this Privacy Policy, you agree to the collection, use and transfer of your Personal Information as set out in this Privacy Policy.

2. Collection of Personal Information

- a. We may collect your Personal Information such as your name, address, email address, details of parents / guardians, contact numbers, employment history, educational qualifications, absences, proof of address, background check results, profile photograph, etc, as may be applicable.
- b. Further, we may also collect the following Sensitive Personal Data or Information from you as may be applicable:
 - i. Bank account details;
 - ii. Biometric information;
 - iii. Passwords; and
 - iv. Medical information.

You represent that the Personal Information you provide from time to time is and shall be correct and updated and you have all the rights, permissions and consents to provide such Personal Information.

3. Use and Processing of Personal Information

- a. The Personal Information collected by SBSSS may be used for a number of purposes connected with our business operations as below:
 - i. For managing academic records, enrollment processes, attendance tracking, and to facilitate communication between the school, students, and their parents / guardians regarding academic progress, school events, and administrative matters;
 - ii. For delivering educational programmes and services;
 - iii. For managing health records and responding to emergencies or safeguarding incidents;
 - iv. For employee authentication and attendance purposes;
 - v. For the initial assessment during the interview;
 - vi. Administratively to process salary and other benefits;
 - vii. To process any claims or settlements;
 - viii. Training requirements;
 - ix. Competency assessments and to conduct performance reviews;
 - x. For evidence in case of a disciplinary or termination process;
 - xi. For processing payments to vendors/ suppliers;
 - xii. To comply with obligations set out under applicable laws; and
 - xiii. For responding to judicial process and provide information to law enforcement agencies or as permitted by law.

4. Disclosure and transfer of your Personal Information

- a. We may disclose/ transfer your Personal Information (including Sensitive Personal Data or Information) to our partners, associates, service providers and third parties as necessary or appropriate:
 - i. to carry out services on SBSSS' behalf under contract;
 - ii. to Globetrotters Educational Innoventions Private Limited for the management of the schools under SBSSS;
 - iii. in any manner permitted under applicable law, including laws outside your country of residence;
 - iv. to comply with any legal process whether local or foreign;
 - v. to respond to requests from public and government authorities, including public and government authorities outside your country of residence;
 - vi. when SBSSS, in its sole discretion, deems it necessary in order to protect its rights or the rights of others;
 - vii. with companies that provide products and services to us in relation to institution management and employee management, such as payroll and benefits providers, pension providers, human resources service providers, recruitment agencies, etc;
 - viii. to protect our rights or property, privacy, safety or property, and/or that of our affiliates, you or others; and
 - ix. to allow us to pursue available remedies or limit the damages that we may sustain.
- b. SBSSS may also disclose or transfer the Personal Information to another third party as a part of reorganization or sale of the assets or business of SBSSS. Any third party to which SBSSS transfers or sells its assets will have the right to continue to use such Personal Information.

5. Your rights in relation to your Sensitive Personal Data or Information

- a. You have the right to withdraw your consent at any time in writing by sending an e-mail to us at admin.privacy@jphschool.com, in accordance with the terms of this Privacy Policy. However, please note that withdrawal of consent will not be retrospective in nature and shall be applicable prospectively. In case you do not provide your information or consent for usage of Sensitive Personal Data or Information or subsequently withdraw your consent for usage of the Sensitive Personal Data or Information so collected, SBSSS reserves the right to discontinue the services for which the said information was sought.
- b. You may write to us at admin.privacy@jphschool.com to access, review, modify or correct your Sensitive Personal Data or Information or withdraw your consent to provide Sensitive Personal Data or Information. However, we are not responsible for the authenticity of the Sensitive Personal Data or Information provided by you.
- c. You agree and acknowledge that certain information may not be corrected or is prohibited to be modified as required under any applicable law, law enforcement requests or under any judicial proceedings. In respect of such information, the aforementioned rights will not be available.

6. Retention of your Personal Information

SBSSS shall retain your Personal Information in accordance with the obligations established by the regulator and applicable laws.

7. **Security Practices and Procedures**

We use reasonable security measures, to safeguard and protect your Sensitive Personal Data or Information.

Notwithstanding anything contained in this Privacy Policy or elsewhere, we shall not be held responsible for any loss, damage or misuse of your Personal Information, if such loss, damage or misuse is attributable to a Force Majeure Event. A “**Force Majeure Event**” shall mean any event that is beyond our reasonable control and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, etc.

8. **Grievance Redressal**

Any discrepancies and grievances with respect to processing of Sensitive Personal Data or Information shall be informed to the designated Grievance Officer as mentioned below:

Name : Ganesh Kumawat
Designation : Head (HR & Administration)
Email ID : glkumawat@jpschool.com

9. **Changes to this Privacy Policy**

SBSSS reserves the right to revise and update this Privacy Policy at its sole discretion and without any advance notice. Any such revisions will be effective on and from the date of posting the same on SBSSS’ website and will apply to all Personal Information collected both prior to and following the effective date. We recommend that you review this Privacy Policy periodically to ensure that you are aware of the current privacy practices of SBSSS.