

# Privacy Policy

Last updated on 01-07-2022

## T&C and This Policy

This Policy should be read in conjunction with the Terms & Conditions.

We at Virgio, understand that your privacy is important to you and we are committed to being responsible custodians of the information you provide us and the information we collect. This Privacy Policy describes the practices concerning the information collected by us through the use of the Website, mobile applications, and our social media channels; and how we collect, use, disclose, and process personal information for operating our business

This Policy explains the rights and choices available to you concerning your personal information. We recommend that you read this entire Policy carefully. By continuing to access the Website, mobile applications, and our social media channels, you agree that you have read, understood, and accepted the terms and conditions of this Policy. We may provide additional privacy notices to you at the time we collect your data.

## What information do we collect

The type of information we collect depends on how you are specifically interacting with us, whether directly or through automated means, through the use of the Website, mobile applications, and our social media channels, and services referred therein (Services): when you call or email or otherwise communicate with us (including through social media and chat) when you sign up for or request that we send you newsletters, alerts, or other materials; or when you respond to our communications or request information; or when you participate in events including webinars or other promotions or collaboration with any third party.

## Source of information and purpose of use

We collect information, including personal information, about you either directly or by your use of our Services or otherwise during your interaction with us. We may obtain information about you, including personal information, from our business partners, such as suppliers, vendors, and other third parties.

You may choose not to provide us with some or all of your personal information. Doing so may prevent us from providing our Services to you or limit our ability to provide you with the level of service that you would otherwise expect or get from us.

## Information collected from You

The type of information we collect depends on how you are specifically interacting with us and which Services you are using. The following are examples of the types of information we may collect directly from you:

1. *Name*: we collect your name to personalize your user experience.
2. *Telephone number*: we require your phone number for the technical provision of our Services to you.
3. *e-mail address*: we use your email address to communicate with you about the products and services we offer, respond to your requests, inquiries, comments, and suggestions, and update you with information about your Account.
4. *Finance-related information*: you may choose to input or provide access to the billing address, credit/debit card information, billing contact details, and similar data, etc.

5. *Photograph or photographs*: you may provide us with your photograph for a personalised experience of your Account.
6. *Account Information*: such as security-related information (including usernames and passwords, authentication methods, and roles), service-related information (including purchase history and account profiles), billing-related information (including payment, shipping, and billing information), and similar data, etc.
7. *User Content*: such as the content of communications, suggestions, questions, comments, reviews, feedback, and other information you send to us, or that you provide to us when you contact us, or that you post on our Services (including information in alerts, folders, notes, and shares of content), and similar data, etc.
8. *Location Data*: such as the location of your device, your household, and similar location data, etc.
9. *Demographic Information*: such as country, state, district, preferred language, age and date of birth, marital status, gender, physical characteristics, personal or household/familial financial status and metrics, military status, and similar data, etc.
10. *Identity Information*: such as government-issued identification information and similar data, etc.
11. **Social Media handle**: Manage your participation in any promotions, offers or discount schemes you choose to participate in

## Information collected by automated means

We may collect automated information through the use of cookies, web beacons, pixels, clear gifs, and other similar technologies.

## Cookies and other tracking technologies

*Cookies are small text files* that can be stored on your computer or other devices when websites are loaded in a browser. To enhance your online experience, we and our partners use "cookies", "web beacons" and/or other tracking technologies. The other tracking technologies work similarly to cookies and place small data files on your devices or display units of your activities on the Website to enable us to collect information about how you use our Services or the Website.

Cookies and other similar technologies do a lot of different jobs, such as letting you navigate between pages efficiently, remembering your preferences, and generally improving the user experience. They can also help to ensure that the advertisements you see online are more relevant to you and your interests. We also may work with partners to help them advertise to you when you visit other websites or mobile applications and help them perform user analytics. These technologies may also be used to analyze how our users interact with advertising on our Services and elsewhere. In the spirit of transparency, we provide detailed information about how we use these technologies.

We use cookies or other tracking technologies to identify you and your interest, remember your preferences, track your use of our services/the Website, and to offer, improve or customize the products, content, offerings, services, and deliver relevant advertising when you visit our Service, or when you visit other websites or applications. For example, we may use cookies to personalize your experience for our Services (for instance, to recognize you by name when you return to a Service), save your password in password-protected areas, and enable you to use shopping carts on our Services. We or a third-party platform with whom we work may place or recognize a unique cookie on your browser to enable you to receive customized content, offers, services, or advertisements on our Services or other sites. Please note, that these cookies contain no information intended to identify you personally. The cookies may be associated with

de-identified demographic or other data linked to or derived from data you voluntarily have submitted to us (for instance, your email address) that we may share with a service provider solely in hashed, non-human readable form.

We, our third-party service providers, advertisers, advertising networks and platforms, agencies, or our partners may also use cookies or other tracking technologies to manage and measure the performance of advertisements displayed on or delivered by or through other networks or Services. This also helps us, our service providers, and partners provide more relevant advertising.

*Syncing Cookies and Identifiers:* we may work with our partners (for instance, third-party ad platforms) to synchronize unique, anonymous identifiers, such as those associated with cookies, to match our partner's uniquely coded user identifiers to our own. We may do this, for instance, to enhance data points about a particular unique browser or device, and thus enable us or others to send more relevant ads, match Users to their likely product interests, or better synchronize, cap, or optimize advertising.

*Locally Stored Objects:* our network services may employ locally stored objects and other client-side storage tracking technologies in certain situations where they help to provide a better user experience, such as to remember settings, preferences, and usage similar to browser cookies, or to target or help our partners target ads, analyze ad performance, or perform user, website or market analytics.

*Disabling cookies:* there are many ways to manage cookies and other tracking technologies. Through your browser settings, you can accept or decline cookies or set your browser to prompt you before accepting a cookie from the website you visit. However, if you disable the use of cookies in your web browser, it will have an impact on your user experience and some features of the Services may be difficult to use or inoperable.

*Interest-based Advertising:* we may work with certain third-party companies to recognise your computer or device and/or to collect and record information about your web surfing activity, including those integrated with our Services. With the aid of these cookies, we measure matters including whether an advertising campaign is relevant to you or a specific target group. Please keep in mind that your web browser may not permit you to block the use of these techniques, and those browser settings that block conventional cookies may not affect such techniques.

*Web beacons:* we and our partners may also use "web beacons" or clear GIFs, or similar technologies, which are small pieces of code placed on a Service or in an e-mail, to monitor the behaviour and collect data about the visitors viewing a Service or e-mail. Web beacons may also be used to provide information on the effectiveness of our e-mail campaigns, for instance, open rates, clicks, forwards, etc.

*Clear gifs:* are tiny graphics with a unique identifier, similar in function to cookies. In contrast to HTTP cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on web pages.

By visiting the Service/Website, whether as a registered user or otherwise, you acknowledge, and agree that you are giving us your consent to track your activities and your use of the Services through the technologies described above, as well as similar technologies developed in the future and that we may use such tracking technologies in the emails we send to you.

Our unaffiliated/affiliated partners and third parties may themselves set and access their tracking technologies when you visit our Services/the Website and they may have access to

information about you and your online activities over time and across different websites or applications when you use the Service/Website. Their use of such tracking technologies is not in our control and is subject to their privacy policies.

In addition to cookies, other technologies that may be used include:

*Pixel tags:* (also called "clear GIFs" or "web beacons") are tiny images that can be placed on a web page or in our electronic communications to you to help us measure the effectiveness of our content; for instance, we use pixel tags to evaluate the effectiveness of our advertising and marketing campaigns by determining whether you open and interact with the content in our promotional emails.

*HTML5:* (the language some websites, such as mobile websites, are coded in) may be used to store information on your computer or device about your website usage activities and to help determine how our Services are being used by our visitors, how the services can be improved and to customize our Services for our users.

The above tracking technologies may be deployed by us or our service providers on our behalf.

Automated Information includes information such as:

1. IP address
2. Operating system used
3. Browser type
4. Internal resolution of the browser window
5. Type of Device
6. Geographical location as indicated by your IP address
7. Identifiers associated with technologies that may uniquely identify your device or browser (e.g., IMEI/UDID and MAC address)
8. Dates and times of access
9. IDFA (Identifier for Advertisers)
10. Subscription information

We or our third-party service providers may assign you a unique identifier through automated means to match information collected from you through different means or at different times, (including both personal information and Automated Information) and to use such information as described in this Privacy Policy.

This Automated Information is generally used for the following purposes:

1. to uncover insights about your use of our website and mobile applications to provide you and improve the experience, products, and services you request, view, engage with, or purchase;
2. for the technical provision of our Services to be able to provide you with a functioning user-friendly experience;
3. to provide you with a secure experience and to take measures to protect our website and mobile applications from cyber risks;
4. to facilitate your access to our Website or mobile application;
5. personalise and customize our Services/Website for you;
6. to help us better understand our current and potential customers so that we may market our Services accordingly;
7. events and usage data are captured for our internal business analytics to understand how our Users interact with our mobile applications and use our Services/the Website;

for instance, we may capture when a User visits a screen, taps a button, permits notifications, upgrades, or otherwise interacts with the app; and

8. monitoring and analysing the effectiveness of our communications including but not limited to - identifying when e-mails sent to you have been received and read.

### Information collected from integrated services

We may obtain information, including personal information, from third parties and sources that we integrate into our Services/the Website either for the provision of our services/ the Website or to facilitate your access to our Services/Website. You may be given the option to access or register for our Services through the use of your third-party social media account. If You select this option, your social media provider may make some of your personal information available to us, such as your e-mail address or other unique identifier or we may be asked to share certain information with such social media providers. If You choose to sign on through your third-party social media provider, you authorize us to collect your information from such a service provider and process it following this Policy and You also authorise us to share your information with your social media service provider as necessary to permit You to access our services using your social media account. We recommend that you review your social media provider's privacy policies carefully before using their service to connect to our Services.

### How we may use your personal information

In addition to the purposes described above, we may use the information we collect for a variety of purposes, such as the following:

1. *Performing our Services*: maintaining or servicing accounts, providing customer service, operating our Website and mobile applications, processing or fulfilling orders and transactions, verifying user information, processing payments, communicating about the products and services we offer, and responding to requests, inquiries, comments, and suggestions, etc.
2. *Internal research*: understanding and evaluating how our Services and features perform with our Users; uncovering insights about usage to improve the Services and provide customers with enhanced features as well as inform our development of new features and products; and development of customized or personalized experiences of our Services, such as remembering your information so you do not have to re-enter it each time you use one of our Services.
3. *Auditing interactions with consumers*: measuring usage of our Website and mobile applications and measuring our advertising and marketing activity.
4. *Security*: to provide you with a secure experience and to take measures to protect our website and mobile applications from cyber risks. Protecting against, identifying, investigating, preventing, and responding to fraud, illegal activity such as incidents of hacking or misuse of our Website and mobile applications, and claims and other liabilities, including by enforcing the terms and conditions that govern the Services we provide.
5. *Debugging/Repair*: identifying and repairing impairments of the intended, existing functionality of our Services.
6. *Marketing*: knowing and understanding our customers to provide our Services more effectively.
7. *Quality and safety maintenance and verification*: improving the quality of the Services we provide, including an upgrade or enhancement of the Services; verification or maintenance of the quality or safety of Services; tracking and responding to quality and safety matters, and protecting our rights and property;
8. Complying with legal or regulatory requirements, judicial process, industry standards, and [Virgio's user policies](#).

9. Other purposes that may be described at the time you choose to provide personal information to us.

To perform the above functions, we may match information collected from you through different means or at different times, including both personal information and Automated Information, and use such information along with information obtained from other sources. We may also aggregate and/or de-identify any information that we collect, such that the information no longer identifies any specific individual. We may use, disclose, and otherwise process such information for our legitimate business purposes including but not limited to historical and statistical analysis and business planning without any restriction.

### How we may share information with others

We may share information about you for the purposes described in this Policy or according to a specific privacy notice we may provide at the time we collect the information.

### Corporate affiliates

We share your information within Group entities for legitimate business purposes, including but not limited to :

1. to assist us in technical processing operations, such as data hosting and maintenance, finance, legal, HR, and accounting assistance, securing our data and systems and fighting against spam, abuse, fraud, infringement, and other wrongdoings; and
2. for corporate audit, analysis, and consolidated reporting as well as compliance with applicable laws.

### Third-party service providers

We may share information about you with the following categories of third-party service providers for business purposes including but not limited to:

1. *Customer communications and insights platforms:* we may share your phone number, e-mail, app usage, and interactions with our third-party customer communications platform providers for performing services that allow us to communicate with you and administer your account as well as track your usage for our internal analytics.
2. *Internal business insights platforms:* our third-party internal business analytics platform provides us with the tools to help us understand app usage and interactions and find insights that allow us to improve our product and features. We may share or make available unique user identifiers, IDFA, device ID, IP address, and app usage and events with the service providers for performing services that allow us to monitor and understand usage to enhance existing Services or develop new products and features and better understand our customers to market our products more effectively.
3. *Customer care and support:* when you contact us, your e-mail may be directed through our third-party customer care and support platform which will have access to your personal information, the content of your e-mail as well as the date and time your request came into our system. We use this provider to allow us to communicate with you about your Account and to receive reports from Users about the quality or safety of our products.
4. *Measurement and attribution:* the service providers offer tools that allow us to measure and attribute the source of new subscription sign-ups and that allow us to find insights about usage and app events. We may use unique user identifiers made available to us from third-party providers to help us measure the effectiveness of our ads and to uncover information about how our customers are using our apps to improve their

quality and safety. We may also share and/or store unique user identifiers, device IDs, IDFA, or IP addresses with these providers for the same purpose.

5. *Other technology providers:* these providers are necessary to provide our services and include cloud storage and web hosting providers. We may use certain Automated Information and/or aggregate or non-personally identifiable information available to us from the customer/ third parties for various purposes including monitoring network traffic to detect malicious actors and to protect against malware, fraud, or other unlawful uses or activity.
6. *Marketing providers:* the third-party service providers, who assist us with marketing our products to you, and may use the information we collect from you to provide advertisements and offers for our other products. Additionally, we may share certain information with social media platforms that allows us to create custom or lookalike audiences. We may also obtain your information through any contest, sweepstakes, event, offering, or other promotional activity that is jointly offered by us and any third parties. By entering into such contest or sweepstakes or otherwise, you authorize and direct us to share your information with our co-sponsor. We may also share your information with a third-party service provider who administers the promotion, event, contest, and/or sweepstakes, etc. We may also share aggregate information including personal information to third-party providers and platforms that help us understand our user demographics, including user demographic interests, habits, and usage patterns for some of our Services so that we may market our products more effectively.

### **Corporate Transactions**

We may share information about you during the evaluation or negotiation in connection with a corporate change or dissolution; for instance, a merger, acquisition, reorganization, consolidation, bankruptcy, liquidation, sale of assets, or winding-up of the business (hereinafter referred to as "Corporate Transaction"). Unless prohibited by applicable law, we reserve the right to transfer the information we maintain in the event we engage in any Corporate Transaction, including but not limited to selling or transferring all or a portion of our business or assets. If we engage in such a sale or transfer, we will, where feasible, direct the recipient to use the information in a manner that is consistent with this Privacy Policy. After such a sale or transfer, you may contact the recipient with any inquiries concerning the processing of your personal information.

### **Legal, regulatory, compliance, and other identical reasons**

Also, we may disclose and/or share your information to comply with legal or regulatory requirements, industry standards, judicial process, and our internal company policies, as well as to protect against, identify, investigate, prevent and respond to fraud, illegal activity; for instance, identifying and responding to incidents of hacking or misuse of our Website and mobile applications, adverse event reporting, and claims and other liabilities.

We also reserve the right to disclose your information:

1. when we believe in good faith that disclosure is appropriate or necessary to take precautions against liability;
2. to protect our rights or property or the legal and property rights of others; and
3. investigate and defend third-party claims or allegations against us.

We may also collect, use, and disclose your personal information as required or permitted by applicable law, or as directed by you, following this Policy.

### **Do not track disclosures**

Some web browsers have a “Do Not Track” (DNT) feature. This feature lets you tell websites you visit that you do not want to have your online activity tracked. These features are not yet uniform across browsers. Our Website does not currently process or respond to “do-not-track” (DNT) settings in your web browser.

### **Social media and other communication**

We maintain a presence on several social networking and blogging platforms including but not limited to Facebook, Instagram, Google, LinkedIn, Twitter, Snapchat, Telegram, TikTok, WhatsApp, Pinterest, etc.

We may incorporate some third-party social networking features into our Services, ie., allowing users to interact with others and share content and information on social media platforms or utilize third-party provided platforms to publish or manage the Services or portions thereof. Through these platforms and features, we receive or may share information about you, and this Policy applies to that information as well. Besides, some providers of third-party social media or blogging platforms we utilize, have their privacy policies that explain how the third parties that provide them may collect, use and protect your information; for instance, if you establish an account with such platform providers directly. By using social features, you agree to those third parties' privacy policies and terms of use.

If you choose to communicate with us or another user through social features available on the Website or mobile applications or through our social media pages, or other similar communication or messaging features or services, such information may be made publicly available. For security purposes, we advise you, please do not include any password, social security number, debit/credit card information, or other sensitive information via these features. We have the right, but not the obligation to monitor messages and communications between and among Users for security and training purposes. We may, but are not obligated to, remove any content we deem inappropriate.

### **Your rights for the personal information we hold about you**

*Changing or deleting your personal information:* if you wish to change or delete the personal information we hold about you, you may contact us. If we change or delete your personal information or if you decline to actively share certain personal information with us, we may not be able to provide you with our Services or some of the features and functionality of our Services. Please note that we may reject a request at our sole discretion, including if the request is unlawful. For your protection, we may require proof of identity and verification before we can answer the above requests.

*Legal basis for processing data:* please note that we have set out the legal grounds on which we rely to process personal information. In some cases, we have a legitimate interest to process the personal information that we collect, such as to develop, administer and support our products and services; to operate, evaluate and improve our business; to facilitate and manage engagement programs; to promote research; to support our recruitment activities; or to facilitate a corporate transaction including but not limited to a sale of assets or merger or acquisition. In other cases, we process personal information to fulfill our contracts with business partners. We may also process your personal information to establish, exercise, or defend against fraud, illegal activity, claims, and other liabilities, including by enforcing the terms and conditions that govern the services we provide. Our processing of certain information may be necessary to comply with our legal obligations, and for reasons of public interest. By using our services and providing personal information, you consent to the processing of your information as mentioned herein.

*International data transfers:* the data we collect may be transferred to, stored, and processed in countries other than the country in which the data was originally collected for the purposes described in this Policy. If you choose to use our Services, with laws governing data collection and use that may differ from Indian law, please note that you are transferring your personal information outside India to other countries for storage and processing. The countries to which we transfer personal information may not have the same data protection laws as in India. When we transfer personal information across borders, we consider a variety of requirements that may apply to such transfers. By using our services and providing personal information, you consent to such transfer, storage, and processing.

### **Online privacy choices and rights**

*Access, edit, and delete your information:* your rights to edit or delete your information can be found as mentioned hereinabove [Click here](#)

*Device permissions:* mobile platforms have permission systems for specific types of device data and notifications, such as camera and microphone as well as push notifications. Where applicable, you can change your settings on your device to either consent to or oppose the collection of the corresponding information or the display of the corresponding notifications.

*Uninstall:* you can stop all information collection by the app by disabling call forwarding and deactivating your Account and then uninstalling the app using the standard uninstall process for your device. If you uninstall the app from your mobile device, the unique identifier associated with your device will continue to be stored. If you re-install the application on the same mobile device, we will be able to re-associate this identifier to your previous transactions and activities.

*e-mail:* if you receive promotional e-mails from us, you may unsubscribe at any time by following the instructions contained within the e-mail. You may also opt-out from receiving promotional e-mails from us by sending your request to [care.in@virgio.com](mailto:care.in@virgio.com). Please note, if you opt-out of receiving promotional e-mails from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to 15 (fifteen) business days for us to process your request, and you may continue to receive promotional communications from us that you have opted-out from during that period. Additionally, even after you opt-out from receiving promotional messages from us, you will continue to receive transactional or administrative messages from us regarding the Services.

*Location information:* if you choose to opt-in, some of our apps may collect your device's precise real-time location, and in such cases, you may be able to opt-out from further allowing us to have access to such location data by managing your location preferences in the app and/or on your device.

### **Data retention**

We may retain your personal information for a period as required under the applicable law of the geographical region of your residence. However, we may not know if you have stopped using our Services, so we encourage you to contact us at [care.in@virgio.com](mailto:care.in@virgio.com) if you are no longer using the Services. We may retain other information that is not personally identifiable for backups, archiving, prevention of fraud and abuse, analytics, or where we otherwise reasonably believe that we have a legitimate reason to do so.

### **Protection of your personal information**

We apply various measures from time to time to safeguard the security and integrity of your personal information collected through our Services/ Website. Despite these measures,

however, we cannot and do not guarantee that information will be safe from interception or intrusion during transmission or while stored on our system, or otherwise, and you provide information to us at your own risk.

If you correspond with us by e-mail, text message, or using web forms like a "Contact Us" feature available through our Services or otherwise, You should always be aware that your transmission might not be secure from access by unauthorized parties. We have no liability for disclosure of your information due to errors or unauthorized acts of third parties during or after transmission. If you create an Account as part of using our Services, you are responsible for maintaining the confidentiality of your Account user id, password, and for any activity that occurs under your Account. Please notify us of any unauthorized use of your Account or password.

If we believe that the security of your personal information in our care may have been compromised, we may seek to notify you but are not obliged to do so. If we have your e-mail address, we may notify you by e-mail to the most recent e-mail address you have provided us in your Account profile but we are not obliged to do so. Please keep your e-mail address in your Account up-to-date. You can change that e-mail address anytime in your Account profile. To receive notices from us, you must check your e-mail account using your computer or mobile device and e-mail application software. We may also post a conspicuous notice on our Website or notify you through the mobile application. You consent to our use of e-mail, text message, and/or notification through the app as a means of such notification.

#### **[Link to websites and third-party content](#)**

For the User's convenience and information, we may provide links to websites and other third-party content that is not owned or operated by us. The websites and third-party content to which we link may have separate privacy policies. We are not responsible for the privacy practices of any third party. We encourage you to review the privacy policies of such third parties before providing them with any personal information.

#### **[Information relating to underage](#)**

We do not knowingly collect information relating to a minor. If you are a minor then DO NOT DOWNLOAD OR USE THE SERVICES. If you believe that we may have personal information from or about an individual who is a minor, please contact us. Please note that we'll attempt to delete the account of any individual who is a minor that's reported to us as soon as possible. You are responsible for all account activity conducted by a minor on your account.

#### **[Updates to this Policy](#)**

We reserve the right to update this Policy to reflect changes in our practices and services. When we post changes to this Policy, we will update the date of this Policy. Continued use of the Services after such date constitutes acceptance of such updates. When required by applicable law, we may inform the User by additional means, such as through a notification on the website or in our mobile applications if we make material changes to how the User's personal information is collected, accessed, or otherwise used as a result of your use of the Services or if your rights under this Policy are materially impacted by changes to our privacy practices. We recommend that the User check this page from time to time to inform himself of any changes in this Policy.

#### **[No Agreement No Use](#)**

if the User does not agree or cannot comply with any of the conditions of this Policy, then please do not use the Website or mobile application or any of our offered Services.

### **Grievance Officer**

As per the requirements of the Information Technology Act, 2000 and rules made thereunder, the name and contact details of the Grievance Officer are –

Name: Lingesh Biradar

Address: No 8, The ICON Building, BHIVE, 80 Feet Main Road, HAL 3rd Stage, Indiranagar, Bengaluru, Bengaluru Urban, Karnataka, 560075

Phone No.: +91-80-41130948

e-mail: Grievance@virgio.com

Time: Mon - Fri (9:00 AM - 6:00 PM)

### **Contact us**

The User/Customer can call Customer Care within operational hours, i.e., 8:00 AM to 10:00 PM, all 7 (seven) days of the week at +91-80-41130948 or write at care.in@virgio.com