

## PRIVACY POLICY

The protection of privacy and security of your personal information is important to **TARTAM DIGITAL PRIVATE LIMITED** ("**Company**"), a company incorporated under the laws of India. We therefore conduct our business, and collect information in compliance with the applicable laws in India and keeping with the following security practices. Our Privacy Policy discloses our information practices regarding information being collected, method of such information collection, use of such information, information sharing if any with third parties, measures to safeguard information collected and the choices that you make about the way such information is collected, used and disclosed including accessing and updating the information.

By using/accessing/registering on [www.sociafluence.com](http://www.sociafluence.com) ("**Site**") you agree to accept the terms of this Privacy Policy. This Privacy Policy applies regardless of the means or device you use to access the Site.

It is clarified that the Company has adopted these privacy principles for the Site alone. This Privacy Policy does not apply to any other third party or to any third party sites which can be accessed using the links available on the Site.

Personal Information shall, for this Privacy Policy, include without limitation, any information that identifies or can be used to identify, contact or locate you, including, but not limited to, name, photograph, salutation, gender, address, phone number and email address, etc. ("**Personal Information**").

Terms capitalised but not defined herein shall have the same meaning ascribed to them in the Terms of Use.

### PERSONAL INFORMATION THAT WE MAY COLLECT

We only collect Personal Information that you choose to provide us or for the collection of which we have your consent under this Privacy Policy. Through your use of this Site, we will not collect any Personal Information about you unless you voluntarily choose to provide us with the same. However, for safety and security reasons we will monitor your usage of the Site through cookies as mentioned in our Terms of Use.

We collect Personal Information in the following ways:

- When you register online for accessing, submitting or entering any information/content/inputs being offered on the Site;
- When you upload, transmit, display, perform or distribute Content and other Personal Information;
- When you participate in any contests, sweepstakes and/or promotions;
- When you post on a message board;
- When you participate in any survey or poll conducted on the Site, either by the Company or through third parties;
- When you send SMS, MMS or other mobile device based messages;

- When you interact with the content available on the Site;
- When you sign up to receive emails or other communications from the Company or other third parties through the Site;
- When you contact us with a question or comment;
- When you expressly enter information into a text field, post any content or otherwise submit information to us.

We will only collect Personal Information as is permitted by applicable laws and regulations in India. You are under no obligation to provide Personal Information notwithstanding any other law applicable to you, however, not providing this information may prevent you from accessing the information available on the Site.

### **COLLECTION OF NON-PERSONAL INFORMATION**

We may automatically collect certain information from your visit to the Site such as your information about the domain name of the website from which you came, information relating to frequency of visits, average time spent, pages viewed during the visit, your IP address, name of your internet service provider, device specific information, your browser type, operating system and language, your device etc. ("**Non-Personal Information**"). This Non-Personal Information is anonymous information that cannot be easily used to personally identify you. We may use such Non-Personal Information for the purposes of administering the Site, analysing user trends, gathering demographic information, ascertaining how our visitors use our Site, evaluating your use of the information on the Site and to improve content on our Site and performance.

We may share this Non-Personal Information with third party service providers and advertisers to measure the overall effectiveness of our online advertising, if any, content programming and for other bonafide purposes as we may desire, at our sole discretion. By using our Site you expressly provide us with your consent to access such information for one or more purposes deemed fit by the Company.

### **USING THE INFORMATION COLLECTED**

You explicitly consent to the Site and the Company using your Personal Information by (i) using this Site, (ii) registering with this Site, (iii) providing Personal Information or (iv) opting in when presented with the choice, you explicitly consent to the Company using your Personal Information, subject to applicable laws.

We will use the Personal Information provided by you, more elaborately, to:

- Facilitate in providing the services and features that most likely meet your needs;
- Facilitate in providing the information/content/inputs as submitted/posted by you for brand campaigns to users;
- Facilitate in providing the information you request (e.g. send you by email or other electronic means the information);

- Manage our relationship with you;
- Inform you of products, promotions and competitions which you may find interesting;
- Respond to any queries you may have;
- Monitor and improve our Site;
- Develop a more direct relationship with you for the purposes described in this section;
- Deliver content and information via SMS, MMS and other mobile services;
- To enhance and support our relationship with you including to inform you if we change anything important about how the Site works;

The Site will collect, use or disclose the Personal Information provided by you and/or collected by us as mentioned in this Privacy Policy only for the purposes disclosed to you, unless the disclosure:

- is a use of the Personal Information for any additional purpose that is directly related to the original purpose for which the Personal Information was collected,
- is necessary to prepare, negotiate and perform a contract with you,
- is required by law or the competent governmental or judicial authorities,
- is necessary to establish or preserve a legal claim or defence,
- is necessary to prevent fraud or other illegal activities, such as wilful attacks on our information technology systems.

Please note that we cannot and will not be responsible for other parties' use of the Personal Information which you make available for public view through the Site.

## **MARKETING PURPOSES**

By accessing the Site, you provide us with your consent to use your Personal Information for marketing purposes.

It is clarified that your participation in marketing activities is voluntary and if you ever want to change your preferences regarding the use of your Personal Information and would like us to remove your information from our marketing e-mails or newsletters, unsubscribe you from our database, or if you would like to change or correct any of your information, please contact us at [support@sociafluence.com](mailto:support@sociafluence.com) . Please include your name, email address, and clear instructions regarding any changes you are requesting.

## **OTHER SOCIAL MEDIA**

You may also be able to engage with third party content, as well as content offered to you by the Site, through third-party social networking sites, such as Twitter, Instagram, Facebook, etc. Your access and usage of the Site through any other social networking sites will be subject to the Terms of Use and this Privacy Policy. Providing us with information from your social media account enables us to give you exclusive content, personalize your web experience, and allow us to directly send you promotional and marketing material. It is clarified that your information as seen on social media accounts is governed by your privacy settings and policy and hence we

cannot prevent further use of this information and it is your responsibility to control what data you share through privacy settings available on the social media websites.

## **SHARING INFORMATION WITH THIRD PARTIES**

The Personal Information provided by you is stored in our database. If you have chosen to provide us with the Personal Information through your use of the Site, you agree that authorized third parties, including affiliates, associate partners/business partners, will be granted access to your Personal Information. We may transfer or otherwise make available your Personal Information to authorized third parties for various purposes including, to process information on our behalf, including service providers, to host the Site, serve advertisements, send e-mails on our behalf, run contests, promotions, conduct surveys and research, process any online transactions and to operate certain features on the Site.

Further, such third parties may obtain Personal Information that you voluntarily submit to them to make use of the products and/or services and/or any offers being provided by them. We are not responsible for the collection and use of your Personal Information by these third parties. The Company assumes no liability whatsoever for any disclosure of Personal Information due to unauthorized third party access or other acts of third parties, or any other acts or omissions beyond reasonable control of the Company.

In the event the Company is required to respond to subpoenas, court orders or other legal process, your Personal Information may be disclosed pursuant to such subpoenas, court order or legal process, which may be without notice to you.

Further, we also reserve the right to disclose your Personal Information to third parties, in accordance with applicable law, where a complaint arises concerning your use of the Site, where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person and where we believe, in our sole discretion, that your use is inconsistent with the Privacy Policy or our Terms of Use.

The Site may contain links to certain third party websites owned, operated and maintained by third parties. You may enter certain personal information and/or sensitive personal information at third party websites to avail of certain services. You acknowledge that the Company is not responsible for the privacy policies or content practices of such other websites and such websites are subject to their own privacy policies and are not covered by this Privacy Policy. You expressly acknowledge and confirm that the Company is not responsible for the privacy policies of such third parties' websites that you link to, nor do we have control over the use or security of information provided by you to those websites or collected by those websites. We haven't verified the privacy policy or the manner of collection of information of the third party website. By visiting their website you agree to be bound by their terms of use and privacy policy. It is hereby expressly stated that Company has no control whatsoever over information you submit on third party websites. This Privacy Policy only deals with your Personal Information shared with the Company and the Company shall in no manner be liable for protecting the personal information

which you may share on such third party websites. We therefore encourage you to carefully review the privacy policy of any third party websites you visit before using it.

## **SECURITY**

During the course of storing your information we are committed to ensuring that your information is secure. We make every reasonable effort to preserve the privacy and confidentiality of your Personal Information shared with us and we do not allow any unauthorized persons or organization to use any Personal Information that we may collect from you through the Site. However, you understand and acknowledge that no internet site can fully eliminate security risks associated with protecting such information. Further, while we have in place appropriate and required technical and organization security measures to protect your Personal Information against accidental or intentional manipulation, loss, misuse, destruction or against unauthorised disclosure or access to the information we collect online, as required under the applicable laws, we cannot guarantee the security of any information transmitted on the Internet. We cannot guarantee that information you transmit via our service will not be accessed, disclosed, altered or destroyed by breach of any of our safeguards. We therefore advise you to acknowledge this risk while using our services and you hereby agree to do so at your own risk.

## **STORAGE AND RETENTION OF PERSONAL INFORMATION**

Your Personal Information will not be stored for longer than is necessary for the purposes described in this Privacy Policy, or to otherwise meet legal requirements.

## **OPT OUT MECHANISM**

You have the right to request that we remove your Personal Information from our databases and the right to access, update and correct inaccuracies in your Personal Information in our custody or control, subject to certain exceptions prescribed by law. If you choose not to have your Personal Information used to support our relationship (especially direct marketing or market research) or to amend/update the Personal Information, please contact us at [support@sociafluence.com](mailto:support@sociafluence.com) by sending us an email to let us know.

## **COOKIES**

When you access the Site, we send standard technology called "cookies" and web server logs to your computer, to collect information about how the Site is used, for record-keeping purposes and to help automatically recognize your computer the next time you access the Site. The cookies do not contain any personally identifiable information. The Company may use Cookies, and other methods, to store and retrieve data from your web browser. Cookies help us tailor the services offered by the Site to suit your needs and to enhance your online experience and to improve the design and content of the Site to suit your needs. We use this information to do internal research on our user's demographics, interests, and behaviour to understand, protect and serve our users. Additionally, you may encounter 'cookies' or other similar devices on certain pages of the Site that are placed by third parties. We do not control the use of cookies by third parties.

If you do not wish to receive cookies, please configure your Internet browser to erase all cookies from your computer's hard drive, block all cookies or to receive a warning before a cookie is stored. However, blocking Company cookies may disable certain features on our Site and may make it impossible for you to use certain services available on our Site. This may also affect your overall content experience with us.

## **GRIEVANCES**

Should you have any grievances about the processing of your Personal Information, you may contact **SARTHAK**, [support@sociafluence.com](mailto:support@sociafluence.com) , designated as the Grievance Officer for this purpose.

**BY USING THE SITE, YOU SIGNIFY YOUR CONSENT TO THE TERMS OF THIS PRIVACY POLICY. THE COMPANY RESERVES THE RIGHT, IN ITS SOLE DISCRETION, TO CHANGE, MODIFY, ADD OR DELETE PORTIONS OF THE TERMS OF THIS PRIVACY POLICY AT ANY TIME, WITHOUT PROVIDING ANY PRIOR NOTICE TO YOU. THE REVISED POLICY WILL BE EFFECTIVE IMMEDIATELY UPON POSTING UNLESS OTHERWISE MENTIONED. THIS VERSION OF THE POLICY IS EFFECTIVE FROM 15<sup>th</sup> September 2017. YOU SHALL BE BOUND BY THE REVISED PRIVACY POLICY AND IT IS YOUR SOLE RESPONSIBILITY TO CHECK THE SAME FROM TIME TO TIME. YOU ACKNOWLEDGE THAT NO KNOWLEDGE OF THE REVISED PRIVACY POLICY SHALL NOT BE A DEFENCE IN ANY PROCEEDINGS WITH REGARD TO THE PRIVACY POLICY.**