

UNIDEL Privacy Policy

Last Updated

The UNIDEL Privacy Notice was updated on December, 2017.

UNIDEL Corporation and its venture companies ("UNIDEL", "we", "us" and "our") respect your privacy. This Privacy Notice describes our privacy practices regarding the collection, use, and disclosure of your information through UNIDEL's web sites, products, online services, software, apps, tools, and other services and functionality we provide both online and offline (collectively referred to as "UNIDEL Services"), along with our marketing and advertising practices.

Some UNIDEL Services use cookies and similar technologies to access or store information. Specific information about how we use cookies, how we respond to Do Not Track signals, and how you can refuse certain cookies, is set out in our cookies guidelines.

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1. INFORMATION COLLECTION

Personal Information We May Collect

UNIDEL may collect various types of personal information, including:

- Personal and business contact information (such as name, billing and shipping address, phone number, email address, and social media/messaging account ID)
- UNIDEL Account ID
- Profile picture
- Social media postings and information
- Payment card, digital wallet, or other payment service information
- Depending on the service we are providing to you we may also need to collect more sensitive personal information (such as location, government-

issued identification, photographs, audio/video recordings, images, and biometrics) directly from you

If you submit any personal information about other people to us or to our service providers, you represent that you have the authority to do so and to permit us to use their personal information in accordance with this Privacy Notice.

We and our partners may collect personal information from a variety of sources, including:

- **From you or someone acting on your behalf:** We may collect personal information you or someone acting on your behalf shares with us such as your name and contact details.
- **Through the UNIDEL Services:** We may collect personal information about you when you use UNIDEL Services, for example, when you sign up for a newsletter, make a purchase, or use or install our products or apps.
- **Through Third Parties' Services:** We may collect personal information about you when you use third party services that utilize the UNIDEL Services.
- **Offline:** We may collect personal information you provide to us offline, such as when you visit our stores, attend one of our trade shows or events, place a verbal order over the phone or contact customer services.
- **From Other Sources:** We may collect your personal information from other sources, such as public databases, joint marketing partners, and social media platforms. We may also receive your personal information from people with whom you are "friends" or otherwise connected on social media platforms. For example, if you elect to connect your social media account to your UNIDEL Services account, certain personal information from your social media account will be shared with us. Such information may include personal information that is part of your social media profile or your friends' profiles. Similarly, if your social media "friends" connect their social media account to their UNIDEL Services account, information about you may be shared with us via this "friend" connection.

Other Information We May Collect

UNIDEL may also collect other information from your app, browser, or device that does not reveal your (or anyone else's) real world identity, for example:

- Browser and device information
- App or device usage data
- Information collected through cookies, pixel tags, and similar technologies
- IP address
- Location data
- Aggregated, anonymized, or de-identified information
- Demographic information and other information provided by you (i.e., language, occupation, postal code).

We and our third-party service providers may collect this information in a variety of ways, including:

- **Through your browser or device:** Most browsers and devices collect certain information automatically, for example, type and version of operating system, screen resolution, device manufacturer and model, language, Internet

browser type and version, and the name and version of the UNIDEL Services (such as the app) you are using. We use this information, for example, to make sure that the UNIDEL Services function properly, analyze the performance of our products, and improve and maintain the UNIDEL Services.

- **Through your use of an UNIDEL app:** When you download and use an UNIDEL app, we and our service providers may track and collect usage data, such as the date and time the UNIDEL app on your device accesses our servers and what information and files have been downloaded to the UNIDEL app.
- **Through cookies and similar technologies:** We use cookies to make our web sites operate, work more efficiently, and provide analytic information. Technologies similar to cookies are also used in connection with some UNIDEL Services, such as pixel tags, web beacons, clear GIFs, JavaScript, and local storage.
- **IP Address:** IP addresses are automatically transmitted as part of any Internet communication, and collecting IP addresses is a common practice; many web sites, applications and other UNIDEL Services collect IP addresses automatically. We use IP addresses for purposes such as communicating with your device, calculating usage levels of the UNIDEL Services, helping diagnose server problems, security, and administering the UNIDEL Services.
- **Location Data:** We may collect the physical location of a connected device, for example, using satellite, cell phone tower, and WiFi signals. We may use your device's physical location to provide you with personalized location-based UNIDEL Services, content, and advertising. We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. You can choose whether to allow or deny uses and/or sharing of your device's location by changing your device settings, but if you choose to deny such uses and/or sharing, we and/or our marketing partners may not be able to provide you with the applicable personalized UNIDEL Services, content, and advertising.

2. NOTICE

We provide access to our Privacy Notice by:

- Linking to it throughout our websites
- Referencing it in our Terms of Use, End User License Agreement
- Incorporating it into our contracts, agreements, and other documents as necessary or appropriate

3. INFORMATION USE AND DISCLOSURE

How We May Use and Disclose Personal Information

We may use personal information:

- To provide UNIDEL Services.
- To respond to your inquiries and fulfill your requests, such as to send you technical documents or whitepapers.

- To send you marketing communications that we believe may be of interest to you, such as newsletters, in accordance with your communication preferences.
- To personalize your experience on the UNIDEL Services by presenting products, marketing messages, offers, and content tailored to you.
- To allow you to participate in surveys, sweepstakes, contests, and similar promotions and to administer these activities. Some of these activities have additional rules, which could contain more information about how we use and disclose your personal information, so we suggest that you read these rules carefully.
- To allow you to send messages to a friend through the UNIDEL Services. By using this functionality, you are telling us that you are entitled to use and provide us with your friend's contact information.
- To complete and fulfill your purchase, for example, to process your payments, have your order delivered to you, communicate with you regarding your purchase, provide you with related customer service, and establish and manage your UNIDEL accounts.
- For our business purposes, such as data analysis, audits, crime/fraud monitoring and prevention, security, developing new products, testing, enhancing, improving or modifying our UNIDEL Services, identifying usage trends, determining the effectiveness of our promotional campaigns, and operating and expanding our business activities.
- Perform accounting, auditing, billing, reconciliation, and collection activities. To send administrative information and service notifications to you, for example, information regarding the UNIDEL Services and changes to our terms, conditions, and policies.
- Perform other activities consistent with this Notice.

Personal information may be shared or disclosed:

- To our affiliate entities and subsidiaries for the purposes described in this Privacy Notice.
- To our authorized service providers and suppliers who provide services to us such as web site hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, credit card processing, auditing and other similar services.
- To third parties to permit them to send you marketing communications, as permitted under applicable law and in accordance with your communication preferences.
- To third party sponsors of sweepstakes, contests, and similar promotions.
- To identify you to anyone to whom you send messages through the UNIDEL Services.
- By you, on message boards, forums, chat, profile pages and blogs to which you are able to post information and materials. Please note that any such information you post or disclose in public forums will become public information, and may be available to users and to the general public. We urge you to be very careful when deciding to disclose your personal information, or any other information, online.
- To a third party in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

- As we believe is required, necessary, or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process and/or to respond to requests from competent public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations and those of any of our affiliates; (f) to protect our rights, privacy, security, safety, and physical and UNIDELlectual property, and/or the rights of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

How We May Collect, Use and Disclose Other Information

Please note that we may collect, use, and disclose other information obtained through cookies in accordance with our cookies policy. In some instances, we may combine other information with personal information (such as combining your name with your postal code). If we combine any other information with personal information, we will treat the combined information as personal information as long as it is combined and is personally identifiable.

Product Updating and Reporting

Our products and services may also process certain data to provide software updates and reports. These update functions may automatically check your system to see whether files relating to the services need to be refreshed, updated, or modernized.

UNIDEL may also use the information to adapt the product to conform to user preferences based on actual use.

4. THIRD-PARTY SERVICES

This Privacy Notice does not address, and we are not responsible for, the policies and practices of third parties or other organizations that are not UNIDEL service providers, including policies and practices related to privacy and security, data collection, processing, use, storage, and disclosure. This includes: (a) any third party operating any site or service to which the UNIDEL Services link – the inclusion of a link on the UNIDEL Services does not imply endorsement of the linked site or service by us or by our affiliates; or (b) any app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer (such as Facebook, Apple, Google, Microsoft, LinkedIn, etc.) - including any personal information you disclose to other organizations through or in connection with the UNIDEL Services or our Social Media Pages. For example, we may use and direct you to a third-party payment service to process payments made through the UNIDEL Services. If you wish to make such a payment, your personal information may be collected by such third party and not by us, and will be subject to the third-party's privacy policy, rather than this Privacy Notice.

When we share personal information with an UNIDEL service provider, we require that they first contractually agree to comply with reasonable and appropriate privacy and security standards.

5. THIRD-PARTY ADVERTISERS

We may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the

UNIDEL Services and other web sites, based on information obtained, for example, through cookies and similar technologies relating to your access to and use of the UNIDEL Services and other web sites. Please refer to our cookies policy on how we use cookies and how you can disable certain cookies.

UNIDEL does not share your personal information with non-affiliated third parties for their own marketing use without your permission.

6. SECURITY

The UNIDEL Services are designed to provide reasonable and appropriate organizational, technical, and administrative measures to protect personal information within our organization against unauthorized or unlawful access, alteration, disclosure, or destruction. Users of UNIDEL Services must also do their part in protecting the data, systems, networks, and service they are utilizing. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that your password to any UNIDEL account has been compromised), please immediately notify us by contacting us in accordance with the “*Contact Us*” section below.

7. MARKETING PREFERENCES

We give you many choices regarding our use and disclosure of your personal information for marketing purposes. You may update and request access to your contact details and communication preferences by using one of the following methods: visit the specific product or service web site; use the “unsubscribe” link, or send a letter to the postal address below. You may choose to update your communication preferences for the following types of marketing activities:

- To accept or refuse receiving marketing-related messages from us in the future.
- To accept or refuse our sharing of your personal information with affiliates and subsidiaries so that they may market directly to you.
- To accept or refuse our sharing of your personal information with non-affiliated third parties so that they may market directly to you.

You can also unsubscribe from UNIDEL marketing-related messages by following the unsubscribe instructions included in each marketing-related message sent to you. We will comply with your request(s) as soon as reasonably practicable. Please also note that if you do choose not to receive marketing-related emails from us, we may still send you important administrative and transactional messages (i.e., service notifications) about your UNIDEL Services.

8. HOW YOU CAN MANAGE YOUR PERSONAL INFORMATION

If you would like to correct, update, delete, or request access to the personal information that you have provided to us, you may contact us by: visiting the specific product or service web site; or sending a letter to the postal address below including your name, email address, account identification, and purpose of the request.

For your protection, we will only implement requests with respect to personal information about you (not anyone else), and we may need to verify your identity before implementing your request. We will comply with your request as soon as

reasonably practicable and in accordance with applicable law. We may need to retain certain information for recordkeeping purposes, as required under applicable legal obligations, and/or to complete any transactions that you began prior to requesting such change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the personal information provided until after the completion of such purchase or promotion). Some of your information may remain within our systems and other records, in compliance with applicable law.

Storage of the information we collect from you

The information we collect may be stored and processed in servers in the United States and wherever UNIDEL and our service providers have facilities around the globe and in accordance with local laws.

9. RETENTION PERIOD

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

10. USE OF UNIDEL SERVICES BY MINORS

We comply with the Children's Online Privacy Protection Act of the United States and similar laws around the world where applicable to UNIDEL Services. We do not knowingly collect personal information from children without proper parental consent. If you believe that we may have collected personal information from someone under the age of thirteen (13), or under the applicable age of consent in your country, without parental consent, please let us know using the methods described in the Contact Us section and we will take appropriate measures to investigate and address the issue promptly.

12. CONTACT US

If you have questions or concerns about UNIDEL's privacy practices, you can contact us by using the contact us or send a letter to the postal address listed below. Please include your contact information, name of the UNIDEL Service or website, and a detailed description of your request or privacy concern.

UNIDEL Group

ATTN: Privacy Office
86, Jolly Maker Chamber II

225, Nariman Point,

Mumbai – 400 021

13. SUPPLEMENTS AND ADDITIONAL NOTICES

Some UNIDEL Services may have additional Notices about how such products and services process Personal Information. Please refer to the relevant Notice for the UNIDEL Service you are using for additional information about how UNIDEL processes Personal Information.

14. UPDATES TO THIS PRIVACY NOTICE

We may change this Privacy Notice. The “*Last Updated*” section at the top of this page states when this Privacy Notice was last revised. Any changes to this Privacy Notice will become effective when we post the revised Privacy Notice on the UNIDEL Services. Your use of the UNIDEL Services following these changes means that you accept the revised Privacy Notice.

If any change may materially and negatively affect the privacy of your personal information, we will use reasonable efforts to notify you in advance and give you a reasonable period of time to object to any changes.

We encourage you to periodically review this Privacy Notice to stay informed about how we collect, use, and share personal information.