### WEBSITE PRIVACY POLICY

- A. SCOPE: This website ("Platform") is operated by a Private Limited Company, Prezenty Infotech Private Limited ("Prezenty Infotech"). This Privacy policy ("Privacy Policy") succinctly describes how we collect and use your information through a variety of digital means. You are advised to read the Privacy Policy carefully and provide your consent as appropriate when accessing or using this website on any computer, mobile phone, tablet, console or other device (collectively, "device". This Privacy Policy applies to current and former visitors of the Website. By way of the Website, Prezenty Infotech is inter alia engaged in the business of providing to its customers including you, end to end stored value card solutions by managing gift card, prepaid card and loyalty programs and facilitating distribution of gift and prepaid cards through various channels (collectively "Services"); This Privacy Policy is incorporated into, and is subject to, the Terms of Use.
- **B. INFORMATION THAT IS OR MAY BE COLLECTED FROM YOU:** We may automatically receive and collect certain anonymous information in standard usage logs through our server, including computer-identification information obtained from "cookies" sent to your browser from various sources as detailed out in the Cookie notice section. We may actively collect the following personally identifiable information about you
  - Name including first and last name;
  - Email address;
  - Mobile phone number and contact details;
  - Address and postal code;
  - Identity Proof;
  - Opinions of features on this Website;
  - IP address
  - Product / service preferences; and
  - Other information may be collected as per our registration process and as stipulated by applicable law, ancillary to availing of the different classes of Services provided by us. We may also actively collect the following personal data as below:
  - About the pages you visit/access on this Website;
  - The links you click on this Website;
  - The number of times you access a particular page on this Website; and
  - The number of times you have interacted on this Website.

We may collect your name and billing address when you make payment for the Services. All payment information barring the aforesaid (i.e. name and address) will be obtained and processed by our online payment partners and payment gateways. They have access to personal data needed to perform their functions but may not use it for other purposes. Further, they must process the personal data in accordance with this Privacy Policy and as permitted by applicable law.

We may work with third-party analytics services to help us understand how this Website is being used, such as tracking the frequency and duration of use of the Sites. We may use tracking tools including, but not limited to, Google Analytics, Google Webmaster, browser cookies and web beacons to collect information about your use of this Site. These Analytics Tools may use cookies to collect information about the content you view, what websites you visit immediately prior to and after visiting this Site, and your system information and geographic information. The information generated by these cookies about your use of this Website will be transmitted to and stored by the applicable analytics services.

The information collected by these analytics services allows us to analyze your use of this Site. The Analytics Tools may also transfer this information to third parties where required to do so by law, or where such third parties process the information on their behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this Website.

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## C. METHOD OF COLLECTING INFORMATION

We may collect information from you passively. We use tracking tools including, but not limited to, Google Analytics, Google Webmaster, browser cookies and web beacons for collecting information about your usage of the Website. Our advertisers may collect anonymous traffic information from their own assigned cookies to your browser. This Website may contain links to other websites. We are not responsible for the privacy practices of websites which we do not own, manage or control.

Please find more details about our Cookie Policy here - https://www.prezenty.in/cookie-policy

#### D. METHOD OF USING INFORMATION COLLECTED

We use your personal data to:

- tailor-make our Website to suit your interest.
- carry out our obligations arising from any contracts entered into between you and us and to provide you
  with the information and Services that you request from us;
- respond to your inquiries or to process your requests in relation to your information;
- optimize the Website for you based on your usage pattern;
- to get in touch with you when necessary;
- carry out market research campaigns;
- to preserve social history as governed by existing law or policy; and
- For auditing and logging purposes
- We use personal data internally to:
- send you confirmations, notifications, acknowledgments and other details pertaining to the Services you have placed on the Website;
- administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- direct our efforts to improve features and facilities, including privacy features; and
- send you materials regarding:
  - o (i) upcoming offers; and/or
  - o (ii) any information that we deem material in order for you to be a fully informed user and customer of, and visitor to the Website.

#### E. SHARING OF INFORMATION

We will not use information collected by you, for any purpose other than to complete a transaction with you. We do not rent, sell or share your personal data and we will not disclose any of your personally identifiable information to third parties unless:

- we have your permission;
- it is to provide and facilitate provision of the Services;
- it is to help investigate, prevent or take action regarding unlawful and illegal activities; suspected fraud, potential threat to the safety or security of any person, violations of our Terms of Use or to defend against legal claims;
- it is with a successor to all or part of our business;
- special circumstances such as compliance with court orders, requests/order, notices from legal authorities or law enforcement agencies compel us to make such disclosure; and
- it forms part of the anonymous information we share with our sub-distributors and channel partners and/or advertisers on an aggregate basis.

### F. THIRD PARTY PLATFORMS

You may be directed to third-party applications from our website which we do not control. This Privacy Policy solely and exclusively governs your usage and experience of our website. Accordingly, we undertake no liability whatsoever as regards your usage of these third-party applications and you may visit them at your own risk. We strongly encourage that you read the privacy policies of any third-party website / application you are directed to before using the same.

If you choose to use chat rooms or other message areas or leave feedback, 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.

This Website and its contents do not give any party additional rights or remedies and should not be construed as a binding agreement. This section is to explain who will have access to your personal data. Your personal data will only be seen or used by our employees or third parties who have a legitimate business need to access your personal data for the purposes set out in this Privacy Policy. We may communicate your personal data to the following categories of third parties for the purposes mentioned but not limited to in this notice:

- service providers who provide us data center services.
- authorized authorities, agencies, or administrations, as required by applicable local law such as respective IOCs' of the country
- e mail notification service providers, SMS service providers to send transaction alerts to end customers
- CRM tools used for Customer grievances and support issues
- Helpdesk and chat support tools

In case you require more specific details of this, you may write to us at <a href="mailto:info@prezenty.in">info@prezenty.in</a>

We may also pass aggregate information on the usage of our website (e.g., we might disclose the median ages of visitors to our website, or the numbers of visitors to our Website that come from different geographic areas) to third parties, but this will not include information that can be used to identify you personally. If a business transfer or change of business ownership takes place or is envisaged, we may transfer your personal data to the new owner (or a prospective new owner). If this happens, you will be informed of this transfer following the completion of such transfer or change of business ownership.

## G. DUE DILIGENCE AND SAFEGUARDS

Prezenty Infotech uses reasonable physical, technical and administrative measures to safeguard personal data you provide through the Website or in connection with its Services.

We apply these measures based on the sensitivity of the personal data we collect, use, and store, and the current state of technology. We protect your personal data through technical and organizational security measures to minimize risks associated with data loss, misuse, unauthorized access, and unauthorize disclosure and alteration.

Unfortunately, the transmission of your personal data via the internet is not completely secure and although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us over the internet and you acknowledge that any transmission is at your own risk.

Prezenty Infotech uses commercially reasonable efforts to evaluate the data protection practices of third parties that process electronic documents and files and will or may have access to or process personal data. Prezenty Infotech requires such third parties to provide, at a minimum, the level of data protection required of Prezenty Infotech under applicable data protection laws and regulations, including, but not limited to, the requirements to:

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- Use commercially reasonable security measures in providing services to Prezenty Infotech to preserve the security, integrity, and confidentiality of personal data, and to protect against unauthorized access and anticipated threats or hazards to personal data;
- Use personal data only for Prezenty Infotech to provide its services, and not process personal data for any other purpose;
- Handle and maintain personal data in compliance with applicable data privacy and protection laws, rules, and regulations;
- Comply with obligations as required by all applicable data privacy and protection laws, rules, and regulations;
- Immediately notify Prezenty Infotech about any actual or potential security breach affecting personal data processed on behalf of Prezenty Infotech;
- Assist and support Prezenty Infotech in dealing with requests from governmental authorities, data controllers, data subjects or data protection authorities, as applicable;
- Not transfer personal data to a third country unless expressly authorized to do so by Prezenty Infotech; and
- Not engage another data processor without prior specific authorization of Prezenty Infotech.

### H. PROCEDURE FOR CORRECTING INACCURACIES IN THE INFORMATION

You may have certain rights related to your personal data, subject to local & applicable data protection laws. These rights may include:

- You can access and review personal data associated with your account at any time by sending us an e-mail to submit this request with us: e-mail ID: <a href="mailto:dpo@prezenty.in">dpo@prezenty.in</a>
- You also can request the following information: how we collect and use your personal data and why; the categories of personal data involved; the categories of recipients of your personal data; how we received your personal data and its source; our business purpose for using your personal data; and how long we use or store your personal data or the manner in which we determine relevant retention periods.
- You have a right to correct your personal data by sending us an e-mail to submit this request with us: e-mail ID: <a href="mailto:dpo@prezenty.in">dpo@prezenty.in</a>
- In certain situations, you can ask that we delete/erase or stop using your personal data (and object to use of your personal data) or export your personal data. Please send us an e-mail to submit this request with us: e-mail ID: dpo@prezenty.in
- Where we rely on your consent to process your personal data, you have the right to decline consent and/or if provided, to withdraw consent at any time. This will not affect the lawfulness of processing prior to the withdrawal of your consent. At any time, you can request that we stop using your personal data for direct marketing purposes. See our Cookie notice, how can I control my cookies section of our Privacy Policy for more information on your choices.
- You have a right to provide us with guidance on the use, storage, and deletion of your personal data after your death.
- You have a right to raise questions or complaints with your local data protection authority at any time.

We will take reasonable steps to verify your identity. If you have an account with us, we may verify you through your login of your account. If you do not have an account with us, we may seek a confirmation by email or seek other identification information, including government-issued identification, to verify your identity.

You may authorize an agent to make a request to us on your behalf and we will verify the identity of your agent or authorized legal representative by either seeking confirmation from you or documents that establish the agent's authorization to act on your behalf.

Please note your rights and choices vary depending upon your location. Certain personal data may be exempt from such requests under applicable law. We need certain types of personal data so that we can provide the Services to you. If you ask us to delete it, you may no longer be able to access or use our Services.

Please send an e-mail to: <a href="mailto:dpo@prezenty.in">dpo@prezenty.in</a>

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## I. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will keep your personal data for no longer than necessary, for the purposes we have set out above. We will retain your information for as long as needed in order to provide the relevant Services to you or perform any contract we have with you and for a limited period afterwards in order to deal with any queries or complaints.

Any third parties that we engage will keep your data stored on their systems for as long as is necessary to provide the relevant Services to you or us. If we end our relationship with any third party providers, we will make sure that they securely delete or return your personal data to us.

We may retain personal data about you for statistical purposes (for example, to help us better advertise our Services). Where data is retained for statistical purposes it will always be anonymized, meaning that you will not be identifiable from that data.

### J. POLICY UPDATES

This Privacy Policy was last updated on 31<sup>st</sup> January 2022. We reserve the right to change or update this policy at any time. Such changes shall be effective immediately upon posting on this Website. Please check it regularly on our Website(s) for any updates.

### K. GRIEVANCE OFFICER

In accordance with the Indian Information Technology Act, 2000 and the rules made thereunder, the name and contact details of the grievance redressal officer are provided below:

Mr. Clement Dcruz No. 26 S R T ROAD, SHIVAJINAGAR, BANGALORE, KARNATAKA, INDIA, 5600621

T: +91.80.40509200

<u>nodal.officer@prezenty.in</u> If you have any other questions about this Privacy Policy or other privacy concerns, you can also email us at the data protection officer <u>dpo@prezenty.in</u>

## L. JURISDICTION

If you choose to visit the Website, your visit and any dispute over privacy is subject to this Privacy Policy and the Website's Terms of Use. Regardless of where you live, you consent to have your personal data transferred, processed and stored in India. In addition to the foregoing, any disputes arising under this Privacy Policy shall be governed by the laws of India and the courts at Bangalore shall have exclusive jurisdiction.

# M. TERMS OF USE

Your use of and access of the Website including any disputes arising therefrom, is subject to this Privacy Policy as well as our Terms of Use. Please read our Terms of Use - <a href="https://www.prezenty.in/termsofuse">https://www.prezenty.in/termsofuse</a> carefully in order to obtain information on the terms governing the use of and access to the Website.

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