

Data Privacy Policy

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1. Introduction

- GEDU Services Private Limited, a company incorporated under the provisions of the Companies Act, 2013 and having its registered office at 2nd Floor, Plot No. A-67, Sector-64, Noida, Gautam Budh Nagar, Uttar Pradesh - 201301, India (hereinafter referred to as “**GEDU**” or “**Company**” or “**us**” or “**we**” or “**our**”) is a wholly owned subsidiary of Global Education Holdings Limited based out of the United Kingdom (hereinafter referred to as “**Parent Company**”).
- GEDU, along with its Parent Company, in its course of day-to-day business operations, needs to collect, store and process personal data of its staff, employees, students and the prospective students, third party vendors and other individuals it has dealings with. GEDU becomes a controller for most of the personal data it processes and is committed to full compliance with the applicable data protection legislations, including but not limited to, the Digital Personal Data Protection Act, 2023 (hereinafter “**DPDP Act**”) along with the Digital Personal Data Protection Rules, 2025 (hereinafter “**DPDP Rules**”) and the United Kingdom General Data Protection Regulation (hereinafter “**UK GDPR**”) 2016. This policy sets out how GEDU shall handle the personal data of our staff, students, suppliers, partners, and other third parties in course of its day-to-day business.
- GEDU gathers and processes your personal information in accordance with this privacy policy. This policy provides you with information regarding your rights and our obligations, and explains how, why, and when we process your personal data and how we are keeping it safe.
- GEDU is responsible for your personal data, and we have appointed a Data Protection Officer (hereinafter “**DPO**”) who oversees privacy related matters. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

Data Protection Officer: Ms. Priya Pathania, Legal Counsel - Risk and Compliance

Email: dpo@globalbanking.ac.uk

Address: GEDU Services Private Limited

Centre of Excellence: 2nd Floor, Plot No. A-67, Sector-64, Noida, Gautam Budh Nagar, Uttar Pradesh - 201301, India



2. Definitions

- **Data Processor** - in relation to personal information, means any person (other than an employee of the Data Controller) who processes the personal information on behalf of the data controller.
- **Data Subject/ Data Principal** - means a natural person, is an individual, who is the subject of certain personal information or whose information is being collected by the Company (hereinafter “you” or “your”).
- **Data Subject Right** - any request received by the Company from a Data Subject or other individual or legal entity who wishes to receive or amend or modify his/her digital personal information stored with the Company.
- **Disclosure** - means rendering personal information accessible, for example by allowing access to personal information either transferring, distributing, or publishing the personal information.
- **European Union (EU)** – the European Union shall mean and include the members of the European Union.
- **Personal Identifiable Information (PII)** - means any information relating to an identified or identifiable living person ('Data Subject'). An identifiable living person is one who can be identified, directly or indirectly, from the data items or by using a common identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- **Processing** – means any operation or set of operations which is performed on personal information or on sets of personal information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, combination, restriction, erasure or destruction.
- **Profiling** - means any form of automated Processing of personal information consisting of the use of personal information to evaluate certain personal aspects relating to a person, in particular to analyse or predict aspects concerning that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.



- **Personal profile** - means a collection of data that allows the appraisal of fundamental characteristics of the personality of an individual.
- **Special categories of personal data/ Sensitive Personal Information (SPI)** - personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- **Third party**- means a natural or legal person, public authority, agency, or body other than the Data Subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal information.

3. Collection of Information

- GEDU processes personal information to meet our legal, regulatory, statutory, and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will never collect any unnecessary personal data from you and will not process your information in any way other than as specified in this policy without telling you first. We do not knowingly collect data relating to children and our websites are not intended for children.
- The Company collects personal data primarily from the following sources:
 - Visitors to our website
 - Enquiries, visitors, and survey respondents, namely:
 - People who email GEDU or the Parent Company or fill in our forms;
 - People who call GEDU or the Parent Company
 - People who contact GEDU or the Parent Company via social media
 - People who respond to a Survey of GEDU or the Parent Company.
 - Visitors to the office of GEDU or the Parent Company.
- Current and former student details, including when they apply for a course at GEDU or the Parent Company, enrolment information, and progression through the course.
- Data received from other students or external sources such as UCAS and external referees.
- GEDU's staff, board members, contractors, volunteers, and people who apply to work with us.



- GEDU's suppliers and partners who we enter into or negotiate agreements with.
- You do not have to create an account or provide us with any personal information when you access our website. We may ask you for some personal details if you access some of our services, for example:
 - To order a prospectus,
 - To register for an event such as an open day, and
 - To make an enquiry.
- If you use one of our website forms or if you contact us by email, we may collect and process personal information about you. This may include:
 - Your contact details including your address and phone number,
 - Your name, title, date of birth and gender,
 - Your email addresses, and
 - Education or professional details
- We may automatically collect certain data from you as you use our website, by using cookies and similar technologies.
- We may receive data from third parties such as analytics providers such as Google, advertising networks, providers of technical, payment and delivery services, such as data brokers or aggregators.
- If you do not provide us with data when requested to perform our contractual obligations, under the terms of the contract between us and you, we may not be able to fulfil our contract. In these circumstances we may have to cancel your service, but if we do, we will notify you at the time.
- It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

3. How we use your personal data

- The Company takes digital data privacy seriously and will never disclose, share, or sell your data without your knowledge. We may process your personal data without your knowledge or consent where this is required or permitted by law.



- We will only use your data for the purposes it was collected for, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for in unrelated purpose, we will seek your consent to use it for that new purpose.

4. Purposes for which we will use your personal data

- We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.
- Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us on the email provided above, if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you on our systems when you are applying for one of our courses or enter contractual relationship with us.	(a) Identity	
	(b) Contact	Performance of a contract with you.
To process your order, comply with our contractual obligations towards you and deliver services to you including:	(a) Identity	(a) Performance of a contract with you.
(a) Manage payments, fees, and charges.	(b) Contact	(b) Necessary for our legitimate interests (to recover debts due to us).
(b) Pay money to you, collect money from you and recover money owed to us.	(c) Financial	
(c) Maintain records of academic progress, achievement, awards, and incidental records during the course of our contractual relationship with you.	(d) Transaction	
	(e) Academic Data	
	(f) Incidents and Health and Safety Data	
To manage our relationship with you which will include:	(a) Identity	(a) Performance of a contract with you.
(a) Notifying you about changes to our terms or privacy policy.	(b) Contact	(b) Necessary to comply with a legal obligation.



(b) Asking you to leave a review.	(c) Profile	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services).
	(d) Marketing and Communications	
To enable you to partake in a prize draw, competition or complete a survey.	(a) Identity	(a) Performance of a contract with you.
	(b) Contact	(b) Necessary for our legitimate interests (to study what courses students apply for, to develop them and grow our business).
	(c) Profile	(c) consent (where results of a survey are analysed outside India or the United Kingdom (UK)/European Economic Area (EEA)).
	(d) Usage	
	(e) Marketing and Communications	
To manage, administer and protect our business (including legal and accounting support, investments, and leverage) and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).
	(b) Contact	(b) Necessary to comply with a legal obligation.
	(c) Technical	
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
	(b) Contact	
	(c) Profile	
	(d) Usage	
	(e) Marketing and Communications	
	(f) Technical	
To use data analytics to improve our services, including enhancing existing services and developing new features, marketing, customer relationships and experiences	(a) Technical	Necessary for our legitimate interests (to define types of customers for our services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy)
	(b) Usage	



To make suggestions and recommendations to you about goods or services that may be of interest to you, including goods and services of our partners	(a) Identity	Necessary for our legitimate interests (to develop our services and grow our business).
	(b) Contact	
	(c) Technical	
	(d) Usage	
	(e) Profile	

- Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to analysing results of surveys which are processed outside India or the UK/EEA.
- **Marketing.** We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this Marketing). You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.
- **Third-Party Marketing.** We do not share your personal data with any company outside our group for marketing purposes.
- **Opting out.** You can ask us to stop sending you marketing messages at any time by contacting our DPO at dpo@globalbanking.ac.uk. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

5. Disclosure of your Personal Data

- We may have to share your personal data with the parties set out below:
- **External third parties**, such as:
 - Service providers who provide IT and system administration services, marketing, and delivery services,
 - Professional advisers including lawyers, bankers, auditors, and insurers,



- Partner institutions,
 - Government bodies that require us to report processing activities,
 - Regulators,
 - We may also share your personal data with third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, to enforce or apply our site terms of use or to protect the rights, property or safety of our site, our users, and others.
 - Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- **Internal third parties**, such as other companies in the group acting as joint processors and who provide HR, IT, administration, financial services etc. and undertake leadership reporting.

6. International Transfers

- We may need to share your data with our group companies, partners, or providers, who are based outside India or the UK/EEA. This will involve transferring your data outside India or UK or the European Economic Area where existing laws do not provide the same level of protection for the security of your personal data. However, we require all involved parties to respect the security of your personal data, and to treat it in accordance with principles of confidentiality as specified in clause 8 below.
- You have the right to withdraw consent to the data transfer outside India or the UK/EEA at any time by contacting our DPO at on dpo@globalbanking.ac.uk. Please note, that if you withdraw your consent to the transfer of your data outside India or the UK/EEA, we may not be able to perform the contract we have or are trying to enter with you (for example, the services for which we have been engaged). In this case we may have to cancel a service you have with us, but we will notify you if this is the case at the time.
- Please, note that some of our surveys and services are currently processed outside India and the UK and the European Economic Area (EEA). We will secure your express opt-in consent where necessary before you take any of those surveys or services.



7. Data Security

- We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also only allow access to your personal data to employees and contractors that have a business requirement to process your personal data. They will only process your personal data on our instructions, and they must keep it confidential.
- We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of such a breach.
- Where your data is shared with third parties, we will seek to share the minimum amount of data necessary, and we do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your data for specified purposes and in accordance with our instructions.
- Whenever we transfer your data to the internal third parties, we have put in place the same safeguards that guaranty the security of your data within our organisation.
- Where we share your data with partners or providers, there is a contract in place which includes obligations in relation to the confidentiality, security and lawful processing of any personal data shared with them.
- Whenever we transfer your data outside India or the UK/EEA, the security of your data is protected by international data transfer agreements approved by the regulator that provide the same level of protection afforded in India or the UK/EEA.

8. Data Retention

- We will retain your data for as long as necessary to provide you with the services that you have requested from us or for as long as the law otherwise permits.
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.



- By law we must keep basic information about our customers and employees (including Contact, Identity, Financial and Transaction Data) for seven (07) years after they cease being customers for tax and legal purposes. Academic regulations require us to keep some data relating to students' activities for ten (10) years and some data indefinitely.
- In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your rights with respect to your Personal Data with us.

- Under the data protection laws you have rights in relation to your personal data that include the right to access, correction, erasure, and transfer of your data, as well as the right to impose a restriction on or object to the processing of your data. Finally, you have the right to data portability and the right to withdraw consent to data processing. If you wish to exercise any of the rights set out above, please contact our Data Protection Officer at: dpo@globalbanking.ac.uk
- You have the right to see the personal data that we keep about you, by making a request in writing to us at dpo@globalbanking.ac.uk. You will not have to pay a fee to access your personal data (or to exercise any of other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive or refuse to comply with your request in these circumstances. We aim to respond to you within a month. Occasionally, it may take us more than a month if your request is particularly complex or you have made many requests. In this case, we will notify you.
- If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Data Protection Board of India (DPBI) established under the provisions of the DPDP Act. However, we would be grateful if you would contact us first if you do have a complaint, so that we can resolve it for you informally.

10. Responsibilities and Rights of the Data Principal

10.1 Responsibilities

- Throughout the course of your engagement with us, you have a responsibility to keep your personal details up to date.



- During the time of your engagement, you may have access to other individuals' personal data, and you are legally obliged to handle this in a confidential, professional, and responsible manner, in line with data protection legislation, this Privacy Policy, and any other codes of conduct, as applicable.

10.2 Rights

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with the applicable law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. The further retention of the personal data should be lawful where it is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, on the grounds of public interest in the area of public health, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, or for establishment, exercise or defence of legal right.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.



- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information for which you had initially provided your consent for us to use or where we used the information to perform a contract with you.
- **Right to Data Portability.** The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the services after the time you withdraw your consent.

11. Use of Technology Platform

- The website of the Company uses Google Analytics technology which may collect non-personally identifiable information relating to your use of the site. This may include:
 - Which pages you see,
 - How long you stay,
 - What you click on our pages,
 - If you visit the website again,
 - Which country and city you are browsing from



- This data is collected for monitoring and understanding the effectiveness of our websites. We also collect data relating to the demographics and interests of our users via Google Analytics and cookies set by Google advertising networks. This data is used in aggregated form to help improve the site and Company's marketing efforts. For further information on Google safeguards for personal data see: <https://policies.google.com/privacy>

12. Cookies

- You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information about how to reject cookies using your internet browser settings, please consult the "Help" section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). If you disable or refuse cookies, please note that some parts of Company's website may become inaccessible or not function properly.

13. Third-Party Links

- The website of the Company or its affiliates may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

14. Consent

- By using our website, you consent to the Company's and its affiliates website privacy policy.

15. Data Protection and Confidentiality

- The Company, as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the DPDP Act, and Rules made thereunder along with the UK General Data Protection Regulations (UK GDPR), as amended from time to time.



16. Our Policy concerning children and their data

- We are committed to protecting the privacy and safety of children. In certain circumstances, we may process personal data of children for associated services and social service initiatives. However, we take utmost care to comply with applicable laws and regulations regarding the Processing of children's personal data.
- When processing such data, we take reasonable efforts to obtain appropriate Consent from parents or legal guardians, in accordance with the relevant legal requirements. We ensure that the collection, use, and Disclosure of children's personal data is limited to what is necessary for the intended purposes and is done in a secure manner.
- If you believe that We may have inadvertently collected personal data from a child without proper Consent or have any concerns regarding the Processing of children's data, please contact us using the Email ID DPO as mentioned herein and we will take reasonable endeavours to promptly address the issue. We encourage parents and guardians to actively participate in and supervise their children's online activities to ensure their privacy and safety.

17. Our Policy concerning people with disability and their data

- We may collect and process personal data of person with disability for the purpose specified in this policy.
- Lawful guardian shall provide the Consent on behalf of person with disability to process their personal information.
- We shall take reasonable endeavour to ensure that adequate measures are implemented to the Processing of the personal data of the person with disability in compliance with the applicable privacy regulations.



18. Complaint Mechanism

- The Company only processes your personal information in compliance with this privacy policy and in accordance with the relevant data protection laws. If you wish to raise a complaint regarding the processing of your personal data you may send a written complaint to the company's Data Protection Officer at dpo@globalbanking.ac.uk.
- If you still remain concerned and/or are not satisfied with the response of the DPO, you may raise your complaint with the DPBI as per the provisions of the DPDP Act and Rules made thereunder, as amended from time to time.
- By submitting a complaint, you are agreeing that the Company can process, use, and share information it contains to enable the complaint to be considered. Information may be disclosed to any person who has a need to see it for the complaint to be fully investigated. Information may also be shared with relevant people after a complaint to facilitate actions and recommendations after investigation.
- All documentation relating to complaints will be kept confidential and shall be disclosed only to those persons who have a right to the information by virtue of their role in the complaints process, or as required by law.

19. Monitoring and Review

- This policy may be amended by the Company at any time without any prior notice. The Company reserves its right to regularly test its systems and processes to monitor compliance.

GEDU Services Private Limited reserves the right to alter, append or withdraw this policy either in part or in full based on management's discretion.

