

## PRIVACY POLICY

THIS DOCUMENT IS AN ELECTRONIC RECORD IN TERMS OF THE INFORMATION TECHNOLOGY ACT, 2000 AND RULES MADE THEREUNDER. THIS ELECTRONIC RECORD IS GENERATED BY A COMPUTER SYSTEM AND DOES NOT REQUIRE ANY PHYSICAL OR DIGITAL SIGNATURES. THIS DOCUMENT IS PUBLISHED IN ACCORDANCE WITH THE PROVISIONS OF RULE 3(1) OF THE INFORMATION TECHNOLOGY (INTERMEDIARIES GUIDELINES) RULES, 2011 THAT REQUIRES PUBLISHING THE RULES AND REGULATIONS, PRIVACY POLICY AND TERMS OF USE FOR ACCESS OR USAGE OF THIS WEBSITE.

### 1. ABOUT US

The domain name www.Luxeva.com (hereinafter referred to as the "**Website**") is owned by Luxeva Limited, a company registered in England and Wales under the registration number 08384295 and having its registered office at 71 Queen Victoria Street, London EC4V4BE. The Website is an online portal operated by Luxeva Limited through its wholly owned subsidiary, Luxeva India Private Limited, a company incorporated under the Companies Act, 2013 with its registered office at 3rd Floor, Flat No 11, Pocket-26, Sector 24, Rohini, New Delhi-110085 and Corporate office at Ground Floor, RMZ Infinity, Plot No.15, Udyog Vihar Phase-IV, Gurugram, Haryana-122015 ("**Luxeva**"). Luxeva reserves the right, at its sole discretion, to change, modify, add or remove portions of this Privacy Policy (the "**Policy**"), at any time without any prior written notice to you. It is your sole responsibility to review this Policy periodically for updates or changes. Your continued use of the Website following the posting of changes shall be deemed to mean that you accept and agree to the revisions. Unless otherwise noted in this Policy, the terms "we" and "us" refer to Luxeva.

### 2. PURPOSE OF THIS PRIVACY STATEMENT AND CHANGES TO IT

2.1. This privacy statement ("**Privacy Statement**") sets out:

2.1.1. how Luxeva collects, stores, shares and uses personal information (such as information that identifies, relates to or describes you, or which is capable of being associated with you) collected from you when you use our website (the "**Site**") or any software, services or application programming interfaces available on or through our Site ("**Personal Data**"); and

2.1.2. Details the types of Personal Data collected, stored, shared and used and your right to control your Personal Data.

2.2. This Privacy Statement does not apply to information that may be collected by third parties who own or operate websites which link to our Site or are accessible by links from our Site. While accessing those other websites, you will be subject to the terms and conditions of use and privacy policy of those other websites.

2.3. If you are under the age of 18, you must not use this Site or submit Personal Data to it unless you have the consent of and are supervised by a parent or guardian. Any minor accessing, using or transacting on the Website in violation of this Policy shall be doing so at their own risk and Luxeva shall not be responsible or liable for any activities or interactions of such minor on the Website.

- 2.4. The Personal Data and information procured hereunder maybe distributed to entities situated within or outside India for the purposes set out hereunder, as required from time to time.
- 2.5. This Website is not intended for users located in the European Union. If you are residing in the European Union, please do not proceed further on this Website. Please note that any continued use of this Website shall constitute a waiver of your rights under the EU's General Data Protection Regulations.
- 2.6. You should read this Privacy Statement carefully and we recommend that you print and keep a copy of it for your future reference.
- 2.7. This Privacy Statement was updated on February 15, 2019. We reserve the right to change and update this Privacy Statement from time to time. We recommend that you revisit this page regularly to stay informed on the current Privacy Statement and ensure that you are happy with any changes.
- 2.8. If we make any changes to this Policy that materially change how we treat your personal information, we will endeavour to provide you with reasonable notice of such changes, such as via prominent notice on the Site or to your email address of record, and where required by law, we will obtain your consent or give you the opportunity to opt out of such changes. By continuing to use the Site and its services without consenting to the changes or opting out, it will be deemed that you have consented to such changes by your conduct.
- 2.9. By continuing to use this Site, you confirm that you have read, understood and agree with the entire Privacy Statement in effect at the time of your use. If you do not agree to the entire Privacy Statement in effect at the time of your use, then you must not use this Site.

### **3. THE PERSONAL DATA THAT WE COLLECT FROM YOU**

- 3.1. When you use this Site (including through submissions/posts in user forums or blogs on or via this Site, by accessing or browsing it or by communicating with us via email or by signing up for newsletters or other communications through it), we may collect all or some of the following Personal Data from or about you:
  - 3.1.1. your name and title and gender and date of birth;
  - 3.1.2. your company name or affiliation;
  - 3.1.3. your contact information including telephone/mobile number/fax and email address, device information, photo, IP Address, location, date and time stamp, and network carrier;
  - 3.1.4. other demographic information including your home or other addresses and postcode;
  - 3.1.5. your communication and shopping preferences and interests;
  - 3.1.6. Your financial information such as bank account information or credit card or debit card or other payment instrument details;

3.1.7. other information relevant to customer surveys and/or offers which we may make available to you;

3.1.8. your browsing;

3.2. We may also collect some or all of the above types of information from our business partners or third parties who have your consent to pass that information on us or who may be authorised by you to authenticate or identify you to us.

3.3. When you submit/post content which is Personal Data via the Site in user forums or blogs on or accessed via this, you agree that any such Personal Data may be viewed by others including users of this site and that such data is not subject to any obligations of confidentiality.

3.4. We do not knowingly collect information from children under the age of 18 unless we have the consent to do so of the parent or guardian.

#### **4. AUTOMATIC COLLECTION OF INFORMATION ABOUT YOUR ACTIVITY**

We may use cookies, log files, pixel tags, local storage objects, and other tracking technologies to automatically collect information about your activities, such as your searches, page views, date and time of your visit, and other information about your use of the Site. We also collect and may store information that your computer or mobile device provides to us in connection with your use of the Site such as your browser type, type of computer or mobile device, browser language, IP address, mobile carrier, unique device identifier, location, and requested and referring URLs. We also receive information when you view content on or otherwise interact with the Site.

#### **5. WHAT WE DO WITH YOUR PERSONAL DATA**

5.1. We do not sell your personal data such as your name and contact information to third parties to use for their own marketing purposes. We (and third party data processors, vendors and hosting partners who may be acting on our behalf) may collect, store and process your Personal Data for the following reasons:

5.1.1. To provide you the services we offer on the Site, communicate with you about your use of the Site, respond to your inquiries, provide troubleshooting, and for other customer service purposes.

5.1.2. To make this Site available, to customise it, to provide content tailored to individual requirements; to understand your needs and provide you with improved products and services, newsletters and other communications and to enable others to view submissions/posts and blogs of users;

5.1.3. For our internal record keeping requirements including collection of anonymised details about visitors to our Site to compile aggregate statistics or produce internal reports;

- 5.1.4. With your agreement, to contact you about our or our business partners' promotions, products and services or other information which we think you may find interesting, offers, or for customer satisfaction purposes (including contact by email, phone, SMS or through Site);
- 5.1.5. To provide you with advertisement contents based on your interests and to measure the effectiveness and reach of ads and services on the Site and/or the website and other platforms owned by Luxeva's business partners;
- 5.1.6. In order for availing certain services, Luxeva may share the Personal Data with its third party service providers;
- 5.1.7. For market research, analysis, testing, monitoring, risk management and administrative purposes (including diagnosing technology problems which may be reported to us); and
- 5.1.8. For any purposes related to the above or where we have a legal right or duty to use or disclose your Personal Data (including for abuse, crime and fraud prevention and related purposes).
- 5.2. In terms of sharing, disclosing or transferring your Personal Data to third parties (together, "Disclose" or "Disclosing"), except as set out in this Privacy Statement, we will not Disclose your Personal Data unless we have your permission or unless we are required to do so to:
  - 5.2.1. comply with applicable law or an order of a governmental or law enforcement body; or
  - 5.2.2. investigate, prevent or take action against suspected illegal activities (including fraud or where the personal safety of another person may be threatened) or breaches of our Terms of Use; or
  - 5.2.3. Establish or exercise our legal rights or defend against legal claims.
- 5.3. In the event that a third party proposes to acquire all or some of our business and/or assets, we may disclose your Personal Data to that third party in connection with their proposed or actual acquisition. In the event that we become insolvent or we are in any similar situation, we may also disclose your Personal Data to third parties as part of a business or asset sale carried out where such disclosure is lawful and compliant with the Data Protection Act 1998.
- 5.4. We reserve the right to retain your Personal Data, any other information which we have collected and any content that you have submitted to the extent required by applicable laws and as we may require for operational and legal purposes.

## **6. INTERNATIONAL TRANSFERS OF DATA**

We may transfer Personal Data that we collect from you to third party data processors, vendors or hosting partners acting on our behalf located in countries outside of the European Economic Area or to other entities in the Luxeva group of companies from time to time in connection with the purposes set out in WHAT WE DO WITH YOUR PERSONAL DATA.

Countries outside the European Economic Area may not offer the same level of data protection as the United Kingdom, although our collection, storage and use of your Personal Data will continue to be governed by this Privacy Statement. We will take steps to ensure that your personal information receives an adequate level of protection in the jurisdictions in which we process it.

## **7. YOUR CHOICES**

You may, of course, decline to submit information through the Site, in which case we may not be able to provide certain services to you. You may also control the types of notifications and communications we send.

## **8. METRICS**

We may share with users of our advertisers or publishers aggregate statistics, metrics and other reports about the performance of their ads or content on our site such as the number of unique user views, demographics about the users who saw their ads or content, conversion rates, and date and time information. We do not share IP addresses or personal information. We may also allow our advertisers or publishers to use Pixels on the Site in order to collect information about the performance of their ads or content.

## **9. ANONYMIZED AND AGGREGATED DATA**

We may share aggregated or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual.

## **10. COOKIES, PIXELS AND TRACKING**

We and our third party providers may use cookies, clear GIFs/pixel tags, JavaScript, local storage, log files, and other mechanisms to automatically collect and record information about your usage and browsing activities on the Site and across third party sites or online services. We may combine this information with other information we collect about users.

## **11. ADS AND PERSONALIZATION**

We may display personalized content (including from third party publishers) and personalized ads (including sponsored content), based on information that we have collected via the Site and through our Pixels, widgets, and buttons embedded on third party sites. We also may report aggregated or de-identified information about the number of users that saw a particular ad or content and related audience engagement information to users of our Ad Services and to publishers of content on the Site.

Users of our Ad Services may also provide us with information as part of their ad campaigns, including customer list information (e.g., email addresses and demographic or interest data or) with us in order to create customized audiences for their ad campaigns; we only use this information to facilitate the particular user's campaign (including ad metrics and reporting to that user) or for fraud detection and security purposes, and we do not disclose these customer lists to third parties (other than our service providers) unless required by law. We also do not disclose to users of our Ad Services the names or identities of their customers that were successfully reached as part of such campaigns.

We may also work with third parties such as network advertisers to serve ads on Our site and on third-party websites or other media (e.g., social networking platforms), such as Google AdSense. These third parties may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you.

## **12. INFORMATION SECURITY**

12.1. We are committed to ensuring that your Personal Data is secure.

12.2. In order to minimise the risk that there is unauthorised access to or Disclosure of your Personal Data, we put in place where practicable appropriate physical, electronic and managerial procedures to safeguard and secure it.

12.3. Although we take appropriate measures to safeguard the Personal Data that you provide to us, no transmission over the internet is guaranteed to be secure. For your security, you should:

12.3.1. if using a computer in a public location, always close the website browser when you complete your online session;

## **13. LINKS TO OTHER WEBSITES AND THEIR PRIVACY STATEMENTS**

13.1. Your use of other websites which are owned and operated by third parties and are accessed by links from this Site is not governed by this Privacy Statement and we do not control any of those other websites.

13.2. Once you use the links from this Site to access those other websites, we are not responsible for the privacy of any data that you provide while using them.

13.3. You should review the privacy policies applicable to those other websites and ask any questions or raise any concerns about their collection or use of your Personal Data with that website operator.

## **14. CROSS BROWSER INTEGRATION**

Personal Data collected from a particular browser or device that you use to access the Site may be used with another computer or device that is linked to the browser or device on which such Personal Data was collected.

## **15. YOUR CALIFORNIA PRIVACY RIGHTS**

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the types of personal information disclosed to those parties. If you are a California resident and would like to request this information, please submit your request in an email to [hello@luxeva.com](mailto:hello@luxeva.com).

## 16. YOUR CONTROL OVER YOUR PERSONAL DATA AND ACCESS TO IT

16.1. You may request details of the Personal Data that we hold about you under the Data Protection Act 1998 or amendments to such details if they are inaccurate or incomplete. We may charge you a small administration fee to respond to your request.

16.2. We may use pixels for collecting data. If you are not fine with it, you may stop using the service of our site.

16.3. You have the choice to restrict our collection or use of your Personal Data in the following ways:

16.3.1. when you are asked by us to accept a cookie or to fill in a form on the Site, look for your cookie settings and the area that you can click to indicate your preference as to use of your Personal Data for marketing or other purposes; and

16.3.2. if you have previously agreed to accept a cookie, then you may change your mind at any time disabling or deleting the cookie or amending your cookie settings.

You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. In certain cases browser settings that block cookies may have no effect on the technologies used by Luxeva and its business partners.

16.4. You have the choice as to whether we use your Personal Data to send you promotional or other information about third parties or us. If you consent but later change your mind to receiving such communications, you may contact us and we will cease such activity.

16.5. Our details:

16.5.1. [www.Luxeva.com](http://www.Luxeva.com) is owned by Luxeva Limited, a company registered in England and Wales under registration number 08384295 and having its registered office at 71 Queen Victoria Street, London EC4V 4BE. The Website is an online portal operated by Luxeva Limited through its wholly owned subsidiary Luxeva India Private Limited, a company incorporated under the Companies Act, 2013 with its registered office at 3rd Floor, Flat No 11, Pocket-26, Sector 24, Rohini, New Delhi-110085 and corporate office at Ground Floor, RMZ Infinity, Plot No.15, Udyog Vihar Phase-IV, Gurugram, Haryana-122015. [Luxeva Limited is registered as a data controller with the Information Commissioner's Office under registration number ZA139086].

16.5.2. Write to us on [hello@luxeva.com](mailto:hello@luxeva.com); or indicate your consent or withdrawal of your consent to marketing communications, interest-based advertising, cross-app advertising, statistical identification and cross-device targeting by clicking on the "Unsubscribe" link in communications which you receive from us.