

## PRIVACY POLICY

QUHU Private Limited, a company incorporated under the Companies Act, 2013, having its registered office at Hindustan Times House - Level 10, Plot No. 18-20, HT House, Kasturba Gandhi Marg New Delhi-110001 (hereinafter "**we**", "**our**" or "**us**") owns and operates the website <https://quhu.me/> (the "**Website**"), our application hosted on android, iOS or any viable media from time to time (the "**App**") and provides the services that can be availed using our App ("**Services**"). We are committed to protecting the privacy of anyone who accesses the Website and/or the App or avails our Services ("**you**", "**your**"). The following Privacy Policy outlines the information that we may process and how we may use that information to better serve you. Please review the following carefully so that you understand the application of this Privacy Policy to your use of our Website and/or App to avail our Services. This Privacy Policy must be read in conjunction with the Terms of Use available at [www.quhu.me](http://www.quhu.me)

### 1. GENERAL

We recognize the importance of protecting your personal and financial information when you access our Website and/or the App. This Privacy Policy will help you understand our information collection practices.

By accessing our Website and/or App, you are accepting the practices described in this Privacy Policy. Please also review the Terms of Use to learn of other terms and conditions applicable to your use of this Website and/or App to avail our Services.

This Privacy Policy is published by us in compliance of:

- (i) Section 43A of the Information Technology Act, 2000; and
- (ii) Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 ("**SPI Rules**")
- (iii) Regulation 3(1) of the Intermediary Rules, 2011 ("**IR Rules**")

Personal information is defined under the SPI Rules to mean any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person. The SPI Rules further define "sensitive personal data or information" of a person to mean personal information about that person relating to:

- (i) passwords;
- (ii) financial information such as bank accounts, credit and debit card details or other payment instrument details;
- (iii) physical, physiological and mental health condition;
- (iv) name, age, address, e-mail, phone number, date of birth, sexual orientation;
- (v) medical records and history;
- (vi) biometric information;
- (vii) information received by body corporate under lawful contract or otherwise;
- (viii) visitor details as provided at the time of registration or thereafter; and
- (ix) call data records

Any and all the aforementioned information is collectively referred to as "**Sensitive Personal Information**" for the purposes of this Privacy Policy.

In accordance with Regulation 3(2) of the IR Rules, you shall not host, display, upload, modify, publish, transmit, update or share any information that:

- (i) belongs to another person and to which the user does not have any right to;
- (ii) is grossly harmful, harassing, blasphemous defamatory, obscene, pornographic, paedophilic, libellous, invasive of another's privacy, hateful, or racially, ethnically objectionable, disparaging, relating or encouraging money laundering or gambling, or otherwise unlawful in any manner whatever;
- (iii) harm minors in any way;
- (iv) infringes any patent, trademark, copyright or other proprietary rights;
- (v) violates any law for the time being in force;
- (vi) deceives or misleads the addressee about the origin of such messages or communicates any information which is grossly offensive or menacing in nature;
- (vii) impersonates another person;
- (viii) contains software viruses or any other computer code, files or programs designed to interrupt, destroy or limit the functionality of any computer resource;
- (ix) threatens the unity, integrity, defence, security or sovereignty of India, friendly relations with foreign states, or public order or causes incitement to the commission of any cognisable offence or prevents investigation of any offence or is insulting any other nation.

## 2. CHANGES TO THIS PRIVACY POLICY

We reserve the right to change, modify, add, or remove portions of this Privacy Policy at any time for any reason. Such changes shall be effective immediately upon posting of the latest Privacy Policy on the Website and/or the App. We suggest that you review the updated Privacy Policy periodically for changes. The latest version of our Privacy Policy can be accessed from a link on our Website and/or App. You acknowledge that by accessing our Website and/or App after we have posted changes to this Privacy Policy, you are agreeing to the terms of the Privacy Policy as on the date of such use.

## 3. INFORMATION COLLECTION AND USE

We only collect your Sensitive Personal Information to conduct our business and to enable us to deliver and improve our Services and will only disclose your Sensitive Personal Information in accordance with our Privacy Policy. If we want to use it for any other purpose, we will obtain your prior consent. In order to access certain features and benefits of our Services, you may be required to submit/share your Sensitive Personal Information. If you decline to submit any required Sensitive Personal Information to us, then we reserve the right to refuse/decline to provide the Services to you.

Apart from your Sensitive Personal Information, we may also track other information, including, but not limited to the following:

- (i) For everyone who visits our payment gateway to undertake a transaction, we log IP addresses, the type of operating system that your computer uses, and the type of browser software used by you. From the IP address, we can determine the ISP and the geographic location of your point of connectivity.
- (ii) **"Profiling Information"** which includes:
  - Information about your navigation using our Services, for example the URLs of websites, which you visit and from which you request downloads.
  - Your contact details such as your name, sex, physical addresses, postal addresses, and contact numbers.
  - Payment related account information: Your account history with us including (without limitations) all billing information and communications, payment history etc. You may update your Profiling Information at any time by using the personalize function.
- (iii) Information about your navigation using our Services, for example the URLs of linked third party websites, which you visit and from which you request downloads ("**Service Usage Information**");

- (iv) Information such as your web request, IP address, browser type, browser language, date and time of request ("**Log Information**")
- (v) Transactional history (other than banking details) about your e-commerce activities ("**Transactional Information**")
- (vi) All reviews, comments, feedback, suggestions, ideas, complaints and other submissions disclosed, submitted or offered on the Website and/or App or otherwise disclosed, submitted or offered by you in connection with use of our Website and/or App (collectively, "**Feedback**")
- (vii) Information related to your account created while registering with us ("**Account Information**"), which includes:
  - Your usernames, passwords, email addresses and other security-related information used by you in relation to our Services;
  - Information stored in your account created with us.

#### 4. **RIGHT TO COLLECT**

By accessing our Website and/or the App, you agree that we may collect and store any of the above mentioned information, including Sensitive Personal Information as long as you subscribe to our Website/App or use our Services subject to the limitations set out herein.

We collect your Profiling Information and Account Information for the following reasons:

- We need your identity details, contact details, banking information and account history to manage our relationship with you and provide Services to you. We will only disclose this information in accordance with clause 5 of this Privacy Policy.
- We use certain of your information in an aggregated form to compile statistical and demographical profiles for our business and marketing activities. We may disclose such information about you, in accordance with Section 5 of this Privacy Policy, provided that the information is in an aggregated form that is not capable of being used or interpreted in such a manner as to identify you.

We collect and store your Service Usage and Transactional Information to:

- Determine and verify the service charges payable by you and to administer our relationship with you.
- Comply with any statutory or regulatory requirement.
- Compile statistical and demographical profiles about you for our business and marketing activities and to customize our Services to you. While we are entitled to use such information about you for our own internal business purposes without limitation, we will only disclose it, in accordance with Section 5 of this Privacy Policy, in a non-aggregated form which is not capable of being used or interpreted in such a manner as to identify you; and
- Monitor your access and use of our Website and/or App for the purposes of ensuring compliance with our Terms of Use.

We collect and store your Feedback and Personal Identifiers to:

- Comply with our obligations in accordance with Section 5 of this Privacy Policy.
- Monitor your access and use of our Website and/or App.

Any Sensitive Personal Information which we collect and which we may use in an aggregated format is our property. We may use it in the aggregated format, in our sole discretion and without any compensation to you, in accordance with Section 5 of this Privacy Policy and you hereby confirm that you have no objection to the aforesaid use of your Sensitive Personal Information.

## 5. DISCLOSURES AND MONITORING

You acknowledge and agree that in the interest of improving personalization and Service efficiency, we may, under controlled and secure circumstances, share your Sensitive Personal Information with any entity which is our subsidiary or holding company or a subsidiary of our holding company or an entity which controls, is controlled by or is under common control with us (our "**Affiliates**").

If we are required to intercept, disclose, monitor and/or store any information, including Sensitive Personal Information, by or under applicable laws of India:

- pursuant to direction/order of any governmental/regulatory authority or court.
- to conduct our business.
- to secure our systems.
- to enforce our own rights.

we will do so in the manner as prescribed under such applicable laws. Such interception, disclosure, monitoring and storage may take place without your knowledge. In that case, we will not be liable to you or any third party for any damages howsoever arising from such interception, disclosure, monitoring and storage.

In order to ensure that you comply with our Terms of Use, we may monitor your information, including Sensitive Personal Information to the extent that this may be required to determine compliance and/or to identify instances of non-compliance.

To ensure that the security and integrity of our Services are safeguarded, we may monitor your information, including Sensitive Personal Information. This monitoring may include (without limitation) the filtering of Feedback to identify, limit and/or prevent the transmission of spam, viruses and/or unlawful, defamatory, obscene or otherwise undesirable material or content.

We may send emails and/or SMS to you in connection with the provision of agreed Services or products and this Privacy Policy. We only act as an intermediary and procure your ordered products from third party vendors and deliver the same to you. You agree that to the extent necessary, and solely for the purposes of providing such Services to you, we may disclose to such third party any and/or all of your information, including Sensitive Personal Information that may be necessary for the procurement of such services from the third party vendor. These third party vendors may also use information (including your name, address, email address or telephone number) about your visits to our Website and/or App and other websites in order to provide advertisements about goods and services of interest to you. We ourselves or through these third parties may send emails/SMS/use such other means to communicate/advertise our Services/any products etc. to you. More information about their data collection and use practices and your options about not having such information used by these third party vendors would be available with the respective third party vendors.

Nothing contained in this privacy policy restricts Quhu Private Limited from providing any and all information to the Funders relating to the Campaign Owners for the purpose of initiating legal prosecution against the Campaign Owners.

## 6. COOKIES

Our Website and/or App may use "cookies" so that we can provide you with more customized information when you access our Website and/or App and use our Services. "Cookies" are used to store user preferences and to track user trends, so as to enhance your interactive experience and generally improve our Services to you. You can set your browser to notify you when you are sent a "cookie", giving you the

chance to decide whether or not to accept it. If you do accept a “cookie”, you thereby agree to our use of any Sensitive Personal Information collected by us using that Cookie.

## **7. BUSINESS TRANSFERS**

If all or some of our business, stock or assets and/or that of our Affiliates are acquired or merged with another business entity, we will share all or some of your information, including Sensitive Personal Information with such entity/entities to continue to provide the Services to you. You will receive notice of such an event and the new entity will inform you of any changes to the practices in this Privacy Policy by posting such new Privacy Policy on the Website and/or App. If the new entity wishes to make additional use of your information including Sensitive Personal Information, you may decline such use at such time.

## **8. OUR EMAIL POLICY**

You can choose to opt out of receiving any further email correspondence from us or our Affiliates. We will not sell, rent, or trade your email address to any third-party, other than our Affiliates, without your prior permission. You understand that email is not considered a secure form of communication. Generally, any information you disclose in an email may be viewed by hackers while such information is on route to us. As such, ensure that you take due care in what you disclose in any email that you send to us.

## **9. PAYMENT SOURCES**

You may have to provide a credit card, bank details or other payment gateway related information to use our Services. You agree that we have no control over these third party payment processors or their services. You accept that payment gateways are hosted by third party payment processors and usage of such payment gateway(s) shall be subject to such additional terms and conditions which such third party payment processor may prescribe from time to time. We use commercially reasonable efforts to make sure that your payment source information is kept strictly confidential by using only third party payment gateway services that use industry standard encryption technology to protect your payment source information from unauthorized use. However, you hereby understand and agree that we are in no way responsible for any misuse of your payment source information by such third parties.

## **10. SOCIAL MEDIA FEATURES**

Our Website and/or App includes social media features, including but not limited to the Facebook Like button and widgets, such as the "Share" button or other third-party interactive mini-programs that run on our Website and/or App ("**Social Media Feature(s)**"). These Social Media Features may collect your IP address, which page you are visiting on our Website and/or App, and may set a cookie to enable the Social Media Feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Website and/or App. Your interactions with these Social Media Features are governed by the privacy policy of the company providing such Social Media Feature and are not covered under this Privacy Policy.

## **11. LEGAL DISCLAIMER**

Though we make every effort to preserve your privacy, we may need to disclose information including Sensitive Personal Information when required by applicable laws wherein we have a good-faith belief that such action is necessary to comply with an appropriate law enforcement investigation, current judicial proceeding, a court order or legal process served on us or our Affiliates.

This Website and/or App may contain links to other third parties and we are, under no circumstance, responsible for the privacy practices and terms of use or the content of such other third party links.

## **12. DATA RETENTION**

We will retain your information, including Sensitive Personal Information, for as long as your account is active or as needed to provide you Services. We will remove any information from our database that you request to be removed. However, Sensitive Personal Information and any other information may remain in our or any third party servers as part of standard back-up procedures in accordance with applicable laws.

If you wish to cancel your account, you can discontinue using our App and uninstall the same. We will retain and use your information including Sensitive Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements in accordance with this Privacy Policy.

### **13. SECURITY**

Information security is critical to our business. We work to protect the security of your Sensitive Personal Information during transmission by using appropriate software, which encrypts any data you input. We store information gathered on secure computers. The number of employees involved in the management of the data centre that have physical access to these computers is limited. We use advanced security technology to prevent our computers from being accessed by unauthorized persons. We have also implemented information security practices and standards that are in compliance with the regulations under Indian laws including but not limited to the Information Technology Act, 2002 and the corresponding rules so as to protect the Sensitive Personal Information provided to us from unauthorized access, use, modification, damage, disclosure or impairment, which is not in accordance with the terms of our Privacy Policy and Terms of Use.

We follow generally accepted industry standards to protect the information submitted to us, including Sensitive Personal Information, both during transmission and after we have received it. However, please understand that no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, including Sensitive Personal Information, please note that we do not ensure or warrant that all/any of such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If we learn of a security breach, then we will attempt to notify you by posting a notice on the Website and/or App so that you can take appropriate protective steps.

### **14. CONTACT US**

If you have any questions or complaints about this Privacy Policy or our privacy related practices, please contact us at [support@quhu.me](mailto:support@quhu.me).

### **15. NOTICE OF GRIEVANCE**

In accordance with Information Technology Act, 2000 and the Information Technology (Intermediaries Guidelines) Rules, 2011, the name and contact details of the Grievance Officer who can be contacted for any complaints or concerns pertaining to the Website and/or App, including any grievance relating to the processing of information provided by you, is as follows:

Name: Mr. Vishal Saini

E-mail ID: [support@quhu.me](mailto:support@quhu.me)