

PRIVACY POLICY

Date: June 1, 2020

Your privacy matters to Kayr Technologies Private Limited (the “Company”, “we”, “our” or “us”). This privacy policy (“**Policy**”) explains how we collect, process, use, share and protect information about you. It also tells you how you can access and update your information and make certain choices about how your information is used.

The Privacy Policy covers both:

- (i) “online” e.g., web and mobile) services, including any websites operated by us such as *www.outcampus.in* (“Site”) or mobile application (“App”), however accessed and/or used, whether via personal computers, mobile devices or otherwise), and
- (ii) “offline” e.g., collection of data through mailings, telephone, or in person) activities owned, operated, provided, or made available by the Company.

Our “online” and “offline” activities, in relation to the listing of digital services made available by various services provider are collectively referenced as the “Services”. This Policy supplements our user terms and conditions (“T&Cs”).

This Policy sets out:

- Information we collect about you
- How we use your information
- Our promotional updates and communications
- Who we give your information to
- Where we store your information
- Child safety
- Payment processing
- How we protect your information
- How long we keep your information
- Changes to this Policy
- How you can contact us

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

BY ACCEPTING OUR TERMS AND CONDITIONS AND BY ENGAGING WITH THE SITE/APP, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTOOD AND AGREE TO THE TERMS OF THIS POLICY. If you do not agree to this Policy, do not accept the T&Cs or use our Services. This Policy is incorporated by reference into the T&Cs.

Information we collect about you

We will collect and process the following personal data from you:

Information you give us:

This is information about you that you give us directly when you interact with us. This includes your profile information, login details, and other details required to create your register with us.

This is information about you that you give us by filling in forms on the Site or App or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use the Site or App, subscribe to our service, search for a product, place an order on the Site or App, participate in discussion boards or other social media functions on or via the Site or App, enter a competition, promotion or survey, submit a query, and when you report a problem with the Site or App.

The information you give us may include your name (including account username), address (including the city you live in), e-mail address and phone number, personal description, photograph, login and password details. It may also include certain personal details of your emergency contacts that you add to your account, and whether you have a connection with others whose personal data we may collect or hold, for example family members and friends. We may also access contacts stored on your device in order for you to add them to your favourites or emergency contacts. Please note that we do not import or sync your contacts with the Site/App.

You may also choose to share details of your membership in any loyalty programs with which we are partnered, including the date and expiry details of the membership, membership number and points/rewards accrued.

Information we collect about you from your use of the Site and/or App:

We will automatically collect information from you each time you visit the Site and/or use our App. This includes technical information, information about your visit, and your location data.

Technical information

Information about your visit to the App/ Site

Information regarding your use of our Services;

Location data

Technical information may include the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed and other such information.

Information about your visit may include the full Uniform Resource Locators (URL), clickstream to, through and from our Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number or social media handle used to connect with our customer service team. It may also include reference numbers used when you book a service through the Site or the App, and details of what, how, when and where you have engaged in services which we provide or services procured or booked using our services. Where the Services allow you to call or text other users using the Services, the information may also include call and text information, including the date, time and duration of the calls and texts.

Location data - we collect information through the Site/App as to your real time location to provide location services where requested or agreed to by you in order to deliver content and services that are dependent on knowing where you are, such as allowing us to deliver or allowing the App to calculate the service fee. Please note that we only collect your live location on the Site/App if you specify in your setting that you would like us to “always collect” your location. If you have not specified this, we not collect your live location unless you are accessing the Site/App or availing our services. This information is collected in combination with an identifier associated with your device to enable us to recognise your mobile browser or device when you return to the Site/App. You may also feed in your location manually in the Site/App. You may turn off location access using your device or not provide us your location manually, however, please note that without the ability to collect your location we will not be able to provide you our services.

Device information i.e. the devices you use (mobile phones, computers, tablets, etc.) to access our services such as the hardware models, operation system information, software information and version, file names, language preferences, IP address cookie information, advertising identifiers, browser version, device settings, and mobile network information. We may recognise your devices to provide you with personalised experiences and advertising across the services you use.

We also collect data from SMS/ text messages upon receiving device permissions for the purposes of (i) issuing and receiving one time passwords and other device verification, and (ii) automatically filling verification details during financial transactions, either through us or a third-party service provider, in accordance with applicable law. We do not share or transfer SMS/ text message data to any third party other than as provided under this Policy.

Information we receive from other sources.

This is information we receive about you:

if you use any of the other websites or apps we operate or the other services we provide.

from third parties through whom you are able to access or register for the services (e.g. where you are able to log in with a Google or Facebook account).

from third parties we work closely with

How we use your information

We conduct the following type of processing with your personal information (either in isolation or in combination) in order to directly provide you the Services or assist in better Service levels, grievance redressal, and processing as required under law:

- in connection with Services by:
 - using your personal data (including current location, photograph and ratings); and
 - using your location data to record and verify use of Services and payment information if you provide or procure our services or are logged onto our App/ Site;

- to store your data and retrieve as necessary to provide you with our services. We currently store all personal data in secure servers provided by Amazon Web Services, which are based in Singapore and the United States of America;
- to process and facilitate your payment for goods and services, including as required by law;
- for direct marketing. We will also share your personal information to our group entities for the purpose of direct marketing;
- for third-party advertising;
- for verification of your identity;
- to develop insights about you or to personalise your offerings or experience in using our services or services of our third-party business partners;
- for research and development or to improve goods and services, for example in connection with safety and security and preventing fraud;
- where you are involved in providing services, for any purposes reasonably connected with your use of our Services, including identification, document verification, driving history, criminal history and background checks and other manual processing checks regarding verification. We will use and may also disclose to our affiliates and third-party partners your personal information to verify your details and contact you regarding the Services;
- to assist in dispute resolution, investigating complaints and in enquiries and support;
- to ensure content from our App/Site is presented in the most effective manner for you and for your devices;
- to provide any additional services you may request from us or are fulfilled by our affiliates, group companies, selected partners, or third-parties;
- to administer the Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- measuring or understanding the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- for incidental or other purposes related to the provision of goods and services to you or the purposes referred to above. For example, we may disclose your personal data among our group's internal operational purposes (including to help us provide our goods and services, and monitor and improve our goods and services), to service providers who assist us in our day-to-day business operations and as part of buying or selling businesses; and
- as required or permitted by law, court order and any government, law enforcement or other regulatory body.

Our promotional updates and communications

We will share promotional updates and communications with your consent or, where applicable, in our legitimate interest. Where permitted in our legitimate interest, we will use your personal information for marketing analysis and to provide you with promotional update

communications by email, telephone, text messages, in-application messages and/or push messages about our products and/or services. We may also share your personal information with third-party social media and other partner platforms in order to provide you with promotional update communications.

All promotional updates and communications will be delivered to you in accordance with applicable laws in India.

Who we give your information to

We may give your information to:

Any affiliates or members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, who support our processing of personal data under this Policy.

Selected third parties.

Our selected third parties may include:

- Organisations who process your personal data on our behalf and in accordance with our instructions and applicable Indian data protection laws. This includes in supporting the services we offer through the Site and/or the App in particular those providing website and data hosting services, providing fulfilment services, distributing any communications we send, supporting or updating marketing lists, facilitating feedback on our services and providing IT support services from time to time. These organisations (which may include third party suppliers, agents, sub-contractors and/or other companies in our group) will only use your information to the extent necessary to perform their support functions.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience and subject to the cookie section of this Policy. We will not send any third-party advertisements without your consent.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site and subject to the cookie section of this Policy (this will not identify you as an individual).
- Business partners who provide services to you via the Site or the App and with whom we have entered into agreements in relation to the processing of your personal data.
- Parties necessary for the provision of services to you and with whom we have entered into agreements in relation to the provision of services. For example, if you have requested to use the service as a customer, we will share only such personal information to facilitate and complete the Service.
- Payment processing providers who provide secure payment processing services. Your payment card details are not shared with us by the provider.

We may also disclose your personal information to third parties:

- Where we think certain carefully selected partners may be of interest to you. These companies may contact you by post, email, telephone or fax for marketing or promotional purposes.
- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets subject to the terms of this Policy.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of supply other agreements with you; or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

Where we store your information

We store your information on our cloud storage and application service providers, based in Singapore and the United States of America.

Children

The Site/App is intended for use only by persons who are at least 18 years of age. By using the Site/App, you confirm to us that you meet this requirement.

Payment processing

Payment details you provide will be encrypted using secure sockets layer (SSL) technology before they are submitted to us over the internet. Payments made on the Website/App are made through our payment gateway providers. You will be providing credit or debit card information directly to our payment gateway providers, which operate secure servers to process payment details, encrypting your credit/debit card information and authorising payment. Information which you supply to our payment service providers is not within our control and is subject to the respective providers' own privacy policy and terms and conditions.

How we protect your information

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our Site may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

How long we keep your information

We retain personal data either for (i) as long as you have an account with us in order to meet our contractual obligations to you, or (ii) for any other purpose detailed in this Policy for which we would need to retain the personal data. We may retain information for any other legal or regulatory requirement, and in order to defend any claims that may arise against us. We may also retain aggregate information beyond this time for research purposes and to help

us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

Changes to this Policy

Any changes we make to this Policy in future will be posted on this page and, in relation to substantive changes, will be notified to you by e-mail. To the extent permitted under applicable law, by using our services after such notice, you acknowledge and accept our updates to this policy. We encourage you to periodically review this Policy for the latest information on our privacy practices.

Contact Us

Questions, comments and requests regarding this Policy are welcomed and should be addressed to:

support@outcampus.in