



To be uploaded at : <https://www.learnjini.com/kids/privacy>

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1. Introduction

LearnJini Kids provides one-to-one online learning for children across the world. Protecting your child's privacy is our highest priority. This Privacy Policy explains what information we collect, how we use it, how we protect it, and the rights available to parents and students in different countries. To enable safe and lawful transactions on LearnJini, certain information is processed when parents/students make payments, enroll in classes, or use any of our learning services.

Below sections explain how such information is collected, used, stored, and shared. If you have any questions, write to us at learnjini@gmail.com.

1.1 Parent & Student Information

- Parent name, email, and phone number
- Child's name, age, learning level
- Time zone, country, scheduling preferences
- Messages sent to our support team

1.2 Learning Activity Data

- Attendance records
- Homework files
- Tutor feedback
- Class recordings (if enabled by parents).
- Usage details such as time spent, features accessed

1.3 Payment Information

Processed securely through third-party partners RazorPay. We may receive:

- Masked card/UPI/bank details



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- Billing address
 - Currency, amount, and payment status
 - For international users: ACH/SWIFT/SEPA/BACS references

LearnJini **never** stores full card numbers, CVV, bank logins, or sensitive credentials.

1.4 Technical Information

- IP address
 - Browser and device type
 - App or website usage logs
 - Cookies and analytics data (details below)
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2. Information We Collect for Payments & Account Verification

When you make a payment through our website or our payment partners, we may receive the following information:

- Your name and contact details
- Billing address and country of residence
- Payment method details (masked card info, UPI ID, bank reference, etc.)
- Transaction amount and currency



- Payment timestamps and status
- Device and network information used during payments

If you are paying from outside India, our payment partners (e.g., Razorpay, Stripe, etc.) may share limited information necessary for:

- Cross-border payment processing
- Regulatory reporting
- Export documentation (e-FIRC/FIRA in India)

We do not store your full card number, CVV, bank password, or sensitive credentials.

3. Why We Process This Information

We use payment-related information for:

- Processing your course or subscription payments
- Generating invoices and receipts
- Fraud detection and prevention
- Compliance with RBI and international financial regulations
- Resolving disputes or failed transactions
- Providing customer support when a payment issue occurs



For international users, applicable laws may require additional identity or billing verification to prevent fraud or unauthorized use.

4. Sharing of Information with Trusted Partners

We may share limited data with:

Payment Gateways and Banks

To process your payments securely.

Regulatory Authorities (when required)

Such as RBI-mandated reporting for international transfers or tax documentation.

Service Providers

For fraud monitoring, analytics, email/SMS notifications, and technical support.

We do **not** sell, trade, or rent your personal information to advertisers or third-party marketers.

5. Storage, Security & Retention

All payment information is managed using encrypted, PCI-DSS compliant systems via our payment partners. LearnJini does not store sensitive payment credentials. Transaction-related data is retained only for as long as needed for accounting, audit, legal compliance, and dispute resolution. Access to your data is strictly limited to authorized personnel.



Data Breach Protocols In the unlikely event of a personal data breach that poses a risk to the rights and freedoms of our students or parents, LearnJini will:

- Notify the relevant supervisory authority (such as the ICO in the UK or the Data Protection Board in India) within 72 hours of becoming aware of the breach, where required by applicable law.
 - Notify affected parents and users without undue delay if the breach is likely to result in a high risk to their rights and freedoms.
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6. International Students & Cross-Border Transactions

For users located outside India:

- Your payments may be processed using international banking networks such as ACH, SWIFT, SEPA, or card networks.
- These transactions may require invoice uploads or service verification under Indian and international financial regulations.
- Your information may temporarily pass through international servers during processing.

LearnJini ensures that such transfers follow applicable privacy and data-protection laws.



7. Age Scope & Who Uses LearnJini Kids

LearnJini Kids is designed for children who learn under the guidance and supervision of a parent or legal guardian.

- For the purpose of this Privacy Policy, “child” or “student” generally means:
 - Under 13 years old in the United States (COPPA rules)
 - Under 16 years old in many EU/EEA countries and the UK (GDPR- Kids/UK GDPR)
 - Under 18 years old in India (DPDP Act) and in many other jurisdictions where the age of majority is 18.
- LearnJini Kids is **not intended to be used independently by children**. A parent or guardian must create the account, manage bookings, and handle payments.
- We do not knowingly allow a child to create an account or submit personal information **without parental involvement**. If we learn that a child has provided information without verifiable parental consent, we will delete that information as soon as reasonably possible.

8. How We Obtain and Verify Parental Consent

Because LearnJini Kids is a child- focused service, we take additional steps to confirm that a parent or legal guardian is in control of the child’s account.

We may use one or more of the following methods (depending on the country and the situation) to obtain and verify parental consent:



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- Requiring a parent/guardian to create the account, provide their own contact details, and confirm that they are the child's legal guardian.
 - Sending a confirmation email or message to the parent's registered email/phone number and asking them to verify the child's enrollment or booking.
 - Using a small, parent- initiated payment (for example, a trial class booking) processed through a verified payment gateway as a sign of adult consent.
 - Collecting a signed consent form or written confirmation from the parent or, where applicable, from the school or institution that has authority to act on the parent's behalf.

We rely on parents and guardians to:

- Provide accurate information when creating a child's account.
 - Supervise their child's use of LearnJini Kids services.
 - Inform us if they believe their child has provided personal information without their consent so we can take corrective action.
 - For users in the United States or where strict age-verification is required, we may use a "monetary transaction" method. This involves charging a nominal amount (or processing the first tuition payment) to a credit card, debit card, or online payment system that provides notification of each separate transaction to the primary account holder. This serves as verification that the person providing consent is an adult.
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9. Parental Rights and How to Exercise Them

Parents and legal guardians have important rights over their child's personal data. Subject to local laws and our legal obligations, a parent or guardian may:

- **Access:** Request a copy or summary of the personal data we hold about their child.
- **Correction:** Ask us to correct or update inaccurate personal information.
- **Deletion (Erasure):** Request deletion of personal data that is not required for legal, accounting, or regulatory reasons.
- **Restriction / Objection:** Ask us to restrict certain types of processing (for example, disabling class recordings or optional analytics where feasible).
- **Withdraw Consent:** Withdraw consent for optional features (such as use of recordings for quality/training) at any time.

How to make a request:

1. Write to us at **[learnjini@gmail.com]** (or the privacy contact listed on this page).
2. Include:
 - Your full name and contact details
 - The email/phone used for the LearnJini account
 - Your child's first name and approximate age
 - A brief description of the request (access, correction, deletion, etc.)



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3. For security, we may ask you to confirm certain details or provide proof that you are the parent/legal guardian and that you control the account.

We aim to respond to verified requests within a reasonable time frame (usually within 30 days, or faster where required by local law). Some information may need to be retained despite a deletion request where we are legally required to keep it (for example, payment and invoice records for tax and accounting compliance).

10. Legal Bases for Processing (EU/EEA & UK Users)

For users located in the European Economic Area (EEA), Switzerland, and the United Kingdom, LearnJini acts as a “data controller” for most processing of student and parent personal data. We process personal data under one or more of the following legal bases:

- **Performance of a Contract**
 - To deliver tutoring services, schedule sessions, communicate with you, and provide access to the LearnJini platform.
- **Consent (including Parental Consent for Children)**
 - To create and maintain a child’s account where consent is required.
 - To record classes, where recordings are enabled and consented to.
 - To send certain optional communications or to enable additional learning features.



- **Compliance with Legal Obligations**

- To meet tax, accounting, anti- fraud, and regulatory reporting requirements.
- To respond to lawful requests from authorities, where applicable.

- **Legitimate Interests** (balanced against your rights and expectations)

- To maintain and improve our services (e.g., debugging, analytics in aggregate form).
- To enforce our terms of use, protect the security of the platform, and prevent misuse.

Where we rely on consent, you may withdraw that consent at any time. Where we rely on legitimate interests, you may object to such processing, and we will assess your objection in line with applicable law.

11. Data Retention: How Long We Keep Information

We retain personal data only for as long as is reasonably necessary to fulfil the purposes described in this Privacy Policy, unless a longer retention period is required or permitted by law. In general:

- **Account and Profile Information**

- Kept for as long as the LearnJini account is active and for a limited period after closure (for example, to help with reactivation or to address disputes), unless deletion is specifically requested and no legal obligation requires retention.



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- **Learning Activity Data (attendance, homework, tutor notes)**
 - Retained while the student actively uses the service and for a reasonable period afterwards for educational history and support, unless parents request earlier deletion and there is no overriding legal need to keep it.
 - **Class Recordings (if enabled)**
 - Stored only for a 1 year, typically no longer than the period needed for review, quality improvement, or as agreed with parents (for example, a few months), after which they are deleted or anonymised, unless required for legal reasons.
 - **Payment and Transaction Data**
 - Retained for the duration mandated by tax, accounting, and financial- compliance laws (often 5–10 years, depending on the jurisdiction).
 - **Technical Logs and Security Data**
 - Kept for a 1 year needed for security monitoring, troubleshooting, and fraud prevention, then deleted or aggregated.

When data is no longer required, we will securely delete it or irreversibly anonymise it so that it can no longer be linked to an identifiable person.



12. No Behavioural Profiling or Targeted Advertising for Children

LearnJini does **not** use children's personal data for behavioural advertising or to build marketing profiles.

- We do **not** track children across third- party websites for advertising purposes.
- We do **not** sell, rent, or trade student or parent data to advertisers or data brokers.
- Any analytics we perform are focused on:
 - Service reliability (e.g., load, errors)
 - Feature usage in aggregate to improve the platform
 - Safety and fraud prevention

Where analytics tools are used, they are configured to minimise personal data collection and, where possible, to work with aggregated or pseudonymised information. If any optional analytics or additional features rely on personal data beyond what is necessary for core tutoring, we will seek appropriate consent and offer a way to opt out where legally required.

13. Guardian and Student Rights

Depending on your country of residence, you may have the right to:

- Access your personal data



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- Request corrections
 - Request deletion of non-mandatory data
 - Withdraw consent where applicable
 - Request details of how your data is being used

Write to us at learnjini@gmail.com for any privacy concerns.

14. Country-Specific Privacy Rights for LearnJini Students

□□ **Australia — Students in Australia**

Australian law focuses on protecting personal information, especially for minors.

For students in Australia:

- Personal and learning data is collected only with parental consent.
- Payment information is handled through encrypted, PCI-compliant partners.
- Data may be stored or processed outside Australia but always under secure, contractual protection.



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- Parents may request access, correction, or deletion of student data at any time.

We align our practices with the **Australian Privacy Principles (APPs)**.

□□ **Canada — Students in Canada**

Canada has strong privacy protections, especially around educational services.

For Canadian students:

- Only essential student data is collected for classes and homework.
- Data may be transferred outside Canada (e.g., to India) but only under strict confidentiality safeguards.
- Payment records follow Canadian financial-compliance standards.
- Parents have rights to access, correction, objection, and deletion under **PIPEDA**.

We do not sell or monetize any student or parent information.

□□ **Denmark — Students in Denmark**

Danish students are protected by **GDPR**, which sets strict rules for data processing.

For Denmark:



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- We collect only the minimum required information for tutoring.
 - Parents may request full access to all student data.
 - Data may be transferred internationally using GDPR-approved safeguards such as Standard Contractual Clauses (SCCs).
 - Payment data is encrypted and handled only by certified providers.
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□□ **Germany — Students in Germany**

Germany enforces some of the strictest privacy standards in Europe.
For German students:

- We follow all GDPR rules around transparency, consent, and data minimization.
- Parents can request deletion of non-essential data at any time.
- Any cross-border transfer is done under SCCs with strong technical safeguards.
- No student profiles are ever used for advertising or behavioural analytics.



□□ Hong Kong — Students in Hong Kong

Hong Kong privacy rules require clarity, purpose limitation, and safeguards.
For Hong Kong students:

We collect only the information necessary for lessons.

- Data use is always tied to teaching, billing, or support—never marketing without consent.
- Transfers outside Hong Kong occur only under secure contractual protections.
- Parents may ask for review or correction of personal information.

We align with the **Personal Data (Privacy) Ordinance (PDPO)**.

□□ India — Students in India

For Indian students, LearnJini follows the **Digital Personal Data Protection Act (DPDP)** and child-safety norms.

- Data is collected with parental consent.
- Sensitive data such as payment details is never stored by us directly.
- Student data is used only to deliver educational services.



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- Parents can request correction, access, withdrawal of consent, or deletion.

We do not share student information with advertisers or third-party marketers.

☐ ☐ **Ireland — Students in Ireland**

Ireland follows GDPR rules for child data protection.

For Irish learners:

- Parents have full rights to access, correction, portability, and deletion.
- We transfer data outside Ireland using approved SCCs and security safeguards.
- We do not track or profile students for advertising.
- Class recordings (if enabled) are stored securely with time-bound retention.

☐ ☐ **Luxembourg — Students in Luxembourg**



For Luxembourg students:

- GDPR governs all personal information.
- Only minimal necessary data is collected for creating accounts and tutoring.
- Transfers to India or other countries occur under GDPR-approved mechanisms.
- Parents may request deletion of any non-essential student data.

We maintain strict access controls to protect student records.

□□ **Netherlands — Students in the Netherlands**

Dutch students are protected under GDPR and additional educational guidelines.

For students in the Netherlands:

- Only essential class-related information is processed.
- Parents may request a copy of all data we store about their child.
- Data is transferred internationally only under strict contractual protections.
- We do not use student information for any behavioural profiling.



□□ **New Zealand — Students in New Zealand**

New Zealand privacy expectations emphasize fairness and minimal data use.
For NZ students:

- We follow the **New Zealand Privacy Act** principles.
 - Student data is collected only for teaching or support purposes.
 - When transferred internationally, data is protected by encryption and secure agreements.
 - Parents can request correction or deletion of information at any time.
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□□ **Singapore — Students in Singapore**

Singapore's **PDPA** requires purpose limitation and parental consent for minors.

For Singapore students:

- We collect only essential data for lessons and billing.
- Student data is protected through strong encryption.
- International transfers follow PDPA guidelines and contractual safeguards.



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- Parents may request access to, or corrections of, their child's information.

□□ **Switzerland — Students in Switzerland**

Swiss regulations focus on transparency and secure handling of personal data.

For Swiss students:

- We comply with the **Swiss Federal Act on Data Protection (FADP)**.
- Data may be processed outside Switzerland only with adequate safeguards.
- Parents can request deletion or correction of data.
- Student information is never shared for marketing purposes.

□□ **United Kingdom — Students in the UK**

UK students fall under the UK GDPR and Data Protection Act 2018.

- Lawful basis for processing (consent / contract / legal obligation)
- Parental consent for children below applicable age thresholds
- Data minimization and purpose limitation
- Right to:
 - Access



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- Rectification
 - Erasure
 - Restriction
 - Objection
 - Data portability
 - International transfers via safeguards (e.g., SCCs)
 - Defined retention periods
 - Security and access controls
 - Only essential academic and parent contact data is collected.
 - Data transfers outside the UK (e.g., to India) use UK-approved SCCs.
- Parents can request access, deletion, correction, and data portability.
- No data is shared with advertisers or external marketing platforms.

For users in the European Economic Area and the United Kingdom, LearnJini processes personal data in accordance with the General Data Protection Regulation (GDPR) and UK GDPR, including providing data subject rights and appropriate safeguards for international data transfers.

□□ **United States — Students in the USA**



For U.S. students, LearnJini aligns with **COPPA**, **FERPA principles**, and strong parental-consent requirements.

- Parents control the child's data at all times. Requires **verifiable parental consent**
- We do not collect unnecessary personal information beyond what is needed for tutoring. **We do not** allow children **to create independent accounts**
- Payment data is handled only by compliant payment partners.
- Video recordings, homework files, and chat data are stored securely with limited retention.
- We do not sell or share student data with advertisers — ever.
- Limits data collection to **educational necessity**. Prohibits behavioral advertising or profiling
 - Allows parents to:
 - Review child data
 - Request deletion
 - Withdraw consent

LearnJini complies with the U.S. Children's Online Privacy Protection Act (COPPA) by requiring verifiable parental consent and limiting the collection and use of children's personal data to educational purposes only.



15. Cookies, Tracking Technologies & Preferences

LearnJini uses cookies and similar technologies to give you and your child a safe, consistent learning experience. These tools help us:

- remember your login session
- keep classes running smoothly
- understand what features are being used
- improve website performance
- prevent fraud and unauthorized access

Cookies do **not** give us access to your device, photos, microphone, or personal files.

Types of cookies we may use:

- **Strictly Necessary Cookies:** Required for security and core functionality.
- **Preference Cookies:** Remember time zone, language, and settings.
- **Performance & Analytics Cookies:** Help us understand how our platform is used.
- **Communication Cookies:** Support chat, notifications, and customer support.

How you can control cookies

www.learnjini.com/kids



You can disable or delete cookies anytime through your browser settings. If you choose to block certain cookies, some features on our website may not work as intended (e.g., login, scheduling classes).

We do not use cookies to track children across websites or for targeted advertising.

Cookie Consent for EU/UK Users For users located in the European Economic Area (EEA) and the United Kingdom, we will not set non-essential cookies (such as analytics or performance trackers) unless you have explicitly clicked "Accept" on our Cookie Banner. You may withdraw this consent at any time via the website settings.

16. Use of Third-Party Service Providers

To deliver a safe, reliable, and high-quality educational experience, LearnJini works with a small number of trusted third-party providers. These partners support essential functions such as:

- payment processing
- video conferencing and class delivery
- secure cloud hosting
- analytics to improve platform performance
- customer communication (email/SMS/WhatsApp)
- fraud detection and security monitoring



Data shared with these providers

We only share the minimum information required for them to perform their services—for example:

- Payment processors receive billing info necessary to complete a transaction.
- Video platforms may receive your display name and meeting details.
- Cloud providers store encrypted class files and homework submissions.
- Analytics tools receive anonymized or aggregated usage information.

These providers are bound by confidentiality agreements and are not permitted to sell, misuse, or share your data for advertising.

Where required by law (such as GDPR, PDPA, or DPDP), cross-border data transfers occur only under approved legal safeguards and encryption standards.

Third-party privacy notices

Some partners may have their own privacy policies. When using their services (e.g., using a Zoom/RazorPay/AWS), their terms may also apply.

17. Tutor & Teacher Privacy



This section explains how LearnJini handles personal information of tutors/teachers who register with us to deliver classes to students.

What Information We Collect About Tutors

When an Indian tutor or other teacher registers to work with LearnJini, we may collect:

- Identification and contact details (name, email, phone number, address, time zone)
- Professional profile information (education, qualifications, subjects taught, years of experience, short bio, languages)
- Verification and compliance information (ID proof, certificates, references, background checks where required by law or by a client)
- Payment and tax details (bank account/UPI details for payouts, PAN or other tax identifiers required under Indian or foreign tax rules)
- Platform usage data (login times, classes taught, feedback received, chat records within the platform, support communications)
- Technical data (IP address, device/browser type, logs related to teaching sessions and platform access)

We collect this information directly from tutors and, in some cases, from third parties (for example, payment providers or background-check services where applicable).

How We Use Tutor Information

We process tutor data in order to:

- Create and manage tutor accounts and profiles
- Match tutors with suitable classes, students, or parents
- Schedule, monitor, and support live online sessions
- Process payouts, generate tutor invoices, and meet tax and accounting obligations



- Maintain quality and safety (for example, handling complaints or performance issues)
- Provide training, updates, and operational communications to tutors
- Protect the security and integrity of our platform and comply with legal requirements

We do not sell tutor personal data to advertisers or share it for third-party marketing purposes.

Sharing Tutor Data

We may share tutor information only as needed with:

- Payment processors and banks – to send payouts and complete financial reporting
- Cloud and IT service providers – to host lesson data and communications securely
- Background-check or verification services – where checks are required by law or requested by certain clients
- Parents or students – limited profile information such as name, qualifications, subjects, languages, and feedback so they can select a tutor
- Regulators, tax authorities, or law-enforcement – where we are legally required to do so

All such partners are bound by confidentiality and data-protection obligations and may not use tutor data for their own marketing.

Retention of Tutor Data

- Core tutor account and profile information is retained for as long as you actively work with LearnJini and for a reasonable period afterwards, for example to handle disputes, references, or re-engagement.



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- Payment and payout records are retained for the time required under tax and accounting laws (often 5–10 years, depending on jurisdiction).
 - Session logs, chat records, and support tickets are retained only as long as necessary for safety, quality review, and legal compliance, after which they are deleted or anonymised.

When data is no longer needed, we delete it securely or store it only in an anonymised form.

18. Tutor Rights

For LearnJini tutors, all are residents of India, have the following rights with respect to their personal data, subject to applicable Indian law (including the Digital Personal Data Protection Act):

To **access** the personal data LearnJini holds about you

To **request correction or updating** of inaccurate or incomplete information

To **request deletion** of personal data that is not required for legal, tax, accounting, or contractual purposes

To **withdraw consent** for any processing that is based on your consent (for example, optional features or marketing use of your profile), where this does not affect processing required by law or our contract with you



To exercise these rights, Indian tutors can contact us at **learnjini@gmail.com**. We may ask you to provide certain details (such as your registered email/phone and basic identity information) so we can verify your identity and protect your account. We may continue to retain specific records where we are legally required to do so, for example for taxation, accounting, or dispute- resolution purposes.

19. Data Protection Officer / Privacy Contact

19.1 Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or the handling of personal data, you may contact our Data Protection Officer (DPO) or privacy team at:

Email: learnjini@gmail.com

WhatsApp: You can connect with us at +91-7379977983.

We will respond to all legitimate requests within the timelines required by applicable data protection laws.

This Privacy Policy shall be **governed by and construed** in accordance with the laws of India, without prejudice to any mandatory rights available to individuals under applicable data protection laws in their country of residence.

19.2 Grievance Officer (For Users in India) In accordance with the Information Technology Act, 2000 and the Digital Personal Data Protection Act, 2023, the contact details of the Grievance Officer are:

- **Name:** Abhilasha Rani
- **Designation:** Proprietor
- **Email:** learnjini@gmail.com
- **Address:** Adityapur-2, Jamshedpur, Jharkhand. Pin 831014.



We will acknowledge your complaint within 24 hours and aim to resolve all grievances within 15 days from the date of receipt.

LearnJini