

## Privacy Policy

WOW LOTUS platform (hereinafter referred as the “WOW LOTUS ") is committed to respect the privacy of every person who shares information with our Company. Your privacy is important to us and we strive to take reasonable care to protect the information we receive from you.

This Privacy Policy is applicable to all our employees, customers and any other persons who discloses his/ her Personal Information (as defined below) to the Company such as vendors, suppliers, distributors, licensors, licensees, agents, representatives, sub-contractors or advisors of the Company.

We continuously collect and generate various data points about you. Data, by which you are identified, is termed as “**Personal Data**”. Personal Data does not mean information that is freely available or accessible in a public domain.

Your Privacy is of utmost importance to us and thus protection of your personal data is a key commitment from our side.

In addition, we are governed by the provisions of applicable laws of Information Technology Act, 2000 and rules there under to maintain the privacy of your Personal Data.

### **Note:**

Our privacy policy is subject to change at any time without notice. To make sure you are aware of any changes, please review this policy periodically.

By visiting and/or using our application you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree please do not use or access our application.

By mere use of the application, you expressly consent to our use and disclosure of personal information provided by you in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the Terms of Use.

### **➤ The Personal data we may collect from you are as under:**

- Personal details (e.g. name, contact details including, address, date of birth, documents such as identity card / Aadhaar details / PAN, Bank details , credit card / debit card / other payment instrument details) provided by you to us to avail various products/services from us.

- Your details including transaction history, contact number, email, profile photo, country code, balances, payment details, firm name, address for effecting transfer of monies through payment channels to us.
- Images of documents/ photos required to avail any of our products/services.
- Voice recordings of our conversations with our customer care agent with you to address your queries/grievances.
- Employment details (e.g. occupation, positions held, employment history and/or benefits) as part of our record retention for credit/various product evaluations or required under applicable law
- Opinions provided by you to us by way of feedback or responses to surveys.
- Information obtained from your mobile device by way of using our app, if any like device location, log information, communication information including contacts and call logs, device information (including storage, model, mobile network), transactional and promotional SMS/app notifications.

### ➤ **Application**

“Apps” refers to the WOW LOTUS platform Mobile application developed/owned/run by Wow Lotus that provide end users remote control to Smart Devices.

### ➤ **Sharing of your Personal data:**

Any Personal Data that we have access to shall never be shared without your consent.

In various processes / submission of applications / availing of product/service offerings, we even seek your explicit consent to use / share your Personal Data. In our business and operational processes, we only share the data on a partial and “need-to-know” basis to designated personnel or partners or service providers.

We will share your data with competent/ legal/statutory/regulatory agencies / authorities or partners/service providers acting on our behalf (as the case may be) in following cases:

- Only for enabling the provision of the products/services availed by you, strictly on a “need to know” basis and subject to applicable laws.
- It is directed or required by legal/regulatory / statutory / governmental authorities under applicable laws/regulations though a legally obligated request.
- It is required by financial institutions to verify, mitigate or prevent fraud or to manage risk or recover funds in accordance with applicable laws/regulations.

### ➤ **Usage of Your Personal Data**

We may use your Personal Data in our business activities for providing our or our partners' products/services and to perform, among other actions, the following:

- To facilitate the transactions or report on these transactions.
- To undertake research and analytics for offering or improving our products/services and their security and service quality.
- To check and process your requirements submitted to us for products/services and/or instructions or requests received from you in respect of these products/services.
- To share with you, updates on changes to the products/services and their terms and conditions.
- To operate and improve our services
- To take up or investigate any complaints/claims/disputes.
- To respond to your queries or feedback submitted by you.
- To verify your identity for us to provide products/services to you;
- To carry credit checks, screenings or due diligence checks as lawfully required by us.
- To monitor and review products/services from time to time.
- To undertake financial/regulatory/management reporting and create and maintain various risk management models.
- For conducting audits and for record keeping purposes.
- For selective offers and promotions.

➤ **External processing:**

We may provide your personal information to our affiliates or other trusted businesses or persons or service providers engaged by us, or institutions that we partner with to assist us with providing you with products/services to better serve your needs and interests, based on your instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. We also use your Personal Data to fulfil the requirements of applicable laws/regulations and/or court orders/regulatory directives received by us.

➤ **Purging of your Personal Data**

- You may delete your account at any point of time by making such choice in the mobile application. With this, we will no longer provide your data for external processing as mentioned above. However, we retain your Personal Data as long as the purpose for its usage exists, after which the same is disposed of by us except for any record retention required as per applicable law.
- The provisions of various laws require your transaction logs to be stored for longer periods post the deletion of an account. Further, in the event of the

pendency of any legal/regulatory proceeding or receipt of any legal and/or regulatory direction to that effect, we may be required by the law of the land to retain your personal data for longer periods.

### ➤ **Cookie Policy**

- Please note that a “cookie” is a small piece of information stored by a web server on a web browser so it can be later read back from that browser.
- We may use cookie and tracking technology depending on the features offered.
- No Personal Data will be collected via cookies and other tracking technology; however, if you previously provided personal data, cookies may be tied to such information.

### ➤ **Minors**

The Platform and its contents are not targeted to minors (those under the age of 18). However, WOW LOTUS have no way of distinguishing the age of individuals who access our Platform. If a minor has provided WOW LOTUS with personal information without parental or guardian consent, the parent or guardian should contact WOW LOTUS’s Legal Department at the address set out in clause 9 below to remove the information.

### ➤ **Reasonable Security Practices and Procedures**

We take various steps and measures to protect the security of your Personal Data from misuse, loss, unauthorised access, modification or disclosure. We use latest secure server layers encryption and access control on our systems. Our safety and security processes are audited by a third party cyber security audit agency from time to time. We have provided security measures to safeguard your app by Login/Logout option. Please do not share your login, password credential with anybody.

### ➤ **Your Consent**

By using the application and/ or by providing your information, you consent to the collection and use of the information you disclose on the application in accordance with this Privacy Policy, including but not limited to Your consent for sharing your information as per this privacy policy. If you disclose any personal information relating to other people to us, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

➤ **Grievance officer**

You may contact us on any aspect of this policy or for any discrepancies/grievances with respect to your Personal Data, by writing to our Grievance

Goyal Officer at:

Mr. Arbind Kumar Jhunjhunwala

Shikhar Creation

Address: T 24/3, Bartala rail line, Matiabruz, Kolkata - 700018

Email: shikharcreation19@gmail.com

Time: Thurs - Tue (9:00AM to 7:00 PM)

Phone: +91 9007387489, +91 8595143133