## Privacy policy

LASTARZI Private Limited provides a platform to record financial details of a person (or organization) for record and/or dissemination purpose. We hold true to our values of integrity, authority and independence. Our mission is our commitment to upholding the highest standards of data protection for our customers.

This Privacy Policy applies to the website, mobile application and/or and web applications that are published by LAST ARZI Private Limited.

If you wish to amend any of the personal information that we hold about you, or update your marketing preferences, you can do so at any time through your account.

If you have any queries about how we use your personal information, please contact our Data Protection Officer at <a href="mailto:info@lastarzi.com">info@lastarzi.com</a>.

#### Information we collect

This section details the information we may collect about you. We explain why, and how, we use it in later sections.

#### Account information

If you decide to create an account or enquire about our product or services, we'll ask you to provide us with some specific information, for example:

- Basic personal details such as name, email address, and mobile phone number;
- Personal contact details such as title, gender, date of birth, home address;
- Login details such as username and password;
- Payment details such as your bank account and payment card information.

We may also use your account information, such as your title, name and country, to infer your gender.

#### Additional information

On occasion, we will ask you to voluntarily provide additional information, for example:

- Your opinion of our products and services;
- Your preferences, including mail communications.

## Information we obtain from partners and public sources

We, under no circumstances, shall obtain information from public sources. LAST ARZI Private Limited is an isolated, self-contained application that has no external link with third parties, except the payment gateway. Otherwise, we do not share information with any third party.

#### Information we obtain through cookies and similar tools

We use cookies (and similar technologies) and analytics tools across our Sites to collect information about you. This information can be used to improve the performance of the site, make advertising more relevant and enhance your user experience. We provide detailed information about cookies and similar technologies within our <u>Cookie Policy</u>; examples include:

- Your location we use cookies to display the version of the site that is most relevant to your location.
- Your usage we use cookies to understand how our customers use our Sites and interact with our communications and journalism. For example, we use technology on our Sites, which records user movements, including page scrolling, clicks and text entered. (It does not record payment details.) This helps us to identify usability issues and improve the assistance we can provide to users and is also used for aggregated and statistical reporting purposes.
- Your device we use cookies to understand what type of device you are using to show you the best version of the site.
- Your engagement with advertisements we use cookies to understand what advertisements you have been shown, or clicked on, to bill our advertising partners, and to present you with advertisements that are more relevant to you.

If you wish to manage your cookies, please follow the instructions on our <u>Cookie Policy</u> page.

## Lawful basis for processing

We only process personal information where we have a lawful basis for doing so, such as the following:

- **User consent** This is where you have given us permission to process personal information for a given purpose. For example, if you complete one of our general enquiry forms, we would ask for your consent if we wanted to use your personal information for any other purpose. You have the right to withdraw this consent at any time. You can manage your preferences within your account.
- Legitimate business purposes This is where we have a legitimate interest, as a business, to process personal information. For example, where we are aware of copyright infringements on our Site, it is in our legitimate interests as a business to identify those responsible. We take due care to balance our interests against your right to privacy.
- Contractual necessity This is where we have to process personal information to meet our
  contractual obligations. For example, if you engage us to store your legal will, we would need to
  process delivery address to fulfil your legal will.
- **Legal obligation** This is where we have to process personal information in order to comply with the law. For example, we process and retain customer invoice information to comply with financial regulations.

We may also rely on relevant exemptions under the GDPR to the requirement to identify a lawful basis for processing.

## How we use your personal information

We collect personal information for the following main reasons:

- 1. **To provide our service** We require some of your basic personal information so our services work as you would expect. Also we require details of your nominee to process the information as per your designated time, for example, sending asset, liability, or personalized messages at the event of perceived death of the user, notifying you of changes to our services and dealing with customer care queries. We record customer calls for monitoring and training purposes.
- 2. **To improve and maintain performance** In order to provide you with the best possible user experience and value, we need to make sure that our products and services work as they should. Using personal information helps us understand how our readers experience our Sites and services, so we can make improvements.
- 3. **To bill our customers** We, along with our authorised payments processors, securely process your payment information to take payments, give refunds and to detect and prevent fraudulent activity. We will also update your payment information in the event that a payment is

- unsuccessful. You can manage your payment information at any time by contacting Customer Care. If your subscription is provided under a group subscription or trial, we will report information about your activity on our Site(s) for the purposes of billing.
- 4. **To monitor compliance with our policies and terms** We monitor for breaches of our terms and conditions and copyright policies. For example, we reserve the right to inform the subscription holder if, through use of a premium/elite subscription, you are using our content in breach of the terms and conditions or copyright policies of our Sites. We also monitor activity on our Sites to detect and prevent invalid or fraudulent traffic.
- 5. **To personalise our products and services –** We improve your experience of our products and services by personalising parts of our Sites and apps with the information you give us and what we learn about you. This includes showing you advertisements you may be interested in and recommending emails you may wish to sign up to. Where our Sites have such functionality, you can manage elements of personalisation in your account.
- 6. **To communicate product changes and offers –** We want you to get the most out of our products and services, including showcasing our latest features. We will contact you with carefully-curated LAST ARZI offers and promotions. For example, if there is a promotional offer to upgrade your subscription, we will send you email and message communication about it. You are able to change your preferences at any time through your account or by contacting Customer Care.
- 7. **For the purpose of advertising –** We rely on advertising revenue in part to support our award-winning journalism. We need to process your information to understand the effectiveness of the advertising we serve to you and others, and to deliver relevant personalised advertising. We use the information you give us, the information we collect about you and the information we infer, to serve you with the most appropriate advertisements. You can manage your advertising settings for the Sites that carry out this activity in your account. If you do decide to turn off personalised advertisements or advertisements tailored to you, you will still see the same number of advertisements but they may be less relevant to you. You may continue to see advertisements that are targeted to you based on other non-personal information.
- 8. **Recruitment** If you apply for a role via one of our Sites, we will process your information in order to facilitate the application process.
- 9. **For the purpose of diversity & inclusion initiatives -** We rely on information, such as inferred gender, to understand the composition of our audience and ensure that our products and services are engaging across our audience.

#### Who we share your personal information with

We disclose personal information to facilitate the running of our business or to provide specific services you have requested. Commonly, we will disclose information to:

- Service providers We engage service providers who help us to support our business. These
  fulfilment service providers primarily include, for example, messaging services, and payment
  gateway.
- Advertisers We, and our advertising partners, use cookies to collect personal information and serve you with advertisements that we believe are relevant to you and your interests. There is more specific information about our advertising partners and data sharing in our Cookie Policy.
- Legal processes and successors in title We, and our suppliers, may also disclose your information
  to comply with applicable laws, court orders or other valid legal processes, and to enforce or apply
  our terms of use, any subscription agreement, or any of our other rights. We may transfer or
  disclose your personal information to any entity which takes over or acquires the relevant LAST
  ARZI business.

How long we retain your personal information

We retain the majority of your personal information for as long as your account is active and therefore open; this allows you to continue accessing our content, products and services.

If you become inactive and are not a subscriber, we may delete elements of the information associated with your account. We will normally warn you if your access is going to be withdrawn and give you the opportunity to retain your account.

Where we don't need to keep all of your information in full, we will obfuscate or aggregate it, for example, web activity logs and survey responses. This is to ensure that we do not retain your information for any longer than is necessary.

A summary of how long your personal information is retained can be found below:

Category of Data	Example	Retention Period	Justification for Retention
Billing information	Masked details of most recently used payment method	7 years	For regulatory reasons we are required to retain accounting records for 7 years.
Business intelligence	Web activityon LAST ARZI	36 months (then aggregated + non-personally identifiable)	To improve and maintain performance, personalise our services and to provide our product.
Customer care queries	Complaint about non- delivery of services	7 years	To provide a case history to assist us to answer your queries.
Communication history	Email stating that your subscription is up for renewal	7 years	So that we have a record of what communications we have sent to you, to better assist your queries
Site features	Portfolio tool information	Lifetime of the account	To improve your experience of our products and services and to enable you to continue accessing site features.
Subscription information	Account information relating to a subscription	7 years post-subscription	To enable us to fulfil your contract with us.

It is sometimes necessary for us to keep your personal information for longer periods of time, for example:

- If there is a statutory requirement to retain it;
- If we require the information for legal reasons or there is a legitimate business need for us to retain it:
- To ensure we do not contact you if you have asked us not to.

### How we keep your personal information secure

We have appropriate technical and administrative security measures in place to help ensure that our users' information is protected against unauthorised or accidental access, use, alteration, or loss. To demonstrate our commitment to security, we have achieved the ISO 27001:2018 accreditation. We use encryption technology, such as AES-256, SHA Asymmetric and Salt Hashing, to protect your personal information when you register with us.

#### Your rights

Under data protection laws, you may have rights as an individual in relation to the personal data we hold about you. These rights include:

- The right to object to direct marketing your preferences, including in relation to direct marketing, can be found in your account;
- The right to access the personal data that we process about you;

- The right to request the deletion of your personal data;
- The right to request the rectification of your personal data you can manage some of this information in your account.

You can exercise these rights through your account or by contacting Customer Care.

### Where this Privacy Policy applies

Our Sites contain links to third party websites which are not subject to this privacy policy. We are not responsible for their content, use of personal information, or security practices.

If you have a query in regard to the processing of your personal information, please contact our Data Protection Officer directly at <a href="mailto:info@lastarzi.com">info@lastarzi.com</a>.

Registered Office: LAST ARZI Private Limited, S. 8/110 A-G, Khajuri,

Varanasi, U.P. - 221002

# Changes to this Privacy Policy

This policy was reviewed on 01/01/2022 and last updated on 01/01/2022.

Any changes we may make to this privacy policy will be posted on this page. If changes are significant, we may choose to notify you by email or to clearly indicate on our home page that the policy has been updated.