

"PRIVYSTREET" represents a network of Partners that are interested in providing relevant offers and services to the members, and the members who are interested in receiving these offers and services. To ensure that the offers and services are relevant we may solicit information from the members time to time. This is solely for the purpose of making the program more meaningful. We are committed to protecting the privacy of our members and their transactions. This section explains how we protect and use your information in safe, secure and responsible manner because we value your privacy.

This document includes information about:

- Protection and Security of information a priority
- Collecting information
- Managing information
- Ensuring Information accuracy
- Honoring your preferences

Protection of customer data is our priority:

- Setting policies and procedures for carefully handling your information
- Limiting access to sensitive information
- Protecting against unauthorized access to customer data
- Authentication and virus detection technology
- Requiring service providers to comply with privacy laws

### **Information collected**

We collect and use various types of information to service your accounts, save your time and money, better respond to your needs, and manage risk. Customer information shall be collected under the following categories

#### **Personally Identifiable Information or (PII):**

PII refers to any information that can be used to identify you as an individual in any way. Enrolment in the PAYBACK Program is contingent upon your agreeing to the terms of service and providing basic registration information, including: first and last name, email address, date of birth, gender, zip code, contact number, lifestyle information and country.

#### **Profiling Information:**

Apart from the above we shall also solicit and collect from the members, time to time details on their preferences, subscription to news segments or offers and other promotional activities we do. The decision to participate in such activities is at the sole discretion of the member.

#### **Transaction history within the program:**

Privy Street is capable of and will collect information on transactions linked to your profile account and required for processing of bookings, credits and debits to member's accounts. This shall include all transactions on the Website, at the Privy Street.

Partners, all promotional campaigns through emails, SMS or any other communication channel, at any other participating affiliates, subsidiary, program partners, surveys and more.

All the above information is collected for:

Better servicing of the members and preparing quarterly statements for account maintenance.

Making the offerings more relevant to the members and as desired by them ensuring no spam mails go through.

Keeping track of point transactions, for help in case of any disputes; processing your orders; dealing with requests, enquiries or complaints and other customer care related activities; and all other general administrative and business purposes; marketing our and our partners products and services; carrying out any activity in connection with a legal, governmental or regulatory requirement or in connection with legal proceedings, crime or fraud prevention, detection or prosecution;

To effectively administer and fulfil our obligations under any agreement we may have with you;

To seek your feedback or to contact you in relation to the services offered our website; registering your details and allocating or offering you rewards, discounts or other benefits as part of the program

You hereby expressly agree to share personally identifiable information for the above purposes. In the event, you do not wish that your personally identifiable information be used for the above-mentioned purposes; we will not be in a position to provide you any products or services. In the event you wish to withdraw consent for use of your personally identifiable information please contact us at [wecare@privystreet.com](mailto:wecare@privystreet.com). In such event, we will not be able to provide you any products or services from the date you withdraw your consent.

To collect the above information, we shall use channels such as physical forms, contact center, website cookies etc. emails, promotional offers, surveys, sweepstakes and mailers. Participation in some of these channels is optional but you may be required to provide your personal identification information in order to participate. We are not liable to verify the authenticity or accuracy of any information we collect from you.

From time to time we shall ask the members to update their contact & personal information with the program on our authorized website, contact center or any other approved channels. This is to help keep you updated on any program changes and enhancements. We shall not be liable for any failure to notify you of program changes if you fail to update such information in a timely manner. Privy Street does not solicit or ask for any confidential information like website passwords and any such communication appearing to come from Privy Street should not be replied with any confidential information.

We do not provide or share information collected, with any companies other than our group companies or business partners, to market their products. Even when we do so, these companies shall be bound by a non-disclosure agreement to strictly maintain the confidentiality of the information shared and will not share the personal information any further or for purposes beyond our specific authorization.

The entity that will collect, store and maintain information provided by you is (Privy Street registered details)

In some situations, however, we are required to, or we may provide all information we collect about you to third parties outside our group companies, as permitted by law, such as, with your consent:

To respond to judicial process, or

To consumer reporting agencies; or

In connection with a proposed or actual sale, merger, or transfer of all or portion of business; or

To protect against fraud, money laundering or other risks

Some of the data may have to be provided to third party services for the sole purpose of implementing marketing services on behalf of Privy Street and/or group companies and for providing customer support services like sending statements

### **Information Storage**

All information shall be stored in a separate server placed in our approved premises. Privy Street reserves the rights to hold its members data indefinitely.

We may occasionally share our information with trusted third party data processors to organize, process, clean & analyze our data to help us better understand the trends and segments within our member base. We shall use this information solely with the purpose of enhancing the value of the program for the member base and to better tailor our offers to suit your specific interests. All such third parties shall be bound by a non-disclosure agreement to maintain the confidentiality of the information shared and will not share the personal information any further or for purposes beyond our specific authorization.

We intend to share data with our sponsors & advertisers in aggregate form, but we will ensure that the program is designed to make sure you are not identified personally to advertisers unless you make the choice to share your personal identification information directly with them. Hence, the advertisers shall be made aware of the segments and trends in the database and can then route their customized messages through our channels. Occasionally, you may want to avail of services or offers that, by the very terms, will require us to forward information to the advertiser or partner so that they can provide the service to you. In such instance you will be governed by the privacy policies of such advertiser or partner with whom you share information. Please ensure to read the privacy policies of such advertiser or partner prior to disclosing any information.

In case of redemption offers requiring mailing of vouchers or gift items or rewards to your mailing address, we shall have to part with your personally identifiable information to the extent required, with the redemption fulfillment vendor for delivery of orders and gift certificates. As stated before, strict compliance with a non-disclosure agreement will be sought. Such redemption vendor will not share the personally identifiable information any further or for purposes beyond our specific authorization.

We offer you the choice to participate in offers from our partners. It is your decision whether to share your personally identifiable information with them or not. We recommend you to carefully read privacy policy of our partners before divulging your personally identifiable information, as we will not be held liable for the information practices of third-parties. Members may receive promotional offers and campaign details by email among other means. If you have opted to receive promotional offers there will

be unsubscribe options with all such category of offers and members can choose to unsubscribe from such offers at any time by following the mentioned procedures.

Selectively, members may also receive program offers via your landline or postal mail. Such contacts may result in rewards being issued to the member. We also contact you via email for administrative purposes, such as program change notifications or if we update our privacy promise. While you can elect to stop receiving email for promotional offers (as described above), you cannot unsubscribe from these administrative messages while enrolled in the program. Our member care department may contact you in response to an enquiry you submit. Member care may also contact you regarding a problem that may have occurred with your account or with an offer in which you might have participated. We might use this information to learn further about your participation in the program and make it more relevant to your interests.

### **Information access by member**

At Privy Street we respect your privacy and are committed to ensuring the confidentiality of your information with us. We may contact you with useful information on products and services through our telemarketing / tele calling activities, which may be beneficial for you. However, if you do not wish to be contacted through our telemarketing calls or messages, we request you to kindly register at our contact centre and give details of the telephone on which you do not wish to be contacted. However, Privy Street reserves the right to contact you through tele calling for services related to your account. Further, we are committed to follow the laws laid out with regards to tele calling and telemarketing and, does follow the guidelines set by any regulatory authority like TRAI in cases of DND policy or any such similar rule which may be in force.

Once you have registered for any such DND policy:

Your telephone number(s) will be removed from all our telemarketing calling lists within 30 working days.

We will ensure that you do not get any further telemarketing calls on the telephone number(s) that you have registered

### **Voice Call Recordings at Contact Centre**

With a view to providing the best possible service to its customers, Privy Street will be (i) monitoring the voice call recorded; and (ii) overseeing the services furnished by the customer call centers appointed by Privy Street. While doing so, Privy Street inter alia seeks to (a) improve customer satisfaction; (b) assure quality management and customer experience; (c) identify and analyze the patterns and the types of requests/complaints raised by customers frequently on a real time basis; (d) initiate remedial measures to prevent the reoccurrence of such complaints/issues; (e) retain a recording of the voice calls; and (f) support any transactions that take place over the phone and/or if there is a dispute. Further Privy Street as a part of its continuing arrangement with its network partners may share (i) all or any particular call recordings received exclusively from those customers who have been enrolled with the Program through the concerned network partner; and/or (ii) a report with details of the complaints, if any, received by the customer, in each case pursuant to a specific request received from the relevant network partner. Please note that the sharing of voice recordings received from the call centers with the applicable network partners by Privy Street shall be done in due compliance of applicable privacy laws and having regard to strict maintenance of confidentiality obligations owed to its customers.

Aggregate Data: We do not provide any of your personally identifiable information to our advertisers.

Because we contact you on their behalf, they do not have access to your personally identifiable information unless you make the choice to share it with them. We may share non-personally identifiable information collected via the program in aggregate (or grouped), anonymous form with advertisers or other third parties so that they may better evaluate what products and services are most appealing to different segments of our member base, but we do not disclose your personally identifiable information to these third parties without your consent.

- Anti-Spam Policy:

Because email is an integral part of the program, your sharing of email contact with us allows us to share the program information, offers and promotions via email with you. If you later decide you wish to cease participation in this portion of the program, you may do so at any time by unsubscribing to our communication. Please note that opting not to receive email does not exempt you from receiving administrative emails that include but are not limited to, notices about vital program and membership status changes or alterations to our terms of service or any other service requests, redemption orders placed with us.

- Automatically Collected Information

When you log on to the Privy Street website or use the PrivyPass, the server automatically recognizes you by your encrypted PrivyPass ID. This ID acts as a unique identifier, which allows us to recognize you and authorize your transactions. It also allows us to keep track of your activity on our site for crediting points to your account. If you choose, this information may be added to your personal profile and used to target you with offers and advertisements that are most relevant to your interests.

- Data Verification and Supplementation:

Data verification involves the use of third-party data processing services to standardize and clean your provided enrolment information so that it is easily identified and accessed in our database. Data supplementation involves appending any publicly available information about you to your personal profile. Guarding your own information: We recommend that you take the following precautions to guard against the disclosure and unauthorized use of your account and personal information:

Never provide personal information that can be used to access your account over the phone unless you have initiated the call and know with whom you are speaking; update any changes in addresses immediately through the proper channel; report lost or stolen cards immediately.

- Security of the information

We maintain physical, electronic and procedural safeguards to protect customer information. Specific employees are authorized to access customer information on a need to know basis for business purposes only. Our employees are bound by code of ethics that requires confidential treatment of customer information and are subject to disciplinary action if they fail to follow this code.

- Making sure the information is accurate:

It is in your interest and it is our objective, to have accurate, current and complete information concerning you and your account. We have strict procedures that our employees abide by to meet this objective. While some procedures are required by Central, State or RBI regulations, we have implemented additional procedures to maintain accurate, correct and complete financial information, including processes to update information and remove outdated information. If you believe that we have incorrect information about you or your accounts, please intimate us. We will correct any erroneous information as soon as possible.

- Grievance officer

In the event you have any queries or issues in relation to collection or usage of your personal information, please contact [wecare@privystreet.com](mailto:wecare@privystreet.com)