



**INCHIN CLOSER**<sup>®</sup>  
Bringing India and China closer

Last updated 1<sup>st</sup> June 2022

INCHIN CLOSER respects the privacy of our users. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website “inchincloser.com” (the “Website”). Please read this Privacy Policy carefully. **IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE WEBSITE.**

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last updated” date of this Privacy Policy. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Website after the date such revised Privacy Policy is posted.

This Privacy Policy does not apply to the third-party online/mobile stores from which you may make payments, which may also collect and use data about you. We are not responsible for any of the data collected by any such third party.

## **COLLECTION OF YOUR INFORMATION**

We may collect information about you in a variety of ways. The information we may collect via the Website depends on the content and materials you use, and includes:

### **Personal Data**

Demographic and other personally identifiable information such as your name, email address, birth date, pin-code etc. that you voluntarily give to us when you sign-up for and use this Website or when choosing to participate in various activities related to the Website, such as posting messages in comment sections or in our forums, accessing the Learning Management System (LMS), sending feedback, and responding to surveys. If you choose to share data about yourself via your profile, online chat, or other interactive areas of the Website, please be advised that all data you disclose in these areas is public and your data will be accessible to anyone who accesses the Website.



**INCHINCLOSER**<sup>®</sup>  
Bringing India and China closer

### **Derivative Data**

Information our servers automatically collect when you access the Website, such as your native actions that are integral to the Website, including liking, re-blogging, or replying to a post, as well as other interactions with the Website and other users via server log files.

### **Speaking Practice**

We will access your phone's microphone for the story/ any other content that you submit. You also have the option of using your camera to share your video. INCHIN may record these audio and video stories/ content and retain them until you close your account.

### **Financial Data**

Financial information, such as data related to your payment method (e.g. valid credit card number, card brand, expiration date) that we may collect when you purchase, order, return, exchange, or request information about our services from the Website. We store only very limited, if any, financial information that we collect. Otherwise, all financial information is stored by our payment processor, Google Play, and you are encouraged to review their privacy policy and contact them directly for responses to your questions.

### **Geo-Location Information**

We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using the Website, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

### **Mobile Device Access**

We may request access or permission to certain features from your mobile device, including your mobile device's location, phone, storage space, audio, microphone. If you wish to change our access or permissions, you may do so in your device's settings.

### **Mobile Device Data**

Device information such as your mobile device ID number, model, and manufacturer, version of your operating system, phone number, country, location, and any other data you choose to provide.



**INCHINCLOSER**<sup>®</sup>  
Bringing India and China closer

### **Push Notifications**

We may request to send you push notifications regarding your account or the Application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

### **Third-Party Data**

Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the Application permission to access this information.

### **Data From Contests, Giveaways, and Surveys**

Personal and other information you may provide when entering contests or giveaways and/or responding to surveys.

## **USE OF YOUR INFORMATION**

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Website to:

1. Administer promotions, and contests.
2. Assist law enforcement and respond to subpoena.
3. Compile anonymous statistical data and analysis for use internally or with third parties.
4. Create and manage your account.
5. Deliver targeted advertising, coupons, newsletters, and other information regarding promotions and the Website to you.
6. Email you regarding your account or order.
7. Enable user-to-user communications.
8. Fulfill and manage purchases, orders, payments, and other transactions related to the Website.
9. Generate a personal profile about you to make future visits to the Website more personalized.
10. Increase the efficiency and operation of the Website.
11. Monitor and analyze usage and trends to improve your experience with the Website.
12. Notify you of updates to the Website.
13. Offer new products, services, mobile Websites, and/or recommendations to you.
14. Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.



**INCHINCLOSER**<sup>®</sup>  
Bringing India and China closer

15. Process payments and refunds.
16. Request feedback and contact you about your use of the Website.
17. Resolve disputes and troubleshoot problems.
18. Respond to product and customer service requests.
19. Send you a newsletter.
20. Solicit support for the Website.

## **DISCLOSURE OF YOUR INFORMATION**

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

### **By Law or to Protect Rights**

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

### **Third-Party Service Providers**

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

### **Marketing Communications**

With your consent, or with an opportunity for you to withdraw consent, we may share your information with third parties for marketing purposes, as permitted by law.

### **Interactions with Other Users**

If you interact with other users of the Website, those users may see your name, profile photo, and descriptions of your activity, including sending invitations to other users, chatting with other users, liking posts, following blogs.



**INCHINCLOSER**<sup>®</sup>  
Bringing India and China closer

### **Online Postings**

When you post comments, contributions or other content to the LMS accessible from the Website, your posts may be viewed by all users and may be publicly distributed outside the Website in perpetuity.

### **Third-Party Advertisers**

We may use third-party advertising companies to serve ads when you visit the Website. These companies may use information about your visits to the Website and other websites that are contained in web cookies in order to provide advertisements about goods and services of interest to you.

### **Affiliates**

We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

### **Business Partners**

We may share your information with our business partners to offer you certain products, services or promotions.

### **Offer Wall**

The Website may display a third party-hosted “offer wall.” Such an offer wall allows third-party advertisers to offer virtual currency, gifts, or other items to users in return for acceptance and completion of an advertisement offer. Such an offer wall may appear in the Website and be displayed to you based on certain data, such as your geographic area or demographic information. When you click on an offer wall, you will leave the Website. A unique identifier, such as your user ID, will be shared with the offer wall provider in order to prevent fraud and properly credit your account.

### **Social Media Contacts**

If you connect to the Website through a social network, your contacts on the social network will see your name, profile photo, and descriptions of your activity.



**INCHINCLOSER**<sup>®</sup>  
Bringing India and China closer

### **Other Third Parties**

We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

### **Sale or Bankruptcy**

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur, and that the transferee may decline honor commitments we made in this Privacy Policy.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

## **TRACKING TECHNOLOGIES**

### **Cookies and Web Beacons**

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Website to help customize the Website and improve your experience. When you access the Website, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the Website. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

### **Internet-Based Advertising**

Additionally, we may use third-party software to serve ads on the Website, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technology to help manage and optimize your online experience with us.



**INCHINCLOSER**<sup>®</sup>  
Bringing India and China closer

## **Website Analytics**

We may also partner with selected third-party vendors, such as Google Analytics to allow tracking technologies and remarketing services on the Website through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the Website, determine the popularity of certain content, and better understand online activity. By accessing the Website, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors.

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out cookies, plug-ins, or settings.

## **THIRD-PARTY WEBSITES**

The Website may contain links to third-party websites and Websites of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the Website, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or Websites that may be linked to or from the Website.

## **SECURITY OF YOUR INFORMATION**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

## **CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers including our Website include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing



**INCHINCLOSER**<sup>®</sup>  
Bringing India and China closer

activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

## **OPTIONS REGARDING YOUR INFORMATION**

### **Account Information**

You may at any time review or change the information in your account or terminate your account by logging into your account settings and updating your account

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

### **Emails and Communications**

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the Website
- Logging into your account settings and updating your preferences.

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

## **CALIFORNIA PRIVACY RIGHTS**

Residents of California have the right to:

- a. Know what personal information we collect about you and from where we collect it.
- b. Access a copy of the personal information we hold about you.
- c. Understand how we process your personal information and how it may be shared.
- d. Opt out of having your personal information shared with certain third parties.



**INCHINCLOSER**<sup>®</sup>  
Bringing India and China closer

To make such a request, please send an email to [learnchinese@inchincloser.com](mailto:learnchinese@inchincloser.com)

## **POLICY FOR CHILDREN**

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data we have collected from children under age 13, please contact us using the contact information provided below.

## **CONTACT US**

If you have questions or comments about this Privacy Policy, please contact us at:

Inchin Closer  
61a Jaldarshan,  
51 Nepean Sea Road,  
Mumbai 400026  
India  
+91 98700 90966  
[learnchinese@inchincloser.com](mailto:learnchinese@inchincloser.com)