

## **PRIVACY POLICY**

We, \_\_\_\_\_, a private limited company incorporated under the Indian Companies Act, 2013, having its registered office at \_\_\_\_\_, where such expression shall, unless repugnant to the context thereof, be deemed to include its respective legal heirs, representatives, administrators, permitted successors and assigns, the creator of this Privacy Policy ensure our steady commitment to Your privacy with regard to the protection of your invaluable information. This privacy policy contains information about the Website/ Mobile App called “Qyura”. In order to provide You with Our uninterrupted use of services, We may collect and, in some circumstances, disclose information about you. To ensure better protection of Your privacy, We provide this notice explaining Our information collection and disclosure policies, and the choices You make about the way Your information is collected and used.

If You have any queries or concerns regarding this privacy policy, You should contact Our Customer Support Desk at \_\_\_\_\_/ email Us at \_\_\_\_\_.

ANY CAPITALIZED WORDS USED HENCEFORTH SHALL HAVE THE MEANING ACCORDED TO THEM UNDER THIS AGREEMENT. FURTHER, ALL HEADING USED HEREIN ARE ONLY FOR THE PURPOSE OF ARRANGING THE VARIOUS PROVISIONS OF THE AGREEMENT IN ANY MANNER. NEITHER THE USER NOR THE CREATERS OF THIS PRIVACY POLICY MAY USE THE HEADING TO INTERPRET THE PROVISIONS CONTAINED WITHIN IT IN ANY MANNER.

### **1. DEFINITIONS:**

- (a) “We”, “Our”, and “Us” shall mean and refer to the creators of this privacy policy.
- (b) “You”, “Your”, “Yourself” and “User” shall mean and refer to natural and legal individuals who use the Website/ Application.

- (c) “Application” shall mean and refer to “Qyura” created by \_\_\_\_\_.
- (d) “Personal Information” shall mean and refer to any personally identifiable information that We may collect from You. For removal of any doubts, please refer to Clause 2.
- (e) Sensitive Personal Data or Information means Personal Information of any individual relating to password; financial information such as bank account or credit card or debit card or other payment instrument details; physical, physiological and mental health condition; sexual orientation; medical records and history; biometric information; any detail relating to the above as provided to or received by Qyura for processing or storage. However, any data/ information relating to an individual that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law shall not qualify as sensitive personal data/information.
- (f) “Third Parties” refer to any application, website, company or individual apart from the User and the creator of the Application.

## **2. OVERVIEW:**

We are committed to respecting Your online privacy. We further recognize Your need for appropriate protection and management of any Personal Information You share with us.

This Privacy Policy is published in compliance of the (Indian) Information Technology Act, 2000 and the rules, regulations, guidelines and clarifications framed thereunder, including the (Indian) Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011.

This Privacy Policy shall apply to the use of the Website/ Application by all Users. Accordingly, a condition of each User's use of and access to the Website/ Application and to the other services provided by Qyura to Users is their acceptance of this Privacy policy. Any User is required to read and understand the provisions set out herein prior to submitting any sensitive personal data or information to Qyura, failing which they are required to leave the Website immediately.

In order to use the services of this Website or Application, You are required to register Yourself by providing the following information which *inter alia* includes:

- (a) Name;
- (b) Gender;
- (c) Date of Birth;
- (d) User name;
- (e) Password;
- (f) Email ID;
- (g) Mobile number;
- (h) Address;
- (i) Other details as the User may volunteer;
- (j) Valid financial account information;
- (k) Scanned copy/ picture of medical prscription;
- (l) Any medical record the user wishes to upload etc.

### **3. INFORMATION COLLECTED:**

We may collect the following information:

- (a) Personal data of the User such as, but not limited to, Your name, address, age, email address and Phone Number, Mailing address
- (b) Sensitive Personal Information, which refers to Your user name and password for the website/ application.
- (c) Tracking Information such as, but not limited to the IP address of Your device when connected to the Internet.
- (d) By installing our Application you give us the permission to access your device's camera, location, sms, contacts etc., as required.

### **4. COOKIES:**

We use data collection device known as “cookies” at certain stages of use of Our Website/ Application. “Cookies” are small files situated on Your mobile/ computer/ device's hard disk that assists Us in providing customised services. A cookie helps us

analyse your preferences by, for example, recording the number of times you have used the Application, and help us in tailoring our services to suit your interests. Further, there are certain features of the Application that are available only through the use of a “cookie”. These “cookies” may be used whether You register on the Application or not. However, a “cookie” does not give Us access to your device.

You may choose to disable the “cookie” feature on Your device. But this may prevent full utilization of the services provided by the Application.

## **5. EXTERNAL LINKS ON THE APPLICATION:**

The Website/Application may include advertisements hyperlinks to other websites, applications, content or resources. We have no control over such external links present in the Application, which are provided by persons or companies other than Us.

You acknowledge and agree that We are not responsible for any collection or disclosure of your Personal Information by any external sites, applications, companies or persons, nor do We endorse any advertising, products or other material on or available from such external application, websites or resources.

You further acknowledge and agree that We are not liable for any loss or damage which may be incurred by You as a result of the collection and/or disclosure of Your personal information by external applications, sites or resources, or as a result of any reliance placed by You on the completeness, accuracy or existence of any advertising, products or other materials on, or available from such applications, websites or resources. This external application, websites and resource providers may have their own privacy policies governing the collection, storage, retention and disclosure of Your Personal Information that You may be subject to. We recommend that You enter the external application or website and review their privacy policy.

We allow third parties/individuals to display advertisements when you use the Website/ Application.

## **6. OUR USE OF YOUR INFORMATION:**

The information that Qyura collects from You may be used for various business and/or regulatory purposes such as to register the User on the Website/ Application, processing the User's orders / requests and provision of Services, complete transactions with Users effectively and billing for the products/ Services provided, Technical administration and customization of Website/ Application, delivery of personalized information and target advertisements to the User, improvement of Services and features on the Website/ Application, research and development and for User administration (including conducting User surveys).

Qyura may use the information to contact You when necessary. For more details about the nature of such communications, please refer to Our Terms of Service. We may keep records of telephone calls received and made for making inquiries, orders, or other purposes for the purpose of administration of Services. Further, Your personal data and Sensitive Personal Information may be collected and stored by Us for internal record.

Internet use: Qyura may also receive and/or hold information about the User's browsing history including the URL of the site that the User visited prior to visiting the website as well as the Internet Protocol (IP) address of each User's computer (or the proxy server a User used to access the World Wide Web), User's computer operating system and type of web browser the User is using as well as the name of User's ISP. The Website/ Application uses temporary cookies to store certain data (that is not sensitive personal data or information) that is used by Qyura and its service providers for the technical administration of the Website/ Application, research and development, and for User administration. We use Your tracking information such as IP addresses to help identify you and to gather broad demographic information.

We does not knowingly collect personal data from children / minors.

We may in future include other optional requests for information from the User including through User Surveys in order to help Us customize the Website/ Application to deliver personalized information to the User and for other purposes are mentioned herein. Such information may also be collected in the course of

contests conducted by Qyura. Any such additional personal information will also be processed in accordance with this Privacy Policy.

Non-personally identifiable information, exclusively owned by Qyura may be used in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes, and Qyura may sell or otherwise transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates.

Dealing with requests, enquiries or complaints and other customer care related activities; and all other general administrative and business purposes.

In case of any contests conducted by Qyura in which the User participates, the User Information may be used for prize fulfillment and other aspects of any contest or similar offering.

In case We are acquired by or merged with another company, We shall transfer information disclosed by You and information about You to the company we are acquired by or merged with. In the event of a merger or acquisition, We shall notify You by email/by putting a prominent notice on the Website/ Application before Your Personal Information is transferred and becomes subject to a different privacy policy.

## **7. CONFIDENTIALITY:**

You further acknowledge that this Website/ Application may contain information which is designated confidential by Us and that you shall not disclose such information without our prior written consent.

Qyura makes all User Information accessible to its employees and data processors only on a need-to-know basis. All Qyura employees and data processors, who have access to, and are associated with the processing of User Information, are obliged to respect its confidentiality.

Your information is regarded as confidential and therefore shall not be divulged to any third party, unless if legally required to do so to the appropriate authorities, or if necessary to ensure Users may fully avail of the services of the Application.

We shall not sell, share, or rent your personal information to any third party or use your e-mail address for unsolicited mail. Any communication by Us to You shall be undertaken in accordance with Our Terms of Service and Privacy Policy.

## **8. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES:**

Due to the existing regulatory environment, We cannot ensure that all of your Personal Information shall never be disclosed in ways other than those described in this Privacy Policy. For example, but without limiting and foregoing to, We may be forced to disclose Your Personal Information to the government, law enforcement agencies or other Third Parties. Under certain circumstances, Third Parties may unlawfully intercept or access transmission or private communications, or abuse or misuse Your Personal Information that they may collect from our Website/Application. Therefore, although we use industry standard practices to protect your privacy, we do not promise, and you should not expect, that your personally identifiable information or private communications would always remain private.

Non-personally identifiable information may be disclosed to third party ad servers, ad agencies, technology vendors and research firms to serve advertisements to the Users. Qyura may also share its aggregate findings (not specific information) based on information relating to the User's internet use to prospective, investors, strategic partners, sponsors and others in order to help growth of Qyura's business.

As a matter of policy, we do not sell or rent any Personal Information about You and/or disclosed by You to Third Parties.

**8.1 External Service Providers:** There may be a number of services offered by external service providers that help You use our Website/Application/ Services. If You choose to use these optional services, and in the course of doing so, disclose information to the external service providers, and/ or grant them permission to collect information about You, then their use of Your information is governed by their privacy policy. Further, We may need to disclose/ transfer your personal information to our partners such as pharmacies or courier companies etc. for the purpose of carrying out services on Qyura's behalf under contract. Generally these contractors do not have any independent

right to share this information, however certain contractors who provide services on the Website, including the providers of online communications services, will have rights to use and disclose the personal information collected in connection with the provision of these services in accordance with their own privacy policies.

**8.2    *Other Corporate Entities:*** We share much of our data, including Your Personal Information, with Our parent and/ or subsidiaries that are committed to serving Your needs through use of Our Application and related services, throughout the world. Such data shall be shared for the sole purpose of enhancing Your experience of using the Application. To the extent that these entities have access to your information, they shall treat it at least as protectively as they treat information they obtain from their other members. It is possible that We and/or its subsidiaries, or any combination of such, could merge with or be acquired by another business entity. Should such a combination occur, you should expect that we would share some or all of your information in order to continue to provide the service. You shall receive notice of such event (to the extent it occurs).

**8.3    *Law and Order:*** We cooperate with law enforcement inquiries, as well as other third parties to enforce laws, such as: intellectual property rights, fraud and other rights. We can, and You so authorise Us, disclose Your Personal Information to law enforcement and other government officials as We, in Our sole discretion, believe necessary or appropriate, in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose Us/ Us or You to any legal liability.

Any information that you make publically available on the site may be potentially viewed by any party, and by posting such material it is deemed that you consent to share such information with such parties.

You may request details of the Your Personal Information collected and/ disclosed by Us. If You would require such details, please call us at \_\_\_\_\_ / email us at \_\_\_\_\_.



#### **9. ACCESSING, REVIEWING AND CHANGING YOUR PROFILE:**

Following registration, You can review and change the information You submitted at the stage of registration. An option for facilitating such change shall be present on the home screen of the website/ application and such change can be facilitated by emailing us at \_\_\_\_\_. If You change any information, We may keep track of Your old information.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at \_\_\_\_\_ or contact us at \_\_\_\_\_. We shall promptly correct any information found to be incorrect.

We shall retain in Our files information You have requested to remove for certain circumstances, such as to resolve disputes, troubleshoot problems and enforce Our terms and conditions. Further, such prior information is never completely removed from Our databases due to technical and legal constraints, including stored 'back up' systems. Therefore, You should not expect that all of Your personally identifiable information shall be completely removed from our databases in response to Your requests.

#### **10. CONTROL OF YOUR PASSWORD: (OPTIONAL)**

When You register on the Website/Application, You shall be asked to choose a password. You are entirely responsible for maintaining the confidentiality of Your password. It is important that You protect it against unauthorised access of Your account and information by choosing Your password carefully, keeping Your password and device secure by signing out after using Our services and exercising caution in disclosing Your password if needed.

You agree not to use the account, username, email address or password of another User at any time. Further, if You choose to disclose Your password to any Third Party, You are solely responsible for all actions taken with Your account information and password, including fees. If You lose control of Your password, You may lose substantial control over Your Personal Information and may be subject to legally binding actions taken on Your behalf. Therefore, in the event of loss of Your password, You should immediately change Your password. Further, You agree to notify Us immediately if You suspect any consistent unauthorized use of Your account or access to Your password even after changing it.

#### **11. SECURITY:**

We treat data as an asset that must be protected against loss and unauthorised access. We employ many different security techniques to protect such data from unauthorised access by members inside and outside the company/ website. We follow generally accepted industry standards to protect the Personal Information submitted to Us and information that we have accessed. However, “perfect security” does not exist on the Internet. You therefore agree that any security breaches beyond the control of Our standard security procedures are at Your sole risk and discretion.

#### **12. INDEMNITY:**

You agree and undertake to indemnify us against in any suit or dispute by any Third Party arising out of disclosure of Personal Information by You to Third Parties either through Our website/ Application or otherwise and Your use and access of websites, applications and resources of Third Parties. We assume no liability for any actions of Third Parties with regard to Your Personal Information, which You may have disclosed to such Third Parties.

#### **13. SEVERABILITY:**

Each clause of this privacy policy shall be and remain separate from and independent of and severable from all and any other clauses herein except where otherwise expressly indicated or indicated by the context of the agreement. The decision or declaration that one or more of the clauses are null and void shall have no effect on the remaining clauses of this privacy policy.

#### **14. AMENDMENT:**

Our Privacy Policy may change from time to time. Hence we shall post any privacy policy changes on the homepage of the Website/ Application/ notify You by email.

#### **15. DISCLAIMER:**

We cannot ensure that all of Your private communications and other personal information shall never be disclosed in ways not otherwise described in this Privacy Policy. Therefore, although We are committed to protecting Your privacy, We do not promise, and You should not expect, that Your personal information shall always remain private. As a User of the Website/ Application, You understand and agree

that You assume all responsibility and risk for Your use of the Application, the internet generally, and the documents You post or access and for Your conduct on and off the Application.