



OVS INDIA RETAIL PRIVATE LIMITED

PRIVACY POLICY

1. SCOPE OF THIS POLICY

1.1 This Privacy Policy (“Policy”) is an electronic record in the form of an electronic agreement formed under the applicable law. This Policy does not require any physical, electronic, or digital signature. This Policy is a legally binding document between you (“Visitor”/ “User”) and OVS INDIA RETAIL PRIVATE LIMITED (“Company”, “Platform”, “we”, “us”, and “our”). We collect and process your personal data and third-party data carefully, only for the purposes described in this Policy and the associated T&Cs, and only to the extent necessary as defined herein and within the scope of the applicable legal regulations. This Policy seeks to ensure that any personal information or third-party information handled by the Company is managed in a way that is ethical, compliant, and adheres to best industry practices.

1.2 This Privacy Policy governs the processing of personal data collected in connection with the Loyalty Programm “OVS FRIENDS” as well as for any further online and offline business operations carried out by the Company, both offline and online including enrollment, participation, point accumulation, redemption of benefits, and related promotional benefits.

1.3 PLEASE READ THIS PRIVACY POLICY CAREFULLY, BEFORE ACCESSING OR USING THIS WEBSITE/MOBILE APPLICATION (TOGETHER COLLECTIVELY REFERRED TO AS THE “PLATFORM”), TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR PERSONAL DATA AND HOW WE WILL TREAT IT BY ACCESSING OR USING THIS PLATFORM, INCLUDING OUR SERVICES, YOU AGREE AND ACCEPT THE TERMS OF THIS POLICY, AND YOU UNDERSTAND AND AGREE TO THE COLLECTION, USE, SHARING AND PROCESSING

OVS INDIA RETAIL PRIVATE LIMITED

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OF PERSONAL DATA IN THE MANNER DESCRIBED HEREIN. IF YOU ARE ACCEPTING THIS POLICY ON BEHALF OF ANOTHER PERSON, YOU REPRESENT AND WARRANT THAT YOU HAVE FULL AUTHORITY TO BIND SUCH PERSON TO THESE TERMS.

- 1.4** This Privacy Policy is published in accordance with Rule 3(2) of the Information Technology (Intermediaries Guidelines and Digital Media Ethics Code) Rules, 2021 (“Intermediaries Guidelines”), in consonance with the Information Technology Act, 2000, and any other applicable laws.
- 1.5** **Our Policy describes the types of Information we collect, why and how we use the Information, with whom we share it, and the choices you can make about our use of the Information.** It also tells you how you can access and update your Information and make certain choices about how your Information is used. **We also describe the measures we take to protect the security of the Information and how you can contact us about our privacy practices.**
- 1.6** **This Policy describes the Company’s** current data protection policies and practices and may be amended/updated from time to time. Any changes to this Policy will become effective upon posting of the revised Policy on the Platform. We suggest that you regularly check this Policy to apprise yourself of any updates. Your continued use of the Platform or provision of Data or Information thereafter will imply your unconditional acceptance of such updates to this Policy.

2. CONSENT

- 2.1** By mere use of the Platform as well as for the purposes of availing our Services or for engaging with us, you expressly consent to the Company’s use and disclosure of your Personal Data/Information (as defined below), and third-party information in accordance with this Policy. If you do not agree with the terms of this Policy, please do not use this Platform. This Policy shall be deemed to be incorporated into the

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terms and conditions governing the use of the Platform (“T&Cs”) and shall be read in addition to those T&Cs.

3. APPLICABILITY

3.1 This Privacy Policy applies to all of the Services offered by the Company and its Affiliates, agents, representatives, contractors, employees, including the Services offered on third-party sites, such as advertising services. This Privacy Policy does not apply to services that have separate privacy policies that do not incorporate this Privacy Policy. Our Privacy Policy applies to all the Visitors/Users and others who access our Platform.

3.2 This Privacy Policy does not apply to—

- (i) The information practices of other companies, consultants, or organizations that advertise our Services;
- (ii) Services offered by other companies or individuals, including sites that may include the Company’s Services, be displayed to you in search results, or be linked from our web pages/mobile application.

4. DEFINITIONS

4.1. Personal Data or Information: ‘Personal Data/Information’ means any information relating to an identified or identifiable natural person (“**Data Subject**”/ “**Visitor**”/ “**User**”), including their name, email address, mobile number, geographical address, etc. We limit our collection of Personal Data/Information to that which is necessary for its intended **purpose**.

4.2. Non-Personal/Non-Business Data/Information: ‘Non-Personal Information’ or ‘Non-Business Information’ means information that does not specifically identify an individual (“**Visitor**”/ “**User**”), but includes information collected from you, such as your browser type, the URL of the previous websites you visited, your

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Internet Service Provider (ISP), operating system and your Internet Protocol (IP) address. The Company may gather any Non-Personal/Non-Business Information regarding how many people visit this Platform, the pages they visit, their IP address, the type of browser they used while visiting the Platform, and database interaction of login mechanism, such as login time, logout time, and in-between interactions on the Platform (hereinafter referred to as **“Non-Personal Information”/ “Non-Business Information”**). Non-Personal/Non-Business Information may also include: (a) information that you voluntarily provide, such as information included in response to a questionnaire, or a survey conducted by the Company; and (b) information generated by the Company based on analytics derived from the usage of our Platform.

4.3. Sensitive Personal Data or Information (“SPDI”): ‘Sensitive Personal Data or Information’ of a person means such personal information which consists of information relating to—

- (i) Password.
- (ii) OTP for logging onto the Platform.
- (iii) financial information such as Bank account details, or credit card/debit card/other payment instrument details used for ordering any Service(s) on the Platform.
- (iv) Transaction history on our Platform, including the date, time, and amount of transaction successfully completed on our Platform.
- (v) OTP for processing and finalizing the transaction/payment in response to the purchase of any Service(s).
- (vi) Gender and any such other information for the purpose of providing our Services or for collecting, processing, using, and storing the data under a lawful contract or otherwise.

Provided that any information that is freely available or accessible in the public domain or furnished under the applicable law for the time being in force shall not be regarded as Sensitive Personal Data or Information for the purposes of this Policy.

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- 4.4. Information:** ‘Information’ means Personal Data/Information, Non-Personal Data/Information, and Sensitive Personal Data/Information.
- 4.5. Data Subject:** ‘Data Subject’ means an identifiable natural person intending to avail our Services, and who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number (government-issued national identity card, in case of an individual), geographical data, an online identifier, or to one or more other factors specific to the identity of that natural person. It shall include all the persons who visit or register on our Platform, including our customers, Users, Visitors, and others who access or interact with our Platform.
- 4.6. ‘Consent’ of the Data Subject:** ‘Consent’ of the Data Subject means any freely given, specific, informed, and unambiguous indication of the Data Subject’s wishes by which he or she or they, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data and/or Sensitive Personal Data/Information relating to him or her or them.
- 4.7. Processing:** ‘Processing’ means any operation or set of operations which is performed on Personal and Sensitive Personal Data or on sets of Personal and Sensitive Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 4.8. Restriction of Processing:** ‘Restriction of Processing’ means the marking of stored Personal/Non-Personal Data with the aim of limiting their processing in the future.
- 4.9. Recipient:** ‘Recipient’ means a natural or legal person, public authority, or another body, to which the Personal and/or Sensitive Personal Data are disclosed, whether a third party or not. However, public authorities that may receive Personal Data in the framework of a particular inquiry in accordance with the applicable law shall not be regarded as Recipients; the processing of that data by those public authorities shall

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be in compliance with the applicable data protection rules according to the purposes of the processing.

4.10. Personal Data or Sensitive Personal Data Breach: ‘Personal/Sensitive Personal Data Breach’ means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data or Sensitive Personal Data transmitted, stored, or otherwise processed.

4.11. User: ‘User’ may include any person using our Platform, filling out the ‘Login’, ‘Sign Up’, and ‘Contact Us’ information form on our Platform, and shall include any of our clients, whether existing or potential, or future.

4.12. User Account: ‘User Account’ means the account of the User on the Platform, for the purpose of accessing and utilizing our Services, including but not limited to viewing, accessing, browsing, and ordering the Service(s) through the Platform.

5. INFORMATION COLLECTED BY THE COMPANY

5.1 To contact you through our Platform, we must process information about you. Most of the Personal Information we process is provided to us, specifically, voluntarily, and directly by you for availing our Services.

5.2 The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

5.3 We may collect information to communicate with all our Users. The following data is collected, preserved, and used by us, for specific purposes only, solely at your instance, for the purpose of providing you with the intended Services as requested/obtained by you—

- (i) Full Name;

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- (ii) E-mail address;
- (iii) Mobile Number;
- (iv) Geographical Address along with Pin Code;
- (v) User ID and Password (“Login Credentials”), if you create a User Account on the Platform;
- (vi) OTP for registering/logging into the Platform;
- (vii) Billing information, such as shipping address of the recipient, credit or debit card number, verification number, and expiration date, at the time of making the payment towards the order placed by you;
- (viii) Information about purchases on the Platform;
- (ix) Information about your customer service interactions on the Platform;
- (x) Demographic information such as your address, date of birth, or other information you choose to provide as part of your profile/User Account;
- (xi) Any Data provided over calls made or chats/discussions entered into with and through the Company;
- (xii) User-generated content, such as when you comment on the Platform, or submit your review/feedback in respect of the Services, or respond to a survey request, review a class, or participate in the public forums;
- (xiii) Any Information received via any application form or e-mail or any other electronic medium, including your use or access to any social media site (Facebook, Instagram, Twitter, etc.) which you have signed in using your email address provided to Us;
- (xiv) Any other additional Information, as may be needed, for the purpose of providing our Services or for processing or storing the data under any lawful contract or otherwise.
- (xv) Without prejudice to the above, we do not knowingly collect personal information from people under the age of 13. We will take immediate steps to delete such Account Information as soon as it is detected.

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5.4 Even if you do not register on our Platform, you might choose to provide us with Information, like an e-mail address and/or phone number, to receive updates about our Services, and promotions.

6. INFORMATION COLLECTED AUTOMATICALLY BY THE COMPANY

6.1 When you visit our participating stores or use our Platform, subscribe to our newsletters or otherwise interact with us through our Platform, in addition to the information you provide to us directly, we may collect information sent to us by your computer, mobile phone, or other access device(s).

6.2 When you visit our Platform, certain information is collected automatically on our servers, which helps us to provide you with verified access to our service portal. The information we collect automatically includes—

- (i) Unique identifiers, browser type, and settings;
- (ii) Device identifiers and features, such as type and settings, operating system, mobile network information, including ISP or carrier name and phone number, and application version number. Most devices allow Users to prevent location data from being sent to a third party. The Company will honour such user settings.
- (iii) Referring website, your general geographic location as indicated by your IP address, web-browsing behaviour, app behaviour, and whether and how you interact with content available on our website and/or within our mobile application;
- (iv) Any information collected when visiting or leaving our Platform in general, through plugins or cookies, including the—
 - (a) URL of the site the User came from and the one he/she go to next;
 - (b) General location information (IP address, city/state, and or postal code associated with an IP address);
 - (c) Proxy server;
 - (d) Operating system;

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- (e) Web browser and add-ons;
 - (f) Device identifier and features, and/or ISP or the mobile carrier;
 - (g) Transactional SMSs/emails;
 - (h) Your prior search results;
 - (i) Log-in time and Log-out time;
 - (j) Number of clicks;
 - (k) Pages viewed and the order of those pages; and
 - (l) Such other similar information about how you use the Platform, all of which may or may not be publicly accessible.
- (v) Your device periodically contacts our servers to provide information about your device and connection to our Services. This information includes your device type, carrier name, crash reports, and which applications you have installed.
- (vi) We use different methods to collect the aforementioned information, including our own cookies, web beacons, and third-party cookies.

7. INFORMATION WE COLLECT FROM OTHER SOURCES

We may receive additional information, such as demographic and statistical information, from third parties, such as business partners, marketers, researchers, analysts, and other parties that we may attribute to you based on your assignment to certain statistical groups. We use this information to supplement the information that we collect directly from you in order to derive your possible interests and to provide more relevant experiences for you and improve our products, analytics, and advertising.

8. COLLECTION OF PERSONAL DATA AND SENSITIVE PERSONAL DATA

We collect only the Personal Data and Sensitive Personal Data you provide to us directly and specifically, subject to your consent, for the purposes of availing our complete Services along with a smooth user experience.

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We may collect information from you when:

- (i) you submit the same voluntarily, such as your full name, e-mail address, mobile number, birth date, residential address (including postal code) for purposes of enrolment, participation, benefit redemption, or addressing any queries or concerns in relation to the Loyalty Programm as well as for any further online and offline operations carried out by the Company.
- (ii) use the Platform for any of the Services being offered thereon;
- (iii) to purchase or redeem a gift card
- (iv) participate in campaigns/surveys conducted by the Company (if any) on the Platform; and
- (v) download or update software, in case of mobile application.

We may collect any other information depending on the privacy settings configured by the User on their device.

We may use Cookies and Web beacons (pixel tags) to monitor the Platform usage including, without limitation, to provide useful features to simplify your experience when you return to the Platform, like remembering your name, Login ID, password, and to deliver relevant content based on your preferences, usage patterns and location. Please understand that Cookies and Web beacons (pixel tags) are used solely to provide you complete user experience on the Platform. No cookies or web beacons are used to collect any personal or sensitive personal data/ information.

Information collected by the Company from a particular browser or device may be used with another computer or device that is linked to the browser or device on which such information was collected.

9. LOYALTY PROGRAMME AND OVS CARD

9.1 Eligibility and Subscription

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Subscription to the OVS loyalty programme (“OVS Card”) is reserved exclusively for natural persons of legal age who are resident in the territory of the Republic of India. Each OVS Card is issued free of charge, without any expiration date, and is strictly personal and non-transferable. The OVS Card may only be used by the registered holder at participating stores forming part of the programme.

9.2 Issuance and Use

For the issuance of the OVS Card, the holder is required to provide certain personal and contact details, which shall be collected and processed in accordance with applicable data protection laws and this Privacy Policy. Upon successful enrollment, the holder will receive an electronic communication containing:

- a) a digital version of the OVS Card, which may be used immediately and,
- b) a summary of the data provided and any consents granted.

9.3 Loss, Theft or Misuse

In the event of loss, theft, or suspected misuse of the OVS Card, the holder shall promptly request blocking of the card at any participating store. A replacement card shall be issued free of charge. The Company shall not be liable for any unauthorized use of the OVS Card prior to such notification and blocking.

9.4 Refunds and Transactions

Purchases made using the OVS Card shall not entitle the holder to any cash refunds, except where expressly required by applicable law.

9.5 Limitation of Liability

The Company shall not be held responsible for the non-receipt, delayed receipt, or misdirection of the digital OVS Card or related communications due to causes beyond its reasonable control, including but not limited to: incorrect or inactive email addresses provided by the holder, full inboxes, server errors, disabled mailboxes,

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blacklisting of the holder's email address, or automatic filtering of communications into spam or promotional folders.

10. USE OF INFORMATION

10.1 We use your Information only for the purpose for which it has been collected, including but not limited to—

- (i) Provide, operate, and maintain our website
- (ii) Improve, personalize, and expand our website
- (iii) Understand and analyze how you use our website
- (iv) Develop new products, services, features, and functionality
- (v) Communicate with you. Whether directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the website, and for marketing and promotional purposes
- (vi) Send you emails, sms and phone calls
- (vii) Find and prevent fraud
- (viii) To provide requested Services;
- (ix) To complete an order for the Services requested;
- (x) To process the payment made by you to purchase the Service ordered;
- (xi) To complete a purchase or provide the Services you have requested, including invoicing and accounting;
- (xii) To respond to your request for information and provide you with more effective and efficient customer service or customer support, including answering questions and responding to feedback and complaints;
- (xiii) To provide you with updates and information about the status of the order(s) placed by you;
- (xiv) To contact you by email, postal mail, or call regarding our Services, surveys, promotions, special events, and other subjects that we think may be of interest to you;
- (xv) To allow you to purchase or redeem a gift card

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- (xvi) To respond to an individual's request or inquiry, or concern, if any;
- (xvii) To allow users to interact with us and/or our team;
- (xviii) To enhance the security and safety of the portal, etc.
- (xix) To maintain contact with Users and customers;
- (xx) To send marketing/promotional communications;
- (xxi) To send newsletter(s), if any, subject to subscription;
- (xxii) To notify about changes/upgradations in the Service(s);
- (xxiii) To resolve disputes, if any, and for troubleshooting;
- (xxiv) To conduct data and system review and analytics to provide you customized Services, including research to improve the Services. For this purpose, we shall use only de-identified (when all Personal Information is removed) or aggregated data (in a summary form).
- (xxv) To prevent fraud, criminal activity, or misuse of our Platform, and to ensure the security of our IT systems, architecture, and networks;
- (xxvi) To secure our websites and mobile applications, and resolve app crashes and other issues being reported;
- (xxvii) To establish, exercise, or defend our legal rights where it is necessary for our legitimate interests or the legitimate interests of others;
- (xxviii) To comply with legal obligations and legal process and to protect our rights, privacy, safety, or property, and/or that of our Affiliates, you, or other third parties, if any;
- (xxix) All other lawful purposes related to business and in furtherance of the fulfilment of a lawful contract.

10.2 We use your Information with the intent to understand your interests in availing our Services, including to contact you to explain and provide you with the reminders for the Services most viewed by you, or added to your cart.

10.3 We may use your Non-Personal Information for internal business purposes, such as data analysis, research, developing/enhancing and/or improving our Services, and in identifying usage trends.

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10.4 We also use your information for purposes demanded by Law, rule, regulation, or guidelines to facilitate the transaction entered by you, including carrying out background checks/financial checks/identity checks, or any other regulatory due diligence mandated by applicable law/rule/regulations.

10.5 Combined Information. For the purposes discussed in the T&Cs, we may combine the information that we collect through the Platform with information that we receive from other sources, and use such combined information in accordance with the T&Cs.

10.6 Aggregate/Anonymous Data. We may aggregate and/or anonymize any information collected through the Platform so that such information can no longer be linked to you or your device. We may use such information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors.

11. LOG FILES

The platform follows a standard procedure of using log files. These files log visitors when they visit websites, All hosting companies do this, and a part of hosting services' analytics. The information collected by log files includes Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/ exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

12. STORAGE OF COLLECTED DATA

12.1 All information you provide to us is stored on our secure systems, designed by our trusted partner.

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12.2 All information you provide to us is preserved for a period of 2 (“two”) years from the date of discontinuation of your use of our Platform. Please keep in mind that in certain cases a longer retention period may be required or permitted by law. The criteria used to determine our retention periods include:

- (i) How long is the data needed to provide you with our Services or to operate our business?
- (ii) Are we subject to a legal, contractual, or similar obligation to retain your data? Examples can include government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation, or protection against a possible claim.
 - a. Visitor’s IP Data
 - b. Date and time of Platform visit
 - c. Pages visited and navigation on the Platform
 - d. Browser being used
 - e. Country of accessing the Platform/Portal
 - f. Language of the browser being used
 - g. Words searched for
 - h. Pixel tags
 - i. Feedback (Reviews, Complaints, etc.)

13. USE OF COOKIES AND SIMILAR TECHNOLOGIES

13.1 To collect the Information through Automated Means, we use Internet server logs, cookies, tracking pixels, and other similar tracking technologies. We use these technologies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences. Cookies are small text files that are placed on your computer or mobile device when you visit a site that enable us to: (i) recognize your computer; (ii) store your preferences and settings; (iii) understand the web pages of the Services you have visited; (iv) enhance your user

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experience by delivering and measuring the effectiveness of content and advertising tailored to your interests; (v) perform searches and analytics; and (vi) assist with security and administrative functions. Some cookies are placed in your browser cache, while those associated with Flash technologies are stored with your Adobe Flash Player files.

13.2 As we adopt additional technologies, we may also gather information through other methods such as web beacons. Please note that you can change your settings to get a notification as to when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information (e.g., Internet Explorer; Google Chrome; Mozilla Firefox; or Apple Safari). You can also manage the use of Flash technologies, including Flash cookies and local storage objects, with the Flash management tools available on Adobe’s website. Please note that by blocking, disabling, or managing any or all cookies, you may not have access to certain features or offerings of the Platform.

13.3 The Company’s or Platform’s Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policy of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt out of certain options. You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browser’s respective websites.

14. HOW WE SHARE AND DISCLOSE YOUR INFORMATION

We may share your information in the following ways:

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14.1 Affiliates and Subsidiaries. We may share information we collect through our Platform to deliver the order placed by you, ensure a consistent level of Service offering, and enhance your customer experience.

14.2 Service Providers. We may provide access to or share your information with select third parties who render Services on our behalf through our Platform, including but not limited to, a logistic service provider; however, the same shall be on a need-to-know basis. They may have access to your Information to render their Services, but are strictly prohibited from using your Information for purpose other than the intended purpose under this Policy. They provide a variety of services to us, including billing, sales, marketing, Platform content and features, advertising, analytics, research, customer service, data storage, security, fraud prevention, payment processing, and legal services.

14.3 Protection of the Company's rights and interests: By using the Platform, you acknowledge and agree that we may access, retain and disclose the Information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process (e.g. a summon or court order); (b) enforce our Terms & Conditions, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; (d) respond to your requests for customer service; and/or (e) protect the rights, property or personal safety of the Company, our agents, affiliates, users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, spam/malware prevention, and similar purposes.

14.4 Business Transfers. As we continue to develop our business, we may buy, merge, or partner with other companies. In such transactions (including in contemplation of such transactions), user Information may be among the transferred assets. If a portion or all of our assets are sold or transferred to a third party, customer information (including your email address) would likely be one of the transferred business assets.

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However, any such transfer of information shall be done in an encrypted form after obtaining your consent in this regard, and after signing appropriate Non-Disclosure Agreements with such other companies, only for the purposes of providing you a complete service experience. If such transfer is subject to additional mandatory restrictions under applicable laws, we will comply with such restrictions.

14.5 Public Forums. Certain features of our Services make it possible for you to share comments publicly with other users on the Platform. Any information that you submit through such features is not confidential, and we may use it for any purpose (including in testimonials or other marketing materials). Any information you post openly in these ways will be available to the public at large and potentially accessible through third-party search engines. Accordingly, it is advisable to take utmost care when using these features.

We may need to share your personal data with certain third-parties, such as:

- (i) other entities within our group as part of our regular reporting activities on our Company's performance, in the context of a business reorganization or group restructuring exercise, or for assistance in relation to marketing and business development;
- (ii) professional advisers including lawyers, bankers, auditors and insurers to the extent such information is relevant to the performance of their services;
- (iii) regulators; and
- (iv) any of our service providers where such information is relevant to their performance of such services.

However, we will make our best efforts to ensure that the third party with whom the data is shared affords the same level of data protection as offered by us, or even better and secure protection of your Personal Information as compared to our data protection services.

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14.6 We reserve the right, in our sole discretion, to share or disclose your Personal Information in encrypted form, when required to do so by law or regulation, or under any legal obligation or law or in response to a written request from a law enforcement or governmental agency or judicial, quasi-judicial, or any other statutory or constitutional authority:

- (i) to respond to summons, court orders, or legal process;
- (ii) in order to investigate, prevent, defend against, or take other action regarding violations of our T&Cs, illegal activities, suspected fraud, or situations involving potential threats to the legal rights or physical safety of any person or the security of our network, sites or Platform;
- (iii) to respond to or defend against legal claims, without your consent;
- (iv) in an emergency, to protect the health and safety of our Platform, Registered Users/Subscribers or the general public; or
- (v) to establish or exercise our legal rights; or
- (vi) as otherwise required by any applicable law.

The Company shall not be held liable for any privacy violation in this regard.

14.7 We may use your device ID for security purposes. For example, if you have activated a feature that limits access to a Platform from a specific device, our systems will access the device ID from each device you attempt to access the Platform with to determine if the device is the specific authorized device. Additionally, we may use device IDs to monitor suspicious activity. For example, if we detect that a single account on the Platform is being accessed from multiple devices, as determined by tracking the device IDs that access an account, we may contact the Registered User to ensure that such access has been authorized by the Registered User.

14.8 Aggregate/Anonymous Information. From time to time, we may share Aggregate/Anonymous Information about use of the Services, such as by publishing a report on usage trends. In such case, the anonymized data shall no longer be associated

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with you, and will not be deemed a Personal Data. The sharing of such data, in anonymized and/or aggregate form, shall be unrestricted.

15. RETENTION OF DATA/INFORMATION

We keep your Information for no longer than necessary for the purposes for which such Data is collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements, and our legitimate interests in maintaining such Personal Information in our records, and strictly use it and/or as required to comply with applicable laws. In doing this, we will have regard to the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements. Generally, we will keep information relevant to our dealings with you for 6 (“six”) years following the last date of the activity (or longer if required by applicable laws and regulations). In some circumstances, your Personal Data may be anonymized so that it can no longer be associated with you, in which case it is no longer Personal Data. Once we no longer require your Personal Data for the purposes for which it was collected, we will securely destroy your Personal Data in accordance with applicable laws and regulations.

16. THIRD-PARTY SHARING OR USE OF DATA/INFORMATION

16.1 We do not rent and sell your Personal Information in personally identifiable form to anyone. However, we share your Personal Information in encrypted form with third parties with your consent, only for the purposes of providing you a complete service experience.

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16.2 We may share your personal data with a third party where this is required by law, where it is necessary to perform any contract with you, or where we have another legitimate interest in doing so.

16.3 We may need to share your personal data with:

- (i) other entities within our group as part of our regular reporting activities on company performance, in the context of a business reorganization or group restructuring exercise, or for assistance in relation to marketing and business development.
- (ii) professional advisers, including lawyers, bankers, auditors, and insurers, to the extent such information is relevant to the performance of their services;
- (iii) regulators; and
- (iv) any of our service providers, where such information is relevant to their performance of such services.

16.4 We may also need to share your Personal Data with a regulator or to otherwise comply with applicable law or judicial process, or if we reasonably believe that disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

17. USER SUBMISSIONS

Any content or Personal Information that you voluntarily disclose online on our Platform, which can be viewed by our other Visitors/Users, like in chat areas, reviews, etc., will be available to all such Visitors/Users, and can be viewed and used by them.

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18. COOKIES

18.1 A cookie is a small piece of text file stored by the website on a user's computer hard disk when the Platform is opened. The Platform uses cookies to improve the quality of interaction of Visitors/Users with the Platform.

18.2 In some instances, we and our service providers, if any, use cookies, web beacons, and other technologies to automatically collect certain types of information when you visit us online, as well as through emails that we may exchange. The collection of this information allows us to customize your online experience, improve the performance, usability, and effectiveness of our online presence, and measure the effectiveness of our marketing activities. The Platform may use cookies to store a unique identifier for logged-in Users to enhance user experience.

18.3 If you choose to disable the cookies, you might not be able to fully experience the interactive features of the Platform. Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we may obtain other identifiers, including IP addresses, but this is for the purpose of identifying the number of unique visitors to our Platform and geographic origin of visitor trends, and not to identify individual visitors.

18.4 BY NAVIGATING ON OUR PLATFORM OR ENTERING YOUR LOGIN DETAILS TO ACCESS AREAS RESERVED FOR USERS, YOU AGREE THAT WE CAN PLACE THESE COOKIES ON YOUR COMPUTER OR INTERNET-ENABLED DEVICE.

19. WEB BEACONS

19.1 A web beacon is a small image file on a web page that can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server.

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19.2 Our Platform only uses web beacons in accordance with applicable laws. The Platform or its service providers may use web beacons to track the effectiveness of third-party websites that provide us with marketing services or to gather aggregate visitor statistics and manage cookies. You have the option to render some web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address but cookie information will not be recorded. In some of our newsletters and other communications, we may monitor recipient actions such as email open rates through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences.

20. HOW WE PROTECT YOUR INFORMATION

The Company takes technical and organizational security measures to protect the Information provided via the Platform from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. We employ sufficient administrative, physical, and electronic measures designed to protect your Information from unauthorized access. However, no Internet or email transmission is ever fully secure, error-free or impenetrable. We cannot guarantee the security of our database, nor can we guarantee that the Information you supply will not be intercepted while being transmitted to us over the Internet or email. It is advisable to exercise utmost care when disclosing any Information to us via the Internet. In addition, we are not responsible for the circumvention of any privacy settings or security measures contained on the Platform, or third-party websites. You are advised to use the Platform at your own risk.

21. THIRD-PARTY LINKS AND FEATURES

The Services contain links to third-party websites such as social media sites, and also contain third-party plug-ins (such as the Facebook, Twitter, and YouTube buttons). If you choose to use these sites or features, you may disclose your Information not just to those third parties, but also to their users and the public

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more generally, depending on how their services function. We are not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your Information will be subject to the privacy policies of such third-party websites or services, and not the T&Cs or this Privacy Policy. We urge you to read the privacy and security policies of these third-party websites.

22. MARKETING COMMUNICATIONS AND SHARING

You may instruct us not to use your contact information to contact you by email, postal mail, or phone regarding Products, Services, promotions, and special events that might appeal to your interests by contacting us using the information below. In commercial email messages, you can also opt-out by following the instructions located at the bottom of such emails. Please note that, regardless of your request, we may still use and share certain information as permitted by applicable law. For example, you may not opt-out of certain operational emails, such as those reflecting our relationship or transactions with you, or important notifications based on the content accessed by you.

23. ONLINE ANALYTICS AND ADVERTISING

23.1 Analytics

- (i) We may use third-party web analytics services (such as those of Google Analytics) on our Platform to collect and analyse usage information through cookies and similar tools; engage in auditing, research, or reporting; assist with fraud prevention; and provide certain features to you. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-out Browser Add-on by clicking [here](#).
- (ii) If you receive email from us, we may use certain analytics tools, such as clear GIFs to capture data such as when you open our message or click on any links or banners our email contains. This data allows us to gauge the effectiveness of our communications and marketing campaigns.

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23.2 Online Advertising

- (i) The Platform may integrate third-party advertising technologies that allow for the delivery of relevant content and advertising on the Platform, as well as on other websites you visit and other applications you use.
- (ii) The ads may be based on various factors such as the content of the page you are visiting, information you enter, such as your age and gender, your searches, demographic data, user-generated content, and other information we collect from you. These ads may be based on your current activity or your activity over time and across other websites and online services, and may be tailored to your interests.
- (iii) Third parties may also place cookies or other tracking technologies on your computer, mobile phone, or other devices to collect information about you as discussed above. These third parties (e.g., ad networks and ad servers such as Google Analytics, DoubleClick and others) may also serve tailored ads to you as you use the Internet and Internet-connected applications and access their own cookies or other tracking technologies on your computer, mobile phone, or other device you use to access the Services to assist in this activity.
- (iv) We neither have access to, nor do our T&Cs govern the use of, cookies or other tracking technologies that may be placed on your device(s) you use to access the Platform/avail the Services by such non-affiliated third parties. If you are interested in more information about tailored browser advertising and how you can generally control cookies from being put on your computer to deliver tailored advertising, you may visit the Network Advertising Initiative's Consumer Opt-Out link [here](#), the Digital Advertising Alliance's Consumer Opt-Out link [here](#), or Your Online Choices to opt-out of receiving tailored advertising from certain companies that participate in those programs [here](#). To opt out of Google Analytics for display advertising or customize Google Display Network ads, visit the [Google Ads Settings page](#). We do not control these opt-out links or whether any particular company chooses to participate in these opt-out programs. We are not responsible for any choices you make using

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these mechanisms or the continued availability or accuracy of these mechanisms.

- (v) Please note that if you exercise the choices above, you will still see advertising when you use the Services, but it will not be tailored to you based on your online behaviour over time.

24. Notice Concerning Do Not Track

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our Platform for third-party purposes, and that is why we provide a variety of opt-out mechanisms listed above. However, we do not currently recognize or respond to browser-initiated DNT signals. To learn more about Do Not Track, you can do so [here](#).

25. CHANGE OF OWNERSHIP

If the ownership or control of all or part of our Platform or its assets changes, we may transfer your Information to the new owner.

26. REASONABLE SECURITY PRACTICES AND PROCEDURES

The Company collects Sensitive Personal Information/Data of its Registered Users/Subscribers (like full name, residential address, contact number, date of birth etc.), in accordance with the SPDI Rules, 2015 (as may be amended from time to time). The Company follows reasonable security practices and procedures and has a documented information security programme and information security policy that contains managerial, technical, operational, and physical security control measures, which are commensurate with the information assets being protected, with the nature of our business.

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27. LEGAL RIGHTS AND CHOICES OF USERS

27.1 LEGAL RIGHTS

We would like to make sure you are fully aware of all of your data protection rights and that by virtue of the Information Technology Act, 2000 and its rules, and any other applicable data protection law and other applicable laws, you have the rights, including:

- (i) **Your right of access** - You have the right to request copies of your personal data. We may charge you a small fee for this service.
- (ii) **Your right to rectification** - You have the right to request that we correct any Personal Information you believe is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- (iii) **Your right to erasure** - You have the right to request that we erase your Personal Information in certain circumstances.
- (iv) **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your Personal Information in certain circumstances.
- (v) **Your right to object to processing** - You have the right to object to the processing of your Personal Information in certain circumstances.
- (vi) **Your right to data portability** - You have the right to ask that we transfer the Personal Information you gave us to another organization, or to you, in certain circumstances, whether in India or outside India, subject to the provisions of applicable laws.
- (vii) If you make a request, exercising your rights, we have one month to respond to you. Please contact us at grievance.officer@ovs.in, if you wish to make a request.

28. CHOICE OF USERS

You can always contact our Privacy Officer if you would like to:

- (i) review, change, or delete the data you have supplied to us;

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- (ii) object to certain data processing operations (e.g., opt-out from marketing communications);
- (iii) receive a copy of your data (in a common machine-readable format, to the extent it is required by applicable law);
- (iv) ask us any other questions related to the protection of your data on our Platform.

There may be situations, however, where we are entitled to deny or restrict your rights, for example, when necessary to protect the rights and freedoms of other individuals, or refuse to delete your Personal Data in case the processing of such data is necessary to comply with legal obligations and/or to establish, exercise, or defend our self from legal claims. In such cases, we expect your kind cooperation.

29. LINKS TO OTHER WEBSITES

Our Platform contains links to other websites not operated or controlled by the Company, including social media platforms. The fact that we provide a link to a third-party website on our Platform is not an endorsement, authorization, or representation of our affiliation with that third party. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data, or solicit personally identifiable information from you. The information that you share with the third-party platform will be governed by the specific privacy policies and Terms and Conditions of the third-party platform and not by this Privacy Policy.

30. DATA PRIVACY OFFICER

If you have any queries or concerns in relation to the privacy policy or the steps taken under this policy, you are free to contact the Data Protection Officer through email address: grievance.officer@ovs.in and Contact No.: 1800 889 9131.

Please keep in mind that email communications are not always secure. Therefore, please do not include sensitive information in your emails to us.

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We will do our best to address your request in time and free of charge, except where it would require a disproportionate effort. In certain cases, we may ask you to verify your identity before we can act on your request. If you are unsatisfied with the reply received, you may then refer your complaint to the relevant regulator in your jurisdiction.

31. GRIEVANCE OFFICER

In accordance with the Information Technology Act, 2000 and the corresponding Rules made thereunder, if you have any queries or concerns in relation to the privacy policy or the steps taken under this policy, you are free to contact the Grievance Officer at E-mail Address: grievance.officer@ovs.in and Contact No.: 1800 889 9131

Such person will be responsible for addressing any of your discrepancies and grievances, as expeditiously as possible, but not more than one month from the date of receipt of such grievance.

32. SIGNATURE CLAUSE

When this Policy mentions “**we**”, “**us**”, “**our**”, it refers to the Controller of your Data under this policy document, namely the Company or the platform with which you had, have or will have a “**service provider and user**” relationship”. As a Controller of your Data, the Company or the platform decides the type of data collected and the manner of use of such Data, considering the kind of Services we offer on or through our Platform.

33. UPDATE TO THE PRIVACY POLICY

The most current version of this Privacy Policy document will govern our use of your data and can be found on our Platform (“**Privacy Policy**” section). We reserve the right to update this Privacy Policy, at any time, and we will make an updated copy of such Privacy Policy available to you and notify you when we make any substantial updates.

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34. FURTHER INFORMATION

This Privacy Policy is not an exhaustive account of all aspects of our collection and use of Personal Data. If you require any further information, please do not hesitate to contact us at grievance.officer@ovs.in.

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