

Our Privacy/Data Policy

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all products and services, and instances where we collect your personal data.

This privacy notice applies to personal information processed by or on behalf of Life.University, Dr. Amit Jain, CFEL: World Center For Enlightened Living and Cosmic Care.

Our Privacy Notice

Life.University, Dr. Amit Jain, CFEL: World Center For Enlightened Living and Cosmic Care collect some Personal Data from its Users.

POLICY SUMMARY

Personal Data collected for the following purposes and using the following services:

- **Contacting the User, Mailing List or Newsletter**

- **Get Response**

Personal Data: email address, first name and last name

- **Mail Gun**

Personal Data: email address, first name and last name

- **Handling payments**

- **CCAvenue**

Personal Data: various types of Data as specified in the privacy policy of the service

- **Paypal**

Personal Data: various types of Data as specified in the privacy policy of the service

- **Hosting and backend infrastructure**

- **Hostgator India**

Personal Data: various types of Data as specified in the privacy policy of the service

- **Registration and authentication**

- **Direct registration**

Personal Data: email address, first name, last name, birthdate, city, country, whatsapp/cellular number, facebook messenger contact, personal photo and profile

- **Course usage, content commenting, questions, answers and testimonies**

Personal Data: Usage Data

Contact information

Owner and Data Controller

Dr. Amit Jain
277 B, Pocket C
Mayur Vihar Phase II
Delhi 110091
India

Owner contact email: cosmiccare@gmail.com

FULL POLICY

Owner and Data Controller

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PERSONS OR PARTIES COVERED

This Privacy Policy is intended to cover all visitors to this website, all subscribers to lists or newsletters whether paid or unpaid, all students or members whether paid or unpaid, and all customers.

- Persons who visit or view this website, whether intentionally or unintentionally, whether solicited or unsolicited, are described herein as "Visitors" and are parties to this Privacy Policy.
- Subscribers to lists or Newsletters are referred to herein as "Subscribers" and are parties to the Privacy Policy.
- Persons who join this website or organization as students, course participants, initiates, apprentices, disciples, advocates, counselors, facilitators or coaches are called "Members" herein and are covered by this Privacy Policy.
- Finally, anyone who orders, attempts to order, or uses a service or receives a product sold (recipients) or advertised on or delivered from this website, even at no cost, is called a "Customer" herein and is subject to this Privacy Policy not only by passive acceptance, but by virtue of the Terms of Service and the Purchase Agreement contract.
- The website, its agents, owners, operators, and employees are referred to collectively herein as "Website," "Site," and/or "Seller".

PERSONS EXCLUDED FROM THIS WEBSITE ARE STILL COVERED

In the event that a person excluded from this website because of the Terms of Use or from denial of service by the website, who nonetheless unlawfully views this site, that person remains subject to the terms of this Privacy Policy and is in violation of the Terms of Use.

PERSONS UNDER 13 YEARS OF AGE ARE EXCLUDED FROM THIS WEBSITE

We believe it is important to inform and educate children about online safety. This site is not intended for use by anyone under the age of 13, nor does we knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the service or send any information about yourself to us, including your name, address, telephone number, or email address. In the event that we come to know that we have collected personal information from someone under the age of 13 without verification of parental consent, we will delete that information promptly. If you are a parent or legal guardian of a child under 13 and believe that we might have any information from or about such child, please contact us.

This website is not lawfully accessible to persons under the age of 13 or who are otherwise covered by the provisions of the Child Online Privacy Act of 1998 (COPA). If you are under the age of 13 you must leave this site immediately. Fraudulent use of this website may make you subject to civil or criminal sanctions.

VIEWING AND/OR USE AND/OR COMMUNICATION IS CONSTRUED AS ACCEPTANCE OF THE TERMS OF THIS POLICY

Acceptance of the terms of this Privacy Policy is a portion of the consideration required for your right to visit the website. If you do not accept these terms, you have no right to visit this site and you are fraudulently using this site. By interacting with the website you agree to the terms and conditions of the Privacy Policy.

Types of Data collected

Among the types of Personal Data that we collect, by itself or through third parties, there are: Usage Data, email address, first name, last name, birthdate, city, country, whatsapp/cellular number, facebook messenger contact, personal photo and profile.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using our websites, products, courses and services.

We collect information from you when you register on our site, place an order, subscribe to a newsletter or enter information on our site. Also when you provide us with feedback on our products or services

Unless specified otherwise, all Data requested by us is mandatory and failure to provide this Data may make it impossible for us to provide our services. In cases where we specifically state that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Users are responsible for any third-party Personal Data obtained, published or shared through us and confirm that they have the third party's consent to provide the Data to the Owner.

To provide our products, courses and other services, we must process information about you.

Things that you do and provide.

- **Information and content you provide.** We collect the content, communications and other information you provide when you use our Products, Courses and other services including when you sign up for an account, and when you post comments, testimonies, questions and answers. Apart from this, we also collect the information that you provide in your Profile: your photo, professional & work details, family details, religious or spiritual views, about your gurus & teachers, your learning and interests, philosophical beliefs, etc. But this profile information is not visible to any other member. Except for your name, photo, questions, answers, comments, testimonies and level in the course, none of your other details are shared with any other member. That is only visible to admin, directors and select coaches.
- **Your usage.** We collect information about how you use our Products, Courses and other services such as the types of content that you view or engage with, the features you use, the actions you take and the time, frequency and duration of your activities. For example, we log when you're using and have last used our website, and what lessons, audios, videos, posts and

- other content you view on our website.
- **User generated content.** Our products, courses and services often give you the option to provide feedback, such as comments, testimonies, questions, answers, etc. We invite you to provide such feedback as well as to participate with comments, questions and answers on our forums. If you choose to do so, your name, photo and level in the course will be visible to all other members. We are not responsible for the privacy of any information that you choose to post to our website, including in our forums, or for the accuracy of any information contained in those postings. Any information that you disclose in the forums becomes common information. We cannot prevent such information from being used in a manner that may violate this Privacy Policy, the law or your personal privacy.
 - **Sensitive personal information.** Subject to the following paragraph, we ask that you not post, send or disclose to us or any other member any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, health, biometrics or genetic characteristics, etc.) on or through the Service or otherwise.
 - If you send or disclose any sensitive personal information to us (such as when you submit user generated content to the Site), you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not provide it. You may use your data protection rights to object to or restrict processing of this sensitive personal information, or to delete such information, as detailed below under the heading “Your Data Protection Rights & Choices.”

How can I manage or delete information about me?

We provide you with the ability to access, rectify and delete your data. From your Profile page, you can yourself edit your profile. You also have a delete button to delete all your data including comments, questions, answers and testimonies anytime you wish, from our servers. We store data until it is no longer necessary to provide our courses and services or until your account is deleted – whichever comes first. This is a case-by-case determination that depends on things such as the nature of the data, why it is collected and processed, and relevant legal or operational retention needs.

When you delete your account, we delete things that you have posted, such as your photos, profile, comments, questions, answers and testimonies, and you won't be able to recover this information later. Information that others have shared about you isn't part of your account and won't be deleted. To delete your account at any time, please visit your profile page in your account.

And every email we send you has an Unsubscribe link at the bottom. Just click on it to unsubscribe from our email list.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation

(administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

We rely on the following legal bases to use your personal data:

- 1) **Where it is needed to provide you with our products or services**, such as:
 - a) Managing & delivering products, courses and services you are registered for with us, or an application for one
 - b) For assessment and other decision making to decide whether to promote you to the next level of the course, or allow admission to you a retreat.
- 2) **Where it is in our legitimate interests to do so**, such as:
 - a) Managing your products and services relating to that, and updating your records
 - b) To perform and/or test the performance of, our products, services and internal processes
 - c) To follow guidance and recommended best practice of government and regulatory bodies
 - d) For management and audit of our business operations including accounting
 - e) For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and service.
 - f) For student assessment, profiling and other decision making
 - g) Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations
- 3) To comply with our **legal obligations**
- 4) With your **consent or explicit consent**:
 - a) For some direct marketing communications
 - b) For some of our assessment, profiling and other decision making

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

How do we use your information?

The Data concerning the User is collected to allow the Owner to provide its Services. We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features as well as for the following purposes: Registration and authentication, Contacting the User, Course usage, content commenting, questions, answers and testimonies; Handling payments, Hosting and backend infrastructure.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- **Contacting the User, Mailing List or Newsletter**

- **Get Response**

GetResponse is an auto-responder service and email marketing platform.

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning us. Your email address might also be added to this list as a result of signing up to us or after making a purchase.

Personal Data: email address, first name and last name

Place of processing: US – [Privacy Policy](#).

- **Mail Gun**

Mailgun is an email automation engine for sending, receiving and tracking emails.

Personal Data: email address, first name and last name

Place of processing: US – [Privacy Policy](#).

- **Handling payments**

Payment processing services enable us to process payments by credit card, bank transfer or other means. To ensure greater security, we do not store any of your financial data. You provide your payment details directly to the financial intermediaries handling the transaction. All transactions are processed through a gateway provider and are not stored or processed on our servers.

Some of these services may also send you messages, such as emails containing invoices or notifications concerning the payment.

- **CCAvenue**

CCAvenue is a payments processing service.

Personal Data: various types of Data as specified in the privacy policy of the service

Place of processing: India – [Privacy Policy](#).

- **Paypal**

Paypal is a payments processing service.

Personal Data: various types of Data as specified in the privacy policy of the service

Place of processing: US – [Privacy Policy](#).

- **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable us to run and be distributed as well as to provide a ready-made infrastructure to run our courses, products and services. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

- **Hostgator India**

Hostgator is a web hosting and backend service provider.

Personal Data: various types of Data as specified in the privacy policy of the service

Place of processing: US – [Privacy Policy](#).

- **Registration and authentication**

By registering or authenticating, Users allow us to identify them and give them access to dedicated services. The User registers by filling out the registration form and providing the Personal Data directly to us.

- **Direct registration**

Personal Data: email address, first name, last name, birthdate, city, country, whatsapp/cellular number, facebook messenger contact, personal photo and profile

- **Course usage, content commenting, questions, answers and testimonies**

We allow Users to make and publish their comments, questions, answers and testimonies on our course contents. Users are responsible for the content of their own comments.

Personal Data: Usage Data

How do we protect your information?

We do not use vulnerability scanning and/or scanning to PCI standards because an external PCI compliant payment gateway handles all CC transactions.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

Do we use 'cookies'?

We do not use cookies for tracking purposes.

Third-party disclosure

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when it's release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

Third-party links

We do not include or offer third-party products or services on our website.

Does our site allow third-party behavioral tracking?

It's also important to note that we do not allow third-party behavioral tracking

Fair Information Practices

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

We will notify the users via in-site notification or email or message

- Within 7 business days

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

CAN SPAM Act

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions
- Process orders and to send information and updates pertaining to orders.
- Send you additional information related to your product and/or service
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

To be in accordance with CANSPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, just follow the instructions at the bottom of each email, there is an UNSUBSCRIBE link in each email we send to you.

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of our products, courses and Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, we may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, we and any third-party services may collect files that record interaction with us (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

We do not support “Do Not Track” requests because we do not use cookies or any external advertising. To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within our website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically by us (or third-party services employed by us), which can include: the IP addresses or domain names of the computers utilized by the Users who use our websites, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using our websites, products, courses and services who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of our websites, products, courses and services. The Data Controller, unless otherwise specified, is the Owner.

Service

The service provided by us as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

Latest update: June 30, 2018