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1. Introduction

This Privacy Policy outlines how **KN NEXUNITED PRIVATE LIMITED**, operating under the brand name **Mentoria Overseas Education** ("Company", "we", "us", or "our"), collects, uses, stores, shares, protects, and otherwise processes the personal and sensitive personal information of users ("you", "your", or "User") when you interact with our website, services, or any digital platforms owned or operated by the Company.

We are committed to ensuring the privacy and protection of your information in compliance with applicable Indian laws, including but not limited to the Information Technology Act, 2000, and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

1.1 Purpose and Scope

The purpose of this Privacy Policy is to provide a transparent explanation of:

- What types of personal information we collect from Users;
- How we process and protect your information;
- The lawful basis for collecting and using data;
- With whom and under what conditions we may share it;
- The choices and rights available to you as a data subject.

This Privacy Policy applies to:

- All Users who access or interact with our website (<u>www.mentoriaoverseas.com</u>);
- Individuals who avail services, submit personal information via forms, email, or chat;
- Anyone who subscribes to our content, newsletters, or marketing communications;
- Third parties whose information may be shared with us by Users (e.g., parent, recommender, co-applicant).

This Policy does not apply to:

- Third-party websites or platforms linked to our website;
- Any offline collection of information unless such collection explicitly refers to this policy.

By using our website or engaging with our services, you acknowledge that you have read and understood this Privacy Policy and agree to its terms.

1.2 Definitions

For the purposes of this Privacy Policy, the following terms shall have the meanings assigned below:

- "Personal Information": Any information that relates to a natural person, which, either directly or indirectly, in combination with other available information, can identify such person. This includes name, phone number, email address, date of birth, address, etc.
- "Sensitive Personal Data or Information (SPDI)": As defined under Indian IT Rules, this includes passwords, financial information, biometric data, passport numbers, health records, and academic transcripts.
- "Processing": Any operation performed on personal data including collection, recording, organization, structuring, storage, alteration, retrieval, use, disclosure, dissemination, or deletion.
- "User" / "You" / "Your": Any individual who accesses the Website, submits information, or avails any services or support provided by Mentoria Overseas Education.
- "Third Party": Any individual, institution, service provider, or legal entity that is not part of KN NEXUNITED PRIVATE LIMITED but may receive data as required for service execution.
- "Website": Refers to our official platform at www.mentoriaoverseas.com, and any subdomains or affiliated digital systems used to provide services.

2. Information We Collect

We collect a variety of personal and technical information from you to provide our educational consulting and related services efficiently and in compliance with legal

obligations. The types of information we collect depend on your interaction with our website and the services you choose to use.

2.1 Personal Information

We may collect the following personal information from you when you interact with our platform, contact us, or use our services:

- **Identity and Contact Data**: Full name, phone number, email address, date of birth, gender, residential address, nationality, and photograph.
- Educational Information: Academic history, school/university transcripts, degree certificates, test scores (IELTS, TOEFL, GRE, GMAT, SAT, etc.).
- Professional Information: Internship or work experience details, resume/CV, LinkedIn profile (if provided).
- **Communication Information**: Any messages, queries, emails, chats, or forms you submit through our website or other communication platforms.
- **Service-related Metadata**: Service preferences, consultation records, documents shared for profile evaluation, SOP/LOR drafts, etc.

This information is typically collected when you:

- Fill out inquiry or registration forms;
- Participate in consultations, webinars, or online chats;
- Subscribe to newsletters or promotional updates;
- Book or pay for services through our website.

2.2 Sensitive Personal Data or Information (SPDI)

In accordance with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, we may also collect the following **Sensitive Personal Data or Information (SPDI)**:

• **Government IDs and Identification Documents**: Passport number, Aadhaar (where applicable), PAN, or visa records.

- **Financial Information**: Bank account details, payment receipts, loan documentation, scholarship records, proof of funds.
- **Login Credentials**: Where necessary, exam portal or application portal logins may be voluntarily shared by the User.
- Academic and Career Documents: SOPs, LORs, resumes, and academic credentials, some of which may include SPDI.
- **Health-related Information**: Only if specifically required for university/visa applications (e.g., medical fitness, vaccinations).

We collect SPDI only when it is **absolutely necessary** for fulfilling a specific service (e.g., visa application or education loan processing), and only with your **explicit**, **informed**, **and written consent**.

2.3 Technical and Usage Information

When you access our website (<u>www.mentoriaoverseas.com</u>), we may automatically collect certain technical data about your device and browsing behavior, including:

- **Device and Browser Information**: Device type, operating system, browser type and version, screen resolution.
- IP Address and Geolocation: Internet Protocol (IP) address used to access our services and approximate geographic location.
- **Log Data**: Time of visit, pages viewed, time spent on pages, click paths, and referring URLs.
- Cookies and Tracking Technologies: For session management, analytics, and performance optimization. (See our Cookie Policy for more.)

This information helps us:

- Optimize the functionality and performance of our platform;
- Understand user behavior and improve user experience;
- Ensure website security and prevent misuse.

2.4 Third-Party Data Sources

We may receive additional information about you from **trusted third parties**, including:

- **Partner Universities**: Updates or confirmations related to your application or admission.
- Test Bodies and Payment Gateways: Confirmation of exam registrations or payment statuses.
- Student Loan Providers: Verification of submitted documents or loan application status.
- Referral Partners or Agents: Data shared for counseling continuity, if you were referred to us.
- **Social Media Platforms**: Information made public or shared through platforms such as LinkedIn, Instagram, or Facebook, if you interact with our official accounts.

All such third-party data is collected and used strictly in accordance with this Privacy Policy and applicable data protection laws.

3. How We Use Your Information

The personal and sensitive personal data we collect is used solely for lawful, necessary, and transparent purposes related to the delivery of our services. This section describes how and why your information is processed by **Mentoria Overseas Education** in the course of your engagement with us.

3.1 Service Delivery

We use your personal and academic information primarily to **provide**, **manage**, **and improve our services**, including but not limited to:

- Conducting personalized academic and career counseling;
- Evaluating your eligibility for specific countries, universities, or scholarships;
- Preparing and submitting university applications on your behalf;
- Drafting or reviewing Statements of Purpose (SOP), Letters of Recommendation (LOR), resumes, and cover letters;
- Supporting visa documentation, interview preparation, and appointment scheduling;

- Facilitating third-party services such as education loans, exam registration (IELTS, TOEFL, GRE, etc.), accommodation, and insurance;
- Providing access to our CRM, dashboards, or internal portals for progress tracking.

All service-related processing is conducted in accordance with your consent and for the purpose of fulfilling a service contract entered between you and the Company.

3.2 Communication and Notifications

We use your contact details to **communicate with you effectively** throughout your engagement. This may include:

- Sending service updates, deadline reminders, meeting invites, or alerts regarding pending actions;
- Responding to your queries, emails, or support requests;
- Notifying you of changes in process, documentation requirements, or institutional guidelines;
- Sharing drafts, invoices, receipts, and feedback summaries through email, WhatsApp, SMS, or calls.

Such communication is necessary to ensure timely delivery of services and maintain accurate records of correspondence between you and our counselors or operational teams.

You may not opt out of **transactional or service-related communication**, as it is essential to the services you have subscribed to.

3.3 Marketing and Promotional Use

With your explicit or implied consent, we may use your information to send **marketing communications** relevant to your interests. This may include:

- Information on new service launches, discounted plans, or limited-time offers;
- Invitations to webinars, workshops, student meet-ups, or college fairs;
- Newsletters with updates on admission cycles, visa changes, or international education trends:
- Testimonials, feedback requests, or student success stories (with your prior permission).

You can opt out of receiving marketing messages at any time by:

- Clicking the **unsubscribe** link in emails;
- Responding with "STOP" via SMS or WhatsApp;
- Writing to **Social@mentoriaoverseas.com** to request opt-out.

We will always respect your marketing preferences and ensure compliance with anti-spam and telecommunication laws.

3.4 Legal and Compliance Obligations

We may process or disclose your data when necessary for:

- Compliance with legal obligations under Indian law or the laws of the destination country for which you are applying;
- Responding to lawful requests from regulatory authorities, courts, embassies, or law enforcement agencies;
- Maintaining records for audit, tax, or consumer protection purposes;
- Detecting and preventing fraud, misuse, or unauthorized access to our systems or services;
- Enforcing the Terms & Conditions, refund policies, or resolving disputes;
- Supporting compliance with examination bodies, visa norms, data protection laws, and international student mobility standards.

Any such disclosure will be made only:

- When legally required;
- With appropriate safeguards and documentation;
- In good faith, we believe that such disclosure is necessary to protect our rights or the safety of our Users or the public.

4. Sharing of Information

We take your privacy seriously and only share your information when necessary and in accordance with applicable law. This section outlines the limited and controlled circumstances under which your personal or sensitive data may be disclosed to third parties.

4.1 With Service Providers and Partners

We may share your information with **trusted third-party service providers and partners** who assist us in delivering services to you. These include, but are not limited to:

- Partner Universities and Educational Institutions: For the purpose of application processing, profile submission, status tracking, and admission communication.
- Language Test Organizations: Such as IELTS, TOEFL, GRE, GMAT, SAT, for registration or result tracking.
- Visa Consultants: In select services, where visa filing support is outsourced or delegated to licensed partners.
- **Education Loan Providers**: For financial documentation processing, co-applicant verification, or disbursement status updates.
- Accommodation, Travel, and Insurance Providers: Where optional or value-added services are availed by the User.
- Payment Gateway Services: For secure and authorized transaction processing.

All such third parties are **contractually obligated** to:

- Handle your data with confidentiality;
- Use your information only for the purpose specified;
- Adhere to appropriate data protection standards and practices.

We do not permit third parties to use your data for their own marketing or promotional activities without your express consent.

4.2 With Government or Legal Authorities

We may disclose your personal or sensitive information to government agencies, regulatory authorities, courts, law enforcement, or immigration bodies if required to do so:

- To comply with **legal or regulatory obligations**, whether under Indian or foreign laws;
- Pursuant to court orders, subpoenas, or official summons;
- For **verification of application materials** by embassies, consulates, or educational bodies;
- To assist with investigations into fraud, cybercrimes, or violations of law;
- To enforce our Terms & Conditions or protect our legal rights or the safety of our Users, staff, or the public.

Such disclosures are made in **good faith**, under the belief that:

- The request is legitimate and lawful;
- The information sought is relevant to the authority's stated purpose;
- The disclosure is necessary to prevent harm or ensure compliance.

We maintain **internal documentation** and take appropriate safeguards before complying with any such request.

4.3 Business Transfers and Restructuring

In the event of a merger, acquisition, joint venture, sale of assets, corporate restructuring, or bankruptcy, your personal information may be transferred as part of the transaction or business continuity process.

This means that:

- Your data may be transferred to a successor entity or affiliate;
- The new entity will inherit the rights and obligations under this Privacy Policy;

• You will be notified, where feasible, about any material changes to privacy practices.

In such cases, we will ensure that the successor organization:

- Continues to protect your data in accordance with this policy;
- Does not use the information in a way that is incompatible with your expectations or applicable law.

5. Data Security and Retention

We are committed to safeguarding the privacy and security of your personal information. This section explains the technical, organizational, and legal measures we take to protect your data and how long we retain it.

5.1 Security Measures

We implement appropriate and industry-standard technical, administrative, and physical safeguards to protect your data against:

- Unauthorized access
- Accidental loss or destruction
- Data breach or alteration
- Theft, misuse, or disclosure

Some of our security practices include:

- Secure Servers and Encrypted Databases: All user information is stored on servers protected by firewalls and, where applicable, end-to-end encryption.
- Access Controls and Role-Based Permissions: Only authorized personnel within our organization or vetted third parties are allowed access to sensitive information.
- **SSL Encryption**: All communication on our website is protected using Secure Socket Layer (SSL) technology to ensure secure data transmission.
- **Regular System Audits**: We conduct periodic internal audits, vulnerability assessments, and security checks.

- **Data Minimization Practices**: We only collect information that is necessary and avoid storing excess or obsolete data.
- Two-Factor Authentication (2FA) (where applicable): For user accounts and back-end admin panels to prevent unauthorized access.

While we use commercially reasonable efforts to protect your data, no method of transmission or storage is 100% secure. Therefore, we cannot guarantee absolute security, but we do undertake all legally required steps to minimize risk.

5.2 Retention Duration and Purpose

We retain your personal and sensitive personal information only for as long as necessary to:

- Fulfill the purposes for which the data was collected;
- Comply with legal, regulatory, accounting, or reporting obligations;
- Resolve disputes, enforce contracts, or protect our legal rights;
- Maintain business records for audit or risk management purposes.

The retention duration varies depending on the nature of the data:

Type of Data	Retention Period
Personal details & contact information	Up to 5 years after last user activity or service completion
Application & academic documents	Up to 3 years post-submission unless deletion is requested
Payment and transaction records	As per applicable tax or financial laws (usually 8 years)
Cookies and technical logs	As per cookie policy or browser settings

After the expiration of the applicable retention period:

- Your data is securely deleted, anonymized, or archived unless legally required to retain it;
- You may request early deletion by emailing **Social@mentoriaoverseas.com**, subject to conditions in Section 6 (Your Rights).

We regularly review our data retention practices to ensure compliance with evolving legal standards and privacy best practices.

6. Your Rights and Choices

We believe in transparency and respect your right to control your personal information. This section outlines the rights you have over the personal data we collect and the choices available to you for managing your privacy preferences.

6.1 Right to Access and Correction

You have the right to:

- Access your personal data held by us;
- Request a copy of the information we hold about you in a commonly used format;
- **Correct, update, or complete** your personal details if they are inaccurate, outdated, or incomplete.

To exercise this right, you may:

- Email us at Social@mentoriaoverseas.com with the subject line: "Data Access/Correction Request";
- Specify what data you wish to access or correct.

We will verify your identity before fulfilling such requests and respond within **15 working** days of receiving a valid request, unless an extension is justified under law.

6.2 Right to Withdraw Consent

You have the right to:

- Withdraw previously given consent to us for collecting, processing, or storing your personal or sensitive personal data;
- Stop the further use of your data, except where processing is required by law or for legitimate contractual obligations already underway.

Upon receiving a withdrawal request:

- We may discontinue the services associated with that data if it is essential for service delivery;
- Your withdrawal will not affect any processing already carried out before the request.

To initiate this process, please write to **info@mentoriaoverseas.com** with the subject: "Withdrawal of Consent".

Please note:

- In some cases, we may retain limited information to fulfill legal or regulatory requirements (e.g., tax, accounting, or fraud prevention).
- Withdrawing consent for certain data may limit your ability to use certain services or features.

6.3 Right to Opt-Out of Marketing Communication

You have the right to control how we communicate with you for promotional purposes.

You can:

- Unsubscribe from marketing emails by clicking the "Unsubscribe" link at the bottom of any promotional email;
- Reply "STOP" to opt out of SMS/WhatsApp communications;
- Email Social@mentoriaoverseas.com with the subject: "Opt-Out Request".

Important notes:

- Opting out of promotional communication will not affect service-related updates (e.g., payment confirmations, application status alerts, or operational reminders).
- It may take up to **7 working days** to process opt-out requests across all channels.

We are committed to honoring your preferences and complying with applicable anti-spam and telecommunication laws.

7. Grievance Redressal

We are committed to protecting your data rights and addressing any concerns you may have regarding the handling of your personal information. This section outlines how you can raise complaints or concerns, and how we manage and resolve such grievances in a timely and fair manner.

7.1 Grievance Officer Contact

In compliance with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, we have appointed a Grievance Officer to address data protection issues, service-related concerns, or privacy violations.

You may contact our designated Grievance Officer through the following official communication channels:

Grievance Officer KN NEXUNITED PRIVATE LIMITED

Office No. 2, Bhagyalaxmi Apartment, D'Souza Colony, College Road, Nashik – 422005, Maharashtra, India Email: info@mentoriaoverseas.com

Phone: +91 94296 90581

Subject Line: "Attention: Grievance Officer – Privacy Concern"

When reaching out, please include the following:

- Full name and contact details
- Description of your concern
- Supporting documents or screenshots (if applicable)

• Desired resolution or outcome (optional)

7.2 Resolution Timelines

We are committed to handling all grievances in a timely, fair, and transparent manner:

- Acknowledgement: All valid grievance submissions will be acknowledged within 72 hours (3 business days) of receipt.
- **Review and Investigation**: A detailed review will be conducted based on the nature and complexity of the issue.
- **Final Response**: We aim to resolve complaints within **15 working days** of acknowledgment. If more time is needed, you will be informed of the extended timeline and reason for the delay.

We strive to ensure your privacy concerns are addressed with the highest level of professionalism, integrity, and compliance with applicable laws.

8. Updates to This Policy

We reserve the right to amend, revise, or update this Privacy Policy at any time in order to:

- Reflect changes in applicable laws or regulations;
- Comply with government directives or regulatory authority guidelines;
- Address new technologies, features, or changes to our services;
- Improve clarity and transparency in our data handling practices.

8.1 Notification of Changes

When we update this Privacy Policy:

• We will post the **latest version** on our official website at <u>www.mentoriaoverseas.com</u>;

- The "Last Updated" date at the top of the document will be revised to reflect the effective date of changes;
- Where material changes are made (i.e., involving new rights, obligations, or types of data collected), we will notify Users through:
 - Email alerts (if you've provided a valid email address);
 - o A notification banner or pop-up on the website;
 - A public notice or blog update.

You are encouraged to regularly check this page to stay informed of how your data is being processed.

8.2 User Responsibility to Review

Your continued access or use of our website or services after the publication of an updated Privacy Policy constitutes:

- Acknowledgment of the revised version;
- Acceptance of the updated terms regarding collection, usage, sharing, and protection of your personal data.

If you disagree with any changes, you must:

- Discontinue using our services immediately; and
- Notify us at **info@mentoriaoverseas.com** if you wish to revoke consent or delete your data.

9. Contact Information

If you have any questions, concerns, feedback, or requests relating to this Privacy Policy or our data practices, you are welcome to contact us through the following channels:

9.1 Registered Office Address

KN NEXUNITED PRIVATE LIMITED

Office No. 2, Bhagyalaxmi Apartment, D'Souza Colony, College Road, Nashik – 422005, Maharashtra, India

9.2 Official Communication Channels

- Email: info@mentoriaoverseas.com
- Phone: +91 94296 90581 (Available during working hours: Monday to Saturday, 10:00 a.m. to 6:00 p.m. IST)

Please include your full name, contact details, and a brief description of your concern when reaching out.