

## 1. Privacy Policy

The information we learn from customers helps us personalize and continually improve your shopping experience at Kube. We use your information to assist in handling a variety of matters including but not related to , communicate with you about vouchers, products, services and promotional offers, update our records and generally maintain your accounts with us, display content and recommend merchandise and services that might be of interest to you. We also use this information to improve our platform, prevent or detect fraud or abuses of our website and enable you to have a grand experience. We use Cookies and Device Data that allow us to connect your activity within the Platform with other information we store about you in your profile or as related to your interactions with the Site. We collect information to provide better services to all our users – from figuring out basic stuff such as which language you speak, to more complex things like which services you find helpful or which services are available in your current location. The information Kube collects, and how that information is used, depends on how frequently you use our services and how you manage your privacy controls internally within your device. We use the information we collect to customise our services for you, including providing recommendations and personalised content. We will ask for your explicit consent to share any sensitive personal information. Additionally, we will also ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

### a. User Information

- a. The Application obtains the information you provide when you download and register the Application.
- b. When you register with us and use the Application, you generally provide (a) your name, email address, phone number and other registration information; (b) transaction-related information, such as when you make purchases and/or upload a selfie, respond to any offers, or download or use any applications from us; (c) information you provide us when you contact us for help; (d) any other information you enter into our system when using the Application, such as contact information and project management information.
- c. The Application may also collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, circle of the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use the Application.
- d. We may use the information you provided us to contact you from time to time to provide you with important information,

required notices and marketing promotions and also improve your activities on our platform such as posting in our forums, liking posts, sending feedback, and responding to surveys. If you choose to share data about yourself via your profile, chat, or other interactive areas of the Application, please be advised that all data you disclose in these areas is public and your data will be accessible to anyone who accesses the Application. Kube shall not be liable for any data that you had chosen to disclose yourself in this public space.

- e. We may also use your personal information to improve our services and user experience on the Application, to enforce our legal rights as permitted under law, and otherwise with your consent.
- f. You may restrict our access to such information by terminating your account on Kube or removing Kube's permission to access the same by directly disabling the same on your phone. The User may note that the latter may severely restrict Kube's ability to provide a personalised feel to the Platform.

a. Geo-Location Information

- a. We collect information about your location when you use our services, which helps us in determining the merchants and outlets near you where Kube vouchers can be used or cashback can be availed. Your location can be determined with varying degrees of accuracy by: (a) GPS; (b) IP address; (c) Sensor data from your device; (d) Information about things near your device, such as Wifi Access Points, cell towers and Bluetooth enabled devices.
- b. We may request access or permission to and track location-based information from your mobile device while you are using the Application, to provide location-based services. We may also collect the precise location of your device when the app is running in the foreground, background, or even if you are not directly using the application depending on your device and its settings. Your device, as well as the Kube mobile app, provides you with options to control how and when we collect your geolocation. This is only to better the User's experience on the Kube Platform.
- c. You may be able to disallow our use of certain location data through your device or browser settings, for example, by disabling "Location" services for the Kube application in your device privacy settings. By allowing Kube access to the same the User acknowledges and accepts that Kube shall be aware of the User's Geo-Location at any time. If

you wish to change our access or permissions, you may do so in your device's settings.

b. Contacts Information

- a. Please note that no other contacts information other than the phone numbers and thereto attached names and email addresses will be collected and used from Your address book. Other numbers or information that may be contained in your address book will be filtered away by our safety algorithms and will therefore not be collected by Kube. Please also note that You can always choose not to share Contacts Information with Kube.
- b. When you turn on phone contacts uploading, information from your phone contacts will be continuously uploaded. This makes it easier to find the people you already know.

c. Financial Information

- a. Availing the services offered by Kube can at times involve the collection of sensitive financial information including but not limited to linking with mobile wallets, entering credit/debit card details, password, etc to facilitate payment for the respective service. You acknowledge and accept that linking Kube with relevant mobile wallet or bank account helps in making the experience better and thereby expressly consent to Kube's collection and subsequent processing of such financial data.
- b. The financial information we learn and gather from you is used to link Kube with your preferred mobile wallet, verify your identity to permit you to undertake transactions (including to facilitate and process payments) in connection with Kube, communicate with you about any promotional offers, services or updates associated with Kube, conduct analysis on the users' spending capability and generally maintain your accounts with us. No information collated while carrying out the above is shared with or sold to a third party by Kube and is strongly protected. You acknowledge and accept that the above activities that involve Kube's use of your financial information is to improve your experience on the Kube platform and hereby provide Kube consent for the same.
- c. We work to protect the security of your information during transmission by encrypting all financial information, including passwords, you input in addition to maintaining security of such information. User authentication is handled by Kube through authentication tokens that is reset on every fresh one time password validation. We reveal only the last four digits of your credit / debit card numbers while

making payment. Of course, we transmit the entire credit / debit card number to the appropriate credit / debit card company or the concerned bank for processing of the transaction.

- d. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of such sensitive personal information.
- e. You may disable Kube's access to the same remotely on the Kube Platform or contact us at [contact@kubeeonline.in](mailto:contact@kubeeonline.in)

d. Health Information

- a. If while purchasing any healthcare product or services, you upload the invoice of the same or use Kube Coin to purchase the same, Kube would gain access to information on such invoice(s) which may include your sensitive personal health information.
- b. You hereby expressly consent to Kube gaining access and storing such information and processing the same in the manner set out in these terms.
- c. Kube shall have the rights in the above clause (b) unless you expressly withdraw the consent you have given us, by contacting us with such request at [contact@kubeeonline.in](mailto:contact@kubeeonline.in)

e. Third Party Access to User Information

- a. We will share your information with third parties only in the ways that are described in this privacy statement.
- b. We may disclose User Provided and Automatically Collected Information unless consent to the same has been specifically withdrawn by the User.
- c. We will not share your contact information at any point without your prior content, but your selfies, comments and other actions specific to our system might be visible to other users and merchants on the platform. However, without your prior consent such users will not have access to your contact information. You, as a User, have the ability, to remove your information from the system and to restrict our access and use of your personal data;
- d. We shall provide all information that is to be provided when required by law, such as to comply with a summons, or similar legal process as well as when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;

- e. Our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement and apply data protection measures, at least equal to those set out below in the section “Data Security Measures”.
- f. We also may share data that is not linkable to a particular consumer or device (for example, information that has been aggregated with other records) for general business purposes.

f. Data Security Measures

- a. Kube takes security of your data very seriously. We work hard to protect information you provide from loss, misuse, and unauthorized access or disclosure.
- b. We maintain commercially reasonable and standard measures to maintain information security and prevent it from unauthorized access. However, given the nature of communications and information processing technology, Kube cannot guarantee that any information, during transmission through the internet or while being processed, will be absolutely safe from intrusion by others.
- c. If Kube becomes aware of any breach of security of your information, we will notify you using the email address that we have. If you do not agree to the terms discussed above, you may exit Kube or stop using the same. When you access Our App, you acknowledge that you have read and agreed to abide by the terms described above.

g. Data Retention Policy

- a. We will retain User Provided data for as long as you use the Application and for a reasonable time thereafter.
- b. We will retain Automatically Collected information for up to 24 months and thereafter may store it in aggregate.
- c. If you would like us to delete User Provided Data that you have provided via the Application, please contact us at care@Kube online.in and we will respond in a reasonable time.
- d. The User must note that some or all the User Provided Data may be required in order for the Application to function properly.

h. Tracking Technologies

- a. We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Application to help

customize the Application and improve your experience. When you access the Application, your personal information is not collected using tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies but be aware that such action could affect the availability and functionality of the Application.

- b. The Application may contain links to third-party websites and applications of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the Application, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Application.
- i. Release of User Information: We release account and other personal information when we believe release is appropriate to comply with applicable law; enforce or apply our Conditions of Use and other agreements; or protect the rights, property or safety of merchants, our users or others. This includes exchanging information with other companies, organizations, government or regulatory authorities for fraud protection and credit risk reduction. Obviously, however, this does not include selling, renting, sharing or otherwise disclosing personally identifiable information from customers for commercial purposes in a way that is contrary to the commitments made in this Privacy Notice
- j. Disclosure of Information
  - a. to report or collect on payments owed to Sellers, merchants or other business partners;
  - b. as necessary to perform contractual obligations towards you with merchant to the extent you have purchased or redeemed a Kubecoin for goods or services offered by a merchant or participated in an offer, rewards, contest or other activity or program sponsored or offered through us or the Sellers on behalf of a merchant;
  - c. in case of a merger, acquisition or reorganization with a purchaser of our company or all or substantially all of our assets;

- d. to comply with legal orders and government requests, or as needed to support auditing, compliance;
  - e. to combat fraud or criminal activity, and to protect our rights or those of our affiliates, business partners and users, or as part of legal proceedings affecting Kube;
  - f. in response to a legal process, including to law enforcement agencies, regulators, and courts; or
  - g. with your consent or as otherwise required or permitted by law.
- k. **User Opt-out:** The User can choose to stop all collection of information by the Application easily by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network. You can also request to opt-out via email, at [contact@kubeeonline.in](mailto:contact@kubeeonline.in)
- l. You may at any time review or change the information in your account or terminate your account. If your Kube user account is terminated or deleted, access to your username, password, and all related information, files, and content associated with your account shall be terminated. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.
- m. By using or continuing to use Kube, you agree to our use of your information (including your personal information and/or your sensitive personal data or information) in accordance with this Privacy Policy, as may be amended from time to time by Kube in its discretion. You also agree and consent to us collecting, storing, processing, transferring and sharing information (including sensitive personal data or information) related to you with third parties or service providers for the purposes as set out in this Privacy Policy.
- n. You may contact us at [contact@kubeeonline.in](mailto:contact@kubeeonline.in) if you wish to obtain: (a) confirmation on whether your respective Personal Data has been processed or is being processed; (b) brief summary of your respective Personal Data that has been processed or is being processed; and (c) brief summary of the Terms. You may also contact us if you wish any respective information to be corrected or removed or deleted.

## 2. **Direct Payment Facility**

- a. The User may, if easier, opt to make direct payment of such purchase price to Kube for the purchased goods or services ("**Direct Payment Facility**"). In the event that You make any payment in the above-mentioned manner, Kube shall be deemed to be the agent of

the respective merchant authorized to collect such purchase price from You on behalf of the merchant.

- a. Any and all communication by Kube or the merchant regarding the Direct Payment Facility, whether to Kube users, your customers or clients, our respective vendors, employees or agents, governmental authorities or any other person or entity whatsoever shall clearly indicate that Kube is acting purely as an agent in relation to the Direct Payment Facility