# Privacy Policy

TALEN promises to maintain the privacy of members’ personal information.

Privacy and the protection of personal information are fundamentally important values for TALEN. We work hard to keep you account secure and safeguard your personal information in order to protect you from potential physical or financial harm. You should not post personal or confidential information about others without first getting their consent. We also provide people with ways to report imagery that they believe to be in violation of their privacy rights.

This privacy policy forms part of our application’s Terms of Service, by accepting the [Terms of Service](https://www.my11circle.com/terms-of-service.html) and the Privacy Policy on the registration page, you consent to provide sensitive personal data or personal information and are aware of the purpose of sharing such information. Please do not register if you do not wish to share the mandatory personal information with TALEN requested at the time of registration. Registration procedure cannot be completed until information in the non-optional fields is provided. Certain additional personal information may be requested by TALEN for permitting you access to any Contest organized by TALEN.

## 1. Policy objective

TALEN respects your privacy and assures you that any information provided by you to TALEN is protected and will be dealt with according to this Policy and the applicable laws. To avail the services offered on TALEN, you may have to provide certain information to us. This Policy provides the procedure followed by TALEN to gather, uses, store, discloses and manages users' personal data. TALEN only collects personal data for the purpose of verifying user accounts, maintaining the accounts of the users, completing transactions of the users and for analyzing user behavior and requirements.

## 2. What is included in personal data?

User's personal data includes the following types of personal data or information:

**1. Sensitive Personal Data for payment transactions:**

* Account password
* Financial information such as Bank account or credit card or debit card or other payment instrument details

**2. Other Personal Information:**

* Name
* Date of birth
* Mobile number
* Postal/Contact address
* PAN number (as applicable)
* The IP address of your computer, browser type and language.
* The date and the time during which you accessed the site.
* The address of the website which you may have used to link to the Website
* Your photograph for testimonials and other promotions.
* Such other information that is defined as sensitive personal data or information in law.

You shall be entitled to update the information provided by you by contacting us at contact us page of TALEN. Your information shall be updated subject to reasonable checks and confirmation by TALEN.

## 3. User Consents:

User's personal data includes the following types of personal data or information:

### 1. Consent for use of Sensitive Personal Data and Other Personal Information:

All users of TALEN consent to the use of Sensitive Personal Data and Other Personal Information for the purpose stated in this policy. We restrict access of personal information to our employees, contractors and agents and only allow access to those who need to know that information in order to process it on our behalf.

Users are entitled to withdraw consent for use of their **Sensitive Personal Data or Other Personal Information** by emailing a specific request to **support@TALEN.com** or as the case may be. Withdrawal of consent of all or any part of Sensitive Personal Data and Other Personal Information may result in immediate withdrawal of any right to avail the services provided by TALEN. Withdrawal of consent shall not restrict the right of TALEN to use Other Personal Information for analysis of user data, subject to the condition that the Other Personal Information used in any analysis is not personally identifiable to any individual user.

Photographs once provided by you for marketing purposes gives TALEN irrevocable rights to use it and it is completely TALEN discretion to delete or not use it any further.

TALEN may also use software applications for traffic analysis and to gather statistics, used for advertising and for determining the efficacy and popularity of TALEN among others.

Presently, TALEN is using display advertising and remarketing through Google Analytics, wherein third party vendors including google, display our ads on sites across the internet and uses first party cookies and third party cookies together to inform, optimize and serve ads based on visits of visitors to our website. Our visitors are free to opt out of Google Analytics for display advertising and customize google display network ads using ads preference manager.

### 2. Consent to use of Cookies:

What is a Cookie: A cookie is a small text file that uniquely identifies your browser?

You understand that when you visit the application, cookies may be left in your computer. The cookies assigned by the servers of TALEN may be used to personalize your experience on the application. Additionally, cookies may also be used for authentication, contest management, data analysis and security purposes.

Cookies may also be assigned by the advertisers of TALEN when you click on any of the advertisements which may be displayed on any Website in which case such cookies are controlled by these advertisers and not TALEN.

### 3. Consent to email communication:

When you register your email address with TALEN, you agree to receive email communication from TALEN, entities specifically authorized by Play TALEN, and other users.

## 4. Data Security:

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data. TALEN has a comprehensive information security program and information security policies which contain managerial, technical, operational and physical security control measures adopted by TALEN for the protection of Sensitive Personal Data and Other Personal Information.

Information gathered by TALEN is stored securely using several information security applications. However, security is always relative and TALEN cannot guarantee that its security measures are absolute and cannot be breached. Data which is transmitted over the Internet is inherently exposed to security risks or threats. For instance, information transmitted via chat or email can be compromised and used by others. Therefore, TALEN cannot guarantee any security for such information in the course of transmission through the internet infrastructure or any unsolicited disclosures made by any user availing the services of the application.

When you register with TALEN, your account is protected by means of login information which includes a username and a password that is known only to you. Therefore, you should not provide your personal information to anyone whosoever and breach hereof constitutes violation of this Policy and can also result in closure of account in certain cases. If you become aware of or reasonably suspect any breach of security, including compromise of your login information, it is your responsibility to immediately notify TALEN.

The application may contain links to other websites or applications. Such websites/application are governed by their own privacy policies and TALEN does not exercise any control over them. It is your responsibility to read and understand the privacy policy of such websites/application when you follow a link outside the Website. You are advised to exercise caution in sharing any personal information with any third party that advertises on the Websites/application and TALEN shall not be responsible for such information provided by you on third party websites.

TALEN has a policy of not sharing any personally identifiable information with anyone other than entities specifically authorized by TALEN which may include advertisers and sponsors of TALEN. However, TALEN may use your name, photo, Login ID and the state from where you are participating when announcing the results of any contests run on the application. Such contests are further governed by terms and conditions which shall be available on the application as and when such a contest is run on any website/application. TALEN reserves the right to share your registration information with TALEN appointed market research and advertising companies or firms from time to time for the said purposes. TALEN may also use cumulative non-personal information for auditing and analysis purposes with the aim of improving its services.

## 5. Data Retention policy:

TALEN shall retain the information provided by the users for such period of time as is required to fulfil the purposes for which such information is collected, as outlined in this Privacy Policy, subject to such longer time periods of retention as may be required under any applicable laws.

## 6. Exclusions:

TALEN may share Sensitive Personal Data and Other Personal Information if sharing of such information is necessary:

* to comply with legal processes or governmental request;
* to enforce the Terms of Service and this Privacy Policy;
* for prevention of fraud;
* for issues involving information security, or
* to protect:
  + your rights;
  + rights of online contests; and
  + rights of the general public.

## 7. Limitation of Liability:

TALEN confirms that this Privacy Policy is only a description of its operation regarding user information. This Policy is not intended to and does not create any legal rights in your favour or in the favour of any other person. TALEN reserves the right to change this Policy at any time without giving you prior notice. The liability of TALEN shall be limited to removal of Sensitive Personal Data from the system of the application and removal of personally identifiable elements of the Other Personal Information. Notwithstanding anything to the contrary contained in this Policy and elsewhere, the aggregate liability of TALEN for all claims for damages pursuant to provisions of services on the application, including claims in respect to the violation of this Policy, shall be limited to the aggregate maximum amount of liability as provided in the Terms of Service.

## 8. Support Team:

TALEN currently appoints Mr. Varun kumar, Mr. Arun kumar, Mr. Thansingh and Mrs. Sujata as the Grievance Officers. All complaints relating to personal data must be sent to the support team at [support@](mailto:support@)[TALEN.com](mailto:grievanceofficer@rummycircle.com)