

Overview

At ShopClues.com your privacy is very important. **We do not publish, sell or rent your personal information to third parties for their marketing purposes without your explicit consent.** Please read this privacy policy to learn more about the ways in which we use and protect your personal information. The privacy practices of this statement apply to our services available under the domain and subdomains of ShopClues.com (the "App") and apply generally to our parent, affiliates, subsidiaries or joint venture webApps. This Privacy Policy describes the information, as part of the normal operation of our services; we collect from you and what may happen to that information. Although this policy may seem long, we have prepared a detailed policy because we believe you should know as much as possible about ShopClues.com's practices so that you can make informed decisions. Our parent, subsidiaries and joint ventures operate under similar privacy practices as described in this Privacy Policy and subject to the requirements of applicable law. By accepting the Privacy Policy and the User Agreement in registration, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the terms of the User Agreement. This Privacy Policy is effective upon acceptance in registration for new registering users, and is otherwise effective on 1st August 2011 for all users.

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 this webApp or mere use of the App 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 App.

1. Your Privacy

At ShopClues.com, we are extremely proud of our commitment to protect your privacy. We value your trust in us. We will work hard to earn your confidence so that you can enthusiastically use our services and recommend us to friends and family. Please read the following policy to understand how your personal information will be treated as you make full use of our App.

2. ShopClues.com Privacy Assurance

ShopClues.com promises that we will not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. From time to time we may reveal general statistical information about our Web App and visitors, such as number of visitors, number and type of goods and services purchased, etc. Your trust and confidence are our highest priority.

3. Information that ShopClues.com collects

When you use our App, we collect and store your personal information from you. Our primary goal in doing so is to provide a safe, efficient, smooth and customized experience. This allows us to provide services and features that most likely meet your needs, and to customize our App to make your experience safer and easier. Importantly, we only collect personal information about you that we consider necessary for achieving this purpose. Although, you can use certain features of the App without telling us who you are or revealing any personal information about yourself, when you download the App we collect device related information pertaining to your mobile phone including, but not limited to, the type of mobile

device you use, **your mobile device's unique device ID**/imei number, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use ('Automatically Collected Account(s) Information'), your all email ID's , name, google advertisement ID , android ID irrespective of whether you register yourself on the App, once you give us your personal information, you are not anonymous to us. Where possible, we indicate which fields are required and which fields are optional. You always have the option to not provide information by choosing not to use a particular service or feature on the App. The identification of the IP address helps diagnose problems with our server, to administer our App and to gather broad demographic information.

We may also automatically track certain information about you based upon your usage of our App. We use this information to do internal research on our users' demographics, interests, and behaviour to better understand, protect and serve our users. This information may be compiled and analyzed on an individual or aggregated basis depending on the nature of the internal research for the intended service to the users of the App. This information may include the products and pages you have viewed on the App, your mobile phone information, and your IP address. We also use this information to send you offers and other communications on the interests expressed by you previously and buying pattern and behavior of other users, who you may know, on the App on an anonymous basis. Similarly, information collected on your buying pattern and behavior on the App will be shared with other users, who you may know, on an anonymous basis.

We collect data about your usage on the App to also help analyse our page flow, measure promotional effectiveness and promote trust and safety. The analysis of this data can also help us provide information that is targeted to your interests. If you choose to buy on the App, we collect information about your buying behaviour to customize user experience on the App.

When you visit the App, we may use GPS technology (or other similar technology) to determine your current location in order to determine the city you are located within and display a location map with promotional materials. We will not share your current location with other users or partners.

Once you give us your personal information, you are not anonymous to us. To fully use our App, you will need to register using our online registration form, where you may be required to provide us with your name, date of birth, contact number, email id, user id, password, residence / place of business information, billing information, shipping information, bank account details and other personal information as indicated on the forms throughout the App. In case you choose to log in through your social media account, Shopclues shall be entitled to use all corresponding details of your social media account. Where possible, we indicate which fields are required and which fields are optional. You always have the option to not provide information by choosing not to use a particular service or feature on the App. You may provide us with your ShopClues.com registered user ID.

We may automatically track certain information about you based upon your behavior on our App. We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve our users. This information is compiled and analyzed on an aggregated basis. This information may include the URL that you just came from (whether this URL is on our App or not), which URL you next go to (whether this URL is on our App or not),

your computer browser information, and your IP address. We use data collection devices such as "cookies" on certain pages of the App to help analyze our web page flow, measure promotional effectiveness, and promote trust and safety. "Cookies" are small files placed on your hard drive that assist us in providing our services. We offer certain features that are only available through the use of a "cookie". We also use cookies to allow you to enter your password less frequently during a session. Cookies can also help us provide information that is targeted to your interests. Most cookies are "session cookies," meaning that they are automatically deleted from your hard drive at the end of a session. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on the App and you may be required to reenter your password more frequently during a session. Additionally, you may encounter "cookies" or other similar devices on certain pages of the App that are placed by third parties. For example, if you view a web page created by a user, there may be a "cookie" placed within that web page. We do not control the use of cookies by third parties. If you choose to buy or sell on the App, we collect information about your buying and selling behavior. We also collect other users' comments about you in our feedback area such as product review, merchant rating, blogs. If you are a seller, we also collect some additional information, such as a billing address, banking information other payment instrument details and tracking information from cheques or money orders. If you choose to post messages on our message boards, chat rooms or other message areas or leave feedback for other users, we will collect that information you provide to us. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the App, we may collect such information into a file specific to you. If you register for the App on another web App or use a web App providing a service for ShopClues or a web App that helps facilitate your activity on the App, that web App may provide personal information about you and your transactions back to us. **As a registered user of the App you may be required to share some personal information with Shopclues in order to transact on the App. Personal Information may include your registered mobile number , messages on your registered mobile numbers and your device, contacts on your mobile numbers, geographical location . We may use this Personal Information to do an internal research on our users' demographics, interests and behavior to better understand and serve our users.**

Additionally, you may encounter similar data collection devices on certain pages of the App that are placed by third parties. We do not control the use of such devices by third parties.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the App, we may collect such information into a file specific to you.

By virtue of you downloading the App on the Google Play Store, we are provided with a unique advertising identifier for advertising and user analytics purposes. We may use the advertising identifier and/or a Shopclues unique identifier in connection with the information collected in accordance with the terms of this Privacy Policy. This Privacy Policy governs use of all data collected by us irrespective of whether any third party/platform has amended its policies from time to time including any periodical control by such third parties on collection of data on your preference.

We will occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like pin code, age, or income level). We use this data to tailor your experience of our App, providing you with content that we think you might be interested in and to display content according to your preferences.

Once you upload images during chats and or upload some photo while filing product return or for some other purpose, you grant us the access to your device's camera and photo gallery. We do not retain your device images in the ordinary course of providing our Services to you. Your messages are stored on your own device temporarily, to improve performance and deliver media messages more efficiently.

4. Our use of your information

We use your personal information to facilitate the services you request. We use your personal information in the file we maintain about you, and other information we obtain from your current and past activities on the App to: resolve disputes; troubleshoot problems; help promote safe trading; collect fees owed; measure consumer interest in the services provided by us, inform you about online and offline offers, products, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our User Agreement; and as otherwise described to you at the time of collection. At times, we may look across multiple users to identify problems or resolve disputes, and in particular we may examine your personal information to identify users using multiple User IDs or aliases. We may compare and review your personal information for errors, omissions and for accuracy. If you choose to list an item for sale on the App, we use your address and billing information to bill you and provide associated support. You agree that we may use personal information about you to improve our marketing and promotional efforts, to analyze App usage, improve the App's content and product offerings, and customize the App's content, layout, and services. These uses improve the App and better tailor it to meet your needs, so as to provide you with a smooth, efficient, safe and customized experience while using the App. You agree that we may use your personal information to contact you and deliver information to you that, in some cases, are targeted to your interests, such as targeted banner advertisements, administrative notices, product offerings, and communications relevant to your use of the App. By accepting the User Agreement and Privacy Policy, you expressly agree to receive this information. If you do not wish to receive these communications, we encourage you to opt out of the receipt of certain communications in your profile under My Account or by clicking unsubscribe any email communication. You may make changes to your profile at any time. You can stop all collection of information by the App easily by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the App. You also have the option to opt out of providing us with any Personal Information, if you choose not to. If you want to remove your contact information from all Shopclues.com lists and newsletters, please visit unsubscribe option contained in such newsletters

We collect and use your personal information like Social media account information, Email addresses, IMEI number, Android ID, messages, contact information to uniquely identify you and provide you with an enhanced customer experience across various channels like social media, email etc. We may also use this Personal Information to do an internal research on our users' demographics, interests and behavior to better understand and serve our users.

Further, we also collect and use your Google registration ID to send you customized push communications.

5. Our Disclosure of your information

We may also use your information to deliver information to you that, in some cases, are targeted to your interests, such as new services and promotions. The following are examples of some categories of persons to whom we would share your

information with from time-to-time.

5.1 Advertisements

a. Where a user enters information on any form of an advertiser, the information is simultaneously collected by ShopClues.com and the advertiser. The information is used by ShopClues.com in accordance with the terms of this privacy policy and is used by the advertiser as per the advertisers prevalent privacy policies. Because we do not control the privacy practices of these advertisers, you should evaluate their practices before deciding to provide the said information.

b. Further, if you explicitly agree to share your information with such third-party advertising companies who advertise on Shopclues.com, we shall share your name, contact or such other information with third parties. When you install the app, Shopclues.com reserves the right to collect the list of apps installed on your phone or such other information available on your phone and use or share such information with third party.

c. ShopClues.com may also aggregate (gather up data across all user accounts) personally identifiable information and disclose such information in a non-personally identifiable manner to advertisers and other third parties for other marketing and promotional purposes.

5.2. Classifieds Listings

a. When a user lists a classifieds advertisement, and the advertisement receives an expression of interest by the interested user, the interested user will be provided the contact information of the user listing the advertisement as provided in that user's registration form.

b. When a user expresses an interest in a classifieds advertisement, the user who has listed the advertisement will be provided the contact information of the interested user as provided in the interested user's registration form.

5.3. Items and Services offered on the App by third parties

There are certain items and services for which third parties request for information before the item/service is listed on the App (example: an image/picture for a customized mug/t-shirt). The information provided by the user for such purposes is simultaneously collected by ShopClues.com and the respective third party. This information is utilised by the third party in accordance with its privacy policy and the terms of the offer. Because we do not control the privacy practices of these third parties, you should evaluate their practices before deciding to use their services.

5.5. Other Corporate Entities

We share much of our data, including personal information about you, with our parent, affiliates, subsidiaries, and joint ventures that are committed to serving your online trading needs and related services, throughout the world. To the extent that these entities have access to your information, they will treat it at least as protectively as they treat information they obtain from their other users. Our parent, affiliates, subsidiaries, and joint ventures follow privacy practices no less protective of all users than our practices described in this document, to the extent allowed by applicable law. ShopClues.com its parent, affiliates, subsidiaries, its joint ventures, or any combination of such, will share some or all of your personal information with another business entity should we plan to, merge with, or be acquired by that business entity. Should such a combination occur, we will require that the new combined entity follow this privacy policy with respect to your personal information.

5.6. Legal Requests

We cooperate with law enforcement and regulatory inquiries, as well as other third parties to enforce laws, such as:

Intellectual property rights, fraud and other rights, to help protect you and the community from bad actors. Therefore, in response to a verified request by law enforcement or other government officials relating to a criminal investigation or alleged illegal activity, we can (and you authorize us to) disclose your name, city, state, telephone number, email address, Registered User ID history, fraud complaints, and listing history without a subpoena. Without limiting the above, in an effort to respect your privacy and our ability to keep the community free from bad actors, we will not otherwise disclose your personal information to law enforcement or other government officials without a subpoena, court order or substantially similar legal procedure, except when we believe in good faith that the disclosure of information is necessary to prevent imminent physical harm or financial loss; or report suspected illegal activity. Further, we can (and you authorize us to) disclose your name, street address, city, state, zip code, country, phone number, email, and company name to Intellectual Property right's owners under confidentiality agreement, as we in our sole discretion believe necessary or appropriate in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity. Due to the existing regulatory environment, we cannot ensure that all of your private communications and other personal information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (without limiting the foregoing), we may be forced to disclose personal information to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your personal information that they collect from the App. Therefore, although we use industry standard practices to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private.

5.7. Your use of other users' information

In order to facilitate interaction among all ShopClues.com members (buyers, sellers, services providers such as payment gateway and third party logistic partners) , our App allows you to access other users' contact information. Further, as a seller you will be sent via email the ShopClues.com registered user ID email address and other information, and as a buyer or winning buyer you will be sent via email the ShopClues.com registered user ID email address and other information of the seller. By entering into our User Agreement, you agree that, with respect to other user's personally identifiable information that you obtain through the App or through a ShopClues.com-related communication or ShopClues-facilitated transaction, ShopClues.com hereby grants to you a license to use such information only for: (a) ShopClues.-related communications that are not unsolicited commercial messages, (b) using co-branded services offered through ShopClues.com (e.g. insurance, shipping and fraud complaints), and (c) any other purpose that such user expressly opts into after adequate disclosure of the purpose(s). In all cases, you must give users an opportunity to remove themselves from your database and a chance to review what information you have collected about them. In addition, under no circumstances, except as defined in this Section, can you disclose personally identifiable information about another user to any third party without our consent and the consent of such other user after adequate disclosure. ShopClues.com and our users do not tolerate spam. Therefore, without limiting the foregoing, you are not licensed to add a ShopClues.com user-even a user who has purchased an item from you-to your mail list (email or physical mail) without their express consent after adequate disclosure.

6. What about children's privacy?

Children are not eligible to use our App and we ask that minors (under the age of 18) do not submit any personal information to us. If you are under the age of 18, you cannot buy or sell any items on the App. If you wish to purchase or sell an item on the App such purchase or sale may be made by your legal guardian or parents who have registered as users of the App provided that such purchase or sale is not in relation to any adult material/mature audience items displayed on

the App, the sale or purchase of which to/by minors is strictly prohibited

7. Access or change your personally identifiable information

To protect your privacy and security, we will verify your identity before granting access or making changes to your personally identifying information. If you have registered your profile on ShopClues.com, your ShopClues.com registered user ID and Password are required in order to access your profile information.

8. Data Retention Policy, Managing Your Information

We will retain User provided data for as long as you use the App and for a reasonable time thereafter. Please note that some or all of the User Provided Data may be required in order for the App to function properly. If you wish to stop us from collecting any Personal information or other data, you may uninstall the App.

9. Commercial use of information

All the information provided by you as set forth above, may be used for data analytics, market research, analyzing trends in the market, providing services to you and for other commercial purposes herein not mentioned and you hereby convey that you have no-objection to the use of your data provided by you as contemplated hereinabove.

10. Links to Other Sites

Our App may link to other websites that may collect personally identifiable information about you. Shopclues.com is not responsible for the privacy practices or the content of those linked websites.

11. Security

When you place orders or access your account information, we offer the use of a secure server. The secure server software (SSL) encrypts all information you put in before it is sent to us. Furthermore, all of the customer data we collect is protected against unauthorized access. To prevent unauthorized access, maintain data accuracy, and ensure correct use of information, we will employ reasonable security practices and procedures and current Internet security methods and technologies in compliance with Information Technology Act, 2000 and rules made there under. Your Consent: By using the App and/ or by providing your information, you consent to the collection and use of the information you disclose on the App by ShopClues in accordance with this Privacy Policy, including but not limited to Your consent for sharing your information as per Clause 5 sub clause 4: Internal Service Providers mentioned above. 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. To make sure you are aware of any changes, please review this policy periodically.

12. Name and address of the entity collecting and retaining your information

Name and address of the entity collecting and retaining Your Information shall be the contracting entity stated in the ShopClues.com User Agreement

13. Grievance Officer:

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are published herewith.

Grievance Officer

Clues Network Private Limited

Plot No. 112, Sector - 44, Gurgaon 122003

CIN No. - U52590HR2011PTC055841

E-mail ID - grievance@shopclues.com Phone No. - 0124-4414888

