# PRIVACY POLICIES

THIS DOCUMENT IS AN ELECTRONIC RECORD IN CONFORMITY WITH THE PROVISIONS OF THE INFORMATION TECHNOLOGY ACT, 2000 AND RULES THERE UNDER AS APPLICABLE AND THE AMENDED PROVISIONS PERTAINING TO ELECTRONIC RECORDS IN VARIOUS STATUTES AS AMENDED BY THE INFORMATION TECHNOLOGY ACT, 2000. THIS ELECTRONIC RECORD HAS BEEN GENERATED BY A COMPUTER SYSTEM AND DOES NOT REQUIRE ANY PHYSICAL OR DIGITAL SIGNATURES.

## COLLECTION AND USE OF PERSONAL INFORMATION

When you access the Website, we collect and store your personal 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. This allows us to provide services and features that most likely meet your needs, and to customize our Website to make your experience safer and easier. More importantly, while doing so we collect personal information from you that we consider necessary for achieving this purpose.

In general, you can browse the Website without telling us who you are or revealing any personal information about our self. Once you give us your personal information, you are not anonymous to us. Wherever possible, we indicate which field are required and which fields are optional. You always have the option not to provide information by choosing not to use a particular service or feature on the Website. VSSESPL and its Affiliates may share this personal information with each other and use it consistent with this Privacy Policy. We may automatically track certain information about you based on your behavior on our Website. We use this information to do internal research on our users' demographics, interests, and behavior to understand better, protect and serve our users. This information is compiled and analyzed on an aggregated basis. This information may include the URL that you just came from (whether this URL is on our Website 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.

## How we use your personal information

- o The personal information we collect allows us to keep you posted on VSSESPL's latest product announcements, offers, services and upcoming events.
- We also use personal information to help us create, develop, operate, deliver, and improve our Products, Services, Media content and Advertising, and for loss prevention and anti-fraud purposes.
- We may use your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services.
- From time to time, we may use your personal information to send important notices, such as communications about purchases and changes in our Terms, Conditions, and Policies. Please note that as this information is important for your interaction with VSSESPL, you may not opt out of receiving these communications.
- We may also use personal information for internal purposes such as auditing, data analysis, and research to improve our Products, Services, and Customer Communications.

### COLLECTION AND USE OF NON-PERSONAL INFORMATION

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and details of how we may use it:

- We may collect information such as occupation, language, zip code, area code, referrer URL, location, and the time zone where VSSESPL product and/or service is used so that we can understand better customer behavior and improve our Products, Services, and Advertising.
- We may collect and store details of how you use our services, including search queries. This information may be used to improve the relevancy of results provided by our Services. Offer there in limited cases to ensure quality of our Services over the Internet, such information will not be associated with your IP address.
- With your explicit consent, we may collect data about how you use your device and applications in order to help App Developers improve their Apps.
  - If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

## **COOKIES AND OTHER TECHNOLOGIES**

A "cookie" is a small piece of information stored by a Web Server on a Web Browser so that it can be later read back from that browser. Cookies are useful for enabling the browser to remember information specific to a given user. We place both permanent and temporary cookies in your computer's hard drive. The cookies do not contain any of your personally identifiable information.

VSSESPL use data collection devices such as "cookies" on certain pages of the Website to understand and analyze trends, to administer the site, to learn about user behavior on the site, to improve our Product and Services, measure promotional effectiveness, trust, and improve safety and to gather demographic information about our user base as a whole. VSSESPL may use this information in our Marketing and Advertising Services.

In some of our email messages, we use a "click-through URL" linked to content on the Website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our Website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications.

"Cookies" are small files placed on your hard drive to assist us in providing our Services. We offer certain features that are only available through the use of a "cookie".

We also use cookies to allow you to enter your password less frequently during a session. Cookies can also help us provide information that is targeted to your interests. Most cookies are "session cookies," meaning that they are automatically deleted from your hard drive at the end of a session. You are always free to decline our cookies if your browser does not permit, although in that case you may not be able to use certain features on the Website and you may be required to re-enter your password more frequently during a Session.

### DISCLOSURE TO THIRD PARTIES

At times VSSESPL may make certain personal information available to strategic partners who work with VSSESPL to provide Products and Services, or who help VSSESPL market to customers. For example, when you purchase any Product and/or Services from VSSESPL, you authorize VSSESPL to exchange the information you provide during the activation process to carry out Service. Personal information will only be shared by VSSESPL to provide or improve

our Products, Services and Advertising; It will not be shared with third parties for any Marketing purposes.

### **SERVICE PROVIDERS**

VSSESPL shares personal information with Companies who provide Services such as Information Processing, fulfilling customer orders, delivering Products to you, managing and enhancing customer data, assessing your interest in our products and services, and conducting customer Research or Satisfaction Surveys. These Companies are obligated to protect your information.

#### **OTHERS**

It may be necessary — by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence — for VSSESPL to disclose your personal information. We may also disclose information about you if we determine that for purposes of National Security, Law Enforcement, or other issues of public importance, disclosure is mandatory or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our Terms and Conditions or protect our Operations or users. Additionally, in the event of a Reorganization, Merger, or Sale we may transfer any or all personal information we collect to the relevant third party.

## INTEGRITY AND RETENTION OF PERSONAL INFORMATION

VSSESPL makes it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by Law.

### ACCESS TO PERSONAL INFORMATION

You can help ensure that your contact information and preferences are accurate, complete, and up to date by logging on your account. For other personal information we hold, we will provide you with access for any purpose including requesting that we correct the data if it is inaccurate or delete the data if VSSESPL is not required to retain it by law or for legitimate business purposes. We may decline to process requests that are frivolous/vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

## **LOCATION-BASED SERVICES**

To provide location-based services on VSSESPL Products, VSSESPL and Licensees may collect, use, and share precise location data, including the real-time geographic location of your computer or device. Where available, location-based services may use GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and, and other technologies to determine your devices' approximate location. Unless you provide consent, this location data is collected anonymously in a form that does not personally identify you and is used by VSSESPL and our Licensees to provide and improve location-based Products and Services. For example, your device may share its geographic location with application providers when you opt in to their location services.

### THIRD-PARTY SITES AND SERVICES

VSSESPL Websites, Products, and Services may contain links to Third-Party Websites, Products, and Services. Our Products and Services may also use or offer Products or Services from Third Parties, which may include such things as location data or contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of those Third Parties.

## VSSESPL'S COMMITMENT TO YOUR PRIVACY

To make sure your personal information is secure, we communicate our privacy and security guidelines to all VSSESPL employees and strictly enforce privacy safeguards within the company.

## **PRIVACY QUESTIONS**

If you have any further questions or concerns about VSSESPL's Privacy Policy or data processing or if you would like to lodge a complaint about a possible breach of Local Privacy Laws, please contact us. You can always contact us through contact details provided in our website all such communications is examined and replies given where appropriate, as soon as possible. If you are dissatisfied with the reply received, you may refer your complaint to the concerned Regulator in your jurisdiction. If you ask us, we will endeavor to provide you with information about relevant complaint escalation avenues which may be applicable in your case. VSSESPL may update its Privacy Policy from time to time. When we change the Policy in a material way, a Notice will be posted on our website along with the updated Privacy Policy.