

Privacy Policy

Owned and Operated by: Orange Education, a subsidiary of Orange House Pvt. Ltd.

Product: OrangeGPT (hereinafter “the Service” or “OrangeGPT”)

This Privacy Policy (“Policy”) explains in detail how Orange Education (“Company”, “we”, “us” or “our”) collects, uses, discloses, and safeguards information in connection with OrangeGPT, our websites, educational content, and related services (collectively, “Services”). By accessing or using our Services, you agree to be bound by the terms set forth below. This Policy has been prepared in accordance with the applicable laws of the Government of India, including the Information Technology Act, 2000, the IT Rules, 2011, and any subsequent amendments or guidelines issued by Indian regulatory authorities.

1. Definitions

For the purposes of this Policy, the following definitions apply:

- **“Personal Data”** means any information that relates to an identified or identifiable individual, as understood under the IT Act, 2000 and related guidelines.
- **“Sensitive Personal Data or Information (SPDI)”** includes financial details, health information, biometric data, and any other information that requires enhanced protection.
- **“Anonymous Data”** refers to data that has been anonymized such that the individual cannot be identified from it.
- **“Processing”** means any operation or set of operations performed on Personal Data, whether automated or manual, including collection, storage, retrieval, use, disclosure, and deletion.
- **“Service” or “OrangeGPT”** refers to the AI-powered educational tool offered by Orange Education.
- **“User” or “you”** means any individual accessing or using our Services.

2. Introduction and Scope

This Policy describes how we process both Personal Data and Anonymous Data through the use of our digital platforms, including websites, mobile applications, and other interfaces where the Service is available. This Policy is an essential component of our Terms of Service and is intended to comply with all applicable data protection regulations under Indian law, ensuring transparent and responsible data handling practices.

3. Data Collection Practices

3.1 Types of Data Collected

We may collect information in the following categories to support the educational goals of our Service:

- **Usage Data:** Information such as learning activity logs and interactions with the Service, collected in anonymous or aggregated form for the purposes of personalizing content and improving our offerings.
- **Technical Data:** Data generated automatically (e.g., browser type, IP address in an aggregated manner, device identifiers, operating system information) used to ensure system performance and security.
- **Non-Personal Data:** Data that cannot be associated with a specific individual, used solely for statistical analysis and service improvement.

3.2 Methods of Collection

Data may be collected through:

- **Direct Input:** When users register for an account or interact with our Service.
- **Automated Tracking Technologies:** Such as cookies, web beacons, and similar tools, deployed in accordance with the guidelines under the IT Act, 2000.
- **Third-Party Integrations:** Data may also be received from authorized partners or educational institutions, ensuring that such data sharing complies with Indian legal norms.

3.3 Data Minimization

We are committed to the principle of data minimization and collect only the data necessary to provide an effective educational experience while adhering to the guidelines and limitations prescribed by Indian law.

4. Use of Data

4.1 Educational Enhancement and Service Improvement

The collected data is used strictly for the following purposes:

- Customizing and personalizing educational content based on users' interactions with the Service.
- Conducting anonymous analysis to enhance system functionality and user experience.
- Improving website and application performance by tracking usage patterns.

4.2 Legal and Regulatory Compliance

In addition to service improvements, we process data to comply with legal obligations imposed by the Government of India. These include responding to lawful requests or regulatory requirements under the IT Act, 2000 and applicable IT Rules.

4.3 Prohibited Purposes

We expressly prohibit the use of any collected data for targeted advertising, commercial profiling, or marketing purposes without obtaining explicit consent from the user, unless otherwise mandated by law.

5. Children's Privacy

5.1 Special Protections for Minors

Our Services are designed to support users of all age groups. However, for children (users under the age of 18), we exercise heightened care in data handling. We do not intentionally collect any Personal Data from minors unless it is required for educational purposes and accompanied by appropriate parental or guardian consent, in compliance with Indian guidelines.

5.2 Compliance with Indian Regulations

The privacy practices applicable to minors are aligned with the provisions of the IT Act, 2000, and any future statutory rules developed by Indian authorities governing data protection for children.

5.3 Advertising and Content for Minors

No advertising or promotional content that contravenes the safety standards prescribed for children is displayed or targeted at users under 18. All educational content is rigorously reviewed to ensure it meets safety and ethical standards.

6. Data Protection and Security Measures

6.1 Security Protocols

We implement robust technical and organizational measures to protect Personal Data against unauthorized access, alteration, disclosure, or destruction. These measures include:

- Use of encryption technology for data transmission and storage.
- Implementation of strict access controls and authentication mechanisms.
- Periodic security reviews and audits in line with the best practices under Indian cyber security guidelines.

6.2 Incident Response and Breach Notification

In the event of a data breach, we shall initiate our Incident Response Plan to investigate, contain, and remediate the issue. In compliance with Indian regulatory requirements, any data breach involving Personal Data will be reported to the appropriate authorities and affected users will be notified promptly.

7. Disclosure to Third Parties

7.1 No Unauthorized Sale or Sharing

Orange Education does not sell, trade, or transfer any Personal Data to third parties for commercial purposes. Any data provided to external parties is either anonymized or provided in aggregated form.

7.2 Service Providers and Partners

We may share data with trusted third-party service providers who assist with system maintenance, analytics, or educational content delivery. Each such party is contractually bound to maintain data confidentiality and to adhere strictly to the security practices mandated by the Government of India.

7.3 Legal and Regulatory Disclosures

Should it be required by law or by a valid legal process under Indian law, we may disclose Personal Data to governmental authorities or as necessary to enforce our legal rights.

8. User Rights and Control

8.1 Data Access and Correction

Users have the right to access their Personal Data and request corrections if any information is found to be inaccurate. Procedures for making such requests are outlined in Section 13 below.

8.2 Data Deletion and Portability Rights

In line with applicable Indian law, if any Personal Data has been collected, users may request its deletion or extraction. Such requests will be validated and processed in a manner that respects the user's privacy rights.

8.3 Consent Management

Where data processing is based on user consent, users retain the right to withdraw their consent at any time. The process for withdrawal will be clearly communicated and implemented, subject to any limitations imposed by other legal obligations.

9. Data Retention and Deletion

9.1 Retention Principles

Data is retained only for as long as necessary to achieve the educational and service-related objectives for which it was collected. Retention periods are determined by the nature of the data and relevant legal requirements under Indian law.

9.2 Deletion Procedures

Users may request that their Personal Data be permanently deleted. All such requests will be processed following strict verification of the requester's identity, ensuring compliance with legal and regulatory protocols.

10. International Data Transfers

10.1 Cross-Border Data Flow

As our Services may be accessed globally, data transfers to jurisdictions outside India may occur. Where such transfers take place, we ensure that appropriate safeguards (such as adherence to recognized data protection frameworks and standard contractual clauses) are implemented, consistent with the principles of the IT Act, 2000.

10.2 Ensuring Adequate Protection

All international transfers shall be governed by agreements that guarantee a level of data protection equivalent to that provided under Indian law.

11. Compliance with Applicable Indian Laws

11.1 Legal Framework

Our data processing activities are governed by and comply with the Information Technology Act, 2000, the IT (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, and any other applicable Indian legislation or guidelines on data protection and privacy. We continuously monitor legal developments to ensure ongoing compliance.

11.2 Record-Keeping and Accountability

We maintain comprehensive records of our processing activities and conduct regular internal audits to verify adherence to Indian legal requirements and our own privacy commitments.

12. Amendments to this Privacy Policy

12.1 Policy Revisions

Orange Education reserves the right to amend this Privacy Policy at any time to reflect changes in our practices or to comply with updated Indian legal standards.

12.2 Notification of Changes

Substantial modifications to this Policy will be communicated on our website and, where necessary, through direct communication channels to ensure that users remain fully informed.

13. Contact Information and Dispute Resolution

13.1 Contact Details

For any inquiries, concerns, or requests regarding this Privacy Policy or our data practices, please contact our Data Protection Officer:

- **Email:** info@orangeeducation.in
- **Phone:** 011-4377 6600
- **Postal Address:**
Orange Education
9, Daryaganj,
Delhi, 110002, India

13.2 Dispute Resolution Process

Any disputes arising out of or in connection with the interpretation or application of this Policy should initially be addressed by contacting our support team. If the dispute is not resolved satisfactorily, users may seek recourse under the legal framework provided by the Government of India.

14. Governing Law and Jurisdiction

This Privacy Policy is governed by, and construed in accordance with, the laws of India. Any disputes arising in relation to this Policy shall be subject to the exclusive jurisdiction of the courts located in Delhi, India, unless otherwise agreed by the parties in writing.

By using the OrangeGPT Service, you confirm that you have read, understood, and agree to the terms and conditions outlined in this Privacy Policy as amended from time to time in accordance with applicable Indian law.

This document supersedes any previous privacy notices or policies associated with our Services and forms an integral part of our Terms of Service.

Digitally Signed by Orange Education