



# PRIVACY POLICY

Prepared By:

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InnovaHub, a Flagship Product of Kotlead Limited

This Privacy Policy explains how InnovaHub (“the Platform”), operated by Kotlead Limited (“we”, “our”, or “us”), collects, stores, uses, and protects your personal information when you access or use our virtual learning platform and related services.

By using InnovaHub, you agree to the practices described in this Privacy Policy.

## **1. Information We Collect**

### **1.1 Personal Information**

We collect information that identifies you when you create an account or use our services. This includes:

- Full name
- Email address
- Phone number
- Profile details
- Payment and wallet information
- Tutor verification documents
- School/organization affiliation (where applicable)

### **1.2 Usage Data**

We collect data on how you interact with the platform, including:

- Course activity
- Session attendance
- Learning analytics
- Device information
- IP address
- Browser type
- Time spent in virtual classrooms
- Assignment and assessment records

### **1.3 Tutor-Specific Data**

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For instructors, we collect additional information for compliance and quality assurance:

- Identity verification documents
- Tax or compliance information (depending on jurisdiction)
- Teaching analytics and performance insights
- Wallet transactions and payout history

#### **1.4 Classroom and Recording Data**

To support our virtual classroom features, we may record:

- Live class sessions
  - Audio, video, and chat logs
  - Whiteboard interactions
- These recordings are used strictly for educational, quality assurance, and administrative purposes.

#### **1.5 AI-Generated Data**

**Our AI tools may process:**

- Lecture notes
  - Learning materials
  - Feedback summaries
- This content is processed securely and stored under strict data protection guidelines.

### **2. How We Use Your Information**

We use the information we collect to:

- Provide and maintain the InnovaHub platform
- Enable teaching, learning, and classroom interactions
- Facilitate tutor earnings and wallet transactions
- Generate analytics for learners, tutors, and admins
- Support AI-driven features such as automated notes and insights
- Personalize user experience
- Improve platform stability and performance
- Maintain security and prevent fraud
- Conduct compliance checks for tutors

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- Respond to enquiries and provide customer support

### 3. Legal Basis for Processing

Depending on your jurisdiction, our processing is based on:

- Consent
- Contractual necessity
- Legitimate business interests
- Legal obligations for identity and financial compliance
- Public interest for educational data processing

### 4. Sharing and Disclosure

We do not sell user data.

However, we may share data with:

- Trusted service providers supporting platform operations
- Payment processors for wallet and earning transactions
- Compliance and verification partners
- Law enforcement when legally required
- Educational institutions (only with explicit consent)

All partners are bound by strict confidentiality and data protection obligations.

### 5. Data Storage and Security

We use secure hosting and encryption methods to protect user information.

Measures include:

- Encrypted storage
- Strict access controls
- 24/7 system monitoring
- Data minimization
- Regular security reviews

While we maintain industry-standard safeguards, no system is completely immune to risk.

### 6. Data Retention

We retain your information:

- As long as your account is active
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- As required to provide services
- As needed for legal or regulatory purposes

Class recordings and analytics are retained based on educational value and compliance obligations.

## 7. Your Rights

Depending on your region, you may have the right to:

- Access your data
- Request correction or deletion
- Withdraw consent
- Restrict or object to processing
- Download or transfer your data
- Request limitation of AI-generated profiling

Requests can be submitted via [support@innovaHub.com](mailto:support@innovaHub.com)

or the in-platform support channels.

## 8. Children's Privacy

InnovaHub is intended for users above the age required by local law (typically 13 or older).

Younger learners may only access the platform under parental or institutional oversight.

## 9. International Data Transfers

Where required, we use:

- Standard Contractual Clauses (SCCs)
- Adequacy decisions
- Local hosting policies (including NDPR compliance for Nigeria)

## 10. Changes to This Policy

We may update this Privacy Policy periodically.

Material changes will be communicated via email or in-platform notice.

## 11. Contact Information

Kotlead Limited

Email: [support@innovahub.com](mailto:support@innovahub.com)

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