

## PRIVACY POLICY

**Effective Date:** as of 4th April, 2020.

www.punyagifting.com (the “**Website**”) is an internet based resource owned and operated by Punya, a partnership entity, together with its affiliates, successors, and assigns (hereinafter referred to as “**we**”, “**us**” and “**our**” as the context may require). We are committed to safeguard the privacy of our users, visitors and all other persons who access the Website (hereinafter referred to as “**you**”, “**user**” and “**your**” as the context may require).

This Privacy Policy describes the type of material information collected from users, including Personal Information (*details provided in Clause 1.1 below*) and Usage information (*details provided in Clause 1.2 below*) relating to an individual. It also describes the manner in which we collect, receive, store, process, use, transfer, protect and disclose Personal Information and Sensitive Personal Data or Information of users through the Website.

This Privacy Policy forms a part of the terms of use of our Website (“**Terms of Use**”). By visiting and using the Website, you accept and consent to the terms of this Privacy Policy.

We reserve the right to change the terms of this Privacy Policy, however we will be providing a prior intimation for any such change. You are requested to review any such intimation and further give your consent for the same.

### 1. NATURE OF INFORMATION COLLECTED

#### 1.1. Personal Information

- (a) All information provided to us, when a user registers or subscribes to services, or on the Website, including name, address, telephone number, email address, gender etc.
- (b) All information that a user chooses to share on the Website such as photos, screenshots, comments, events or other user generated content that may be uploaded on our Website.
- (c) Other information such as full name, email address, postal code, password, your gender, mobile phone number, address and other information you may provide in order to validate your account. Your profile picture, if any, will be publicly displayed as part of your account information.
- (d) You may optionally provide us with this information through third-party sign-in services such as Facebook and Google. In such cases, we procure and store any information about you that is made available to us through these sign-in services.
- (e) Financial information such as bank details, credit card details, debit card details, account details, PAN card details or electronic wallet details that may be required to transact on the Website.

#### 1.2. Usage Information

- (a) Technical information such as your IP Address, login information, operating system, browser type, the page served, time preceding page viewed, purchase history, search history, length of visits, metadata (data about other information collected, such as date, time, size etc.).
- (b) Log file information, i.e., information automatically reported by your browser upon accessing the Website.
- (c) Demographic data, profile data about users and behavioural information such as advertisements clicked on, products viewed, comments posted, users followed, artist reservation details and reviews read.
- (d) Information from your mobile phone such as mobile number, device type, contacts list,

location, IP address, login information, search history, purchase history, the length of visits, metadata etc.

- (e) Information in relation to purchases through our services, collected and stored information about you to process your requests and automatically complete forms for future transactions, including (but not limited to) your phone number, address, email, billing information and credit or payment card information. This information may be shared with third-parties which assist in processing and fulfilling your requests, including payment gateway processors.

### **1.3. Cookies**

- (a) Cookies are alphanumeric identifiers or files that we transfer to your device through your web browser/mobile device to enable our systems to recognise your browser and to provide personalised advertisements on other websites.
- (b) Most browsers allow you to prevent them from accepting new cookies or disable cookies altogether. Each browser is different; so check the 'help' menu of your browser to learn how to change your cookie preferences. Since cookies allow you to take advantage of some of the website's essential features, we recommend that you leave them turned on. If you choose to decline cookies, you may not be able to use other interactive features on our Website.
- (c) We may use cookies for a number of purposes, including to: (i) provide general internal analytics; (ii) study traffic patterns in order to improve Website performance, to customise your experience, and to better match your interests and preferences; (iii) keep track of preferences you specify while you are using our Website's services; (iv) support security measures, such as requiring re-login into the website after a certain time period has elapsed; (v) save your username and password, if you login to our Website, so that we can process the saved information and quickly log you into the Website; and (vi) assist in identifying possible fraudulent activities.
- (d) We also allow third party advertising and analytics cookies. These are placed by or on behalf of independent advertisers who are advertising on our site. These cookies may be placed within the advertisement and elsewhere on our site. They are anonymous – they cannot identify individuals. Such cookies are used for statistical analysis by allowing the advertiser to count how many people have seen their advertisement, or have seen it more than once. They might also allow the advertiser to tailor advertising to you when you visit other websites.
- (e) We have no access to third party cookies and third party organisations do not have access to ours. The third party organisations that place cookies have their own privacy policies.

## **2. USE OF INFORMATION**

2.1. User information mentioned in Clauses 1.1, 1.2 and 1.3 may be utilised in the following ways and for the following purposes:

- (a) to provide safe, efficient, smooth and customised experience on the Website and allow you to participate in the features we offer on the Website;
- (b) to process your registration and/or upload your user generated content;
- (c) to process any payments made on or through the Website and any refunds you may get in your account through the Website;
- (d) to enforce the applicable Terms of Use and minimise and protect you from fraud and other criminal activity;
- (e) to carry out obligations arising from contracts between you and us including, but not restricted to, delivery of our services, collection of payment and provision of customer services;

- (f) to provide you with information, products and services that you have requested/subscribed for, or agreed to receive;
- (g) for internal operations such as troubleshooting, data analysis, research, testing and service improvement of the Website, and to improve the Website;
- (h) to respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, and
- (i) to fulfil other purposes disclosed at the time you provide your information or otherwise, with your consent.

2.2. By visiting, accessing and/or using the Website and/or submitting your information, you consent to such use of your information, including your Personal Information and Usage Information.

### **3. TRANSFER AND DISCLOSURE OF INFORMATION**

3.1. We may share your information, including Personal Information and Usage Information amongst our affiliates, business partners, suppliers, sub-contractors and other third parties for processing, in order to provide you with the best quality services. Such affiliates, business partners, suppliers and sub-contractors may be located within or outside India, primarily for business and operational purposes.

3.2. We may transfer your information, including Personal Information and Usage Information to third parties, in case of transfer of our business assets or ownership (such as in case of merger, acquisition, bankruptcy, liquidations etc.). In such event users will continue to remain the owner of such information and the buyer/transferee will continue to honour the terms of this Privacy Policy.

3.3. We may transfer your information, including Personal Information, Usage Information and device information, to third parties, if we are under a duty to disclose or share such information in order to comply with any legal obligation, or where we believe, in good faith, that the law requires it, or at the request of governmental authorities conducting an investigation, or in order to enforce, verify or apply our Terms of Use and other agreements or policies, or to respond to an emergency.

3.4. We may engage third parties to perform functions on our behalf, such as hosting or operating our Website, sending email communications, and data analysis. We may share your Personal Information with third parties in order for them to provide content or otherwise perform services for us, and we will require such parties to adhere to appropriate security practices to protect such information from unauthorised access or processing.

3.5. In the event you use social media features on any of the services provided by us or use your social media credentials to log-in or post content on the Website, these features may collect information about your use. Any interactions with such social media company features are governed by their privacy policies.

3.6. We may exchange information with other companies and organizations for the purpose of fraud protection.

3.7. In the event we acquired by, or we are merged with, a third party entity, we reserve the right to transfer your Personal Information and/or any other information that we have collected from you or from third parties, as part of such merger, sale, acquisition or change of control.

3.8. By visiting, accessing and/or using the Website and/or submitting your information, you consent to such transfer and disclosure of your information including your Personal Information and Usage Information.

### **4. STORAGE OF INFORMATION**

4.1. Your information collected by us may be stored by us or our affiliates, business partners, suppliers and sub-contractors. Information may also be stored in or outside India.

- 4.2. Your information shall be stored only for the period necessary for purposes specified hereinabove.
- 4.3. By visiting, accessing and/or using the Website and/or submitting your information, you consent to such storage of your information, including your Personal Information and Usage Information.

## 5. YOUR RIGHTS

- 5.1. You have a right to opt-out of providing any of the information mentioned in Clause 1.1. However, in such event, we reserve the right to refuse or limit your access and use of our Website and its features, including services offered on our Website.
- 5.2. You have the right to withdraw your consent to the use, disclosure or transfer of your information mentioned in Clause 1.1. However, in such event, we reserve the right to refuse or limit your access and use of our Website and its features, including services offered on our Website.
- 5.3. You have the right to update or correct your information provided under Clause 1.1. You may exercise such right by using the 'Edit Profile' option provided in the Website.

## 6. GRIEVANCE OFFICER

- 6.1. The name and contact details of our grievance officer is as provided below:

**Name:** Rohan Garg

**Designation:** Grievance Officer

**E-mail:** rohan97garg@gmail.com

- 6.2. Our grievance officer may be contacted with respect to any complaints or concerns including those pertaining to breach of our Terms of Use and/or Privacy Policy.

## 7. SECURITY PRACTICES

- 7.1. We strive to ensure the security, integrity and privacy of your information and to protect your information against unauthorized access or unauthorized alteration, disclosure or destruction.
- 7.2. For the above purpose, we have adopted internal reviews of the data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where your information is stored.
- 7.3. We also have a comprehensive documented information security programme and policy which contains managerial, technical, operational and physical security control measures, as required by law.
- 7.4. However, in order to facilitate more effective data protection, we urge you to take steps to keep your information safe, by memorising your passwords, or keeping them in a safe place (separate from your account information), logging out of user accounts, and closing your web browser.