

PRIVACY POLICY

This Application collects some Personal Data from its Users.

- **Access to One of the following third-party services accounts**
 - **Access to the Facebook account**
Permissions: Contact and email along with the non-exclusive license to reproduce and use the public content / material and submission published by the user on the Facebook account.
 - **Access to the Google account**
Permissions: Contact and email along with the non-exclusive license to reproduce and use the public content / material and submission published by the user on the Google account.
 - **Access to Instagram account**
Permissions: Contact and email along with the non-exclusive license to reproduce and use the public content / material and submission published by the user on the Instagram account.
 - **Access to YouTube account**
Permissions: Contact and email along with the non-exclusive license to reproduce and use the public content / material and submission published by the user on the YouTube account.
 - **Access to TrueCaller account**
Permissions: Contacts and emails.

The data / information collected from the above-mentioned accounts linked by you is listed in detail in a tabular form for your ease of understanding under “Data Collected” section below.

- **Analytics**
 - **Google Analytics and Google Analytics with anonymized IP**
Personal Data: Contact email, Cookies and App Usage data
 - **Clevertap Analytics**
Personal Data: Contact email, Cookies and App Usage data

DATA COLLECTED / PROVIDED

When you use our App, we collect and store your information which is provided by you from time to time.

Our primary goal in doing so is to provide you a safe, efficient, smooth and customized experience and services. This allows us to provide services and features that meet your needs, and to customize our Application to make your experience safer and easier and to improve the services provided by us.

More importantly, we collect Personal Data from you that we consider necessary for achieving the aforementioned purpose.

The information we collect from you, inter alia, including:

- a. your full name;
- b. email;
- c. mailing address;
- d. age;
- e. gender;
- f. postal code;
- g. mobile number;
- h. family details;
- i. expected date of delivery / age of child;
- j. phone number;
- k. date of birth; and/or
- l. social media profiles.

Where possible, we indicate the mandatory and optional fields. You always have the option to not provide your personal information by choosing not to use a particular service or feature on the App.

We also collect other identifiable information (your payment card details and transaction histories on the App) from you when you set up a free account with us. The App clearly displays the Personal Data it is collecting from you, and you have the option to not provide such personal information. However, this will limit the services provided to you on the Platform.

Collection of Other Non-Personal Information

We automatically track certain information about you based upon your behavior on our App. We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve our users and improve our services. This information is compiled and analysed on an aggregated basis. We also collect your Internet Protocol (IP) address and the URL used by you to connect your computer to the internet, etc. This information may include the URL that you just came from (whether this URL is on our App or not), which URL you next go to (whether this URL is on our Website or not), your computer browser information, and your IP address.

Cookies are small data files that an App stores on your device. We will use cookies on our App similar to other lending websites / apps and online marketplace websites / apps. Use of this information helps Us identify You in order to make our App more user friendly. Most browsers will permit You to decline cookies but if You choose to do this it might affect service on some parts of Our App.

If you choose to make a purchase through the App, we collect information about your buying behaviour.

Collection of Device Information

The information the App collects, and how that information is used, depends on how you manage your privacy controls on your device.

When you install the App, we store the information we collect with unique identifiers tied to the device you're using.

We collect information from the device when you download and install the App and **explicitly seek permissions from YOU to get the required information from the device.**

The information we collect from your device includes the unique ID i.e. IMEI number, information on operating system, SDK version and mobile network information including carrier name, SIM Serial and SIM Slot, your profile information, list of installed apps, wi-fi information.

We collect information about your device to provide automatic updates and additional security so that your account is not used in other people's devices. In addition, the information provides us valuable feedback on your identity as a device holder as well as your device behavior, thereby allowing us to improve our services and provide an enhanced customized user experience to you.

The key information collected from the device is further detailed below:

- 1. Location:** *We use this information to provide you location specific offers and to connect you to other members of the Healofy community. To this effect, we may share your location with the other members should you activate that feature or when you do any activity on the App;*
- 2. Contacts:** *We use this information to send messages and other communication to inform the people on your contact list about the Healofy App along with its features and functionality. We do not send these messages to people on your contact list who have subscribed to the DND / NCPR. For all other people on your contact list, you hereby represent and warrant that you have the requisite permission to provide this consent on behalf of the said person to receive such information and promotional messages;*
- 3. Storage:** *We use this information to improve our Services and to access the kind and volume of the updates compatible for our user base;*
- 4. Camera and Photos:** *We use this information to enable you to upload and share Content on the App / Website.*
- 5. Installed Apps List:** *We use this information to understand other apps that you use to understand your interests & preferences & personalising your experience on the app.*

Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection. The Personal Data may be freely provided by the User or collected automatically when using this Application. Any use of Cookies - or of other tracking tools - by this Application or by the owners of third-party services used by this Application, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User. Failure to provide certain Personal Data may make it impossible for this Application to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

Additional information about User's Personal Data

In addition to the information contained in this Policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of User Data upon request.

System Logs and Maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System Logs) or use for this purpose other Personal Data (such as IP Address).

Facebook / Gmail / TrueCaller / Instagram / Youtube permissions asked by this Application

We collect information, data, content and submissions through Facebook or Gmail or YouTube or Instagram or TrueCaller or such other social media accounts of the Users which have been registered to the account on the App. We may receive Your Data from such sites/applications. Such Data received from the other websites/platforms/applications at the time of accessing the Website / App may include, and not be limited to, the user name, profile picture, e-mail address associated with that particular website/ application, any information that has not been made public in connection with that website/ application belonging to You and/ or any information or content the social media website/ application has the right to share with us. By registering on the App through a social media website/ application, you authorize us to collect, store, use and retain such Data and other information in accordance with this Policy.

The Healofy App may ask for some permissions allowing it to perform actions with the User's connected account and to retrieve information, including Personal Data, from it and share it with Us.

All permissions for personal non-public information (being the Personal Data) and the public information collected from the social media accounts used by you to connect to the Healofy App shall be disclosed to you at the time of registering on the App.

All public information collected from the said social media accounts of a User are subject to the Terms of Use of the Healofy App whereas all the Personal Data is subject to this Privacy Policy.

The permissions taken by Healofy App are as listed below:

a. Basic information

By default, this includes certain User's public information such as id, name, picture, gender, and their locale, as listed below. Certain connections of the User, such as the friends, are also available.

If the User has made more of their data public, more information will be available to us as it will not be considered Personal Data for the purposes of this Policy and shall be subject to the Terms of Use of Healofy.

b. Specific Information captured by us:

Facebook
Public / User profile details, i.e. details made public by a User on the profile on Facebook.

Email ID
Age
Gender
User's photos
User's videos

Google
Public / User profile's basic details, i.e. details made public by a User on the profile on Google.
Email ID
Age
Gender

Instagram
Public / User profile details, i.e. details made public by a User on the profile on Instagram.
Email ID
Age
Gender
Public content access – i.e. all data of the User made public on Instagram.

Youtube
Public / User profile details, i.e. details made public by a User on the profile on Youtube and Instagram.
Email ID
Age
Gender
Public content access – i.e. all data of the User made public on Youtube.

TrueCaller
Public / User profile details, i.e. details made public by a User on the profile on TrueCaller.
Email ID
Age
Gender

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the Data collected to track and examine the use of our Application, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymize your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

All public content, submissions and material published by you on such social media handles is public and shall be used by us as per the license granted by you under the Terms of Use and shall not be subject to this Privacy Policy. In case of any grievance, queries or issues with respect to the said public content, including a request for removal, please write to us at violations@healofy.com.

MODE AND PLACE OF PROCESSING THE DATA

Methods of processing

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party- technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

Place

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

Retention time

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

USE, DISCLOSURE AND SHARING OF THE DATA

The use of the collected Data

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Analytics and Access to third party services' accounts. The data can also be used to provide updates and subscriptions about our upcoming programs as well as promoting our new products and services on the data shared by you with Healofy. By providing the data you agree to opt-in for future correspondence from us as and when required. As a user you have the sole right to unsubscribe from the correspondences.

Disclosure of Data

We will not sell your Data and shall only share your Data with third parties only in such manner as described below:

- a. We may share your Data with our third-party partners in order to conduct data analysis in order to serve You better and provide Services on our App;

- b. We may disclose your Data, without prior notice, if we are under a duty to do so in order to comply with any legal obligation or an order from the government and/or a statutory authority;
- c. We may also share the Data with our affiliates or service providers to facilitate / provide the Services on/through the App;
- d. We and our affiliates may share your Data with another business entity should we (or our assets) merge with, or be acquired by that business entity, or reorganization, amalgamation, restructuring of business for continuity of business.

The Personal Data used for each purpose is outlined in the specific sections of this Policy.

Retention

We retain your Personal Data to enforce our legal rights against you, to provide customer support and troubleshoot problems as permitted by law and for such periods as necessary to provide you the services on our App, to comply with our legal obligations, to resolve disputes, and enforce our agreements with you.

INFORMATION NOT CONTAINED IN THIS POLICY

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time by way of an email to the Grievance Officer. Please see the contact information under the “**Contact Us**” section of this Policy below.

THE RIGHTS OF USERS

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Application does not support “Do Not Track” requests. To determine whether any of the third-party services it uses honour the “Do Not Track” requests, please read their privacy policies.

CHANGES TO THIS PRIVACY POLICY

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

CONTACT US

If you require any information or clarification regarding the use of your personal information or this Privacy Policy or if you have a grievance with respect to the use of your personal information, you can contact our Grievance Officer, **Ms. Aradhana Singh** at the email address: aradhana@healofy.com.

LAWS

The Company is a company based in India. By browsing/using the application, you hereby acknowledge that the Company is not responsible or liable in any manner to comply with any local laws of your territory except India.

DEFINITIONS AND LEGAL REFERENCES

Personal Data (or Data)

Any personal and non-public information regarding a natural person, a legal person, an institution or an association, which is, or can be identified, even indirectly, by reference to any other information, including a personal identification number.

Usage Data

Information collected automatically from this Application (or third party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refers.

Data Subject

The legal or natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

Data Controller (or Owner)

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The hardware or software tool by which the Personal Data of the User is collected.

Cookies

Small piece of data stored in the User's device.