

## Privacy Policy

This privacy policy (“**Privacy Policy**”), applies to any Staqu Technologies Private Limited device, Software, website or online application (collectively ‘Services’) and describes and determines how we handle and/or deal in your personal information and sensitive personal information, as defined under the applicable laws of India (hereinafter collectively referred to as “**Personal Information**”).

This Privacy Policy shall be applicable throughout the territory of the world. This Privacy Policy *inter alia* determines, how we control the Personal Information provided by you to Us, how We handle and deal in the Personal Information, correction of inaccuracies in the Personal Information provided by you to Us, the purposes for which the Personal Information provided by you may be used by Us.

This Privacy Policy will govern the use and access of the Services by You.

We collect, receive, possess, or store the Personal Information, to enable the Services to function more effectively, and to enable Us to provide more efficient Services to you. If the terms of this Privacy Policy are not acceptable to you, please do not proceed to use the mobile handheld device including the Services provided by Us.

### **1. Collection**

- (a) We collect the following categories of Personal Information from you when you use the Services or any part thereof:
  - (i) Information you provide directly to us;
  - (ii) Information we collect about your use of our Services include time and duration of the user of Services, location from which Services are accessed/used, the websites/applications you visit and use;
  - (iii) Information we obtain from third party sources;
  - (iv) Any other information that may be required by us for allowing you to access the Services;
  - (v) Information of your mobile device, IMEI, hardware and software details, details of operating system and other unique identifiers;
  - (vi) Voice information, if any
- (b) The following will not qualify as Personal Information for the purposes of this Privacy Policy- information/ data, which is anonymous or which due to other factors, is incapable of identifying you either individually or in combination with other information;
- (c) You agree that We are not responsible for the accuracy, authenticity or verification of the Personal Information provided by You.

### **2. Consent**

- (a) You hereby consent to the collection, storage, use, disclosure, and transfer, of the Personal Information by Us for the purposes detailed in this Privacy Policy. You hereby acknowledge and agree that collection, storage, use, disclosure, and transfer, by Us of the Personal

Information is for a lawful purpose and does not violate the provisions of any law for the time being in force and is necessary for providing Services to you;

- (b) You shall at any time be entitled to withdraw your consent to the collection, storage, use, disclosure, and transfer, of the Personal Information by Us, by notifying your intention in writing to the Grievance Officer on the address provided in paragraph 14 below. However, in the event that You so choose to withdraw your consent to the aforesaid, we shall be entitled to discontinue providing any or all of the Services to you.

### **3. Storage**

You acknowledge and agree that the Personal Information collected by Us, shall be stored by Us in our servers (“**Server(s)**”). By using our Services and providing Personal Information to Us, you are consenting to the storage of the same by Us at our Server(s) including storage and processing of your Personal Information outside of your country of residence consistent with this Privacy Policy. Please note that the data protection and other laws of countries to which your information may be transferred might not be as comprehensive as those in your country.

### **4. Use**

The Personal Information collected by Us is used by Us, our affiliates, subsidiaries and joint ventures, *inter alia*, for-

- (i) Allowing you to use the Services that you request;
- (ii) Providing Services to you, facilitating services provided by advertisers, third party service providers, and business partners;
- (iii) Enhancing the efficiency/quality of our Services and providing maintenance services;
- (iv) For assessing and analysing our Services;
- (v) Provide customized content and advertising;
- (vi) Any other purposes required for offering the Services;
- (vii) Any purposes as may be required under applicable laws.

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent and we only use your information as described in the Privacy Policy.

### **5. Disclosure**

- (a) We acknowledge that the Personal Information provided by you is important and confidential, and the contents of such Personal Information shall not be disclosed by Us to any Person, except to such third parties as are specified in this Privacy Policy. For the purposes of this Privacy Policy, the term “**Person**” shall mean and connote any individual, corporation, partnership, limited liability partnership, joint venture, body corporate or other organisation, association or entity;
- (b) The Personal Information provided by you can be shared by Us at any time without obtaining explicit consent from you, with any government agencies mandated under the law to obtain Personal Information including sensitive Personal Information for the purpose of verification of

identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences;

- (c) Personal Information provided by you may also be disclosed by Us at any time without obtaining explicit consent from you, to any third party by an order under the applicable law for the time being in force;
- (d) We will endeavour to ensure that third parties who are the recipients of the Personal Information maintain the confidentiality of such information, with the same level of data security practices as are employed by Us in relation to the Personal Information, and use the Personal Information only in relation to the Portal and the services offered by Us to you;
- (e) We may also disclose the Personal Information to enforce our policies, and/or to address concerns/complaints regarding the nature of the content posted by you, and/or to prevent any unethical/illegal practices/activity.

## **6. Recipients**

- (a) Personal Information may be disclosed/transferred to the following recipients:
  - (i) Third party service providers who assist Us in rendering services to you and/or enhance the efficiency of the services to you;
  - (ii) Your information may be shared among our affiliates;
  - (iii) We also may share your information with trusted business partners, including wireless carriers. These entities may use your information to provide you with services you request, make predictions about your interests and may provide you with promotional materials, advertisements and other materials;
  - (iv) There may be instances when we disclose your information to other parties- to comply with the law or respond to compulsory legal process and/or to verify/enforce compliance with the policies governing our Services;
  - (v) We may disclose your information to a third party as part of a merger or transfer, or in the event of a bankruptcy

## **7. Other Information**

- (a) We may provide You links to other third party websites for your convenience and information. In the event that you choose to visit/ access such third party websites, the privacy policy/terms of use of such third party websites shall be applicable to you, and we shall not at any time be responsible and/or liable for any content/ information provided/intimated to you on such third party websites.
- (b) Any personal and/or sensitive personal information including your contact details, bank account details, credit card account details, collected by such third party websites, shall be subject to the terms of the privacy policy provided by such third party websites, and our privacy policy shall not be applicable to the same. Moreover, we shall not at any time be responsible/ liable/ accountable for any personal and/or sensitive personal information that you provide to and/or is collected by such third party websites.

- (c) We may from time to time send you certain promotional material/ advertisements/ additional information with regard to the services provided/ offered by Us, to the e-mail address provided by you. You may at any time choose to opt-out of receiving such communications, by sending an e-mail to this effect to the contact address provided under paragraph 13.

## **8. Cookies-**

- (a) We may use cookies and other web beacons for the following purposes:
  - (i) To enable Us to identify your device and help you navigate through the Services;
  - (ii) To enable Us to enhance the quality of Services provided by Us to you;
  - (iii) To collect standard information such as your IP address, computer sign-on data, statistics on page views.
- (b) You may refuse the use of cookies on your computer and adjust the settings of your browser to disable cookies. You may also at any time disable/delete cookies which are already activated on your computer. However, please note that should you choose to disable cookies from operating on your computer, certain sections/ features of the Services may become inaccessible to you.

## **9. Alteration/ Deletion**

You may at any time review/ correct/ supplement/ add to, the Personal Information provided by you, by sending an e-mail to this effect to the contact address notified under paragraph 13. We shall at no time be responsible/liable for the authenticity/ veracity of the Personal Information provided by you.

## **10. Security**

We have put in place reasonable physical and technical measures to safeguard the information we collect in connection with the Services. However, please note that although we take reasonable steps to protect your information, no website, Internet transmission, computer system or wireless connection is completely secure.

## **11. Publicly available third party information-**

Our Services may link to third-party websites and services that are outside our control. We are not responsible for the security or privacy of any information collected by websites or other services. You should exercise caution, and review the privacy statements applicable to the third-party websites and services you use.

We also may make available to you certain products or services (e.g., apps available through play stores) developed by third parties. We are not responsible for these third-party products or services.

If you connect with a social networking service, we may receive and store authentication information from that service to enable you to log in, as well as other information that you allow us to receive when you connect with these services.

Also, please note that if you choose to connect with a social networking service on a device

used by people in addition to you, those other users may be able to see information stored or displayed in connection with your account on the social networking service(s) with which you connect.

**12. Updates to Privacy Policy.**

We may update/ modify this Privacy Policy at any time due to changes in the applicable laws and/or changes in our company policies. Your continued use of the Services shall be deemed acceptance of the updated/ modified Privacy Policy by you.

**13. Grievance Officer.**

Mr. Atul Rai shall be the grievance officer for the purposes of this Privacy Policy. Any and all of the following may be addressed to the grievance officer at : A-80, Second Floor, Malviya Nagar, New Delhi - 110017

- (i) Requests for review/ modification/ deletion of any Personal Information provided by you;
- (ii) Questions/ queries/ clarifications regarding the terms of this Privacy Policy;
- (iii) Complaints/ grievances regarding posts/ information shared by other users;
- (iv) Intimation of withdrawal of consent to use Personal Information by us;
- (v) Any other grievances/ complaints/ intimations regarding the terms of this Privacy Policy or the Personal Information provided by you, as specified throughout this Privacy Policy or otherwise.