

# PRIVACY NOTICE

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Issued by: Rakuten India Enterprise Private Limited (hereafter “**Rakuten India**”, “**we**”, “**our**” and/or “**us**”).

This privacy notice (“**Notice**”) describes how we collect, use, and disclose Personal Information (as defined below) about you when you use our website <https://corp.rakuten.co.in> and its sub-pages (“**Website**”).

We may change this Notice from time to time. If we make changes, we update the date of revision at the top of this statement. In cases where there are material changes to how we process your data, we will provide you with additional notification or procure appropriate consents in order to process any personal data.

We encourage you to review this Notice whenever you access or use the Website, to stay informed about our information practices and the choices available to you.

Rakuten India and its group companies are part of the Rakuten Group, which includes the affiliates and subsidiaries of our parent company Rakuten Group, Inc., based in Tokyo, Japan. More information about Rakuten is available at <http://global.rakuten.com/corp/about/company>.

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## What This Notice Covers

This notice applies to your use of Website operated by us.

Please only use the Website after you have carefully read and understood this Notice and other applicable terms and conditions. By continuing to use and access the Website, you represent that you understand the contents of this Notice describing our collection, use, transfer and retention of your information herein.

Please be aware that for certain other services rendered by Rakuten India or other Rakuten Group companies, we or the other Rakuten Group companies may provide you with separate privacy notices applicable to those services.

If you are an applicant or candidate for Rakuten India's career opportunities, please note your personal information will be processed in accordance with the 'Privacy Notice for Applicants and Candidates', available at <https://corp.rakuten.co.in/careers/>.

If you are using or accessing Rakuten SixthSense products or services, please note that your personal information will be process in accordance with the applicable privacy notice, available at <https://sixthsense.rakuten.com/legal>.

If you have any questions or inquiries regarding this Notice, please contact us using the information provided in the 'Contact Us' section below.

## The Information We Collect

We collect information about you as described in this section. This includes information that you give us directly, information about your use of the Website, and information received from third parties. All the personal information that we collect and use in accordance with this Notice is centrally managed and stored by Rakuten India.

The information we collect from or about you is used for the purposes outlined in the "Use, Legal Basis of Use and Retention of Your Information" section.

### Information that you give us

- IP address
- Information related to content on the Website that you interact with

### Information we collect from other sources

We may obtain information about you from other sources such as our third-party marketing and outreach partners. We may combine this information with those listed above, or collected through your use of the Website.

### Information we collect for other associated website run by Rakuten India

We may obtain information about you from other sources such as our conference or events websites.

## Use of your Information

We use your personal information to provide you access to our Website, and information and content about Rakuten India.

We use your IP address to provide us with information that helps us learn about your browser and operating system.

We will use your personal information to send you invites or updates for the upcoming events and conferences.

We will also use your personal information to respond to any inquiries or requests from you, prevent and mitigate fraudulent or illegal activities, protect the legal rights of Rakuten India, the Rakuten Group, and/or the rights of third parties, and to comply with legal obligations.

## **Legal Basis for Collection and Use**

We are obliged to have a legal basis for each processing activity. In most cases, the basis on which we rely will be one of the followings:

- to fulfil our contractual obligations to you, in order to provide you with access to the Website;
- to comply with our legal obligations; and
- to meet our legitimate interests, for example to understand how you use the Website and to improve them.

Additionally, we may ask you to give us your consent to collect and use certain types of personal information, for example, when we would like to send you e-mail marketing messages and process sensitive information. If we ask for your consent to process your personal information, we will ensure that you may withdraw your consent at any time.

## **Retention of your Information**

Unless instructed by you, we will keep your personal information necessary to fulfil our contractual obligations for as long as we have a relationship with you. We will only retain your personal information after this time if we are required to do so to comply with the applicable laws, or if there are outstanding claims or complaints that will reasonably require your personal information to be retained.

## **Disclosure of Information about You**

### **Disclosure to our vendors**

We provide your personal information to relevant service providers including those located outside of India, when you use the Website. These include service providers for website creation and hosting, security monitoring, and notification communication.

### **Disclosure for Legal Reasons**

On occasion, judicial or regulatory authorities may request access to or disclosure of information about you for law enforcement purposes. Such requests typically pertain to criminal investigations or other legal proceedings. Where they are necessary and legitimate, we will respond to such requests in accordance with our internal policies and applicable law.

### **Disclosure to Other Third Parties**

In addition to the disclosures described above, we may also disclose your personal information to certain trusted third party service providers, including those located outside of India, where necessary to carry out our business operations.

Additionally, in cases where it is necessary to prevent and mitigate fraudulent or illegal activities, or to protect life, body, or property, we may disclose your personal information to another Rakuten Group company or to a third party.

Furthermore, we may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Notice.

We may disclose any types your information in the section titled "The Information We Collect" to the minimum necessity in order to achieve the purpose of the disclosure.

Please be assured that we will only disclose your personal information in compliance with the applicable law, and with the appropriate management and supervision of the relevant third parties.

We will not use or disclose your information for purposes not set forth in this Notice without informing you and taking any necessary steps in advance as required under applicable law.

## Exercising Your Rights

Rights available to you with respect to your candidate's personal data held by Rakuten India. These may include:

- **Right to Access Information (Section 11):** Data principals can request a summary of their personal data being processed, the processing activities, and the identities of all data fiduciaries and processors with whom the data has been shared.
- **Right to Correction, Completion, and Erasure (Section 12):** Individuals can request the correction of inaccurate data, completion of incomplete data, or updating of personal data. They have the right to request erasure of data that is no longer necessary for the purpose it was collected, often referred to as the "right to be forgotten".
- **Right to Consent Withdrawal (Section 6):** Data principals can withdraw their consent at any time, with the ease of withdrawal being comparable to the ease with which consent was originally given.
- **Right to Grievance Redressal (Section 13):** Data principals can raise complaints with the Data Fiduciary through an accessible mechanism (e.g., email, helpline) and can escalate unresolved issues to the Data Protection Board of India (DPBI).
- **Right to Nominate (Section 14):** In the event of death or incapacity, a Data Principal can nominate another individual to exercise their rights, such as access or deletion.

If you would like to ask about or exercise such rights, please contact us in accordance with the section titled 'Contact Us'. You may use an authorized agent to exercise your rights in accordance with the applicable law. In that case, please ensure that you give the written permission to the agent.

Once we receive the request, we will verify your identity based on your personal information that we already have and that we may additionally require from you for the verification purpose.

Please note that we may also require additional information from you in order to respond your request appropriately.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

Please also note that your rights are not absolute, and there are some grounds where we may decline your request as permitted under the applicable law.

### **Security and International Transfers**

We are committed to handling your personal information in accordance with high security standards and in compliance with applicable law. We do so in order to prevent unauthorized access or unauthorized disclosure of your information, to maintain the accuracy of such information and, when necessary, to ensure its proper destruction. When collecting or transferring your personal information, we employ data encryption technology, and restrict access only to those persons who require it to fulfil their job responsibilities. We conduct periodic reviews of our practices to ensure that our safeguards are properly implemented and remain state of the art.

### **Changes to this Notice**

From time to time, in order to comply with changes in applicable laws or for legitimate business purposes, we may make changes to this Notice. Any changes we make will be displayed on this page. Please check back from time to time to ensure that you have read the most recent version of this Notice.

### **Contact Us**

If you have any questions or concerns regarding the contents of this Notice or other aspects of how your personal information is handled, please write to our privacy officer at <[isprd-rs.india@rakuten.com](mailto:isprd-rs.india@rakuten.com)>.

Once you contact us, we will respond without undue delay to you. Please note that when contacting us, we may ask you for certain information in order to verify your identity and respond to your request appropriately.