



Privacy Policy

Introduction

Sertify and its agents (“**Sertify**”) are committed to data security and the fair and transparent processing of personal data. This privacy policy describes how Sertify treats the information you provide to us or that we otherwise collect. This Privacy Policy also describes your choices regarding use, access and correction of your personal information. “**You**” refers to the person or entity using the Service. The “**Service**” is the digital credentialing and certification functionality, associated insights and connection to relevant career, education and training opportunities provided through any website or application offered by Sertify. “**Personal Information**” includes the information we collect directly from you as well as personal information from Issuers (defined below) and Third-Party Services (defined below). This Privacy Policy sets out how we will treat the personal data which you provide to us in compliance with applicable data protection laws.

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities in the event that you would like to report a concern about the way in which we process your data.

This Privacy Policy describes our broadest potential use of your Personal Information, although we may actually make far less use. The basis for our processing of your Personal Information is your consent. No law requires you to provide us with your Personal Information. You may withdraw your consent for us to process your Personal Information at any time, but that may preclude you thereafter from using the Website and the Service. We will delete your Personal Information following the withdrawal of your consent, however, such withdrawal will not affect the lawfulness of the processing prior to withdrawal.

Sertify collects Personal Information when you choose to submit it through e-mail, an online form, or other methods. We also collect information through cookies.

Sertify also maintains a log of certain information concerning visitors to our websites, including but not limited to, internet protocol (“IP”) address (a computer's numerical Internet address), third party websites from which visitors access our website, type of web browsers used, and pages viewed. Such information may be treated as Personal Information.

By your use of the Service you consent to our use and disclosure of your Personal Information in accordance with this Privacy Policy.

Who are we?



Sertify is a SertifyDigiCred Technologies LLP with offices in Bangalore City. Our registered address is 3269, HAL 2nd Stage, Indiranagar, Bangalore, Karnataka, India, 560008.

The Sertify Service is an internet-based, hosted platform designed to enable subscribers to the Service (“**Issuers**”) to issue digital badges and credentials (“**Credentials**”) to individuals who meet prescribed requirements (“**Earners**”), and for those Earners to display the Credentials online on the Service or on third party sites, as elected by Earners.

We may provide your information to trusted partners who work on behalf of, or with, Sertify under confidentiality agreements to help Sertify provide the Service. They may also assist Sertify in communicating with you about the Service and about offers from Sertify and our partners, where you have given us appropriate permissions.

You may contact our Primary Point of Contact for data privacy and security with any questions, comments or concerns about this policy by sending an email to hi@sertify.me.

Sertify owns and operates sertify.me. This Policy, together with our website terms of use and any other documents referred to in them, sets out the basis on which Sertify processes Personal Data.

What personal data do we collect?

We may collect and process the following personal data:

Information you provide to us

When registering for or using the Service, you may be prompted to give us information about yourself such as your name, email address, phone number and company/organization name. When you configure your account settings, you may enter additional information about yourself. You may, at times, also send us an e-mail which may contain not only your e-mail address, but other information about you, including home or business addresses, telephone numbers, or account details. The information you give us may also include statements you make on the Service such as testimonials, services reviews, or other statements that may identify you personally.

If you have consented or opted in to receiving news and updates from Sertify on professional growth or further education opportunities, you have the right at any time to prevent us from further contacting you by following the unsubscribe or opt-out instructions included in the relevant email or through the privacy tools provided to you through the Service.

We may use your Personal Information to contact you regarding your use of the Service, for customer support purposes, and to inform you of updates, modifications and other matters relating to the Service, and information about others services that we offer in accordance with your subscription preferences. You may decline to receive mail or e-mail from us that



does not relate directly to your access to or use of the Service by selecting the opt-out link contained in any such e-mail or by contacting us at hi@sertify.me.

Information we collect about you

Sertify also will maintain a history of your access to the Service, and certain actions taken by you while accessing the Service, a log of users' IP addresses, the third-party Website from which users access the Service, the type of web browsers used to access the Service and the browser's settings that may affect Service performance (collectively, "**Usage Log Information**"). For purposes of maintaining and enhancing Service performance and security, Sertify may use Usage Log Information, information about your browser, and other local computer settings. We also may use Usage Log Information to tailor our communications to you about the Service, and contact you in relation to providing support. We also may aggregate Usage Log Information to create or publish statistical analyses and reports about Service usage. We will not authorize the publication of Personal Information about any user without the prior written consent of such person.

Information we receive from Issuers

Issuers provide Personal Information to us, including Credential requirements, and information about you to confirm that you have earned the applicable Credential. The use of information collected from Issuers shall be limited to the purpose of providing the service for which these Organizations have engaged Sertify.

If you are an Issuer, by using the Website or Services, you confirm that you have obtained prior, specific, and informed consent to provide Personal Information to us. We may request a copy or evidence of such consent.

Sertify collects information under the direction of the Issuer, or as provided directly to Sertify by the Earner. If you are a customer of one of the Issuers and would no longer like to be contacted by one of the Issuers that use our service, please contact the Issuer that you interact with directly.

An individual who seeks access, or who seeks to correct or amend inaccurate Credentials should direct their query to the Issuer. We retain Personal Information we process on behalf of the Issuers for as long as needed to provide services to the Issuers and the Earners. Sertify shall continue to make the Service available to Earners, including in cases where the Issuer terminates its use of the Service. Individual Credentials and an Earner's entire account may be deleted by the Earner at any time directly through the Service. Sertify will retain this Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Non-Personal Information

We may statistically aggregate in non-person-specific form information collected to improve our websites, our quality controls, operations management, security processes, future



marketing and promotional efforts, and the overall Service in an attempt to better understand our users' interests and preferences. In some cases, we may transfer this information to our third-party service providers. By using this Site, you consent to this non-person specific data aggregation and the use and transmission of this aggregated statistical data as outlined above.

Information about other people

If you provide information to us about any person other than yourself, such as your relatives, next of kin, your advisers, your suppliers, or your Earners, you must ensure that they understand how their information will be used and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

How do we use your personal data?

Additional Uses of Service Information

In addition to the uses described above of the information received in connection with your use of the Service, Sertify uses and, where specified, shares your information:

- **To display Credentials.** Sertify may use your information to display Credentials that you receive through the Service or through Third-Party Services, embeds that you make on the Service or third parties' Website, or on social network services you link to your account.
- **To provide support or other services** that you have requested, and to respond to your inquiries.
- **To engage in transactions with you**, including contacting you about your account or transactions.
- **To process transactions**, Sertify may use financial, credit card and payment information that you provide. Sertify may need to share some of this information with suppliers, delivery services, credit card clearing houses and other third parties to complete the transactions.
- **To notify you of relevant opportunities** such as new product releases and service developments, related facts or programming that may be relevant to you.
- **To provide online forums and social networks.** The Service allows users the option to participate in interactive discussions and post comments and other content. Note that any information you share may become publicly accessible.
- **To improve quality and facilitate use of the Service.**
- **To operate the Service through the assistance of third parties.** Sertify may use services from third-party service providers, such as hosting services and software developers, in support of its operation of the Service. When doing so, we will take steps to ensure that such service providers implement appropriate privacy and security measures consistent with this Privacy Policy to safeguard against the unauthorized use or disclosure of your information. These companies are authorized to use your personal information only as necessary to provide these services to us.



- **To comply with legal requirements.** In addition, we may also disclose information about you as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is reasonably necessary to enforce our rights or protect our operations or users or others investigate fraud, or in response to legal processes or governmental investigations in accordance with our internal policy on access by governmental authorities, or under exigent circumstances in response to a perceived significant threat to a person's health or property.

Privacy Preferences

The Service allows you to customize the information about yourself that is made accessible to others. When you establish an account, the Service applies default settings. Default settings also apply to new features introduced on the Service. Credentials issued to you will default to the “public” setting. You may activate a “private” setting such that the Credential will no longer be publicly accessed at any time, on a Credential-by-Credential basis. Until you terminate your use of the Service, the fact that you are a user, as indicated by the public display of your full name and avatar, is available to others on the Service. Review your privacy settings regularly to ensure that they match your preferences.

Security

Sertify takes appropriate and reasonable precautions to implement appropriate administrative and technical procedures to protect the security of Personal Information provided or generated through the Service. We permit persons working for us to access and use your information only in a manner consistent with this Privacy Policy.

We protect the security of your information during transmission by using Transport Layer Security (TLS) and Secure Sockets Layer (SSL) software or other encryption technology, which encrypts information you input. Wherever appropriate, we obfuscate and/or encrypt information in our systems and/or during information transfer. Sertify regularly reviews the cryptographic protocols it uses to protect the privacy and security of your Personal Information.

Because of the nature of internet and for other reasons, we cannot guarantee the security of your Personal Information, so you should take precautions to protect it when you are on the internet, such as changing passwords often, using a combination of letters and numbers when creating passwords, using a secure browser and being sure to log off the Service when finished using a shared computer.

Third-Party Sites

The Service may include hyperlinks to the third-party website neither owned nor managed by us, and, as described above, you may use certain Third-Party Services in connection with the Credentials issued through the Service. Sertify has no control over these Third-Party



Services and your interactions with those third parties are subject to their privacy policies and terms of use.

Information collected by Electronic Communications Protocols and Web Beacons

We may collect information about you and your use of the Service through electronic communications protocols, web beacons, cookies, embedded URLs, pixel tags and related devices or technologies.

As is true when you visit most websites, certain information is automatically generated and stored about your visits. Such information may include network routing information (for example, where you came from); equipment information (for example, device type, operating system, browser type); IP address, and dates and times of your visits.

We may use your Personal Information to inform you about other Sertify services that might interest you and to gather feedback from you.

Sensitive Information

Do not send us any sensitive Personal Information (e.g., social security numbers or other national identifiers, or information related to racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sex life or sexual orientation, genetic or biometric information, criminal background, or trade union membership).

Sertify Use of "cookies"

A cookie is a small piece of information, sent by a web server to a web browser, that is stored on your computer so that it can later be read, allowing the server to uniquely identify the browser. Some cookies may remain on a user's computer after the user leaves the Website. Most browsers provide you with information on and control over cookies, including a feature to opt-out of the use of cookies. You can set your browser to alert you when a cookie is being used, and accept or reject it. You can also set your browser to refuse all cookies or accept only cookies returned to the originating servers. However, you may not be able to use some features of the Service if you disable cookies. For more information on managing cookies, please go to www.allaboutcookies.org, or visit www.youronlinechoices.com which has further information about behavioral advertising and online privacy.

Our Website uses cookies or similar technologies to distinguish you from other users and to collect information about your online preferences and to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. This helps us provide you with a good experience when you browse our websites and allows us to improve our websites. Our main purpose in using cookies is to facilitate and enhance communications and interactions between you and our



websites, but cookies can be used for other purposes. Cookies for the Service may collect a unique identifier, user configuration settings and profile information. Sertify also uses cookies to collect general usage and volume statistical information that does not include personally identifiable information.

By continuing to browse the Website, you consent to our use of cookies.

We use the following cookies:

- **Strictly necessary cookies required for the operation of our Website.** They include, for example, cookies that enable you to log into secure areas of our Website.
- **Analytical/performance cookies that collect information about how you use our Website.** They allow us to recognize and count the number of visitors and to see how visitors move around our Website. This helps us to improve the way our Website work. These cookies are sometimes placed by third party providers of web traffic analysis services, such as Google Analytics.
- **Functionality cookies that remember choices you make and recognize you when you return.** This enables us to personalize our content, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies that collect information about your browsing habits** such as the pages you have visited and the links you have followed. We use this information to make our Website more relevant to your interests, and, if we enable advertising, to make advertising more relevant to you, as well as to limit the number of times you see an ad. These cookies are usually placed by third-party advertising networks. They remember the other Website that you visit and this information is shared with third-party organizations, for example advertisers.

We use Google Analytics. For information on how Google processes and collects your information regarding this product and how you can opt-out, please see <https://tools.google.com/dlpage/gaoptout>.

Sertify and its service providers, vendors and partners, may use cross-device/cross-context tracking. For example, you might use multiple browsers on a single device, or use various devices (such as desktops, smartphones, and tablets), which can result in your having multiple accounts or profiles across these various contexts and devices. Cross-device/cross-context technology may be used to connect these various accounts or profiles and the corresponding data from the different contexts and devices.

How long will you keep your personal data?

Access, Retention and Deletion



Upon request Sertify will provide you with information about whether we hold any of your personal information. You may access, correct, or request deletion of your personal information by logging into your account or contacting us at hi@sertify.me. We will respond to your request within a reasonable timeframe.

Sertify may retain your Personal Information for as long as your account is active and so long as retention is required or permitted in accordance with this Privacy Policy, or otherwise by law. When Sertify deletes your Personal Information, Sertify will do so in a manner designed to ensure that it cannot be reconstructed.

Viewing of Data for Support

For the purpose of providing the Service and associated support including answering any questions you may have, Sertify may view and process your Personal Information from nations outside the EEA that are deemed by the EU to have non-adequate data protection laws, including the United States.

Where do we store your personal data and how is it protected?

We take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use procedures and security features consistent with industry practices to try to prevent unauthorized access.

Corporate Matters

Sertify may provide our investors, partners, and others with aggregated information (i.e., information that does not identify users personally) concerning users of the Service. In addition, Sertify may disclose your Personal Information to a successor or acquiring entity as part of a merger, acquisition, reorganization, or other transaction involving all or substantially all of Sertify's assets or shares, or the business to which the Service relates. If Sertify were sold to or merged with another company, that company will agree to abide by the terms of this Privacy Policy.

You will be notified via email or a prominent notice on our website, of any change in ownership, uses of your personal information, and choices you may have regarding your personal information. You have the right to request that your Personal Information be removed from our records at any time.

Subprocessors



To support the delivery of our Services, we may engage and use data processors with access to certain personally identifiable data of Earners (each, a "Subprocessor").

Policy Updates

We may update this Privacy Policy from time to time, and the updated version will be effective upon posting as to our treatment of subsequently acquired Personal Information. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. Please check the revision date at the beginning of this Privacy Policy periodically to check for revisions. By continuing to use the Service, including the Website, after a revised version has been posted, you agree to be bound by the revised Privacy Policy as to subsequently acquired Personal Information.

If you have questions about this Privacy Policy and our information practices, please contact our Primary Point of Contact by e-mail at hi@sertify.me.