

# **Privacy Policy**

Welcome to Rcolorcraft's privacy policy

This Policy outlines Rcolorcraft Company and its affiliates' practices in relation to the collection, storage, usage, processing, and disclosure of personal data that you have chosen to share with us when you access our mobile app Rcolorcraft Company ("Platform") or avail services that we offer you on or through the Platform (collectively, the "Services").

At Rcolorcraft Company, we are committed to protecting your personal data and respecting your privacy. In order to provide you with Services, we have to collect and otherwise process certain data about you. This Policy explains how we process and use personal data about you.

Please note that unless specifically defined in this Policy, capitalised terms shall have the same meaning ascribed to them in our Terms and Conditions agreed upon between you and Rcolorcraft Company ("Terms"). Please read this Policy in consonance with the Terms.

By using the Platform or Services, you confirm that you have read and agree to be bound by this Policy and consent to the process activities described under this Policy.

Please refer to Section 1 to understand how the terms of this Policy apply to you.

## **1. BACKGROUND AND KEY INFORMATION**

### **(a) About Us:**

The Services are made available to you by Rcolorcraft Company. If you have any questions about this Policy, how we process or handle your personal data, or otherwise, you may reach out to us with your queries, grievances, feedback, and comments at Rcolorcraft .com or contact our grievance officers whose details are provided below.

Grievance Officer

Name: Ankita Maheshwari

Designation: General Counsel

Email:

(b) How this Policy applies:

This Policy applies to service professionals who use or want to use the Platform for providing their services to individual customers. For the avoidance of doubt, references to “you” across this Policy are to a service professional that uses or seeks to use our Platform to render their services.

(c) Review and Updates:

We regularly review and update our Privacy Policy, and we request you to regularly review this Policy. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

(d) Third-Party Services:

The Platform may include links to third-party websites, plug-ins, services, and applications (“Third-Party Services”). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these Third-Party Services and are not responsible for their privacy statements. When you leave the Platform or access third-party links through the Platform, we encourage you to read the privacy policy of such third-party service providers.

## 2. PERSONAL DATA THAT WE COLLECT

(a) We collect different types of personal data about you. This includes but is not limited to:

(i) Contact Data, such as email addresses, phone numbers, and permanent address.

(ii) Certain Types of Health Data, such as the status of your Covid-19 vaccination and details of your illness history.

(iii) Identity and Profile-related Data, such as your name, mobile number, gender, date of birth, age, phone book details, address, zip code, description of services provided, headline for profile, content and information about your business including photographs and videos, work experience, current salary details, details of your training certifications, government-issued identifiers (such as voter IDs, Aadhaar details, PAN details), education records, employment records, verification reports, employment references, travel preferences, language preferences, information from testimonials, polls, surveys, and feedbacks.

(iv) Insurance Data, such as details of the insured, unique identification numbers of the primary insured, date of enrolment, relationship of family with primary insured, name of nominee and relationship with insured person, mobile number, and email address.

(v) Loan Application Data, which includes government-issued identifiers (such as Aadhar card details and PAN card details), permanent address, current address, NACH details, signed cheque, cancelled cheque, bank statement details, passbook details, and relationship proof documents.

(vi) Technical Data, which includes your IP address, internet service provider, device ID, device type, domain name, details of operating system, browser type, date and time stamp of accessing the Platform, device metadata, location data, and mobile applications used by you.

(vii) Transaction Data, such as your transactional SMS data, credit or debit card details, GST details, PAN card details, bank details, bank statements, and credit information.

(viii) Usage Data, which includes call logs, mobile application usage and activity data, call and chat records with customers and end-users, and email usage.

(b) We also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data under law as it does not directly or indirectly reveal your identity. However, if we combine or connect

aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

(c) What happens if I refuse to provide my personal data?

Where we need to collect personal data by law, or under the terms of a contract (such as the Terms), and you fail to provide that data when requested, we may not be able to perform the contract (for example, to provide you with the Services). In this case, we may have to cancel or limit your access to the Services, but we will notify you if this is the case at the time.

### 3. HOW DO WE COLLECT PERSONAL DATA?

We use different methods to collect personal data from and about you including through:

(a) Direct Interactions .You provide us your personal data when you interact with us. This includes personal data you provide when you:

(i) create an account or profile with us at the time of registration;

(ii) use the Platform or the Services;

(iii) enter a promotion, user poll, or online surveys; or

(iv) report a problem with the Platform and/or our Services, give us feedback, or contact us, or through testimonials.

(b) Automated technologies or interactions. We automatically collect Technical Data about your equipment, browsing actions, and patterns each time you use the Services. We collect this personal data by using cookies, web beacons, pixel tags, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites that employ our cookies.

(c) Third parties or publicly available sources. We will receive personal data about you from various third parties:

(i) Technical Data from analytics providers such as Facebook, and advertising networks;

(ii) Background verifiers;

(iii) Credit information from credit bureaus (to the extent permitted by law); and

(iv) Identity and profile-related data from publicly available sources.

#### 4. HOW DO WE USE YOUR PERSONAL DATA?

(a) We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data where we need to perform the Services, or where we need to comply with a legal obligation. We use your personal data for the following purposes:

(i) to verify your identity, and create your user account with us on the Platform at the time of registration;

(ii) to assess the performance of your services rendered to customers;

(iii) to monitor your activities on the Platform;

(iv) to monitor trends and personalize your experience;

(v) to improve the functionality of our Services based on the information and feedback we receive from you;

(vi) to improve and facilitate customer service to effectively respond to end users' Service requests, grievances, and support needs;

(vii) to process payments;

(viii) to process loan applications (if any);

(ix) to undertake credit assessment risks for short-term credits provided by us to you;

(x) to help you avail a group personal accident insurance policy through us;

(xi) to send periodic notifications to manage our relationship with you including to notify you of changes to our Services, and to receive occasional company news and updates related to us or the Services;

(xii) to administer and protect our business and the Platform, including for troubleshooting, data analysis, system testing, and performing internal operations;

(xiii) to improve our business and delivery models;

(xiv) to perform our obligations that arise out of the arrangement we are about to enter or have entered with you;

(xv) to enforce our Terms;

(xvi) to market our Services to you;

(xvii) to comply with our legal obligations; and

(xviii) to respond to court orders, establish or exercise our legal rights, or defend ourselves against legal claims.

(b) You agree and acknowledge that by using our Services and creating an account with us on the Platform, you authorise us, our associate partners, affiliates, and end-users or customers to contact you via email, phone, or otherwise. This is to enable us to provide the Services to our customers and end-users, provide you with marketing material, and ensure that you are aware of all the features of the Services.

(c) You agree and acknowledge that any and all information pertaining to you, whether or not you directly provide it to us (via the Services or otherwise), including but not limited to personal correspondence such as emails, instructions from you, etc., may be collected, compiled, and shared by us in order to render the Services to you. This may include but not be limited to vendors, social media companies, third-party service providers, storage providers, data analytics providers, consultants, lawyers, and auditors. We may also share this information with other entities in the rcolorcraft Company group in connection with the above-mentioned purposes.

(d) You agree and acknowledge that we may share data without your consent, when it is required by law or by any court or government agency or authority to disclose such information. Such disclosures are made in good faith and belief that it is reasonably necessary to do so for enforcing this Policy or the Terms, or in order to comply with any applicable laws and regulations.

## 5. COOKIES

(a) Cookies are small files that a site or its service provider transfers to your device's hard drive through your web browser (if you permit it to) that enables the sites or service provider's systems to recognise your browser and capture and remember certain information.

(b) We use cookies to help us distinguish you from other users of the Platform, understand and save your preferences for future visits, keep track of advertisements and compile aggregate data about site traffic and site interaction so that we can offer you a seamless user experience. We may contact third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

(c) Additionally, you may encounter cookies or other similar devices on certain pages of the Platform that are placed by third parties. We do not control the use of cookies by third parties. If you send us personal correspondence, such as emails, or if other users or third parties send us correspondence about your activities or postings on the Platform, we may collect such information within a file specific to you.

## 6. DISCLOSURES OF YOUR PERSONAL DATA

(a) We may share your personal data with third parties set out below for the purposes set out in Section 4:

(i) Internal third parties, which are other companies within the Rcplorcraft Company.

(ii) External third parties such as:

trusted third parties such as our associate partners, and service providers that provide services for us or on our behalf. This includes hosting and operating our Platform, providing marketing assistance, conducting our business, processing payments and transaction-related processes, transmitting content, conducting credit-assessment risks for short term credits availed by you from us, processing your insurance-related claims, and to enable us to provide the Services to our end-users or customers;

Customers who seek to use or have used the services you choose to offer through the Platform;

analytic service providers and advertising networks that conduct web analytics to help us improve our Platform and Services. These analytics providers may use cookies and other technologies to perform their services; and



regulators and other bodies, as required by law or regulation.

(b) We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7. ACCESS AND UPDATING YOUR PERSONAL DATA

You hereby warrant that all personal data that you provide us with is accurate, up-to-date, and true. When you use our Services, we make best efforts to provide you with the ability to access and correct inaccurate or deficient data, subject to any legal requirements.

## 8. TRANSFERS OF YOUR PERSONAL DATA

(a) We comply with applicable laws in respect of storage and transfers of personal data. As a part of your use of the Services, the information and personal data you provide to us may be transferred to and stored in countries other than the country you are based in. This may happen if any of our servers are from time to time located in a country other than the one you are based, or one of our service providers is located in a country other than one you are based in.

(b) By submitting your information and personal data to us, you agree to the transfer, storage, and processing of such information and personal data in the manner described above.

## 9. DATA SECURITY

We implement appropriate security measures to protect your personal data from unauthorized access, and follow standards prescribed by applicable law.

## 10. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

(a) Access and Updating your Personal Data: You hereby warrant that all personal data that you provide us with is accurate, up-to-date, and true. When you use our Services, we make best efforts to provide you with the ability to access and correct inaccurate or deficient data, subject to any legal requirements.

You can request rcolorcraft Company for a copy of your personal data by sending an email . rcolorcraft Company may take up to 7 (seven) working days respond to such request.

(b) Opting-out of Marketing and Promotional Communications: When we send you marketing and promotional content through email, we make best efforts to provide you with the ability to opt-out of such communications by using the opt-out instructions provided in such emails. You understand and acknowledge that it may take us up to 10 (Ten) business days to give effect to your opt-out request. Please note that we may still send you emails about your user account or any Services you have requested or received from us.

## 11. DATA RETENTION

(a) You agree and acknowledge that your personal data will continue to be stored and retained by us for as long as necessary to fulfil our stated purpose(s) and for a reasonable period after the termination of your account on the Platform or access to the Services to comply with our legal rights and obligations.

(b) In some circumstances, we may aggregate your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 12. DELETION OF ACCOUNT AND PERSONAL DATA

Notwithstanding anything contained in the Terms, you may delete your account as well as your personal data stored with rcolorcraft Company by sending an email to rcolorcraft.com. rcolorcraft Company may take up to 7 (seven) working days to process your request. Once your account is deleted, you will lose access to all Services. For avoidance of doubt, it is hereby clarified that all data with respect to transactions performed by you on the Platform will be retained in accordance with applicable law.

## 13. BUSINESS TRANSITIONS

You are aware that in the event we go through a business transition, such as a merger, acquisition by another organisation, or sale of all or a portion of our assets, your personal data might be among the assets transferred.

## 14. UPDATES TO THIS POLICY

(a) We may occasionally update this Policy. If we make changes to this Policy, we will notify you through the Platform or through other means, such as email. To the extent permitted under applicable law, by using our Platform after such notice, you consent to updates made to this Policy.

(b) We encourage you to periodically review this Policy for the latest information on our privacy practices.