

# Privacy Policy

## Introduction

At Cloud Education Holdings Private Limited (hereinafter referred to as "Cloud Education Holdings", "we", "us", or "our") and its entities — including Cloud Education Group Private Limited, The Authorized Partner (TAP), Cloud Education and Visa Services, and its subsidiary Prepx Technologies Private Limited (collectively, the "Group") — we understand the importance of keeping your personal information private. We have listed our privacy practices and policies here. Please read it in conjunction with our terms of use as the terms relate to the privacy policy. This Privacy Policy applies to all services offered by Cloud Education Holdings Private Limited and the entities listed above, including our website and the Abroad Sathi mobile application.

You do not need to give us any information to browse our website, but when you fill in the registration form to become a member or use the Abroad Sathi app, we do ask you for information about yourself.

On registration, you will be asked to subscribe for our newsletter. By subscribing the newsletter, you agree to receive emails in your registered email id regarding promotional campaigns of Cloud Education Holdings, its entities (Cloud Education Group Private Limited, The Authorized Partner (TAP), Cloud Education and Visa Services, Prepx Technologies Private Limited), and associate companies and institutions. You can unsubscribe the newsletter from the link provided in the sent email.

## About the Group and Abroad Sathi Mobile Application

Cloud Education Holdings Private Limited is the parent entity of a group of companies operating in the education, visa services, and technology sectors. The Group includes:

- **Cloud Education Holdings Private Limited** — Parent/holding entity
- **Cloud Education Group Private Limited** — Group operations entity
- **The Authorized Partner (TAP)** — Authorized partner services
- **Cloud Education and Visa Services** — Education counselling and visa services
- **Prepx Technologies Private Limited** — Subsidiary technology company

Abroad Sathi is a mobile application operated by Cloud Education Holdings Private Limited (and/or its designated entity within the Group) designed for international students studying abroad. The app provides comprehensive services including student community features, local student finder, accommodation search, student loan applications, and forex transfer services.

By using Abroad Sathi or any service offered by the Group, you agree to the collection and use of information in accordance with this Privacy Policy. If you do not agree with our policies and practices, please do not use our services or the App.

## Information We Collect and How We Use It

We may store the information you submit to or through the site and Abroad Sathi app, as well as information we collect in connection with your use of our services across any Group entity.

We use the information to fulfill your requests, provide functionality, improve quality, personalize your experience, track usage, provide feedback to course providers that are listed on the site, provide enquiry and application services on behalf of course providers and educational institutions, and provide visa, counselling, and related services through the Group.

**Account Information:** If you create an account on the Cloud Education Holdings website, with any Group entity, or on the Abroad Sathi app, we may store and use your full name, email address, phone number, date of birth, nationality, post code, profile picture, and other information you may provide with your account, such as your gender. Your information will be shared only with the institutions that you wish to enquire or apply to or are eligible to, and with relevant Group entities providing services to you, and the institutions can contact you directly or indirectly and help you with your queries. Your first name and last initial, as well as any photo you submit through the registration process, will be publicly displayed as part of your account profile.

**Student Information (Abroad Sathi App):** For Abroad Sathi users, we collect university/college name, course details, intended country of study, and enrollment status to provide you with relevant services and connect you with appropriate educational opportunities.

**Identity Verification (Abroad Sathi App):** For student loan and forex services within Abroad Sathi, we collect government-issued ID documents and passport details necessary for verification and compliance with financial regulations.

**Visa Service Information:** For users of Cloud Education and Visa Services, we collect documentation required for visa processing, including passport details, academic records, financial documents, and other supporting information as required by relevant immigration authorities.

**Financial Information (Abroad Sathi App):** When you use student loan applications or forex transfer services, we collect bank account details and transaction history necessary to process these services.

**Accommodation Preferences (Abroad Sathi App):** We collect your location preferences, budget, and housing requirements to help you find suitable accommodations.

**Community Profile (Abroad Sathi App):** Information you share in the Abroad Sathi community including bio, interests, and social connections within the app.

**Device and Usage Information:** We automatically collect device type, operating system, unique device identifiers, mobile network information, app features accessed, time spent, interaction patterns, search queries, IP address, access times, app crashes, and system activity.

**Location Data (Abroad Sathi App):** With your permission, we collect approximate or precise location data to help you find local students and accommodations in your area.

**Public Content:** The information that you post to the site or app including your reviews, forum questions and replies is intended for public consumption. We may display this information on the site and within the Abroad Sathi app.

## **Information from Third Parties**

**Educational Institutions:** We may receive verification of enrollment status from universities and colleges.

**Financial Service Providers:** For Abroad Sathi users, we may receive information regarding credit checks, loan eligibility, and forex transaction processing from our financial partners.

**Accommodation Partners:** We receive property listings, availability, and booking confirmations from our accommodation partners.

**Visa and Immigration Authorities:** For visa service users, we may receive status updates and decisions from relevant immigration authorities and embassies.

**Social Media:** If you choose to connect your social media accounts, we may receive information from those platforms.

## **How We Use Your Information**

**Service Delivery:** Create and manage your account across the Group, connect you with other international students (Abroad Sathi), facilitate accommodation searches and bookings (Abroad Sathi), process student loan applications (Abroad Sathi), enable forex transfers and currency exchange (Abroad Sathi), provide visa counselling and processing services (Cloud Education and Visa Services), provide authorized partner services (TAP), provide technology-driven services (Prepx Technologies), and provide location-based services (Abroad Sathi).

**Communication:** Send transactional emails and notifications, provide customer support, send updates about your applications, transactions, and bookings, and share community updates and relevant announcements.

**Improvement and Personalization:** Analyze usage to improve features and user experience, personalize content and recommendations, conduct research and analytics, and develop new services and features across the Group.

**Security and Fraud Prevention:** Verify user identity, detect and prevent fraudulent activities, ensure platform security and safety, and comply with legal obligations.

**Marketing (with your consent):** Send promotional materials about our services and the services of Group entities, share information about partner offers, and conduct surveys and gather feedback.

## **Disclosures and How We Share Your Information**

Your personal information may be passed to and used by Cloud Education Holdings Private Limited and the other Group entities — Cloud Education Group Private Limited, The Authorized Partner (TAP), Cloud Education and Visa Services, and Prepx Technologies Private Limited — in

connection with providing services to you over our website and Abroad Sathi app and delivering or making our services available to you. Sharing between Group entities is limited to what is reasonably necessary to provide you with the services you have requested or to operate the Group's business in accordance with this Privacy Policy.

**Service Providers:** We share information with third-party service providers including payment processors and financial institutions, student loan providers and credit assessment agencies, forex and currency exchange partners, accommodation listing platforms and property managers, cloud storage and hosting providers, analytics and data analysis services, and customer support platforms.

**Community Features (Abroad Sathi):** Information you choose to share through community features (profile, posts, messages) will be visible to other Abroad Sathi users according to your privacy settings.

We may also disclose your personal information in the following instances: If we are required to do so by applicable law or under a court or similar order. As deemed necessary, in our discretion, to protect our legal rights or property or the legal rights or property of a member or third party, or to prevent personal injury. In connection with a sale, merger, assignment, joint venture or other transfer or disposition of a portion or all of our assets or stock or our affiliated entities (including, without limitation, in connection with any bankruptcy or similar proceedings).

## **Data Security**

We implement appropriate technical and organizational security measures to protect your personal information across all Group entities, including encryption of data in transit and at rest, secure server infrastructure with regular security audits, access controls and authentication mechanisms, regular security assessments and updates, and employee training on data protection.

However, no method of transmission over the internet or electronic storage is 100% secure. While we strive to protect your information, we cannot guarantee absolute security.

## **Data Retention**

We retain your personal information for as long as necessary to provide you with our services, comply with legal, regulatory, or contractual obligations, and resolve disputes and enforce our agreements.

When information is no longer needed, we will securely delete or anonymize it. Specific retention periods vary based on the type of data and applicable regulations.

## **Your Rights and Choices**

**Access and Portability:** Request access to your personal information held by any Group entity and obtain a copy of your data in a portable format.

**Correction and Update:** Correct inaccurate or incomplete information and update your profile and preferences through website or app settings.

**Deletion:** Request deletion of your account and personal information (subject to legal retention requirements).

**Restriction and Objection:** Restrict or object to certain processing activities and opt-out of marketing communications.

**Consent Withdrawal:** Withdraw consent for data processing where consent was the legal basis.

**Location Settings (Abroad Sathi):** Control location permissions through your device settings.

To exercise these rights, please contact us at [compliance@cloudeducationholdings.com](mailto:compliance@cloudeducationholdings.com) or through the app's support section. A single request will be processed across all Group entities holding your data, where reasonably practicable.

## **Children's Privacy**

The Abroad Sathi app is intended for users aged 16 and above. We do not knowingly collect personal information from children under 16. If we become aware that we have collected information from a child under 16, we will take steps to delete such information promptly.

## **International Data Transfers**

Cloud Education Holdings Private Limited and its entities operate across 15+ countries. Your information may be transferred to and processed in countries other than your country of residence, including between Group entities located in different jurisdictions. These countries may have different data protection laws. We ensure appropriate safeguards are in place to protect your information in accordance with this Privacy Policy.

## **Hyperlinks to Other Websites**

This website and the Abroad Sathi app may contain hyperlinks to websites owned and operated by third parties which are beyond our control. These other sites have their own privacy policies and we urge you to review them - because this privacy policy will not apply. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

We generally do not object to you linking directly to the homepage of our website, although we reserve the right to refuse our authorization to such linking at our sole discretion. We do not permit our pages to be loaded into frames on your website - our web pages must load into the user's entire window.

We reserve the right to move or change our website URL at any time in order to meet changing business needs and to continually improve our online service. External websites link to our website at their own risk.

## **Cookies**

This website stores cookies on your computer. These cookies are used to collect information about how you interact with our website and allow us to remember you. We use this information

in order to improve and customize your browsing experience and for analytics and metrics about our visitors both on this website and other media.

Most internet browsers enable you to delete cookies or to receive a warning before a cookie is stored on your hard drive. Please refer to your browser instructions or help screen to learn more about how to do this. However, should you decide to disable any cookies we place on your computer you may not be able to use certain services or facilities on our website.

On registration, you will be asked to subscribe for our newsletter. By subscribing the newsletter, you agree to receive emails in your registered email id regarding promotional campaigns of Cloud Education Holdings, its entities, and associate companies and institutions. You can unsubscribe the newsletter from the link provided in the sent email.

## **Ask The Expert**

Our website allows you to leave comments in our ask the expert section. They are open to the public and if you choose to disclose personally identifiable information or reveal your personal details to other users in these areas you are consenting to its unrestricted distribution in a public forum throughout our website and to and by other users of our website. We therefore cannot be responsible for the protection or security of such information, regardless of its sensitivity. You disclose all such information entirely at your own risk.

Please do not disclose personal information about third parties in this section - it is prohibited, and we reserve the right to ban you from our website if you breach this rule.

## **Updates to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, the addition of new Group entities, or for other operational reasons. We will notify you of significant changes through in-app notifications, email notifications, or prominent notice on the website or app.

Your continued use of our services after changes constitutes acceptance of the updated policy.

## **Contact Information**

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices across any Group entity (Cloud Education Holdings Private Limited, Cloud Education Group Private Limited, The Authorized Partner (TAP), Cloud Education and Visa Services, or Prepx Technologies Private Limited), please contact us at [compliance@cloudeeducationholdings.com](mailto:compliance@cloudeeducationholdings.com) or through the app's support section.

For data protection inquiries specific to your region, please specify your location when contacting us.

## **Regional Specific Provisions**

**For Users in the European Economic Area (EEA) and UK:** Legal basis for processing includes consent, contract performance, legitimate interests, and legal obligations. You have the right to

lodge a complaint with your local data protection authority. Data Protection Officer contact: [compliance@cloudeducationholdings.com](mailto:compliance@cloudeducationholdings.com)

**For Users in Nepal:** We comply with the Constitution of Nepal, 2015 (Article 28 - Right to Privacy), the Individual Privacy Act, 2075 (2018), the Individual Privacy Regulation, 2077 (2020), the Electronic Transactions Act, 2063 (2008), the National Penal Code, 2074 (2017), and other applicable laws and rules of Nepal. We collect, store, process, and use your personal information only with your informed consent and for the specific purposes disclosed to you at the time of collection, in accordance with Section 3 and related provisions of the Individual Privacy Act. Sensitive personal information (including caste, ethnicity, religious belief, physical or mental health, sexual orientation, and details relating to property) as defined under Section 27(2) of the Act will be processed only with your explicit consent or where otherwise permitted by law. You have the right to file a complaint regarding any violation of your privacy rights before the concerned District Court within 3 months from the date of the alleged violation. Grievance Officer: [grievance@cloudeducationholdings.com](mailto:grievance@cloudeducationholdings.com) (Response within 24 hours)

**For Users in the United States:** California Consumer Privacy Act (CCPA) rights apply to California residents including the right to know, delete, and opt-out of sale of personal information. We do not sell personal information to third parties.

**For Users in Other Countries:** We comply with applicable local data protection laws in all countries where Cloud Education Holdings Private Limited and its entities operate.

## Consent

By using the website, services, or applications of Cloud Education Holdings Private Limited, Cloud Education Group Private Limited, The Authorized Partner (TAP), Cloud Education and Visa Services, Prepx Technologies Private Limited, and/or the Abroad Sathi mobile application, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use, and sharing of your information as described herein, including sharing between the Group entities listed above.