

# Privacy Policy

**Our Commitment to You**

**Effective Date of August 1st, 2016**

## **To Our Valued Clients:**

The privacy of your information is important to us, also maintaining your trust and confidence is one of our highest priorities. We respect your right to keep your information confidential. We hope that by taking a few minutes to read our Privacy Policy, you will have a better understanding of what we do with the information you provide us and how we keep it private and secure. We appreciate you placing your trust in ALBAB CREATORS (“**Albab**”, “**We**”, “**Our**”, “**Us**”), the provider of Educational Service “**CypherØ**”. The use of information collected through our service shall be limited to the purpose of providing the service for which the Client has engaged CypherØ Software Service.

## **Privacy Statement**

ALBAB CREATORS complies with all Pakistan’s state and federal laws. For customers who reside outside of Pakistan, ALBAB CREATORS complies with the standards set by the relevant European Union Directives. CypherØ provides a business service to our customers. ALBAB CREATORS will only use the information you provide for the purposes intended and as detailed in the Privacy Statement unless we have obtained your consent to use it for other purposes.

ALBAB CREATORS respects the privacy of every institute and person that entrusts their information with us or who visits our website and uses our services. This Privacy Statement outlines the information that will be collected and how we will use that information.

We have developed our privacy policy from industry guidelines and standards, and local, national, and international laws and requirements. All privacy practices and methods described herein only apply insofar as permitted by applicable standards, laws and requirements. The fundamental principles of our privacy policy are:

1. Data will be processed fairly and lawfully.
2. Data is collected for specified and legitimate purposes and not further processed in a way that is incompatible with those purposes.
3. The data collected will be maintained in a secure manner based on industry standards and best practices for the security and the protection of data.
4. Data will not be shared with any third party without the consent of the owner of the data unless required in support of the institute, or to complete a transaction on behalf of the owner of the data such as a payment transaction, or is required by law, warrant, subpoena or similar legal process. In this case data or information is shared it will be the responsibility of ALBAB CREATORS.

## **Information Management and Usage Policies**

### **— Personal Information Collected**

Given that our services include student information management and fundraising support, it is necessary that we store and maintain confidential information about the institutes we serve, along with personal information regarding the administrators, staff members, parents and students associated with these institutes. *ALBAB CREATORS will not market our products or services to parents or students using this information, nor will we directly contact parents or students without the institute's prior consent.*

ALBAB CREATORS does have access to the information provided by the clients but it will not be used or processed in any way without the client's consent. In case of any query or problem, the data will only be accessible to the Development Team and not by Support Personal.

### **— *institute Administration***

We will respond to requests for Contacts and Sales Demonstration made via our website [www.albabcreators.com](http://www.albabcreators.com) using personal information received from you at the time of the request. To request information about our products and services, we may ask you to provide certain information including but not limited to your name, address, telephone number, email address, institute name, institute address, total enrollment, grade levels, and referral information. *No information will be collected unless you provide it to us voluntarily. ALBAB CREATORS will not share this information with anyone outside of our company, subjected to the limitations described above.*

ALBAB CREATORS may use institute information to contact appropriate representatives at the institute. For example, we may send marketing or promotional materials including emails or other information to institute administrators; we may respond to your comments, questions or requests for information; or we may contact you as necessary to provide general customer support. You may update your contact information or opt out of receiving marketing or promotional materials by contacting our Customer Support center by phone at +92 323 583 6363, or via email request sent to [info@albabcreators.com](mailto:info@albabcreators.com).

When a institute becomes a customer of ALBAB CREATORS, the institute administration will be required to submit information regarding your business, its staff members and clients (parents, guardians, students and other associated parties) as well as bank account and financial report info (in some cases to provide specific services). This information will be managed on your behalf within ALBAB CREATORS product databases by means of our software interfaces, the information itself remains the property of the client institute as the owner of the data. You may request the complete removal of your information from our systems at any time; such removal will be completed within 30 days of our receipt of your written request.

If the agreement with any of the clients is discontinued or suspended due to any (non-legal) reason, its data and information will be kept safe and secure for hold-period of 365 days from the date of suspension and the client can demand for its deletion or return. However, after 180 days no claim can be made of any kind and there will be no responsibility on us for the security of the data. Also information about any dealings between Company and Clients will be kept by Company as Company's Data and Record.

### **— *Staff Members***

ALBAB CREATORS client institutes will generally collect personal information regarding their staff members, including but not limited to professional and academic credentials, and contact information. Staff members who wish to review or update their personal information may do so by contacting the institute administrator responsible for maintaining such data using ALBAB CREATORS software interfaces. In addition, confidential information generated in the course of business, such as student evaluations and electronic communications, are acknowledged to be the intellectual property of the ALBAB CREATORS client institute. *ALBAB CREATORS will not share personal information pertaining to institute administrators or staff members with anyone outside of our company, subjected to the limitations described above.*

#### **— Parents / Families**

ALBAB CREATORS client institutes will generally collect personal information regarding the parents, guardians, family members and other parties associated with their students (e.g. physicians, emergency contacts etc.) This information may include, but not be limited to, employment, medical, religious, financial and contact information. Family members who wish to review or update their personal information may do so by contacting the institute administrator responsible for maintaining such data using ALBAB CREATORS software interfaces. In addition, the institute administration has the option to make available certain ALBAB CREATORS software interfaces which allow family members online access to review and update selected personal information. *ALBAB CREATORS will not directly share personal information pertaining to parents, guardians or other parties associated with the family with anyone outside of our company, subjected to the limitations described above.*

Institute administrators have the option of making limited portions of their clients' personal information available in various public venues, such as printed or online student or family directories. Requests for removal from such publications should be made to the institute administration.

#### **— Students**

Institute administrators, staff members and responsible family members will generally use ALBAB CREATORS software interfaces to collect personal information regarding students, including but not limited to medical, insurance, financial, behavioral, academic, religious, demographic and contact information. Responsible family members who wish to review or update the personal information regarding their student(s) may do so by contacting the institute administrator responsible for maintaining such data using ALBAB CREATORS software interfaces. In addition, the institute administration has the option to make available certain ALBAB CREATORS software interfaces which allow responsible family members online access to review and update selected personal information regarding their student(s).

ALBAB CREATORS collects information under the direction of its Clients, and has no direct relationship with the individuals whose personal data it processes.

All contact should be made directly to ALBAB CREATORS and not via a third person.

ALBAB CREATORS respects all applicable national and international children's privacy regulations. *ALBAB CREATORS does not collect personal information directly from children, and any information we retain pertaining to students will not be shared with anyone outside of our company, subjected to the limitations described above.*

It is the responsibility of our client institutes to utilize our services (e.g. the collection of information from students by means of customer-designed web forms) in a manner that complies with Federal and state laws and similar regulations unique to the jurisdiction within which our client institutes operate.

### **Access to Customer Information:**

ALBAB CREATORS has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, who seeks to correct, amend, delete inaccurate data or withdraw consent to further contact should direct his/her query to ALBAB CREATORS' Client (the data controller). If the Client requests ALBAB CREATORS to remove the data, we will respond to their request within 30 days.

The primary goal of ALBAB CREATORS in collecting personal information from our customers is to assist our customers in managing the information they provide utilizing our products and services. We have always safeguarded the confidentiality of information provided to us by our clients and are bound by our professional standards to continue to maintain this vital aspect of our professional relationship. The following individuals may have access to some or all of your information:

1. **Employees of the company:** Employees who need such information to conclude a transaction or provide technical support for which the customer has engaged ALBAB CREATORS.
2. **Service Providers:** As with any business, other service firms may need access to certain information at very specific times and for very specific reasons. An example might be consultants that must have access to certain client records in order to increase the efficiency of our computer processing systems. We have and will always insist that any such information that needs to be disclosed for any business purpose be considered confidential and not used for any purpose other than the specific business need. That well-understood business policy of confidentiality will be reinforced as needed by contractual agreements with any service provider having access to your data.

ALBAB CREATORS will share the information necessary to deliver products and services that you specifically request to receive but we will limit this information to only what is necessary and required to complete a transaction. ALBAB CREATORS also reserves the right to disclose your personally identifiable information in order to respond to duly authorized information requests of any competent governmental authorities, where required by law, when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, warrant, subpoenas or similar legal process. If ALBAB CREATORS is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information. *ALBAB CREATORS will not share, trade or sell the personal information of our visitors or customers for use by any business without your consent.*

ALBAB CREATORS may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the provisions in this Policy regarding notice and choice and the service agreements with our Clients.

### **Consumer Services and Contact Information:**

If you provide our consumer service representatives with feedback on your experiences with our products/services or otherwise submit questions to our consumer service representatives or webmasters, you will be asked to supply personal information for our record keeping and follow-up. *This information will not be disclosed without your permission unless required to do so by law. The consumer testimonials posted on our web site may contain personally identifiable information, but such testimonials will not appear without a consumer's prior consent.*

In addition, consumer testimonials and any personally identifiable information they might contain will be withdrawn from our web site within 30 days of our receipt of a consumer's written request for its removal. If you wish to update or delete your testimonial, you can contact us at [info@albabcreators.com](mailto:info@albabcreators.com).

### **Aggregate and Statistical Data:**

ALBAB CREATORS may collect and store web log information (such as your web browser, operating system, pages visited, IP Address, Location, Screen Size as well as Local and Server Time while using our Software) to help us design our website, to identify popular features, and for other managerial as well as security purposes. These features and many others will be displayed on the footer of our website. However, web logs may also be used if necessary to help identify any person attempting to break into or damage our website, or use our websites to commit any illegal act. We may share web log information with law enforcement agencies if we believe that we have evidence of a violation of computer security or related laws.

We may also display advertisements on our website related to our products and services keeping in mind that such ads do not affect the business of any of our clients and will be displayed under the rules and regulations of our client's country.

## **Our Commitment to Data Security**

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we manage on behalf of our customers and the information we collect and manage. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access to information. We use secure connections to protect sensitive information during its transmission. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security, but it is to be noted that we have been working in this sector since 1996 and there has been no data leakage or security issue since. If you have any questions about security on our Web site, you can contact us at [info@albabcreators.com](mailto:info@albabcreators.com).

## **Tracking Technologies**

We, ALBAB CREATORS use cookies or similar technologies to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. Users can control the use of cookies at the individual browser level.

## **Notification of Changes to this Privacy Policy**

The most current version of our Privacy Policy will always be posted on our website at [www.albabcreators.com](http://www.albabcreators.com). The date of the last change will always be posted on the bottom of the Privacy Policy page. If we decide to change our privacy policy, we will post those changes to this web page, our home web page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy policy at any time, so please review it frequently. If we make material changes to this policy, we will notify you by email, by broadcast through our software interfaces, or by means of a notice on our home page prior to the change becoming effective.

ALBAB CREATORS (PVT.) Limited  
138 - D Satellite Town,  
Gujranwala, Pakistan.

ALBAB CREATORS will retain personal data we process on behalf of our Clients for as long as needed to provide services to our Client. We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at [info@albabcreators.com](mailto:info@albabcreators.com). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.