

## Our Privacy Policy

Last updated April 20, 2021

Thank you for choosing to be part of our community at Multiicon Ideotechnology Pvt. Ltd., doing business as Multiicon ("Multiicon", and also hereinafter referred to as "we", "us", "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [support@multiicon.in](mailto:support@multiicon.in).

When you use our mobile application, as the case may be (the "App") and more generally, use any of our services (the "Services", which include the App), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately. This privacy notice applies to all information collected through our Services (which, as described above, includes our App), as well as any related services, sales, marketing or events. Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy.

### 1. WHAT INFORMATION DO WE COLLECT?

When you use our App, we collect the following information:

We collect "Non-Personal Information" and "Personal Information."

Non-Personal Information includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. Personal Information includes your email which you submit to us through the registration process at the Site.

Information collected through our systems and technology.

To activate various Services that we offer you do not need to submit any Personal Information other than your email address. To use the Service thereafter, you do need to submit further Personal Information, which may include location, mobile number, etc. However, in an effort to improve the quality of the Service, we track information provided to us by your browser or by our software application when you view or use the Service, such as the website you came from (known as the “referring URL”), the type of browser you use, the device from which you connected to the Service, the time and date of access, and other information that does not personally identify you.

## Collection of Information through Cookies

Cookies are small text files which include an anonymous unique identifier. Cookies are sent to a user’s browser from our servers and are stored on the user’s computer hard drive. Sending a cookie to a user’s browser enables us to collect Non-Personal information about that user and keep a record of the user’s preferences when utilizing our services, both on an individual and aggregate basis. The Company may use both persistent and session cookies; persistent cookies remain on your computer after you close your session and until you delete them, while session cookies expire when you close your browser. We use various cookies like essential cookies which are essential for basic functionalities, Insight cookies, Marketing Cookies etc

Please note that if you wish to turn off the cookies in your web browser, you might not be able to take advantage of many features of our Service.

You may need to register with us to avail the services provided by us. You may need to create a profile by registering with the Service and entering your email address and creating a username and a password. By registering, you are authorizing us to collect, store and use your email address and other details in accordance with this Privacy Policy. Registration can be done by supplying a unique email address and password, or by linking your Facebook or Google accounts. If you choose to link your social-media account or account relating to other third-party services to our Services, you may be asking third parties to send us certain information from those social media accounts or services accounts, and you are authorizing us to collect, store, and use what they send us in accordance with this Privacy Policy. You can disassociate your registration from third-party accounts any time. In addition, we may provide Third Party Services’ interfaces or links on the Service to facilitate your sending a communication from the Service. For example, we may use third parties to facilitate e-mails, tweets, “likes,” content submissions or postings of comments on Facebook or other social media platforms. We may also enable access to or display of third-party content via the Service, that is actually being served or published by the third party, and such third party may be collecting data from you in connection with that content. These third parties may collect and retain any information used or provided in any such communications or other activities and these third parties’ practices are not subject to our Privacy Policy.

When you use Third Party Services, you are using their services and not our Service and they, not we, are responsible for their practices. You should review the applicable third-party privacy policies before using such Third-Party Services in connection with our Service. We collect personal information from you in non-digital contexts, including, for example, when you reach us over the phone or contact customer service over phone or/including communication channels such as WhatsApp, Facebook Messenger, Twitter, etc. We may use publicly available databases, including privately held marketing and data analytics resources. For example, we may receive demographic information (age, gender, household income, job industry and job title) from these sources. We may request to send you push notifications regarding your account or certain features of the App. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings. This information is primarily needed to maintain the security and operation of our App, for troubleshooting and for our internal analytics and reporting purposes.

## 2. HOW DO WE USE YOUR INFORMATION?

Except as otherwise stated in this Privacy Policy, we do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties without your consent. We do share Personal Information with vendors who are performing services for the Company, such as the servers for our email communications who are provided access to user's email address for purposes of sending emails from us. Those vendors use your Personal Information only at our direction and in accordance with our Privacy Policy. We use personal information collected via our App for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We use the information we collect or receive:

- To send administrative information to you. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- To protect our Services. We may use your information as part of our efforts to keep our App safe and secure (for example, for fraud monitoring and prevention).
- To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.
- To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

▪ For other business purposes. We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our App, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion. As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Site and the Service. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We may process or share your data that we hold based on the following legal basis: ▪  
Consent: We may process your data if you have given us specific consent to use your personal information for a specific purpose.

▪ Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.

▪ Performance of a Contract: Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.

▪ Legal Obligations: We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

▪ Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

We share some of the collected information with third-party analytics tools in order to produce intelligent insights, detect & remove fraudulent data, including spam, and offer better services. Our data sharing with such agencies is governed by relevant applicable industry regulations.

#### 4. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

Our servers may be located within or outside India. If you are accessing our App from outside, please be aware that your information may be transferred to, stored, and processed by us in either our facilities or by those third parties with whom we may share your personal information (see "WILL YOUR INFORMATION BE SHARED WITH ANYONE?" above), in and other countries. If you are a resident in the European Economic Area, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

#### 5. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### 6. HOW DO WE KEEP YOUR INFORMATION SAFE?

We implement security measures designed to protect your information from unauthorized access. Your account is protected by your account password and we

urge you to take steps to keep your personal information safe by not disclosing your password and by logging out of your account after each use. We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. We further protect your information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secured, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information.

Although we will do our best to protect your personal information, transmission of personal information to and from our App or service is at your own risk. By using our Service, you acknowledge that you understand and agree to assume these risks.

## 7. WHAT ARE YOUR PRIVACY RIGHTS?

If you are a resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/dataprotection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/dataprotection/bodies/authorities/index_en.htm).

If you are a resident in Switzerland, the contact details for the data protection authorities are available here:

<https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have questions or comments about your privacy rights, you may email us at [support@multiicon.in](mailto:support@multiicon.in).

### Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Contact us using the contact information provided. Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list — however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

To otherwise opt-out, you may contact us using the contact information provided

## 8. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we will follow in the future and will inform you about that practice in a revised version of this privacy notice.

## 9. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below. If you are under 18 years of age, reside in California, and have a registered account with the App or our service, you have the right to request removal of unwanted data that you publicly post on the App our service. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the App, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

## 10. DO WE MAKE UPDATES TO THIS NOTICE?

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE? If you have questions or comments about this notice, you may email us at [support@multiicon.in](mailto:support@multiicon.in) or by post to:

Multiicon Ideotechnology PVT Ltd. \_\_\_\_\_

Rajkot, Gujarat 360005 India