

PRIVACY POLICY - “IN” REWARDS PROGRAM

This “Privacy Notice” or “Notice” describes the various types of personal data and information (“Information”) collected on our website, Rewards Platform and mobile applications (“Online Services”). It explains how that Information is used and shared, the lawful bases for our use of your Information, rights in relation to it and, how to contact us for further information.

We care about our Customers/Members and understand as well as respect your privacy. This Privacy Policy (together with the terms of use and any other documents referred to therein) sets out the basis on which Inorbit Malls (India) Private Limited (hereinafter referred to as “Company”) collects and processes any information collected from you or provided by you while you as Customer / Member (“Users”) access or participate in our IN reward program which is available through Inorbit Website, Inorbit IN Mobile application, other products, and features (“IN Services”).

Your privacy is of utmost importance to us and protection of your Information is a key commitment for us. We are governed by the provisions of the Information Technology Act, 2000 read with Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data of Information) Rules, 2011 under the Information Technology Act, 2000 as amended from time to time; that require publishing of the Privacy Policy for collection, use, storage and transfer of sensitive personal data or information, to maintain privacy of your Information.

Applicability of the Privacy Policy :

By accessing or logging in to the IN Rewards Program, you would be sharing with us Information (including sensitive personal information). This Privacy Policy (the “**Policy**”) explains how the Company collects, uses, discloses, retains and protects the personal information of its Users within the framework of its activities, in particular in connection with the use by Users of the products, services, software, applications and websites of the Company (the “**Services**”). The Company reserves the right to update its Privacy Policy at any time and such modifications shall be effective immediately, unless otherwise stated. Users are asked to regularly check to see whether this Policy has been modified. Users are deemed to have accepted any modifications to this Policy if they continue to provide personal information to the Company after publication of such modifications. By accessing the Services of the Company, you as Users hereby consent to the collection, storing, processing, transferring, and sharing your personal information with third party and service providers, without requirement for any further consent from you at any point of time.

Type of information collected and manner in which the information is collected:

For the purposes of this Policy, “Information” is any information relating to the identity of any User, such as name, birth date, address and other information pertaining to such User’s identity, as well as its communications with the Company, which may be presented in any form. The type of Information collected by the Company depends on a number of factors and context and it collects only Information it deems necessary for conducting its business and to achieve specific purposes. Before submitting or

disclosing any information to IN Services, please make sure to understand how any Information you provide will be used, shared, and handled.

Consent:

When you agree and accept the Terms and Conditions of the IN Rewards Program, it is presumed that you have consented to provide the Information and have read and accepted this Privacy Policy. This Privacy Policy also applies to the information you provide to us prior to or after being informed about, presented with, or directed to this Privacy Policy. It is clarified that the Company cannot match any person's identity with the registered member and thus, the Company shall not be liable for any misuse, or any other activity that occurs through the registered account, or mobile number, or email address of the Member or Member's gadget (mobile, laptop, etc.).

Purpose for collecting and using Information:

The Company may collect and use Information for the following purposes:

- (i) Provide customized Services or information requested by Users;
- (ii) Communicate with Users as part of the activities of the Company, for internal quality assurance purposes or to manage the quality of the information provided;
- (iii) Detect and prevent fraud;
- (iv) For statistical and accounting purposes;
- (v) Inform Users of news, updates, information and special offers concerning the Services of the Company, in accordance with applicable anti-spam legislation;
- (vi) If the Company has reasonable grounds to believe that it might be useful as part of the investigation of a violation of statutory law or to ensure the protection or defence of a legal interest;
- (vii) As required or permitted by law.
- (viii) Professional service providers who help us run our business, such as service providers, agents, and consultants.
- (ix) Any agency or third party for the purpose of audit and compliance requirements of the Company as per the applicable laws and regulations, and Company's policies and procedures.
- (x) Government and law enforcement agencies, to (i) comply with a legal process, subpoena, order, or other legal or regulatory requirement; (ii) enforce our Terms of Use or other policies; or (iii) pursue available legal remedies or defend legal claims.

Information we gather or collect and purpose:

We collect information (collected via your access or usage of IN Services) to provide services and for compliance purposes of the IN Rewards Program. There are types of personal information we collect:

A. Information you give us:

We receive and store any information you provide in relation to usage of IN Services (before or after being informed about, directed to or notified about the Privacy Policy). Such information include:

- (i) Your name and contact details (such as name, address, email address and telephone number and other personal information)
- (ii) Additional profile information (such as date of birth, gender, location, and preferred language)
- (iii) Your communications and contact history with us (such as service call recordings, chat and instant messages, images, videos, communications and other content in connection with our social media channels and customer support)
- (iv) Other information (such as IN filter selection, service reviews, forum posts, survey responses, participation in promotions; and other user-generated content)

B. Information we automatically collect from use of IN Services:

We automatically collect and store certain type of information about your use of IN Services, including information about your interaction with content and services available at IN Services. We even use cookies and other identifiers. Some examples of the same are i) adding or removal of products from your wish list or cart; ii) searching something on our website or mobile application; or (iii) redemption activity.

Sources of collection of your Information:

The various sources of collection basis Information provided by you are -

- (i) **Registration** - We need your name, contact and other details to create your account. This information is necessary for the adequate performance of IN Services. It is also required for us to fulfill our obligations with you when you redeem your reward points.
- (ii) **Delivery of services** - We use your name, contact details and other information to take and fulfill our services, and communicate with you about your account, services, and promotional offers.
- (iii) **Earning and redemption of points** - We use your name, contact details and other information to fulfill our obligations under the reward program.
- (iv) **Sending you account information** - We need your name, contact details and other information to provide notifications regarding any promotional offers, changes to account settings, and notices about IN Services and policies. Please note that it is the responsibility of the Member or the accessor of the IN Services to be updated about the policies and procedures of the IN Rewards Program. The Company does not take any responsibility for communication of changes to account settings, and notices about IN Services and policies.
- (v) **To offer an improved user experience** - We use your communications and contact history with us, as well your name, contact details and other information to assist us to improve and optimize the IN Services and to personalize and customize your experience.
- (vi) **Communication, marketing and promotional activities** - We may use information to deliver and personalize our communications with you, or to administer referral programs, rewards, surveys, contests or other promotional activities.

- (vii) **Non-member referrals**-We may obtain your information from a friend or other contact who wants to invite you to use our Services. We will use your information to facilitate your invitation and administer our referral program.

Disclosure of Information:

The Company agrees not to publish, sell, rent or share the Information of the Users with anyone except to the extent allowed in this Policy.

Protection and accuracy of the Information:

- (i) The Company takes seriously the management of the Information of Users.
- (ii) Only authorized Company personnel have access to the Information of Users. These employees have been informed by the Company of their obligation to preserve the confidentiality of this personal Information. The Company employees who have access to personal Information may use it only in accordance with the principles set out in this Policy and applicable legislation and regulation.
- (iii) The security and protection of personal Information is important to the Company. The Company applies reasonable technical, contractual, administrative and tangible measures to protect the personal Information of Users against its unauthorized use or disclosure as well as its loss or theft, including encryption of secured transactions when required. Although it is impossible to guarantee 100% protection, the Company has adopted rigorous methods that comply with strict security standards to ensure protection of personal Information.
- (iv) We also limit access to your Information to those employees, contractors and agents who have a business need to know.
- (v) Depending on the nature of personal Information, it may be stored in the offices of the Company or in various computer systems of the Company or its service suppliers or in storage installations of the Company or its service suppliers.
- (vi) The Company will ensure that the personal Information about Users is as accurate, complete and up-to-date as possible for the purposes for which it is used. It is however the responsibility of the User to update personal Information, such as addresses, with the Company.

Obligation upon you discontinuing being a Member of IN Rewards Program:

You may discontinue your usage / membership with us at any point of time as per your wish by making such choice on our website, mobile WAP site or mobile application. With this we will no longer provide your data for external processing as mentioned above. However, we retain your Information as long as the purpose for its usage exists, after which the same is disposed off by us except for any record retention required as per applicable laws. The provisions of various laws require your transaction logs to be stored for longer periods post the deletion of any account / membership. Further, in the event of the pendency of

any legal/regulatory proceeding or receipt of any legal and/or regulatory direction to that effect, we may be required by the law of the land to retain your Information for longer periods.

Exclusion :

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers, promotion agents, payment gateways and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms and conditions. Please note that we do not accept any responsibility or liability for these policies / terms and conditions. Please check these policies/terms and conditions before you submit any Information to these websites.

COOKIE SETTINGS AND POLICY- "IN" REWARDS PROGRAM

A "Cookie" is a small piece of text file/ information stored by a web server on a web browser/ your device about your visit on our "IN" Rewards Program / Website / Mobile Application / online platforms so it can be later read back from that browser. Cookies allow us to recognize a specific device in order to personalize and optimize your experience. We may use cookie and tracking technology depending on the features offered. No Information will be collected via cookies and other tracking technology; however, if you previously provided Information, cookies may be tied to such information.

We use cookies when you visit our Website and Application to analyze traffic, optimize performance and content and to provide an integrated and more personalized shopping experience for Users. Cookies are small text files that are stored by your Internet browser on your computer.

Use of Cookies:

Use of cookies generally fall into four categories:

(i) **Strictly Necessary:**

These cookies are necessary to operate our online services. They do not store any personally identifiable information. You can set your browser to block or alert you about these cookies, but our online services will not work properly without these cookies.

(ii) **Performance-Related:**

These cookies collect information in an anonymous manner about how visitors use our online services and how our online services perform. These cookies allow us to recognize and count the number of visitors and help us understand which pages are the most popular and where visitors spend most of their time.

(iii) **Functional:**

These cookies enable our website to provide enhanced functionality and personalisation, such as remembering choices you make or information you provide, what region you are in, your login information, or the pages you have viewed. They may be set by us or by third-party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

(iv) **Advertising and Targeting:**

These cookies allow the Company and our advertisers to deliver advertisements that are relevant to you and your interests. They may be used by us and our advertisers to build a profile of your interests and show you relevant advertisements on other sites. These cookies may track whether you clicked on an advertisement in order to limit the number of times you see a particular advertisement and help us understand the efficacy of our advertising campaigns. They do not directly store personal information, but uniquely identify your browser and device. If you do not allow these cookies, you will experience less targeted advertising.

Also note that the type and nature of use of our cookies may change from time to time.

Use of Web Beacons:

Web Beacons are small graphic images that may be included on our websites or other products. Web beacons help us optimize our services and provide us and our third-party partners with analytics information, such as how many visitors a site receives. We may also use web beacons to measure response any email campaigns conducted. Web beacons are also commonly known as “clear GIFs” or “tags”.

Changes to our privacy policy & cookie settings:

Any changes we may make to our privacy policy and cookie settings in the future will be notified through and posted on, this page.

Contact:

Please note that if you use more than one name or email address when communicating with IN Services or using the Site of App, you may continue to receive communications from us to any name or email address not specified in your opt-out request.

Questions, comments and requests regarding this Privacy policy are welcomed and should be sent at inrewards@inorbit.in