

Privacy Policy KUBE

A. Introduction:

- We respect your privacy rights and recognize the importance of secure transactions and information privacy. This Privacy Policy describes how KUBE Limited and its affiliates (collectively “KUBE, we, our, us”) collect, use, share or otherwise process your personal information through KUBE website www.kubecity.in, its mobile application, and m-site (hereinafter referred to as the “Platform”).
- This Privacy Policy is an electronic agreement formed under the Information Technology Act, 2000 and the rules and regulations made there under (as amended till date) including the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 & the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021. It does not require any physical or digital signatures to make the terms of this policy binding. This privacy policy is a legally binding document. The terms of this privacy policy will be effective upon your use of our Platform /service. Please read this policy carefully, together with our Terms of [Services](#)
- By visiting our Platform, providing your information or availing our product/service, you expressly agree to be bound by the terms of this Privacy Policy and the applicable Terms of service. While accessing or using our platform/services, you have given explicit consent to collect, use, share or otherwise process your information in accordance with this Privacy Policy. If you do not agree, please do not access or use our Platform or service.
- You acknowledge that you are disclosing Personal Information voluntarily. Prior to the completion of any registration process on our platform or prior to availing of any services offered on our platform if you wish not to disclose any Personal Information you may refrain from doing so; however if you don't provide information that is requested, it is possible that the registration process would be incomplete and/or you would not be able to avail of the our services. If you are our corporate customer, it is possible that we have entered into a contract with you for non-disclosure of confidential information. This Policy shall not affect such a contract in any manner.

B. Application of Policy:

- This policy governs each website, mobile site, application, and/or other service, regardless of how distributed, transmitted, published, or broadcast (“Service”) provided by KUBE Limited and/or its affiliates (“we,” “us,” or “our” or “KUBE”) that links to this policy, which is binding on all those who access, visit and/or use KUBE’s Services, i.e., Listing Service, Search Plus Services, etc.. This policy shall apply equally to all of our vendors, service providers, subcontractors, partners, agents, representatives, employees, and any other third parties. KUBE undertakes to only collect and use personal data voluntarily provided by you. You are able to browse our platform without disclosing any personal information about them.

However you have to provide limited personal data to us, as may be required, in order to register or to avail certain services from us.

- This policy applies to all contractors, suppliers, customers, users, vendors, sellers, partners, and other third party working on behalf of KUBE or accessing or using our platforms/service. It also applies to the head office, branches office and other offices of KUBE and all employees/officials of KUBE. It applies to all data that KUBE holds relating to identifiable individuals, even if that information technically falls outside of the Privacy & Data Protection law. The said information includes, Names, address, mobile/telephone numbers, email Id of users and any other information collected or received by users while accessing or using our platforms/service.
- This Privacy Policy is part of KUBE's Terms of Service and covers the treatment of user information, including personally identifying information, obtained by KUBE, including information obtained when you access the KUBE platform, use the KUBE Service or any other software provided by KUBE. Unless otherwise stated explicitly, this Policy applies to Personal Information as disclosed on any of our Platform. This policy does not apply to the practices of organizations that we do not own or to people that we do not employ or manage.

C. Objectives of policy:

- KUBE is required to collect & use certain information about individuals, i.e., customers, suppliers/vendors, business contacts, employees, and the third parties with whom KUBE has a business relationship or may need to contact. This policy describes, how KUBE collects, receives, possesses, stores, deals or handles personal information including sensitive personal information about you and ensure that the same are available for review by you. The personal information must be collected, handled and stored to meet the data protection standards as well as legislative requirements. This policy ensures to comply with data protection law and follows the good practice and protects the rights of employees, customers, suppliers/vendors, business contacts, employees, and the third parties and how to stores and processes data and protects from the risks of data breach.

D. Collection of Information:

- In the course of carrying out its various functions and activities, KUBE collects information from individuals & third parties and generates a wide range of information which is stored at our platform. These information can take many different forms, such as, corporate records, financial records, legal records, contracts, letters received from third parties, personnel/employees records, invoices, completed application forms, contact lists, email communications and attachments, photos etc.. KUBE collects information in order to provide and continually improve its products & services. The information may be collected online or offline. Regardless of the collection method, the same privacy protection shall apply to all data/information including personal information.
- We collect Personal Information from you in a variety of ways when you interact with us through our services, such as, installing, accessing, or using our Services; Create an account on our services; Request customer service or contact us; Conduct a

transaction where we collect personal information, including when required by law and regulations; Submit a testimonial, rating or review, or other user-generated content that may be posted; Otherwise submit personal information to us along with any related content of the communication.

- In the course of registering for and availing various services we provide from time to time through our website www.kubecity.in ("Website", telephone search, SMS and Apps) or any other medium in which KUBE may provide services (collectively referred to as "the Platform") you may be required to give your name, residence address, workplace address, email address, date of birth, educational qualifications, Marital status, and similar Personal Information ("Personal Information") & credit card/debit card, and other payment instrument details. We, either through third party service provider or by our own, collect the Know-Your-Customer (KYC) related document from you. KYC related documents include but not limited to, driving licence, proof of possession of Aadhaar number, the Voter's Identity Card, Pan Card, GST, Passport, job card issued by NREGA (duly signed by an officer of the State Government and letter issued by the National Population Register containing details of name and address). If OVD (officially valid documents) furnished by you don't have an updated address, then in addition to OVD, we may also collect the utility bill (electricity, telephone, post-paid mobile phone, piped gas, water bill) not more than two months old, property or Municipal tax receipt; pension or family pension payment orders (PPOs) issued to retired employees by Government Departments or Public Sector Undertakings, containing the address; letter issued by the Foreign Embassy or Mission in India (in case of foreigner), as prescribed by RBI (Reserve Bank of India) from time to time. If you are Sole Proprietary firms, we may collect the documents which include, (a) Registration certificate; (b) Certificate/licence issued by the municipal authorities under Shop and Establishment Act. (c) Sales and income tax returns. (d) GST certificate (provisional/final). (e) IEC (Importer Exporter Code) issued to the proprietary concern by the office of DGFT or Licence/certificate of practice issued in your firm's name (in case of Importer /Exporter). (f) Income Tax Return (just the acknowledgement) in your firm's name, duly authenticated/acknowledged by the Income Tax authorities. (g) Utility bills such as electricity, water, landline telephone bills, etc., or, the documents relating to proof of business/activity. We may also conduct verification and collect such other information and clarification as would be required to establish the existence of your firm, as per our satisfaction. If you are Legal Entities, we may collect the documents which includes, (a) Certificate of incorporation; (b) Memorandum and Articles of Association; (c) Permanent Account Number of the company; (d) Board resolution & power of attorney granted to its managers, officers or employees to transact on its behalf or Documents relating to beneficial owner. If you are partnership firm, we may collect the documents which include, (a) the certified copies Registration certificate; Partnership deed; Permanent Account Number of the partnership firm and Documents relating to beneficial owner, managers, officers or employees. If you are Trust, we may collect the documents which include, (a) the certified copies Registration certificate; Trust deed; Permanent Account Number or Form No.60 of the trust and Documents relating to beneficial owner, managers, officers or employees. If you are unincorporated association or a body of individuals, we may collect the documents

which include, (a) the certified copies Resolution of the managing body; Permanent Account Number or Form No.60 of the unincorporated association or a body of individuals and Documents relating to beneficial owner, managers, officers or employees. We, either through third party service provider or by our own, may also undertake Video based Customer Identification Process (V-CIP) in Compliance of KYC policy of RBI. The Personal Information is used for three general purposes: to customize the content you see, to fulfil your requests for certain services, and to contact you about our services via including but not limited to email's, sms's and other means of communication. 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, product or feature on our Platform. KUBE collects the personal information voluntarily provided by you while accessing or using our platforms/service. KUBE also collects data (on regular basis) from various sources such as newspaper, visiting cards, pamphlets, magazines and journals (including both free and pay), by appointment of data collectors, join free option made available on KUBE platforms. The example of the data/information collected by us is given below:

Types of information Collected by KUBE:

Sr. No.	Source of Information	Nature of Information Collected
1)	Users/Customers	<ol style="list-style-type: none"> 1. Personal Identifying information such as name, address and phone numbers; email Id, Age, personal description, profile photograph etc., & delivery address, 2. payment information. 3. location information. 4. Device information (if you provided). 5. IP address. 6. Name, addresses & phone numbers, e-mail IDs of friends and other people listed in Addresses; 7. Content of reviews and e-mails to us. 8. voice recordings when you call to us.

		<p>9. credit usage, login detail, device log files etc., while using our platform.</p> <p>10. Contacts – address book for app users</p>
2)	Vendors/Sellers	<p>1. Personal Identifying information such as name, address and phone numbers; email Id, Age, personal description, profile photograph ,Marital status etc.,.</p> <p>2. payment information.</p> <p>3. location information.</p> <p>4. Device information (if you provided)</p> <p>5. IP address.</p> <p>6. Name, addresses & phone numbers, e-mail IDs of friends and other people listed in Addresses.</p> <p>7. content of reviews and e-mails to us.</p> <p>8. voice recordings when you call to us.</p> <p>9. images, videos and other content collected or stored in connection with our Services.</p> <p>10. information and officially valid documents (KYC regarding identity and address information, including mobile & landline number, place of business, valid Email id, vendor's photo, id & address proof (such as Aadhar card, Pan Card, GST Voter Id Card, Passport, Shop and Establishment Certificate, etc.,.</p> <p>11. credit usage</p> <p>12. corporate and financial information, and</p> <p>13. device log files and configurations etc.,.</p>

3)	Automatic Information	<ol style="list-style-type: none"> 1. IP address of your device connected to our platform. 2. Login details, e-mail address, and password, device log files etc.,. 3. location of device/computer. 4. content interaction information, downloads, streaming of video, network details etc.,. 5. device metrics, application usage, connectivity data, and any errors or event failures. 6. our Services metrics, any technical errors, interactions with our service features and content, settings preferences and backup information, location of device, file name, dates, times etc while using our service. 7. content use history. 8. URLs including date & time; products & contents viewed or searched for; page response times, download errors, length of visits to certain pages, and page interaction information etc.,. 9. phone numbers used to call to us. 10. Images/videos while visiting our platforms. 11. device identifiers, cookies, browsing history, usage history, and/or other technical information.
4)	Information from Other Sources	<ol style="list-style-type: none"> 1. updated delivery and address information from our carriers or other third parties. 2. account information, purchase or redemption information and page-view information from some merchants/partners for which we

		<p>provide technical, advertising or other services.</p> <ol style="list-style-type: none"> information about interactions with vendors while interacting via JD channel. search results and links, including paid/free listings. internet-connected devices details.
5)	Officials/Employees/Resellers etc...	<ol style="list-style-type: none"> Personal Identifying information such as name, address and phone numbers; email Id, Age, personal description, profile photograph etc.,. Educational Information. information and officially valid documents (KYC) regarding identity and address information. payment information. location information. Device information (if you provided) IP address. content of reviews and e-mails to us. voice recordings when you call to us. login detail, device log files etc., while using our platforms.
6)	Third Party Information	<ol style="list-style-type: none"> Corporate & financial information about our co-branded partners, delivery partners, and other third party associated with us. CIN Number, PAN Number, GSTN Number etc.,. Location information.

		<ol style="list-style-type: none"> 4. Device information (if you provided) 5. IP address. 6. Internet-connected devices details. 7. Identity and address information etc.,.
--	--	---

E. KUBE Doesn't Collect the Information:

- KUBE does not collect sensitive personal data or information. It only collects the sensitive personal data or information which is considered necessary to provide the service or to fulfil the purpose and for a lawful purpose connected with a function or activity of KUBE. User can continue to browse / search on KUBE's platform without giving any information; however, PI is required for availing the certain services on KUBE's platform.
- KUBE does not collect emails, addresses or other contact information from your mobile address book or contact lists other than name and mobile phone numbers. KUBE does not store historical location information in any form or manner at its end, except for last known location from which KUBE software was accessed in case of non-availability of current location data. KUBE App integrates with face-book SDK and may send aggregate usage statistics to face-book from time to time. Usage of information sent to face-book is governed by Facebook's data usage policies which can be found at www.facebook.com/about/privacy.
- While collecting information, KUBE ensures that you must be informed about
 - 1) the fact that the information is being collected;
 - 2) the purpose for which the information is being collected;
 - 3) the intended recipients of the information; and
 - 4) the name and address of (i) the agency that is collecting the information; and (ii) the agency that will retain the information.
- The data/information shall not be collected unless-
 - 1) you have provided a valid, informed & free consent;
 - 2) processing is necessary for the performance of a contract to which you are party;
 - 3) processing is necessary for compliance with the company legal obligation;
 - 4) processing is necessary in order to protect your interests; or
 - 5) processing is necessary for the performance of a task carried out in the public interest.

F. Usage of Information:

- The data/information collected shall be used for the purpose for which it has been collected. In addition, the KUBE uses the data for the following purposes:
 - 1) To provide services.
 - 2) To fulfill your requests for products and services and communicate with you about those requests. If you search the products or service from our platform without logged in or sought the information by calling our hotline, we collect mobile number and generate lead with our vendors/service providers, as per your choice/request. If you search the products or service from our platform with logged in, we share your information (i.e., name, mobile, email etc.,) as available with us with our vendors/service providers to fulfil your choice/request.
 - 3) To administer contests, sweepstakes, promotions, and surveys.
 - 4) To respond to reviews, comments, or other feedback you provide us.
 - 5) To help us personalize our service offerings, websites, mobile services, and advertising.
 - 6) To provide functionality, analyze performance, fix errors, and improve the usability and effectiveness of the Services.
 - 7) To recommend features, products, and services that might be of interest to you, identify your preferences, and personalize your experience with KUBE Services.
 - 8) To operate, provide, develop, and improve the products and services that we offer our customers.
 - 9) To provide our services and to support our core business functions. These include order or service fulfilment, internal business processes, marketing, authentication, loss and fraud prevention, public safety and legal functions.
 - 10) To display interest-based ads for features, products, and services that might be of interest to you.
 - 11) To prevent and detect fraud and abuse in order to protect the security of our customers, KUBE, and others.
 - 12) Communicate with you.
 - 13) Contacting with you for promoting services.
 - 14) The User's Personal Data may be used for legal purposes by KUBE in legal proceeding at the stages leading to possible legal action arising from improper use of KUBE services.
 - 15) For operation and maintenance purposes.
 - 16) We use your voice input, images, videos, and other personal information to respond to your requests, provide the requested service to you, and improve our services.

17) It helps us in operating, providing, improving, understanding, customizing, supporting, and marketing our Services.

18) Comply with legal obligations. In certain cases, we collect and use your personal information to comply with laws. For instance, we collect from seller's information regarding place of establishment and bank account information for identity verification and other purposes.

- Personal Information will be kept confidential and will be used for our research, marketing, and strategic client analysis objectives and other internal business purposes only. We do not sell Personal Information. If you are a customer of our services, your Information shall be shared with our subscribers/advertisers and you shall be deemed to have given consent to the same. Further, the subscribers / advertisers who are listed with us, may call you, based on the query or enquiry that you make with us, enquiring about any Product / Service or Product / Service of any subscriber / advertiser. If you are a vendor/seller/business entity availing our services, your information shall be shared with our users, customers, callers, subscribers/advertisers who are seeking our services. You are hereby giving us deemed consent to share the details.
- We use your personal information to assist vendors, service providers, and business partners in handling and fulfilling orders; enhancing customer experience; resolve disputes; troubleshoot problems; help promote a safe service; collect money; measure consumer interest in our products/services; inform you about offers, products, services, and updates; customize and enhance your experience; detect and protect us against error, fraud and other criminal activity; enforce our terms and conditions; and as otherwise described to you at the time of collection of information.
- With your consent, we will have access to your SMS, contacts in your directory, location and device information. We may also request you to provide your PAN, GST Number, Government issued ID cards/number and Know-Your-Customer (KYC) details to: (i) check your eligibility for certain products and services including but not limited to credit and payment products; (ii) issue GST invoice for the products and services purchased for your business requirements; (iii) enhance your experience on the Platform and provide you access to the products and services being offered by us, vendors, sellers, service providers, affiliates or lending partners. You understand that your access to these products/services may be affected in the event consent is not provided to us.
- In our efforts to continually improve our product and service offerings, we and our affiliates collect and analyse demographic and profile data about our users' activity on our Platform. We identify and use your IP address to help diagnose problems with our server, and to administer our Platform. Your IP address is also used to help identify you and to gather broad demographic information.
- We will occasionally ask you to participate in optional surveys conducted either by us or through a third party market research agency. These surveys may ask you for personal information, contact information, date of birth, demographic information (like zip code, age, or income level), attributes such as your interests, household or lifestyle information, your purchasing behaviour or history, preferences, and other

such information that you may choose to provide. The surveys may involve collection of voice data or video recordings, the participation of which would purely be voluntary in nature. We use this data to tailor your experience at our Platform, providing you with content that we think you might be interested in and to display content according to your preferences.

- We have arrangement with other companies and individuals to perform functions for examples include analysing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit card payments and providing customer service etc. They have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process the personal information in accordance with this Privacy Policy and as permitted by applicable law. In certain cases, we collect and use your personal information to comply with laws. For instance, we collect from vendors/seller's information regarding place of establishment and bank account information for identity verification and other purposes.
- If you submit Personally Identifiable Information to us through the KUBE platform, or KUBE Service, then we use your personal information to operate, maintain, and provide to you the features and functionality of the KUBE platform and KUBE Service. In particular, your mobile phone number is essential to your use of the KUBE Service and will be retained. Your name (as it is saved in other user's mobile phone address book or contact list) may be displayed to other users if they tag your mobile number and access your ratings in the App.
- KUBE "tags" the contacts in your address book as your friends, but at any-time, you can review the list of your tagged friends and choose to untag any of them at any time. Untagging your contacts will hide your ratings from them and will also result in their ratings not being shown to you. Ratings would not indicate your relationship with the reviewer however ratings will be always shown on the platform.
- Only users of KUBE will be displayed in your tagged friends list. If a contact in your address book has rated an establishment/s on KUBE platforms, the ratings associated with the contact will be displayed as part of your friends' ratings. If a contact in your address book has used KUBE's service across any platform and has not rated an establishment, although their name is displayed in your friends list, no ratings will be shown associated with the said contact. If any of your tagged friends registers with our Service across KUBE's platforms, ratings of such a friend will be visible to you only if Your mobile number is present in his contacts list and You have not been untagged by your friend. It will be indicated as friend however rating will be always visible to everyone as a common user of KUBE
- We do not use your mobile phone number or other Personally Identifiable Information to send commercial or marketing messages without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out. We may use cookies and log file information to (a) remember information so that you will not have to re-enter it during your re-visit on our platform; (b) provide custom, personalized content and information; (c) monitoring or pages viewed, etc.; and (d) track your entries, submissions, views etc.,.

G. Processing of Personal Information:

- Personal /Sensitive personal data may be processed if such processing is necessary, for any function of Parliament or any State Legislature and/or for the exercise of any function of the State authorised by law for the provision of any service or benefit to the data principal from the State; or the issuance of any certification, license or permit for any action or activity of the data principal by the State.
- Personal data/Sensitive personal data may be processed if such processing is (a) explicitly mandated under any law made by Parliament or any State Legislature; or (b) for compliance with any order or judgment of any Court or Tribunal in India.
- Personal data/Sensitive personal data may be processed if such processing is necessary— (a) to respond to any medical emergency involving a threat to the life or a severe threat to the health of the data principal or any other individual; (b) to undertake any measure to provide medical treatment or health services to any individual during an epidemic, outbreak of disease or any other threat to public health; or (c) to undertake any measure to ensure safety of, or provide assistance or services to, any individual during any disaster or any breakdown of public order.
- Personal data may be processed if such processing is necessary for— (a) recruitment or termination of employment of a data principal; (b) provision of any service to, or benefit sought by, the data principal; (c) verifying the attendance of the data principal; or (d) any other activity relating to the assessment of the performance of the data principal.
- In addition to the grounds for processing contained aforesaid, personal data may be processed if such processing is necessary for such reasonable purposes as may be specified after taking into consideration— (a) the interest of JD in processing for that purpose; (b) whether JD can reasonably be expected to obtain the consent of the data principal; (c) any public interest in processing for that purpose; (d) the effect of the processing activity on the rights of the data principal; and (e) the reasonable expectations of the data principal having regard to the context of the processing.
- The reasonable purposes means and includes, prevention and detection of any unlawful activity including fraud; whistle blowing; mergers and acquisitions; network and information security; credit scoring; recovery of debt; processing of publicly available personal data. However KUBE ensures the protection of the rights of data principals.
- Sensitive personal data may be processed on the basis of explicit consent. [Consent shall be considered explicit only if it is valid if: (a) informed, having regard to whether the attention of the data principal has been drawn to purposes of or operations in processing that may have significant consequences for the data principal; (b) clear, having regard to whether it is meaningful without recourse to inference from conduct in a context; and (c) specific, having regard to whether the data principal is given the choice of separately consenting to the purposes of, operations in, and the use of different categories of sensitive personal data relevant to processing].

- **Processing of personal data of children:** KUBE doesn't allow children below the age of 13 years to visit our platform without parental guidance or control. Based on your date of birth disclosed by you, we verify your age. When the children visit our platform or use our service, we believe that they access our platform or service under the parental guidance, control and consent and we can process the information accordingly. KUBE shall process personal data of children in a manner that protects the rights and best interests of the child.

H. Disclosure of Information:

- Other users of KUBE Service may see your ratings submissions in a way that is consistent with the use of the KUBE Service. For example, a rating of "ABC Restaurant" on KUBE will be available to every user of the KUBE Service who has that mobile phone number in their mobile phone's address book or contact list and has tagged the mobile phone number as a friend in the KUBE App friends ratings feature. For more information on this feature, please refer paragraphs above.
- We do not sell or share your Personally Identifiable Information (such as mobile phone number) with other third-party companies for their commercial or marketing use without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out. We may share your Personally Identifiable Information with third party service providers to the extent that it is reasonably necessary to perform, improve or maintain the KUBE Service.
- We may disclose your personal information to third parties, such as vendors, sellers, service providers, business partners and other stakeholders. This disclosure may be required for us to provide you access to our products and services; for fulfilment of your orders; for enhancing your experience; for providing feedback on products; to collect payments from you; to comply with our legal obligations; to conduct market research or surveys; to enforce our Terms of Use; to facilitate our marketing and advertising activities; to analyse data; for customer service assistance; to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to our product and services, sending postal mail and e-mail, removing repetitive information from customer lists, analyzing data and links (including paid listings and links), processing payments, transmitting content, scoring, assessing and managing credit risk, and providing customer service. We do not disclose your personal information to third parties without your explicit consent. These third-party service providers may have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process the personal information in accordance with applicable law.
- We share information with our affiliated companies, business partners, associates etc. with whom we are having an arrangement to provide/receive services. We may use the information we receive from them, and they may use the information we share with them, to help operate, provide, improve, understand, customize, support, and market our Services and their offerings. This includes helping improve infrastructure and delivery systems, understanding how our Services or theirs are used, securing systems, and fighting spam, abuse, or infringement activities and promoting, marketing of business.

- As we continue to develop our business, we might sell or buy other businesses or services. In such cases, all of our rights and obligations under our Privacy Policy are freely assignable by us to any of our affiliates, in connection with a merger, acquisition, restructuring, or sale of assets, or by operation of law or otherwise, and we may transfer your information to any of our affiliates, successor entities, or third party while providing the services subject to the pre-existing Privacy policy.
- We may disclose personal information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to: (a) respond to subpoenas, court orders, or other legal process or to government/ law enforcement agencies requests; (b) enforce our Terms and any other applicable terms and policies, including for investigations of potential violations; (c) detect, investigate, prevent, and address fraud and other illegal activity, security, or technical issues; or (d) protect the rights, property, and safety of our users, companies, or others. (e) for purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences.
- We disclose the account and other personal information when we believe such disclosure is appropriate to comply with the law; enforce or apply our Terms of Use and other agreements; or protect the rights, property, or safety of KUBE, our users, or others. This includes exchanging information with other companies and organizations for fraud protection.
- KUBE shall share/disclose the data/information, without obtaining prior consent from You, with Government agencies mandated under the law to obtain information including sensitive personal data or information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences.

I. Transfer of information:

- KUBE shall not transfer sensitive personal data or information including any information, to third parties in India, or outside India, except under the following circumstances:
 - 1) To fulfill your requests for products and services
 - 2) To fix errors, and improve the usability and effectiveness of the Services
 - 3) To fraud prevention, public safety and legal functions
 - 4) To prevent and detect fraud and abuse in order to protect the security of our customers, KUBE, and others
 - 5) It is necessary for the performance of the lawful contract between KUBE and data principal; or
 - 6) where data principal has consented to data transfer;
- However KUBE ensures the same level of data protection that is adhered to by them as that of KUBE as provided for.

- When using vendors to collect personal information on the behalf of KUBE, it shall ensure that the vendors comply with the data protection requirements of KUBE as defined in this Policy.

J. Retention of Your Information:

- The Personal information may only be used for the purposes identified in the TOS and only if you have given consent. Personal information shall be retained for as long as necessary for business purposes identified in the TOS at the time of collection or subsequently authorized by you. We retain your personal information in accordance with applicable laws, for a period no longer than is required for the purpose for which it was collected or as required under any applicable law. However, we may retain data related to you if we believe it may be necessary to prevent fraud or future abuse or if required by law or for other legitimate purposes. We may continue to retain your data in anonymised form for analytical and research purposes.
- When the use of personal information is no longer necessary for business purposes, a method shall be in place to ensure that the information is destroyed in a manner sufficient to prevent unauthorized access to that information or is de-identified in a manner sufficient to make the data non-personally identifiable. KUBE shall have a documented process to communicate changes in retention periods of personal information required by the business to you who are authorized to request those changes.
- KUBE holding sensitive personal data or information shall not retain that information for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force. KUBE has framed the data retention policy and it retains all sorts of data/information including sensitive personal data or information in accordance with data retention policy. The data/information shall be de-identified/destroyed, when the purposes of data collection can be achieved, in accordance with our data retention policy.
- Personal information shall be erased if their storage violates any of the data protection law or if knowledge of the data is no longer required by KUBE or for the benefit of the data providers. Additionally, KUBE has the right to retain the personnel information for legal and regulatory purpose as per applicable laws. KUBE shall perform an internal audit on an annual basis to ensure that personal information collected is used, retained and disposed-off in compliance with the applicable law.

K. Review of Information by You:

1. KUBE shall establish & facilitates a mechanism to enable you to review the data/information you had provided, as per your choice, and shall access, edit, rectify, modify, delete any personal information or sensitive personal information found to be inaccurate or deficient. However KUBE shall not be responsible for the authenticity of the personal information or sensitive personal information supplied by you.
2. You shall be entitled to obtain the details about your personal information upon a request made and set forth in writing. KUBE shall provide its response within 72 (seventy two) hours of receipt of written request. You shall have the right to require KUBE to correct or supplement erroneous, misleading, outdated, or incomplete

personal information. We shall record & document each access request as it is received and the corresponding action taken. KUBE shall provide personal information to you in a plain simple format which is understandable.

L. Your Consent (Opt-in & Opt-out):

- By visiting our Platform or by providing your information, you consent to the collection, use, storage, disclosure and otherwise processing of your information (including sensitive personal information) on our Platform in accordance with this Privacy Policy. If you disclose to us any personal information relating to other people, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy. You, while providing your personal information over our Platform or any of our partner Platform or establishments, consent to us (including our affiliates, lending partners, technology partners, marketing channels, business partners, vendors, service providers and other third parties) to contact you through SMS, instant messaging apps, call and/or e-mail for the purposes specified in this Privacy Policy.
- If you want to manage, change, or edit your information, we allow you to do so through the Settings tools: You can change your settings to manage certain information available to other users. You can manage your contacts, groups, and broadcast lists, or use our block feature to manage the users with whom you communicate.
- If you are vendors, you can add or update certain information in vendor's module, update your account information by accessing your vendors Account Information, and adjust your e-mail or other communications you receive from us by updating your Notification Preferences.
- You can add or update your Personal Information on regular basis. KUBE would retain your previous Personal Information in its records.
- You may, of course, decline to submit Personally Identifiable Information through the KUBE Service, in which case KUBE may not be able to provide certain services to you. If you do not agree with our Privacy Policy or Terms of Service, please delete your account and uninstall the KUBE mobile application; your continued usage of the KUBE Service will signify your assent to and acceptance of our Privacy Policy and Terms of Service (as updated from time to time). To protect your privacy and security, we take reasonable steps (such as SMS authentication in certain cases) to verify your identity before registering your mobile phone number and granting you access to the KUBE Service. Please contact KUBE via email to privacy at KUBE.com or available web forms with any questions or comments about this Privacy Policy, your personal information, your consent, or your opt-in or opt-out choices.
- KUBE shall, prior to the collection of information including sensitive personal data or information, provide an option to you to not to provide the data or information sought to be collected. KUBE shall establish systems for the collection and documentation of Your consent to the collection, processing, and/or transfer of

personal data. You shall be informed about the choices available to them with respect to the collection, use, and disclosure of personal information.

- Further, KUBE shall establish & facilitates a mechanism to enable You to, at any time while availing the services or otherwise, to withdraw its consent given earlier to KUBE. If You not providing the consent or later on withdrawing your consent, KUBE reserves its right not to provide goods/services for which the said information was sought. Consent shall be obtained (in writing/electronically) from You before or at the time of collecting personal information or as soon as practical thereafter.
- The changes to your preferences shall be managed and documented. Consent or withdrawal of consent shall be documented appropriately. The choices shall be implemented in a timely fashion and respected. If personal information is to be used for purposes not identified in the TOS at the time of collection, the new purpose shall be documented, You shall be notified, and consent shall be obtained prior to such new use or purpose. You shall be notified if the data collected is used for marketing purposes, advertisements, etc.. KUBE shall review the policies of the Third Parties and types of consent of Third Parties before accepting personal information from Third-Party data sources.

M. Consent to Push Notification:

- You agree and confirm that any review, rating and comments, including any other content or data therein, that you submit/post on KUBE platforms viz. WEB, WAP, APP & Phone etc. such details as per KUBE's discretion will be shared with your Tagged Friends who are the users of KUBE's services.

N. Third-party Advertisers, Links to Other Sites:

- **KUBE** is currently ad-free and we hope to keep it that way forever. We have no intention to introduce advertisement into the product, but if we ever do, we will update this section.
- If you use KUBE services of our Partners, you will be redirected to Partners' websites/applications and your entry to Partners websites/applications will be based on your KUBE login credentials after seeking your permissions to share the data further. KUBE shall not be responsible for its Partner's privacy practices or the content of their privacy policies, and we request you to read their privacy policies prior to disclosing any information. If you pay using our Services, we may receive information and confirmations, such as payment receipts, from app stores or other third parties processing your payment.

O. Children Information

- We do not knowingly solicit or collect personal information from children under the age of 13 and use of our Platform is available only to persons who can form a legally binding contract under the Indian Contract Act, 1872. If you are under the age of 18 years then you must use our Platform or services under the supervision of your parent, legal guardian or any responsible adult.

P. Our Commitment to Information Security:

- The security of your Personal Information is important to us. You are responsible for keeping your device and your account safe and secure, and you must notify us promptly of any unauthorized use or security breach of your account or our Services. Your account information is protected by the password you use to access your online account. Please keep this password confidential. KUBE uses commercially reasonable physical, managerial, and technical, electronic and procedural safeguards to preserve the integrity and security of your personal information. KUBE shall adopt reasonable security practices and procedures as mandated under applicable laws for the protection of your Information. For this purpose, KUBE adopts internal reviews of the data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where KUBE stores your Personal Information. We cannot, however, ensure or warrant the security of any information you transmit to KUBE and you do so at your own risk and you hereby waive and release KUBE from any claim of damages under contract.
- KUBE may share your Information with third parties under a confidentiality agreement which inter-alia provides for that such third parties not disclosing the Information further unless such disclosure is for the purpose. However, KUBE is not responsible for any breach of security or for any actions of any third parties that receive your Personal Information. KUBE is not liable for any loss or injury caused to you as a result of you providing your Personal Information to third party (including any third party websites, even if links to such third party websites are provided on the Website). Notwithstanding anything contained in this Policy or elsewhere, KUBE shall not be held responsible for any loss, damage or misuse of your Personal Information, if such loss, damage or misuse is attributable to a Force Majeure Event. A "Force Majeure Event" shall mean any event that is beyond the reasonable control of KUBE and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, theft or computer/ mobile hacking, unauthorized access to computer/ mobile, computer system or computer/mobile network, mobile/computer crashes, breach of security and encryption (provided beyond reasonable control of KUBE), power or electricity failure or unavailability of adequate power or electricity. While we will endeavour to take all reasonable and appropriate steps to keep secure any Personal Information which we hold about you and prevent unauthorized access. You acknowledge that the internet or computer networks are not fully secure and that we cannot provide any absolute assurance regarding the security of your Personal Information. We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, processing, and disclosure of personal information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- We maintain reasonable physical, electronic and procedural safeguards to protect your information. Whenever you access your account information, we offer the use of a secure server. Once your information is in our possession we adhere to our security guidelines to protect it against unauthorized access. However, by using our platform, you accept the inherent security implications of data transmission over the internet which cannot always be guaranteed as completely secure, and therefore, there would

always remain certain inherent risks regarding use of the Platform. You are responsible for ensuring the protection of login & password records for their account. You hereby waive and release KUBE from any claim of damages under contract.

- We work to protect the security of your data/information including sensitive personal data during transmission by using encryption protocols and software. We follow the Payment Card Industry Data Security Standard (PCI DSS) when handling payment card data. If you choose a payment gateway to complete any transaction on KUBE Platform then your credit/debit card data/financial details may be stored in compliance with industry standards/ recommended data security standard for security of financial information, i.e., the Payment Card Industry Data Security Standard (PCI-DSS) and as per applicable law.
- KUBE shall review the policies and collection methods of Third-Parties before accepting personal information from Third-Party data sources. The audit of reasonable security practices and procedures shall be carried out by an auditor annually undertake significant upgradation of its process and computer resource.

Q. Transparency & Accountability Measures:

1. Privacy by Design:

- KUBE shall implement policies and measures to ensure that managerial, organisational, business practices and technical systems are designed in a manner to anticipate, identify and avoid harm to you;
- KUBE shall implement policies and measures to ensure that the technology used in the processing of personal data is in accordance with commercially accepted or certified standards;
- KUBE shall implement policies and measures to ensure that the legitimate interest of businesses including any innovation is achieved without compromising privacy interests;
- KUBE shall implement policies and measures to ensure that privacy is protected throughout processing from the point of collection to deletion of personal data and processing of personal data is carried out in a transparent manner and the interest of the data provider is accounted for at every stage of processing of personal Data.

2. Transparency: KUBE shall take reasonable steps to maintain transparency regarding its general practices related to processing personal data and shall make the following information available in an easily accessible form as may be specified -

- the categories of personal data generally collected and the manner of such collection;
- the purposes for which personal data is generally processed;
- any categories of personal data processed in exceptional situations or any exceptional purposes of processing that create a risk of significant harm;
- the existence of and procedure for the exercise of data principal rights;
- the existence of a right to file complaints to the Authority;

- Information regarding cross-border transfers of personal data, if any.
3. **Security Safeguards:** Having regard to the nature, scope and purpose of processing personal data undertaken, the risks associated with such processing, and the likelihood and severity of the harm that may result from such processing, KUBE shall implement appropriate security safeguards including (a) use of methods such as de-identification and encryption; (b) steps necessary to protect the integrity of personal data; and (c) steps necessary to prevent misuse, unauthorised access to, modification, disclosure or destruction of personal data. KUBE shall undertake a review of its security safeguards periodically as may be specified and may take appropriate measures accordingly.
 4. **Personal Data Breach:** KUBE shall notify the Authority of any personal data breach relating to any personal data processed by KUBE where such breach is likely to cause harm to any data principal. The said notification includes, (a) nature of personal data which is the subject matter of the breach; (b) number of data principals affected by the breach; (c) possible consequences of the breach; and (d) measures being taken by the data fiduciary to remedy the breach.
 5. **Record-Keeping:** KUBE shall maintain accurate and up-to-date records of the following: (a) important operations in the data life-cycle including collection, transfers, and erasure of personal data to demonstrate compliance; (b) periodic review of security safeguards; (c) data protection impact assessments;
 6. **Data Audits:** KUBE shall have its policies and the conduct of its processing of personal data audited annually by an independent data auditor. The data auditor will evaluate the compliance of KUBE with the provisions of law including (a) clarity and effectiveness of notices, transparency, security safeguards, instances of personal data breach and response thereto.

R. Monitoring and Enforcement:

1. **Dispute Resolution & Recourse:** KUBE shall define and document a cyber-incident management program which addresses the data protection & privacy related incidents. The incident management program includes a clear escalation path up to the executive management, legal counsel, and the board based on type and/or severity of the data breach. It shall define a process to register all the incidents/complaints and queries related to data breach. KUBE shall perform a periodic review of all the complaints related to data breach to ensure that all the complaints are resolved in a timely manner and resolutions are documented and communicated to the data principals. An escalation process for unresolved complaints and disputes which shall be designed and documented and the Communication of privacy incident / breach reporting channels and the escalation matrix shall be provided to all data providers.
2. **Dispute Resolution & Escalation Process for Employees:** Employees with enquiries or complaints about the processing of their personal information shall first discuss the matter with their immediate reporting manager. If the employee does not wish to raise an inquiry or complaint with their immediate reporting manager, or if the manager and employee are unable to reach a satisfactory resolution of the issues raised, the employee shall bring the issue to the attention of the Grievance Officer.

3. **Dispute Resolution & Escalation Process for Customer / Third Party:** Customers / Third Party with inquiries or complaints about the processing of their personal information shall bring the matter to the attention of the Grievance Officer in writing. Any disputes concerning the processing of the personal information of non-employees shall be resolved through arbitration.

S. Terms of Use, Policy & Revisions:

1. If you choose to use KUBE Services, your use and any dispute over privacy is to this policy and our Terms of Use, including limitations on damages, resolution of disputes, and application of the prevailing law in India. If you have any concern about privacy at KUBE, please contact us with a thorough description, and we will try to resolve it. Our business changes constantly and our Privacy policy will change also. You should check our websites frequently to see recent changes.
2. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account. We assure that will never materially change our policies and practices to make them less protective of your information collected in the past without your consent.

T. Grievance Officer:

1. In accordance with Information Technology Act 2000 and rules & regulations made thereunder, the name and contact details of the Grievance Officer are provided below:

Name:

Address:

Contact No:

Email:

2. If you have a query, issue, concern, or complaint in relation to collection or usage of your personal information under this Privacy Policy, please contact us at the contact information provided above or write to us at :

DEFINITIONS:

"Act"	"Act" means the Information Technology Act, 2000 (21 of 2000);
"Automated means"	"Automated means" means any equipment capable of operating automatically in response to instructions given for the purpose of processing data.
"Biometrics"	"Biometrics" means the technologies that measure and analyse human body characteristics, such as 'fingerprints', 'eye retinas and irises', 'voice patterns', 'facial patterns', 'hand measurements' and 'DNA' for authentication purposes.

"Body corporate"	"Body corporate" means any company and includes a firm, sole proprietorship or other association of individuals engaged in commercial or professional activities.
"Child"	"Child" means a data provider below the age of eighteen years
"Cyber incidents"	"Cyber incidents" means any real or suspected adverse event in relation to cyber security that violates an explicitly or implicitly applicable security policy resulting in unauthorised access, denial of service or disruption, unauthorised use of a computer resource for processing or storage of information or changes to data, information without authorisation.
"Cyber security"	"cyber security" means protecting information, equipment, devices, computer, computer resource, communication device and information stored therein from unauthorised access, use, disclosure, disruption, modification or destruction.
"Data"	"Data" means a representation of information, knowledge, facts, concepts or instructions which are being prepared or have been prepared in a formalised manner, and is intended to be processed, is being processed or has been processed in a computer system or computer network, and may be in any form (including computer printouts magnetic or optical storage media, punched cards, punched tapes) or stored internally in the memory of the computer.
"Data provider"	"Data provider" means the natural person to whom the personal data relates to.
"Data protection & Security"	Anyone collecting personal & customer information must fairly & lawfully process it only for limited, specifically stated purposes and use the information accurately and in a way that is adequate, relevant and not excessive, and retain the information/records no longer than absolutely necessary, process the information in accordance with law and keep the information secure and never transfer the information outside the country without adequate protection.

"Password"	"Password" means a secret word or phrase or code or passphrase or secret key, or encryption or decryption keys that one uses to gain admittance or access to information.
"Personal information"	"Personal information" means any information that relates to a natural person (individual), which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person, i.e., Name, Address, mobile Number, email id, Date of birth etc.,.
"Data processor"	"Data processor" means any person, including the State, a company, any juristic entity or any individual who processes personal data on behalf of a data fiduciary, but does not include an employee of the data fiduciary.
"Processing"	"Processing" in relation to personal data, means an operation or set of operations performed on personal data, and may include operations such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, use, alignment or combination, indexing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.
"reasonable security practices and procedures"	"reasonable security practices and procedures" means security practices and procedures designed to protect such information from unauthorised access, damage, use, modification, disclosure or impairment, as may be specified in an agreement between the parties or as may be specified in any law for the time being in force and in the absence of such agreement or any law, such reasonable security practices and procedures, as may be prescribed by the Central Government in consultation with such professional bodies or associations as it may deem fit.
"Sensitive personal data or information"	<p>Sensitive personal data or information of a person means such personal information which consists of information relating to; -</p> <ol style="list-style-type: none"> 1. password; 2. financial information such as Bank account or credit card or debit card or other payment instrument details ; 3. physical, physiological and mental health condition;

	<ol style="list-style-type: none"> 4. sexual orientation; 5. medical records and history; 6. Biometric information; 7. any detail relating to the above clauses as provided to body corporate for 8. providing service; and 9. any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise; <p>Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information.</p>
"Third Party"	<p>All external parties, i.e. contractors, interns, trainees, vendors, users etc., who have accessed to KUBE information assets or information systems.</p>