### **PRIVACY POLICY**

This Privacy Policy sets forth the policy of Rooter Sports Technologies Private Limited ("Rooter, "we", "us" and/or "our"), with regard to the collection and usage of personal information that you may provide to us while using the Rooter mobile application ("App") and related services ("Service"). We encourage you to read this Privacy Policy carefully when using our Service. By using our Service, you are accepting the terms described in this Privacy Policy. We may revise this Privacy Policy from time to time.

Our servers are located in India. Accordingly, if you reside outside India., by using the Service, you acknowledge and agree that your personal information will be transferred to India, and processed and stored in India. By using our Service, you understand that your information may be transferred to us and those third parties with whom we may share your information as described in this Privacy Policy.

#### HOW ROOTER UTILIZES PUBLIC INFORMATION

Our Service analyzes data that is made available publicly through the Internet (i.e. through the users facebook account, twitter account,) in order to measure the passion the user has for sports and based on the assessment of the information gathered we create a score ("Passion Score") and determine for the user topics of interests and games based upon the interest of each user ("User Interests"), including, but not limited to, our registered users. We present some of this data (including a Passion Score and User Interests) on our App. Such data may also be available on other applications/websites, including third party applications/websites, and we may share this data with our third party partners (as described in more detail below). We do not analyze non-public data from private networks (in other words, networks that are password-protected) unless you authorize us to access such data.

### INFORMATION WE COLLECT

We collect "Non-Personal Information" and "Personal Information." Non-Personal Information includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, browser name, technical information and about your means of connection to our mobile application such as the operating system and the Internet service providers utilized and other similar information preferences you submit and number of views. We use this Non-Personal Information to provide you with the Services (for example, to provide push notifications on your mobile device) and pool it with other information to monitor the use of the Services, and for the technical administration of the Services. We will only identify your Non-Personal Information where we are asked to comply with a court order or other legal demand or where we suspect that there has been a violation of our policies, and/or applicable law.

Personal Information is information which can be used it identify you as an individual. We may collect Personal Information in a variety of ways, including, but not limited to, when you

visit our mobile application, register on the mobile application, and in connection with other activities, services, features or resources we make available on our mobile application. You may be asked for, as appropriate, name, email address, password, mailing address, phone number, city and other information that you decide to provide us with, or that you decide to include in your public profile. This information will be included in your Profile. We will collect Personal Information from you only if you voluntarily submit such information to us. You can always refuse to supply Personal Information, except that it may prevent you from engaging in certain App related activities. Providing additional information beyond what is required at registration is entirely optional, but enables you to better identify yourself and enable you to utilize the App in a better manner.

### Geo-Location Data

We receive location information from Other Social Media (as explained hereinbelow) that you enable within the Service and also (with your permission) from your mobile device ("Geo-location Data"). We use Geo-location Data to:

- complete your Rooter profile (for example, to indicate that you are located in New Delhi);
- customize the Service to make them more relevant to you (for example, to show you topics in your area)

### Cookies

In an effort to improve the quality of our App, we track information provided to us by your device when you view or use the App, such as the websites/applications you came from, the type of browser you use, the device from which you connected to the App, the time and date of access, and other information that does not personally identify you. We track this information using cookies, or small text files which include an anonymous unique identifier to enhance your experience. Cookies are sent to a user's browser from our servers and are stored on the user's device for record-keeping purposes and sometimes to track information about them. Sending a cookie to a user's browser enables us to collect Non-Personal information about that user and keep a record of the user's preferences when utilizing our Service, both on an individual and aggregate basis. If they do so, note that some parts of the App may not function properly. We may use both session cookies and persistent cookies to better understand how you use our Services. A session cookie enables certain features of the App and Services and is deleted from your computer when you disconnect from or leave the App. A persistent cookie remains after you close the App and may be used by your device on subsequent visits to the App. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent.

### **USE OF INFORMATION**

We use the Personal Information you provide in a manner that is consistent with this Privacy Policy. We will use your Personal Information in order to provide you with access to and use of our Service, to help us improve the content and functionality of the Service and to better understand our users. If you contact us by email through the Service, we may keep a record of your contact information and correspondence, and may use your email address, mobile number and any information that you provide to us in your message, to respond to you. In addition, we may use your contact information to market to you, and provide you with information about our products and services and the products and services of our partners that we believe may be of interest to you. If you decide at any time that you no longer wish to receive such marketing information or communications from us, please follow the unsubscribe instructions provided in any of the communications.

We also use your Personal Information (e.g., your name or Rooter username), your Passion Score, Profile, connected networks, User Interests, top moments, information summarizing or derived from this information (collectively "Rooter Data"), and/or the raw data used to calculate Rooter Data collected both prior to and after your registration with Rooter, to analyze and use for the following purposes: (i) product and technology development and enhancement; (ii) identifying target markets for marketing and advertising; (iii) analyzing and prioritizing social media interactions, including responses to posted content; (iv) searching for, locating and providing content relevant to specific individuals' interests; and, (v) other general market analysis.

Further, in an ongoing effort to better understand and serve the users of our Service, we also often conduct research on its customer demographics, interests and behavior based on the Personal Information and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and we may share this aggregate data with our affiliates, agents, advertisers and business partners. This aggregate information does not identify you personally. We may also disclose aggregated user statistics in order to describe our Service to current and prospective business partners, and to other third parties for other lawful purposes (including providing advertising use cases to actual or potential advertisers).

### INFORMATION SHARING AND DISCLOSURE

We consider your information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your Personal Information with certain third parties without further notice to you, as set forth below.

Identifying You and Sharing Information on the App

Your Rooter Data is publicly viewable on our Services and on any network to which you connect your Rooter account.

Service Providers

We engage certain trusted third parties to perform functions and provide services to us, including, without limitation, hosting and maintenance, customer relationship, database storage and management, and direct marketing campaigns. We will share your Personal

Information with these third parties, but only to the extent necessary to perform these functions and provide such services.

#### Partners

From time to time, we may partner with third parties to improve your experience on the App. If you provide Personal Information to them directly, please be aware that the privacy policy of such partners will govern their use of your Personal Information.

Furthermore, in connection with the operation, promotion, advertising or marketing of our Services, we provide to certain third party networks your Personal Information (e.g., your name or username), Rooter Data (as defined above) and/or the raw data used to calculate Rooter Data, to analyze and use for the following purposes: (i) product and technology development and enhancement; (ii) identifying target markets for marketing and advertising; (iii) analyzing and prioritizing social media interactions, including responses to posted content; (iv) searching for, locating and providing content relevant to specific individuals' interests; and, (v) other general market analysis. Such data may be provided through access to our application programming interfaces ("APIs") or other electronic transfer methods.

### Other Social Media

You can choose to access certain third party social media applications and services through our Service (such as Twitter or Facebook) ("Other Social Media"). When you do so, you are sharing information with these Other Social Media, and the information you share will be governed by their privacy policies and terms of service. You may also be able to modify your privacy settings with these Other Social Media, for example, control what information the Other Social Media disclose to third party services like Rooter. When you add Other Social Media accounts to the Service or sign into the Service using your Other Social Media account, we will collect relevant information necessary to enable our Service to access that Other Social Media, but you will provide your sign in information, like your password, directly to such Other Social Media (and not to us). As part of such integration, the Other Social Media will provide us with access to certain information that you have provided to such Other Social Media, and we will use, store and disclose such information in accordance with this Privacy Policy and, if and to the extent applicable, the policies of such Other Social Media Service. In addition, we may provide certain information about you or your activities on the Service, or that you have otherwise provided to us, to such Other Social Media Service as part of such integration (including information that may be used by such Other Social Media to personalize ads for you). However, please remember that the manner in which Other Social Media use, store and disclose your information is governed by the policies of such third parties, and we shall have no liability or responsibility for the privacy practices or other actions of any Other Social Media that may be enabled within the Service.

# Disclosures required under law

In response to a verified request by a law enforcement agency or a court relating to a criminal investigation or alleged illegal activity or if we believe in good faith that it is essential to protect and defend our rights or property protect and/or protect us against legal liability, we can (and you authorize us to) disclose your Personal Information without notice in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity.

### Security

We implement security measures designed to protect your Personal Information from unauthorized access. Your account is protected by your account password and we urge you to take steps to keep your Personal Information safe by not disclosing your password and by logging out of your account after each use.

## Links to Other Websites/Applications

Our Services contain links to other websites/applications. The fact that we link to a website/application is not an endorsement, authorization or representation of our affiliation with that third party. We do not exercise control over third party websites/applications. These other websites/applications may place their own cookies or other files on your device, collect data or solicit personally identifiable information from you. Other websites/applications follow different rules regarding the use or disclosure of the personally identifiable information you submit to them. We encourage you to read the privacy policies or statements of the other websites/applications you visit.

### **OUR POLICY TOWARDS CHILDREN**

If a parent or guardian becomes aware that his or her child has provided us with Personal Information without his/her consent, he or she should contact us at piyush@rooterapp.com. We do not knowingly collect Personal Information from persons under 18. If we become aware that a person under 18 has provided us with Personal Information, we will delete such information from our files. If you are under the age of 18, please do not submit any Personal Information through the Service. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Information via the Service without their permission.

### CHANGES TO THIS PRIVACY POLICY

We will occasionally update this Privacy Policy to reflect changes in our practices and services. When we post changes to this Privacy Policy, we will revise the "Last Updated" date at the bottom of this page. If we make any material changes in the way we collect, use and/or share your Personal Information, we will notify you by sending an email to the email address you most recently provided us in your account, profile or registration. We

recommend that you check our website from time to time to inform yourself of any changes in this Privacy Policy or any of our other policies.

### **GOVERNING LAW**

This Privacy Policy shall be governed by the laws of India and the courts in Delhi shall have the exclusive jurisdiction.

## **GRIEVANCE OFFICER**

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below:

Name: Mr. Piyush

e-mail address: <a href="mailto:piyush@rooterapp.com">piyush@rooterapp.com</a>

# **CONCERNS AND QUERIES**

If you have any concerns or comments about this Privacy Policy or our use of your personally identifiable information, please contact us at <a href="mailto:piyush@rooterapp.com">piyush@rooterapp.com</a>.

Last Updated: [insert date]